

July 10, 2024

Municipal Art Society of New York Testimony on City of Yes for Housing Opportunity

While a zoning text amendment, let alone zoning, will not solve the city's housing crisis, City of Yes for Housing Opportunity's citywide approach to new housing production is a good start. COY is rooted in the notion that restrictive and outdated zoning regulations have stifled housing production and contributed significantly to the current housing crisis. To address the housing crunch, the City seeks to unlock the "missing middle," the long-neglected middle of the housing spectrum; building typologies between single-family and mid-rise apartment buildings that are comparatively less expensive to build but have been prohibited by zoning. City of Yes offers a host of incremental citywide zoning changes—arguably the most significant zoning reforms in over 50 years—designed to add "a little more housing in every neighborhood."

MAS supports the City's plan to equitably distribute more housing density across the city and is encouraged to see town center zoning, transit-oriented development, provisions for accessory dwelling units and universal affordability preference included in the proposal. MAS also supports incentives to spur office to residential conversions, the elimination of parking requirements, and expanding the transfer of landmark development rights.

There is no question that New York City has grossly underperformed in producing sufficient housing, especially in low-density residential areas. And the housing that has been produced has been mainly high-end, out of reach for most New Yorkers. At the same time, one-third of New York City residents now pay more the 50 percent of their income on rent.

Given the magnitude of the housing supply problem and the attention and volume of documentation it has generated—the annotated draft zoning text alone spans almost 1,400 pages—City of Yes for Housing projections are strikingly modest. According to the DEIS, citywide, by 2039, COY is projected to produce a maximum of 109,000 incremental new housing units, which translates to 7,300 per year. Of these, only 20 percent, at most, or approximately 22,000, would be designated as affordable. While the City does not purport that COY is a panacea for our housing woes, the housing projections are a fraction of the 500,000 new dwelling units that the Adams administration intends to create by 2034.

MAS recognizes that zoning is just one tool to create new housing. In a deeply unaffordable city like New York, addressing the housing crisis also requires a comprehensive and multi-faceted approach that synthesizes a broad range of City and State incentives and funding tools. Additionally, with COY and the lifting of the residential FAR



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cap in mind, the City must support communities by ensuring that social and physical infrastructure meets neighborhood needs when density increases, in each community district.

We will be submitting written comments that will explore using campus infill to produce more affordable housing and ways to engage NYCHA residents on planning and design, potential unintended consequences of allowing TDRs from landmarks citywide, and ways to ensure the efficacy of accessory dwelling units in producing housing.

Thank you for the opportunity to comment on this vitally important proposal.