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COMMUNITY BOARD NO. 2, MANHATTAN

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Greenwich Village ♦ Little Italy ♦ SoHo ♦ NoHo ♦ Hudson Square ♦ Chinatown ♦ Gansevoort Market

March 23, 2026

Hon. Sideya Sherman
Director, NYC Department of City Planning
Chair, NYC City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

Hon. Shampa Chanda
Chair
Board of Standards and Appeals
22 Reade Street
New York, NY 10007

Honorable Chairs Sherman and Chanda:

At its Full Board meeting on March 19, 2026, Community Board 2 / Manhattan adopted the following resolution.

***Proposed City Planning Commission Rules:
*Affordable Housing Fast Track Methodology Rule***

Whereas the City Planning Commission proposes rules to establish a methodology to calculate the total number of new affordable dwelling units in each community district, and a methodology to calculate the total number of housing units in each community district at the start of a five-year cycle, for purposes of determining the rate of affordable housing development in each community district during the preceding five-year cycle.

Whereas CB2 Manhattan has a history of approving affordable housing projects that have then been substantially altered by commercial entities. For example, CB2 Manhattan undertook a long process to approve housing at St. John's terminal—hundreds of affordable and market-rate units—but at the last minute the entire site became a massive, new Google office project. A similar process occurred at Duarte Square and the hundreds of residences promised there will now be commercial office space.

Whereas CB2 Manhattan participated in the review process for two significant rezonings: Hudson Square and SOHO/NOHO/Chinatown. In both instances, CB2 Manhattan's hopes for

housing have been severely disappointed. Hudson Square is yielding far less housing than possible and much more commercial space. While the SOHO/NOHO/Chinatown rezoning is more recent, there are troubling instances of private developers' avoiding building affordable housing in favor of luxury units (example at 49 Bleecker Street) and of their building affordable housing on separate sites (285 Hudson Street and 30 Thompson Street) in order to enhance the luxury units (at 360 West Broadway) thus undermining the diversity of available housing that CB2 sought. In both rezonings, far less affordable housing has been constructed to date than DCP forecast and CB2 welcomed.

Whereas CB2 Manhattan needs and welcomes new affordable housing developments of all types in this community district as evidenced by advocacy for and support of the proposed development at 388 Hudson Street with 278 units of 100% permanent affordable housing and by our urging of as much permanent affordable housing as possible at the Gansevoort Square site.

Whereas the increased units of affordable housing at both 388 Hudson Street and Gansevoort Square resulted from lengthy work with CB2 Manhattan thus revealing the value of sufficient time to improve projects.

Whereas CB2 Manhattan is unclear whether offsite housing projects will count toward the Affordable Housing Fast Track Methodology totals.

Whereas CB2 Manhattan is unclear if DCP will include units such as those at 49 Bleecker in the dataset. In that instance, the developer chose to pay into a fund rather than build the required units onsite.

Whereas unfortunately CB2 Manhattan has been judged not on the number of affordable housing units we approve but on what forces outside of our control, both public and private, have done.

Whereas the calculations for the dataset are all based on units rather than a combination of units and square footage, which might be more accurate. For example a 20,000 square foot project with 20 1,000 square foot apartments gets less credit than a 20,000 square foot project with 40 500 square foot apartments. This disparity seems patently unfair. The calculations could be more fairly done if they blended units and square feet.

Whereas CB2 Manhattan finds the charter-mandated 60-day concurrent review period for community boards and the borough president to be a challenging deficiency.

1. In our community board, we have faced a number of outlier projects and used all the time available to analyze the issues before sending our comments to the borough president who then had to digest our findings. 30 Thompson Street with two offsite affordable housing projects comes to mind. CB2 Manhattan had been told that such a situation would not occur in CB2. The developer came to the committee and only under questioning revealed that the affordable housing was linked to a market-rate development nearby. CB2 Manhattan needed time to analyze this application.

2. The full 90-day period for review allows sunshine onto a project.
3. The full-90 period for review allows enough time to address the increasing outlier applications that CB2 Manhattan faces.
4. With concurrent review periods, the borough president has less opportunity to take the community board's input into account.

Whereas CB2 Manhattan advocates for a better dataset, which can account for the outlier applications which we are regularly facing.

Whereas CB2 Manhattan advocates for a time period to review the dataset used for existing and newly constructed affordable housing units calculations and get corrections made through an appeal process.

Whereas, in its current proposed form, the *Affordable Housing Fast Track Methodology Rule* will determine the number of units built/permitted in a community district and then will not change a community district's placement until the next cycle, even if an error in the calculation is found.

Therefore be it resolved that CB2 Manhattan continues to support the increased production of affordable housing in this community District and supports efforts to improve the process, but:

1. Recommends the creation of an appeals process whereby errors in the calculation of the community district rankings can be corrected.
2. Recommends that DCP requires that the dataset include affordable housing units created in offsite buildings.
3. Recommends that DCP requires that the dataset include affordable housing units that developers pay into a fund not to build even though the community district would welcome those units.

Vote: Passed, with 30 in favor, 1 opposed (S. Ryan), 2 abstaining (C. Dignes, R. Kessler), and none recusing.

Respectfully submitted,



Valerie De La Rosa
Chair

Copy: Hon. Brad Hoylman-Sigal, Manhattan Borough President
Hon. Christopher Marte, NYC Council, 1st District
Hon. Harvey Epstein, NYC Council, 2nd District

NYC Council, 3rd District
Hon. Brian Kavanagh, NYS Senate, 27th District
Hon. Erik Bottcher, NYS Senate, 47th District
Hon. Grace Lee, NYS Assembly, 65th District
Hon. Deborah Glick, NYS Assembly, 66th District
Hon. Dan Goldman, U.S. Representative, 10th District