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**Testimony
of Sarah Watson, Policy Analyst,
Citizens Housing & Planning Council, to the
Subcommittee on Zoning & Franchises of the New York City Council
on the Residential Streetscape Preservation text amendment
April 7, 2010**

Good morning Chair Weprin and members of the subcommittee. My name is Sarah Watson. I am Policy Analyst at Citizens Housing & Planning Council. Thank you for the opportunity to testify on this important issue.

CHPC previously submitted comments to the City Planning Commission on this matter, and we're happy that CPC responded by exempting NYCHA properties from the *additional* prohibition on removing parking spaces that would exceed the current zoning's restrictions and would have further restricted NYCHA's infill development strategy to build mixed income housing on its unused open space and parking lots.

CHPC reviewed this text amendment in the context of a delicate balance of four competing needs: aesthetics, housing production, environmental sustainability, and the provision of adequate parking. We have three main objections to these amendments:

First, while these amendments have been described as "Streetscape Preservation", in fact aspects of these changes have little to do with that issue. Because the scope of the text amendment extends beyond mere aesthetics, potentially adversely affecting a wide array of policy issues, we recommend that the City Council postpone this and other rezonings that will significantly impact parking requirements until City Planning's citywide parking demand analysis is complete.

Second, this rezoning will have an adverse impact on affordable housing production in low density areas and discourage environmentally sustainable construction techniques. With a restriction to place parking on side lot ribbons, rather than permit rear yard or front yard parking, attached energy efficient buildings with shared party walls will be discouraged and many sites will lose critical units in an effort to comply.

Third, CHPC is especially concerned about the further restrictions on legalizing additional dwelling units within a small home in R3 and R4 districts. This proposed rezoning will discourage and ultimately prevent legal conversions of additional dwelling units for most small homes since often a new parking spot cannot be located, or will be too costly to be located, on a zoning lot. New York City should address its illegally occupied dwelling units, and a path to legalization for certain types of dwelling units should be encouraged to ensure safe, legal housing that can be regulated. Further it is important to remember that converting existing homes to permit additional units is an important method to create more affordable housing and ensure that these undocumented units have a chance to meet fire and building safety, ingress and egress requirements.

Although the stated goal of the proposed text amendment, enlivening the streetscape, is ultimately a desirable one, the amendment goes far beyond that objective and will adversely affect housing production, the legal conversion of dwelling units, and parking in a number of ways. Thank you for your time and attention to this matter.