



ANHD
50 Broad Street, Suite 1402
New York, NY 10004
Tel: (212) 747-1117

**TESTIMONY OF BENJAMIN DULCHIN, BEFORE
THE CITY PLANNING COMMISSION REGARDING THE PROPOSED
“ZONING FOR QUALITY AND AFFORDABILITY” TEXT AMENDMENT**

December 16, 2015

Good Morning. Thank you City Planning Commission for the opportunity to testify.

My name is Benjamin Dulchin and I am the Executive Director of the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of NYC- neighborhood based housing and economic development groups- CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have over 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

While we do have some suggestions for improvement, and we acknowledge that the proposed text does mean some real trade-offs for communities, we believe the Zoning for Quality and Affordability (ZQA) proposal is worthy of support. The ZQA proposal reflects thoughtful and modest changes to encourage affordable and senior developments, while preserving the types of livable, mixed-use communities New Yorkers value.

We all agree that we should plan for our future needs, and it is clear that housing will continue to be one of the City’s most pressing issues. We currently have a million senior citizens, who are disproportionately low-income. Just this November, the Citizen’s Budget Commission came out with a study which showed that almost a third of single seniors pay more than half their income in rent. This challenge is only poised to increase. The City is projected to add over 360,000 more senior citizens in just the next 15 years. Our low-income population is growing, but our supply of apartments with affordable rents continues to shrink. Going forward, we simply have to make it easier to build affordable and senior housing in New York so that we can address these future needs.

The Zoning for Quality and Affordability proposal takes some smart steps to address this need.

Contextual zoning districts – areas of the city which have strict height limits and design guidelines – were first developed in the 1980s. But the situation in the city has changed dramatically since then. Construction techniques are different. Affordable Housing programs are different. Car usage is different. And our city needs affordable and senior housing more desperately than ever, a need that is projected to continue well into the future. As such, we need to rethink the regulations in these districts in a thoughtful manner, to address the needs of today.

It’s important to be honest about the tradeoffs – these changes do mean height increases for new buildings in many areas. And since **contextual districts are almost always the result of community advocacy, we are concerned about the precedent it sets, and believe revisiting the regulations in these districts is something that should not be taken lightly.** ANHD deeply respects the community voices and feedback that have been expressed through the land use process and ZQA must be mindful of respecting these voices and agreements.

But we also believe that the modest height increases offered by ZQA in return for incentivizing affordable and senior housing are reasonably designed. **The new ZQA rules are specifically written to not encourage tear-downs of existing structures to make way for new developments, just to encourage better design and affordability options for new developments.**

Planning New York City is the art of balancing many concerns in a city with limited space. **With our affordable housing crisis continuing unabated, and our senior population projected to increase 36% by 2030, the ZQA proposal strikes the balance our city will need in the upcoming decades.**

Most importantly, this proposal fits with our belief that **zoning changes should, in all cases, specifically encourage affordable housing development or other community benefits.** Communities of all types from across the City, have made it clear that more luxury housing is not a community benefit – and we are heartened that the City has recognized this, and modified its original ZQA proposal to better encourage Inclusionary Housing, Affordable Housing, and Senior Housing instead of unrestricted market-rate housing.

There are certainly aspect of ZQA which could be strengthened. For instance, we believe all housing throughout an entire development under the new rules should be permanently affordable. With our Senior population looking to peak in 30 years, it makes no sense to allow affordable senior developments under the new rules whose regulatory agreements expires in 30 years, when the crisis will be at its peak.

Another aspect that should be considered is that ZQA must be more than a one-size-fits-all solution. Not all local neighborhoods parking needs, mass transit access, commercial space needs, current density and supportive housing providers are the same, and ZQA should take these types of differences into account. There are a variety of valid concerns that have been raised throughout this the land-use process and the Administration's final ZQA policy needs to factor in community feedback.

And it is also important to note that ZQA is only one piece of a larger puzzle in addressing our affordability crisis. The City must also put in place better support for community-based nonprofits developers, a much stronger Mandatory Inclusionary Housing proposal that creates deeper affordability units, and a citywide plan to prevent displacement and harassment.

More senior and affordable housing is something our city needs, our seniors and low-income families need, and **we are ultimately much better off addressing this issue now, before our affordable and senior housing crisis get worse.** The administration should be commended for its foresight and proactivity on this issue, and we support their effort.

Thank you again for the opportunity to testify.