



**Testimony to the 2019 New York City Council Charter Revision Committee
Submitted by the Supportive Housing Network of New York
May 9, 2019**

The Supportive Housing Network of New York is grateful for the opportunity to submit testimony to this Charter Revision Commission on Land Use, and specifically on the Uniform Land Use Review Procedure (ULURP) and comprehensive planning.

The Supportive Housing Network of New York is a membership organization representing over 200 nonprofit developers and operators of supportive housing statewide. Supportive housing is permanent affordable housing with embedded social services for vulnerable individuals and families, people who are homeless and living with disabilities and/or other barriers to maintaining stable housing. Thousands of New Yorkers who live with mental illness, substance use disorders, chronic health conditions, traumatic histories and/or system involvement rely on supportive housing. At the same time, thousands more languish in shelter or on the street until more units become available. We are extremely grateful for NYC 15/15, the City's commitment to create 15,000 new units of supportive housing over 15 years. Moreover, we were thrilled when the City Council requested that the administration accelerate implementation of the plan by fast-tracking development from 500 to 700 units per year. Our members are now working hard to live up to this accelerated commitment and produce more of this desperately needed housing.

Land Use Review Processes

In order to develop new supportive housing, our developers must start by finding and/or purchasing a site. Then, in many cases – because the property is City-owned, needs spot rezoning, or requires a special permit – our members must go through lengthy environmental review and ULURP before they can start on the financing and construction of a project. These processes add one to two years to the timeline to create more homes for the most vulnerable New Yorkers. This delay hinders our collective ability to address the homelessness and housing crises and lower the homeless census.

Our members work hard to gain communities' trust. Including communities in planning is important and adds value to the development process; our members enter ULURP willing to engage with and listen to neighborhood stakeholders. We understand the desire for a more robust community feedback period, but we are cautious of any proposals to lengthen the formal ULURP timeline. A lengthened timeline will harm our ability to meet the accelerated supportive housing production target of 700 units per year. A significant portion of the supportive housing projects currently in the pipeline will be going through ULURP, so these projects would all be greatly affected and progress would slow. The City Council, the Mayoral Administration, and general public are all extremely concerned about homelessness; we must ensure that we do not jeopardize progress towards ending the homelessness crisis by hampering nonprofit developers' ability to develop new housing.

Both expert testimony and the Commission's Preliminary Staff Report advised that ULURP be left largely unchanged, with the exception of pre-certification review. We caution against adding a formal comment period in the pre-certification step. This added time would lead to community frustration, if feedback was not fully incorporated, or to confusion when a project returns to the community board for review with significant alterations made since the initial pre-certification comment period.



The Network asserts that the most helpful adjustment to pre-certification would be a set time limit for agency review. Pre-certification review is currently an indeterminate amount of time and our developers are left in limbo for months awaiting final Department of City Planning approval to certify. A time limit would ensure projects move into ULURP more efficiently. Additional agency capacity may be necessary to meet a mandated timeline; nevertheless, we feel that restricting the time for agency review is essential. Moreover, we believe there should be an expedited system for 100% affordable housing projects that would allow them essentially to move to the “front of the line” or have a separate line entirely when undergoing pre-certification. Formalizing the prioritization of affordable housing for pre-certification review in the charter would send a strong statement and ensure the policy stands the test of time.

Community Engagement

The ULURP stage intended to capture the views of the community is the community board review period. Unfortunately, the participants in this stage too often are not truly reflective of the entire community. Anyone affected by a project yet absent from the community board hearing is excluded from consideration, including people who are homeless, future residents of the project in question, and evening workers, among others. We must ensure the voices of historically marginalized groups, including people living with disabilities and with experience of homelessness are included in these conversations.

The Commission should consider how to incorporate true community engagement into the already existent 60-day community review window. The Community Board may not be the best option. Publicly hosted meetings by DCP could be a better alternative, or even smaller focus groups convened by DCP that strategically target the marginalized populations mentioned previously. Additionally, the City should consider testimony both from local residents and groups and from citywide subject matter experts during land use hearings. The City Charter Revision Commission itself has used this approach to great success.

The Network supports efforts to encourage more tracking, accountability, and community participation in land use processes, while ensuring the expeditious production of supportive and affordable housing is maintained. We look forward to working with Commission and the City toward that goal. Thank you for the opportunity to testify.