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Gale A. Brewer, Borough President

February 20, 2019

Honorable Bill de Blasio
Mayor
City Hall
New York, NY 10007

Dear Mayor de Blasio:

As you know, I fully support efforts to increase affordable housing throughout the City of New York as well as efforts to develop additional sources of revenue for the New York City Housing Authority (NYCHA). However I oppose your decision to pursue the Holmes Towers infill development on the Upper East Side at 1870 First Avenue (Block 1573, Lot 20) without subjecting it to the City's Uniform Land Use Review Procedure ("ULURP").

As a New York City Housing Authority (NYCHA) NextGeneration (NextGen) Neighborhoods infill initiative, the Holmes Towers development is subject to the provisions of New York City Charter §197-c (a)(8) that require "housing and urban renewal plans and projects pursuant to city, state and federal housing laws" to undergo ULURP. Given that the NYCHA campuses are quite clearly "projects pursuant to city, state, and federal housing laws," the use of land that is within a NYCHA campus requires review by the Community Board, Borough President, and City Council pursuant to ULURP.

I am also opposed to the decision to apply zoning overrides to exempt the Holmes project from setback, minimum building spacing, and open space requirements of the Zoning Resolution ("ZR"), another evasion of the ULURP process. This decision is questionable given that the waivers sought are the same as those specifically allowed via City Planning Commission special permit for a Large Scale Residential Development pursuant to ZR §78-312.

Furthermore, housing advocates, other elected officials and I have serious concerns about the financial benefits to NYCHA that could result from this project. The administration is directing over \$60 million in public money (LIHTC and City housing subsidies) to support a development that will only provide \$26.5 million in revenue to NYCHA for capital repairs. Only half of this money will go to the Holmes Towers, leaving a deficit of \$24 million in funding needed for repairs and maintenance at the Holmes Towers Development. Full public review will allow a complete airing of the costs and benefits to the City as a whole and the surrounding community.

NYCHA, Fetner Properties, and City Hall have failed to appropriately communicate the environmental, structural, and financial impacts of the project to the Community Board, local elected officials, and community stakeholders to ensure informative and timely avenues for community review, input, and involvement. In contrast, a genuine community planning process followed by ULURP is the responsible approach to this type of development.

We do not see ULURP as a way to defeat infill; rather we see it as a way to improve infill. In the absence of subjecting infill projects to ULURP, we disengage from the very communities we claim to be trying to assist, and risk creating situations in which we are hastening the gentrification that may lead to displacement. Thoughtful review, opportunity to comment, and genuine negotiations will result in projects more beneficial to all.

The decision to avoid ULURP for this infill development stands in contradiction to your administration's commitment to "engage communities in comprehensive planning" as put forth in one of *Housing New York's* two fundamental objectives. I request that NYCHA and Fetner Properties submit an application pursuant to Charter §197-c to facilitate the proposed development. If the administration does not proceed accordingly, I am prepared to challenge what I believe to be improper action by pursuing appropriate legal remedies. I await your prompt response to this matter.

Sincerely,



Gale A. Brewer
Manhattan Borough President

cc: Kathryn Garcia, Interim Chair, NYCHA
Maria Torres-Springer, Commissioner, NYC HPD
Honorable Ben Kallos, NYC Councilmember, District 5
Alida Camp, Chair, Manhattan Community Board 8
Sandra Perez, President, Holmes Towers Residents Association
Gregory Morris, President and Executive Director, Isaacs Center