

While the intent to bring more housing to NYC faster on the surface seems well intentioned; you will be giving developers a pathway around the only protections for the environment. DCP noted in its study of the prior EAS and EIS applications that very few developments were found to have significant impacts. The CEQR process is not new, developers know they will not get projects approved or will get stuck in a quagmire if the project they propose does have impacts. These findings don't prove that the system is overly burdensome, they prove it is working! As soon as you create a loophole it won't just be used it will be exploited.

There are areas this seems logical such as areas around subways with ample room for residential additions on top of commercial facilities, old industrial areas, or under used office space; but this change in zoning regulations isn't limited to these ideal locations. In a time when rapid climate change is stressing our City with heating and flooding, adding new "Green" buildings sounds nice, but if it takes away greenspace you are negating any benefits at least locally. The "Green" requirements DCP is claiming, such as 100% electric buildings, are standard and not anything special for getting to skirt the rules. Additionally, pandemics have shed new light on a need for more space with sunlight and airflow all of which will be at jeopardy under this plan. "35.26% of [NYC's tree] canopy occurred on private property"¹ furthermore, NYC ranks last among major cities in the US for Green Space per person at 146 sq ft². Even if this new variance was tied to specific transit-oriented development zones there would be a loss to green space on private property which will have a negative impact on the City.

The loss of private green space was an unattended consequence of the NYC Quality Housing Program. Allowing developers opportunity to develop previously unprofitable lots by building curb to curb so there was no more hedge rows or flower beds just concrete... Lets not exacerbate that mistake. If you move ahead, make a green space offset. Require enhanced green regulations not just the standard.

Lastly, while from DCP presentations they seem to think these developments will occur around public transit hubs even though there is nothing in the regulation ensuring that. These rapid developments could pop-up in residential areas and put additional strain on school, emergency services, sewers, electrical grid and transportation routes if not properly sited and studied. This is especially true if multiple developments would occur in an area.

- Calder Orr, Bronx Resident

¹ [State of the Urban Forest NYC.pdf \(forestforall.nyc\)](#)

² [Urban Footprint - The Allocation of Space in U.S. Cities | Geotab](#)