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COMMUNITY BOARD NO. 2, MANHATTAN

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Hon. Dan Garodnick
Chair, NYC City Planning Commission
120 Broadway
New York, NY 10271

Re: Community Board 2/Manhattan Resolution Concerning the
Green Fast Track for Housing Opportunity

Honorable Chair Garodnick:

At its February 22, 2024 Full Board Meeting, Community Board 2/Manhattan adopted the following resolution.

GREEN FAST TRACK FOR HOUSING OPPORTUNITY

Whereas:

1. In an effort to address New York City's housing crisis, the Department of City Planning (DCP) wishes to expedite the approval of certain private, small- and medium-sized housing projects by exempting them from City Environmental Quality Review (CEQR) through a rule change called Green Fast Track for Housing (GFTH).
2. GFTH would allow projects of up to 250 housing units in higher-density, residential districts (R5-10) and up to 175 housing units in lower-density, residential districts (R1-4) that meet certain density- and site-specific criteria to be newly-categorized as Type II projects under CEQR. (CB2M does not have any R1-4 districts.)
3. Type II projects are exempt from CEQR review and do not require an Environmental Assessment Statement (EAS), so unless a project requires a zoning change, it would not go through the Uniform Land Use Review Procedure (ULURP), a process that includes community board review, and deprive the public of valuable information contained in the EAS documentation.
4. GFTH would also exempt housing proposals of up to 250 units from CEQR review if they are located in an existing stand-alone commercial or manufacturing zoning district, and are a part of a Board of Standards and Appeals decision or an agreement with the

Department of Housing Preservation and Development.

5. CB2M is in favor of streamlining the construction of housing projects, but opposes any changes that would result in a reduction in community board input.
6. For buildings in historic districts, the Landmarks Preservation Commission (LPC) would be responsible for confirming that these Type II projects would not have an impact on historic properties and districts.
7. CB2M, which includes a multitude of historic districts (the most of any community board) is concerned that LPC staff, already overburdened and under-budgeted, would be hard-pressed to handle the complexity and ramifications of the additional determinations.

Therefore, be it resolved that CB2M recommends approval with the following conditions:

1. That DCP conduct a pilot program of 3-5 years, during which time community boards would automatically receive a Type II memo, i.e., a written notice for each new Type II project, including the project's application (at a minimum including the project description and the plans), a detailed planning rationale for approving a project's Task II status that includes correspondence with the relevant agencies tasked with evaluating the various environmental impacts, all concomitant approvals, and 45 days to review the application and make a recommendation to DCP.
2. That DCP not exempt residential development in manufacturing districts. Not only should our city's manufacturing districts be protected in general, but in the case of CB2M, our district is home to many large commercial buildings that could be converted to residential use, but because of their size and proximity to our many small-scale historic and residential districts, could have a consequential environmental impact.
3. That DCP find more and better ways to offer a more nuanced approach to addressing and mitigating the cumulative effects of multiple projects in the same area at the same time.
4. That DCP identify specific mechanisms to prevent applicants who own large sites with multiple housing opportunities from deliberately segmenting larger projects so they appear to be individual projects under the 250-unit (R5-10) and 175-unit (R1-4) thresholds and not subject to the CEQR process.
5. Should GFTH pass, projects in historic districts should continue to go through a full LPC review, as opposed to a staff-level review, before being found eligible for fast-tracking. CB2M recommends that if they are found eligible, LPC should generate a Type II memo with the same Type II content recommended in Resolved #1 above (agency correspondence and rationale for the determination that there are no impacts on historic and archaeological resources) and it should be sent to all community boards with the

same 45-day time frame for comment. LPC should also be given sufficient additional funds earmarked to enable it to thoroughly process the resulting increased workload.

6. That the list of coastal risk districts (none of which currently are in CB2M) be expanded to include areas of CB2 Manhattan that are routinely subject to flooding, and at a minimum, the areas impacted by Hurricane Sandy.
7. That all projects subject to CEQR—not just Type II—be required to demonstrate in a detailed fashion that they are complying with the mandates of Local Law 97.

Vote: Passed, with 22 CB2 Members in Favor; 10 Opposed; 3 Abstaining; and 0 Recusing.

CB2/M respectfully recommends that the Commission take actions consistent with this resolution.

Respectfully submitted,



Susan Kent
Chair, Community Board 2/Manhattan



Eugene Yoo
Co-chair, CB2 Land Use Committee



Katy Bordonaro
Co-chair, CB2 Land Use Committee

cc: Hon. Eric Adams, Mayor of the City of New York
Hon. Brad Lander, NYC Comptroller
Hon. Mark Levine, Manhattan Borough President
Hon. Adrienne Adams, NYC Council Speaker
Hon. Christopher Marte, NYC Council, 1st District
Hon. Carlina Rivera, NYC Council, 2nd District
Hon. Erik Bottcher, NYC Council, 3rd District
Hon. Brian Kavanagh, NY State Senate, 27th District
Hon. Brad Hoylman-Sigal, NY State Senate, 47th District
Hon. Grace Lee, State Assembly, 65th District
Hon. Deborah J. Glick, NY State Assembly, 66th District
Hon. Daniel Goldman, U.S. Representative, 10th District