

To Bronx Council Members

City of Yes Issues that Specifically Affect the Bronx

AFFORDABLE HOUSING AND ENVIRONMENTAL JUSTICE (EJ)

The City of Yes was crafted by the mayor's Building & Land Use Approval Streamlining Taskforce or (BLAST), comprised largely of deep-pocketed lobbyists and special interest groups in the real estate and housing industries. **These proposals are a gift to them.** According to the 2024 Displacement Chart by the Association for Neighborhood & Housing Development, "[How is Affordable Housing Threatened in your Neighborhood?](#)", every Bronx Community Board is more than 50% rent burdened. However, City of Yes proposals promote luxury and market rate housing, where developers may voluntarily elect to build a small number of affordable units in exchange for a 20% FAR bonus. Those so-called "affordable" units will be rented for many times more than the 25% of annual wages of most Bronxites. That means that the 40% of AMI for a household of 4 should be no more than \$850/mo. Lack of any real affordable housing plan is unfair and clearly an EJ issue.

ENVIRONMENT AND ENVIRONMENTAL JUSTICE

The City of Yes' addition of more development without infrastructure or mitigation is an EJ issue exacerbating our climate change. The Bronx has the highest number of unmitigated Combined Sewer Overflows, causing serious water **pollution and flooding** of low-lying areas affecting every Bronx Community Board. Our antiquated infrastructure is a ticking time bomb that cannot accommodate more density. We need a commitment to enforce the existing Uniform Stormwater Rule which is already being challenged by developers.

City of Yes ignores accepted 2030 Climate Change projections, outcomes, and federal mandates. The cost to the city will be catastrophic. The Bronx is already experiencing more severe rain events due to Climate Change. Increasing density, construction, and building envelopes while reducing open space, will dramatically **increase impervious surfaces** reducing the ability of stormwater to infiltrate into the ground. Many neighborhoods are located in low lying floodplains where flooding and erosion will increase exponentially. Adding more concrete buildings will increase our borough's temperature, CO², and the **Heat Island Effect making life intolerable** for all Bronxites.

PUBLIC PARTICIPATION AND ENVIRONMENTAL JUSTICE

The City of Yes has removed ULURP by substituting *As-of-Right* development, thereby reducing the impact of the public, community boards, and elected Council Members to intervene on important land use actions. (See chart p 2). Current zoning allows public participation and transparency through the 50-year-old Uniform Land Use Review Procedure (ULURP). The public's right to participate in their neighborhood's future is a critical right; removing said right is **a serious affront to procedural Environmental Justice concerns.**

These one-size-fits-all proposals are so broad and sweeping that the present ULURP before the City Council now, have placed many communities in the position of voting on something that has no impact on their neighborhood, which may hurt **another community that disagreed and is now voiceless.**

HEALTH AND ENVIRONMENTAL JUSTICE

The Bronx has the highest rate for asthma in the city. The Bronx is also the transportation hub for the metropolitan area with the largest number of federal highways. People live next to these **polluting highways, train and subway yards.** We must prioritize open space, trees, and parkland. The City of Yes will do the opposite. We need to protect the health of future generations.

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PARKING

City of Yes removes parking requirements for new construction, which might be fair for Manhattan, but Bronxites suffer from inadequate low-cost mass transportation options. This proposal discriminates against those for whom a car is a necessity for work, grocery shopping, etc. (We can't all ride bikes everywhere). This proposal will increase pollution as residents spend hours driving around looking for a spot in what is already a parking desert. It also adversely impacts small businesses as customers will go to Westchester for shopping.

UNION JOBS

Bronx residents need permanent union jobs & training. The Bronx has the highest unemployment rate and lowest annual income. Developers for the City of Yes should be required to employ only union workers.

CONCLUSION

The one-size-fits-all of City of Yes proposals do not resolve any of these issues. Vote NO!!!!

Clearly, we have an **affordable** housing crisis in NYC. However, it is a false narrative that City of Yes for Housing Opportunity contains any real proposal to solve this crisis, despite the oft-repeated platitudes of city officials. The City Planning Commission website states that the proposal will incentivize developers to produce between 58,000 and 109,000 new homes over 15 years. Of that only 20 thousand units are projected to be affordable. **Meanwhile, city agencies under current zoning have financed the creation or most importantly preservation of nearly 29,000 income-restricted units in FY 2024 alone.** This number is nothing short of miraculous, given the measly affordable housing projection of the proposal before you.

- ❖ Tell the Mayor and City Planning to come back with a plan that will meet the Bronx's needs.
- ❖ Ask for a Fiscal Cost Analysis for the potential housing subsidies available for this proposal.
- ❖ Consider that environmental injustice occurs when certain communities are disproportionately affected by pollution, unhealthy land uses, and lack of connections to decision-makers. Environmental justice works to ensure that everyone has fair treatment and meaningful involvement in transparent decision-making.

These one-size-fits-all Elements of City of Yes are not Affordable, and do not meet Bronx needs.

1. Town Center Zoning – *make all new housing affordable in commercial areas*
2. Transit Oriented Development – *Remove the greater TOD*
3. Accessory Dwelling Units – *make 50% of the ADUs in a district affordable; provide CPC Working Group report.*
4. District Fixes - *Remove*
5. Universal Affordability Preference – *change "preference" to "mandatory"*
6. Lift Costly Parking Mandates – *Remove totally*
7. Convert Non-Residential Buildings to Housing – *make 50% affordable*
8. Small and Shared Housing - *Remove*
9. Campus Infill – *Remove*
10. New Zoning Districts - *Remove*
11. Update Mandatory Inclusionary Housing – *Remove*
12. Sliver Law - *Remove*
13. Quality Housing Amenity Change – *Remove*
14. Landmark Transferable Development Rights – *Remove - this is a separate stand-alone item for review locally*
15. Railroad Right of Way – *Remove*

#	Proposal	Description	Creates Affordable Housing	Reach 2030 Low Carbon Goal	Removes public role in ULURP
1	Town Center Zoning	Town Center	NO	NO	YES
2	Transit Oriented Development	TOD	NO	NO	YES
3	Accessory Dwelling Units	ADU	NO	NO	YES
4	District Fixes	Fixes	NO	NO	YES
5	Universal Affordability Preference	UAP	NO	NO	YES
6	Lift Costly Parking Mandates	Parking Removal	NO	NO	YES
7	Convert Non-Residential Buildings to Housing	Empty Office Space	NO	YES	YES
8	Small and Shared Housing	SRO	NO	NO	YES
9	Campus Infill	Infill	NO	NO	YES
10	New Zoning Districts		NO	NO	YES
11	Update Mandatory Inclusionary Housing	new MIH	YES	NO	YES
12	Sliver Law	Sliver	NO	NO	YES
13	Quality Housing Amenity Change	Quality Housing	NO	NO	YES
14	Landmark Transferable Development Rights	Landmark	NO	NO	YES
15	Railroad Right-of-Way	Railroad	NO	NO	YES

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