

By their own admission, Mayor Adams and the Department of City Planning's proposed City of Yes – Economic Opportunity (COYEO), is a massive deregulatory program. The vast majority of proposals in this package will do serious damage to not only our neighborhoods in Community Board \_\_\_ but communities throughout the city. **COYEO must be rejected in full.**

Here are short responses to each of the 18 proposed actions:

1. Lifting time limits to reactivating storefronts –  
Legal non-conforming storefront uses that lapse should not be allowed to reopen at will. They should be negotiated on a case-by-case basis. **Reject.**
2. Simplify rules for business types allowed on commercial streets –  
Changes in allowances of business types will seriously affect local commercial streets in lower-density districts in ways that are not being considered by the proposal. **Reject.**
3. Expand opportunities for small-scale clean production –  
Allowing industry and production, no matter how clean, in a blanket fashion throughout the city is not appropriate. **Reject.**
4. Modernize loading dock rules so buildings can adapt over time –  
Instead of allowing this for all loading berths and docks, create new Special District zoning districts for certain areas where there are large concentrations of buildings that would be affected. **Reject.**
5. Enable commercial activity on upper floors –  
Clearly, this proposal would be a nightmare in lower-density neighborhoods. **Reject.**
6. Simplify and modernize the way businesses are classified in zoning –  
Combining 18 Use Groups into 10 categories opens the door to inappropriate uses in neighborhoods throughout the city. For modernization purposes, add new uses to existing Use Groups. **Reject.**

7. Clarify rules to permit indoor agriculture –

Based upon the intent of this proposal, allow vertical farming and indoor operations in high density districts only, as they will create major issues in lower-density areas. **Reject.**

8. Give life sciences companies more certainty to grow –

This is an absolutely terrible idea. Neighborhood commercial and lower-density districts are absolutely not organized or prepared to accommodate life sciences types of development and usage as defined in this proposal. **Reject.**

9. Support nightlife with common-sense rules for dancing and live entertainment –

Before this proposal is allowed citywide, it would make sense for a pilot program in a specific location for several years to see what the ramifications will actually be. **Reject.**

10. Create more opportunities for amusements to locate –

The size, scope and details of amusements in higher density commercial districts (C3-C6) are not described whatsoever in this proposal. Again, adding new uses to the existing framework makes more sense. **Reject.**

11. Enable entrepreneurship with modern rules for home-based businesses – **Absolutely not.**

Increasing allowable uses, such as barber shops/nail salons; increase to 49%/no maximum square feet from 25%/500 square feet maximum of a primary residence presently; and up to 3 employees in a primary residence, is totally unacceptable. **Reject.**

12. Introduce corridor design rules that ensure buildings contribute to surroundings –

We need more mandatory streetscape design that caters to our unique neighborhoods, not uniform rules that dumb everything down while pretending they will make for better design standards. **Reject.**

13. Reduce conflicts between auto repair shops and pedestrians –

The problem with the conflict is that any and all auto repair uses shouldn't be allowed in C2 and C6 districts at all – they should be in C8 zones. **Reject.**

14. Encourage safe and sustainable deliveries with micro-distribution –

It is our belief that this proposal will set up continuous conflict with other storefront operations on typical commercial strips. Micro-distribution should only be allowed through a Special Permit process with mandatory renewal on a two-year basis in targeted neighborhoods, not in every neighborhood. **Reject.**

15. Facilitate local commercial space on residential campuses –

The statement above is false; it is an operation to allow large-scale commercial development on any parcel of land 1.5 acres or larger – not just “campuses” – to make market-rate development in those places more attractive. This should be a ULURP action such as a rezoning with a commercial overlay process, not a simple CPC authorization. **Reject.**

16. Create process for allowing corner stores in residential areas –

If adopted, this would utterly change the face of our communities and potentially allow retail and office commercial development on any residential property within 100 feet of a corner, up to 2500 square feet in size, where it is currently prohibited. While it would need City Planning Commission approval, we believe it will become a routine permitting process that will have extremely negative consequences. Unacceptable on every level. **Reject.**

17. Rationalize waiver process for business adaptation and growth –

Allowing expansion and bulk relief for commercial development by BSA and CPC sign offs makes no sense and removes the ability of communities to assess whether those businesses are still appropriate for their locations (currently done through a typical ULURP rezoning action). **Reject.**

18. Create new kinds of zoning districts for future job hubs –

This is a proposal that is specifically designed to be a vehicle to lift the Floor Area Ratio (FAR) cap (currently at a 12 FAR Statewide) up to 15 in order to allow for still more density and development that’s at an inappropriate scale. **Reject.**