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City of Yes for Housing Opportunity  
CEQR No. 24DCP033Y  
ULRUP No. N240290ZRY  
SEQRA Classification: Type I New York

To Borough President Gibson,

I respectfully urge you to reject the zoning changes in the City of Yes for Housing Opportunity proposed by the NYC Department of City Planning. I am President and Board Member of the Bronx Council for Environmental Quality, a 53 year old environmental organization with a mission “to establish — as an Inherent Human Right — a sound, forward-looking environmental policy regarding an aesthetic, unpolluted, environment protecting a natural and historic heritage.” I submit this testimony in concurrence with testimony submitted by fellow BCEQ Board Member and Secretary Karen Argenti.

The following testimony bring the environmental impact criterion that BCEQ has championed throughout its 53-year history to the City of Yes for Housing Draft Environmental Impact Statement CEQR No. 24DCP033Y. As scoped and evaluated by this DEIS, the Proposed Action – the ULRUP No. N240290ZRY--cannot meet Bronx needs. If the Office of the Borough President brings this simple criterion to its decision, it has no choice but to reject City of Yes for Housing and demand a Supplemental EIS that will properly assess the Proposed Action.

Consider the following:

1. The DEIS does not measure, quantify, or document a housing need. It does not document a housing shortage. It offers longitudinal comparisons of rates of population increase and rates of new housing construction. By its own definition, the purpose of the Proposed Action is this: new construction. New construction is an economic objective, not a proper zoning purpose. It is inconceivable that a Proposed Action would be undertaken without documenting a need.
2. Without an empirically-based housing need, the proposed action cannot have a clear purpose-- objective target or strategic objective—appropriate for the Bronx. The DEIS clearly states that rent reduction is a possible outcome of the Proposed Action, but if it does not adopt rent reduction as a need for the Proposed Action, rent reduction will

remain a wish—or worse, an academic thesis. A Proposed Action that is not scoped to reduce rent for Bronxites in advance is not an appropriate action for the Bronx, a borough whose demographic and income disparities are too well known to reiterate.

3. As many have noted, the DEIS misrepresents the city's affordable housing crisis as a housing shortage. As a result, it fails to analyze the market trends that have brought us to this crisis. Rather than examine the housing needs of the city's lower, middle-income, and working class, the Proposed Action rewards the private housing market with new opportunities to continue doing exactly what has led us to this crisis: building with AMI affordability goals that do not meet the economic capacity of communities. Without documenting the record of MIH or scoping the need of actual neighborhoods, the Proposed Action cannot possibly be expected to produce affordable housing outcomes. The Uniform Affordability reads like an after the fact incentive, providing hope that rents might fall.
  
4. Hurricane Ida of 2021 and Tropical Storm Ophelia 2023 are grim reminders of our borough's vulnerability to non-coastal flooding. Our sewers are now supercharged by torrential rains; our CSO outfalls require hundreds of millions in mitigation (re: the Daylighting of Tibbetts Brook). We are not resilient or building towards resilience. The DEIS states that Proposed Action will increase levels of the borough's imperviousness and yet, without evidence, states that already supercharged sewers will meet increased burdens. The Proposed Action is a foolhardy step to take without proof of sewer capacity and consultation with citywide climate resilience goals.

Finally, I believe that the Proposed Action initiates a historic repudiation of community-based planning provisions that are created by Article 197-A of the New York City Charter and maintained by Community Boards. As a former Chair and longtime Community Board member and former chair, I know that the Office of the Borough President is a fierce guardian of these prerogatives. The Proposed Action substitutes market-driven zoning incentives for neighborhood planning, promising a chaotic and scattershot build-out that can only produce unintended consequences.

We expect more from a CEQR action. And fortunately, CEQR requires more. The Office of the Borough President can reject ULURP No. N240290ZR and recognize the missed opportunities in the Proposed Action for documenting and meeting affordable housing needs in our borough. The best way to stand up for the housing needs of our Bronx citizens is to demand a supplemental EIS that will ensure the Proposed Action address the socio-economic needs of Bronx communities