



The City of New York
BRONX COMMUNITY BOARD #1

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Serving and Representing: Port Morris, Mott Haven and Melrose

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November 15th, 2024

Honorable Diana Ayala
 NYC Deputy Speaker/Councilmember
 Council District 8 – City of New York

Honorable Rafael Salamanca
 Councilmember
 Council District 17 – City of New York

Dear Deputy Speaker Ayala & Councilmember Salamanca:

Bronx Community Board #1 opposes the City of Yes Housing Opportunity Plan in its entirety. Here is why:

The Department of City Planning (DCP) states that changing the zoning laws will lead to the construction of 58,000 to 109,000 new units in 15 years.¹ DCP aims to address the extremely low rental vacancy rate of 1.41%. Yet research has shown that NYC will be approximately 560,000 units by 2030 to address both the deficit in production over the last decade and the units necessary to address future job and population growth.² The rental vacancy rate may remain unchanged. Nonetheless, DCP's theme is "a little more housing in every neighborhood" to increase supply and decrease demand, which will cause rent prices to fall. Unfortunately, this has proven to be false in the communities that Community Board #1 serves.

In 2023, Mott Haven-Port Morris completed the most new building units, at 2,326.³ Yet in Mott Haven, the one-year change in inventory has led to a rent increase of 85% in 2024.⁴ According to the New York State Comptroller Office, the median household income in the South Bronx is \$32,381 in 2021.⁵ The same report stated that the poverty rate in the South Bronx is 36.3%.⁶ Therefore, the increase of units in

¹ 'City of Yes' Housing Development Proposal Gets Council Grilling, October 21, 2024
<https://www.thecity.nyc/2024/10/21/city-of-yes-council-hearing/>

² The Real Estate Board of New York to The Joint Legislative Public Hearing on Fiscal Year 2022-2023 Executive Budget Proposal Topic: Housing, February 1, 2022,
<https://nyassembly.gov/write/upload/publichearing/001270/003547.pdf>

³ New maps show which NYC neighborhoods build the most housing, April, 25, 2024,
<https://www.6sqft.com/nyc-neighborhoods-building-the-least-and-most-housing/>

⁴ More N.Y.C. Rentals Are Available. But Can You Afford One?, May 30, 2024,
<https://www.nytimes.com/2024/05/30/realestate/nyc-rentals-available-price.html>

⁵ The Office of New York State Comptroller. The South Bronx: An Economic Snapshot, page 6
<https://www.osc.ny.gov/files/reports/osdc/pdf/report-13-2024.pdf>

⁶ See 5 at page 6.

Mott Haven has increased the median asking price to \$3,050.⁷ We do not find this affordable. Furthermore, this illustrates that building more units in this community does not benefit those currently residing in the neighborhood. Our Board cannot support legislation that has not served our residents.

We demand deep affordable units be constructed in our community. The current proposal does not do this. The word affordable is general and includes a wide range of rent prices based on the Area Median Income (AMI). And we know that the AMI is a number the federal government sets. However, the city can control what percentage of AMI is considered affordable. Currently, on the Housing Preservation and Development (HPD) city website, a unit that is 165% AMI can be regarded as “affordable.”⁸ For context, a studio at 165% AMI is \$4,483, according to the NYC HPD website.⁹ Therefore, as a Board, we have become weary of the promise of affordable units that are not affordable to us where over one-third of the community is at or below the poverty line.¹⁰

The City of Yes Housing regulation provides deep affordability under Topic 5: Universal Affordable Preference (UAP), but it is only optional. If developers elect to use UAP, they receive a 20% increase in their floor area ratio to build more units. The rental price of those units must average 60% AMI. For context, 60% AMI is \$1630 for a studio.¹¹ An average of 60% AMI allows some units to be rented for less than 60% and some over 60%. In addition to the only component that addresses affordability being optional, it does not detail if the affordable units will be studio or 3 bedrooms. This community is in desperate need of affordable family-size units. Unfortunately, the data shows that 70% of the 24,000 affordable units built under Mayor Adams were studios or one-bedrooms.¹²

Despite the numerous changes discussed in COYHO, which is approximately 1386 pages, affordability is never required. This is a deviation from past mayoral leadership. For example, in 2016, under Mayor de Blasio's Housing 2.0 plan, exemptions were made for small units (Topic 8 in COYHO); a 55-unit development was allowed to have tiny units in exchange for 40% of the units being affordable.¹³ The current recommendation suggests micro units as of right, with no affordability requirement in exchange. The suggestion is premised on City Planning's unsubstantiated claim that individuals are looking to downsize and cannot find smaller units. This belief is contrary to the experience of many residents in this community, where NYCHA residents have continuously opposed being resized despite their current family size. Our Board cannot support policies that do not reflect the needs and experiences of the residents in this community.

⁷ See 4.

⁸ NYC Housing Preservation & Development, Area Median Income
<https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page>

⁹ See 10.

¹⁰ See 4.

¹¹ See 3.

¹² Looking for an 'affordable' 2-bedroom apartment for a family? The odds are against you, February 20, 2024, https://gothamist.com/news/looking-for-an-affordable-2-bedroom-apartment-for-a-family-the-odds-are-against-you?fbclid=IwAR2HsqOGCnNSiimkppyb40d6bMnqhoJBU7BvYYkZJ8bL-zySNdA_v8d9WMo_aem_AYvzqdwztrzs7wR-UdD6CmrPkEQc-ggvl0dnxFhb_3AjHX_tWeEJ1MCThiyKSbZ5Q

¹³ Housing New York 2.0, page 25,
<https://www.nyc.gov/assets/hpd/downloads/pdfs/about/housing-new-york-2-0.pdf>

In conclusion, the current housing crisis is based on affordability and supply. COYHO only prioritizes supply, not affordability. At best, City Planning concedes COYHO will only build 109,000 units in 15 years, far from what is needed. The changes, as is, will not solve the housing supply or affordability crisis we face. We acknowledge building more units is better than building none. And this community has built the most new units in the last year. Therefore, we know firsthand that building more units without intentionally creating and protecting affordable rent prices will harm and not help. We ask all our elected officials to remember that there were 633,808 applications for Section 8 vouchers this June in NYC. The application was only open for a week, demonstrating the need for deep, actual, affordable units in NYC.

For the reasons stated, Bronx Community Board #1 has voted against COYHO: 4 Yays, 16 Nays, and 6 Abstentions.

We hope you take Bronx Community Board #1's position on this matter into consideration when entering into negotiations and taking a vote.

Sincerely,



Clarisa M. Alayeto
Chairperson



Dalourny Nemorin
Committee Chair
Policy & Legislation



Anthony R. Jordan
District Manager



Paola Martinez
Committee Chair
Economic Development, Land Use & Housing

Cc: Honorable Jumaane D. Williams
Public Advocate - City of New York

Honorable Eric Adams
Mayor - City of New York