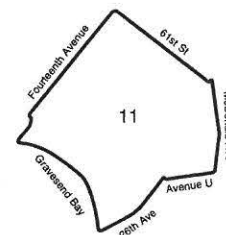




**THE CITY OF NEW YORK**  
**COMMUNITY BOARD No. 11**  
2214 BATH AVENUE  
BROOKLYN, NEW YORK 11214



**WILLIAM R. GUARINELLO**  
*Chairman*

November 16, 2015

**MARNEE ELIAS-PAVIA**  
*District Manager*

Carl Weisbrod, Director  
Department of City Planning  
22 Reade Street  
New York, New York 10007-1216

Re: N 160049 ZRY  
Zoning for Quality and Affordability  
Text Amendment

Dear Mr. Weisbrod:

At the general meeting of Community Board 11, held on November 12, 2015, a resolution was unanimously adopted approving the Zoning for Quality and Affordability Text Amendment with the following modifications:

ZR 12-10 Affordable Independent Residence for Seniors should not be limited to a 30-year occupancy without the opportunity to review, extend the opportunity for City subsidies to maintain senior housing other than permitting conversion to market-rate housing.

ZR 22-22 – Uses Permitted by Special Permit by the City Planning Commission – Discretionary approval should be extended from R1 and R-2 to the contextual zoning districts for long term care facilities in R4A and R5A detached home districts as of right. In seeking such use be pursuant to a Special Permit or City Planning Commission authorization as a means to provide standards of findings and Community Board input.

ZR 22-42 City Planning Special Permit for Long Term Care Facilities – Opposes the blanket finding that use, scale and placement of long-term facilities would not alter the essential character of the neighborhood in the R4A and R5A detached home districts.

There needs to be adequate buffering from adjacent residences in detached home districts. Such facilities should only be granted by Special Permit of the City Planning Commission upon input from the Community Board.

ZR 23-44 (b)(9) Permitted obstructions in required Yard Equivalents in R6A and R7A Districts

Opposed to the height enlargement in R6A and R7A districts along narrow street widths where resulting loss of rear lots are probable.

ZR23-693 Special Height Limitations Special provisions applying adjacent to R1 through R6B Districts for R6-R10 districts

CB-11 opposes the proposal to modify the height permitted within 25 feet when R6-R10 districts abut R1 through R6B Districts from 35 feet in R1 through R5 Districts and R6B requirements (50 or 55 feet) for R6B Districts to a height of 75 feet. Such modification goes totally against the intent of the many neighborhood-wide contextual preservation-based rezoning where the community supported increased density in appropriate locations.

ZR 24-013 (a)(2) Special provision for certain community facility uses for buildings containing long-term care facilities in R3 through R5 districts except in R3A, R3X, R3-1, R4A, R4B, R4-1, R5A and R5D Districts

The proposed as-of-right allowance of provisions for affordable independent residences for seniors to be applicable to long-term care facilities is too wide-spread for these zoning districts and could potentially result in out-of-context development of incapable intensity of use. *The establishment of provisions consistent with ZR 23-011 regarding the Quality Housing Program where according to ZR 23-011(c)(3), zoning lots occupied by a single, two or three-family detached or semi-detached residence where 70 percent or more of the aggregate length of the block fronts in residential use on both sides of the street facing each other are occupied by such residences. Such provision would assure that perfectly sound homes on such blocks are not demolished to develop such out-of-context facilities. In addition, such affordable independent residences for seniors to be applicable to long-term care facilities floor area and bulk envelop should not be applicable to zonings lots exclusively fronting along narrow streets.*

ZR 25-252 Required Accessory Off-Street Parking Spaces for Residences – Modification of Requirements Where Group Parking Facilities Are Required R1-R10 Districts for Affordable Independent Residences for Seniors

Opposed to the elimination of the as of right reduction in its entirety.

ZR 25-261 Waiver of Requirements for Small Number of Spaces for R7A Districts and ZR 25-33 Waiver of Requirements for Spaces below Minimum Number for Permitted Non-Residential Uses

Opposed to any reduction in the parking space requirements or increase in any waivers.

Appendix 1: Transit Zone

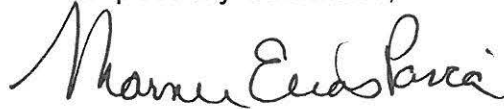
CB 11 opposes the inclusion of the district in a transit zone. The designation of transit zones does not adequately reflect the need for parking and the current parking situation due to development and illegal curb cuts/front yard parking.

Furthermore, City Planning should undertake a study to determine the scope and impact of illegal curb cuts and front yard parking.

Regarding ZR 101-51 (a) Minimum Parking Requirements for Off-Street Parking Regulations

*Opposed to the parking reduction by maintaining minimum parking requirements for structures within its boundaries.*

Respectfully Submitted,



Marnee Elias-Pavia  
District Manager