



CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 10
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HENRIETTA LYLE
Chairperson

ANDREW LASSALLE
District Manager

November 6, 2015

Mr. Carl Weisbrod
Commissioner
New York City Department of City Planning
22 Reade Street
New York, NY 10007

Re: Proposed zoning text amendments: “Mandatory Inclusionary Zoning” and “Zoning for Quality and Affordability”.

Dear Chair Weisbrod:

Harlem residents are deeply concerned about the lack of affordable housing in our neighborhood and across the city. Enabling more affordable housing is an urgent priority for Manhattan Community Board 10 and we are glad that this is the stated goal of the administration in proposing the MIH and ZQA zoning text amendments.

However we are concerned that the Department of City Planning has not reached out to this Board while crafting the MIH and ZQA proposals, and that the public review process is unduly rushed. We have not been given the necessary time, tools or resources to fully grasp all the nuances of these highly technical and complex proposals. We regret this and cannot in good conscience take a vote to support or oppose the MIH and ZQA zoning text amendments.

Our dissatisfaction with the process has not stopped us from hearing a number of concerns with the MIH and ZQA proposals, and we would do a disservice to the Community that we represent if we did not raise them. We urge to take note of these concerns and to amend the MIH and ZQA proposals in response.

Concerns with MIH

- Requiring 25% or 30% of the units to be affordable is a step in the right direction, but it is too small. At minimum developments benefitting from rezoning should be required to provide 50% of the units as affordable.
- Affordable units should be targeted to very low-income and low-income households. This is what Harlem needs most desperately.
- MIH should also include opportunities for homeownership.
- If the affordable units are built off-site, the construction schedules should be required to ensure that affordable units are completed before or at the same time as the market-rate units.

- Units built off-site should be in the Community District or within a half mile in the same borough. Currently the half mile allowance could place the affordable units in the Bronx, which would defeat the purpose of having a community board preference in the application process for affordable housing.
- Eliminate the payment in lieu option for small buildings and require 50% of the units to be affordable.
- Require 50% affordability in small buildings, regardless of the number of units.
- Ensure that permanent affordability requirements are properly recorded, monitored, and that there are adequate enforcement mechanisms.
- Require a plan for the continued investment into permanently affordable housing. As buildings age, their capital needs will increase. If there is no plan to shore up buildings, they will deteriorate the way that public housing has deteriorated. We are concerned about the effect this will have on residents and the potential for rescinding the affordability requirements in order to attract private investment.

Concerns with ZQA

- There should be additional incentives for senior affordable housing relative to “regular” affordable housing. If the incentive for the two is to waive the mandatory parking requirements, developers will never build senior housing.
- Parking waivers for senior and affordable developments are permanent, so the housing that this facilitates should also be required to be affordable and senior housing in perpetuity. Parking waivers are an invaluable incentive which, once awarded, cannot be taken away. We want to prevent scenarios where parking is waived to promote senior or affordable housing but after a few years the housing becomes market-rate.

We hope that these concerns will be taken into consideration in a meaningful way, and we look forward to working proactively with the Department of City Planning in the future to find solutions to the housing needs of Harlem and of our city.

Sincerely,

Henrietta Lyle
Chairperson
Manhattan Community Board 10

Brian Benjamin
Chair of Land Use
Manhattan Community Board 10

Barbara J. Nelson
Chair of Housing
Manhattan Community Board 10

Cc: Gale Brewer, Manhattan Borough President
Inez Dickens, Council Member