

November 12, 2021

Commissioner Melanie E. La Rocca
NYC Department of Buildings
New York, NY

Dear Commissioner:

We write with respect to the Major Projects Development Program, a recently announced Department of Buildings (DOB) initiative that allows developers of certain projects the option to buy into a streamlined and expedited process with additional Agency staff resources and consultation. As organizations representing developers, lenders, builders and advocates of affordable and supportive housing, we would like to express our concern that the initiative is likely to exclude affordable and supportive housing and potentially create additional delays for projects that cannot afford to pay the additional fee. If expedited review is possible we suggest it is targeted to projects working to address the affordable housing crisis, in line with the Administration's priorities.

As a coalition of affordable and supportive housing advocates, we have all long articulated the importance of shortening project development timelines, to reduce costs and, even more importantly, to deliver these life-changing units to families and individuals more quickly. As we all understand, that need to do so is greater than ever as the city confronts record homelessness, rent burdened and overcrowded families, and affordable housing lotteries that regularly get tens of thousands of applicants for a few hundred units.

Streamlining and faster processes in filings, permitting, compliance, violation clearance and TCO and CO issuance at the Department have been a focus of our constituent members, and we reviewed the announcement of this new program with interest. It is exactly the kind of forward thinking that City agencies should be engaged in to tackle the housing crisis. Unfortunately, the fees (\$25,000 for affordable housing projects) and the size and scope thresholds will mean that these important projects largely do not qualify. Our non-profit developers in particular operate on extremely thin margins while providing projects that do more in terms of deep and permanent affordability. They will face insurmountable barriers in paying a fee even if their projects were to qualify.

Elements of this new program appear to be modeled after the Affordable Housing Unit at the Development HUB, a groundbreaking initiative that has been hugely important to our members. However, we feel that to the extent the Major Projects Developments Program goes further and offers even more, it should apply also to our developments, regardless of size and scope. In addition, it should do so without a fee, which for City-funded projects will essentially amount to one City agency paying another in the form of additional subsidy.

Beyond simply not having access to the consulting services and additional fast-tracking, a lack of inclusion from the program could be detrimental to the extent that staff resources dedicated to the Major Projects Development Program are not going to projects outside of the program, meaning further delays. At a time when housing is needed so desperately by so many, our City cannot afford to delay much-needed affordable and supportive projects while market rate and major commercial buildings get special treatment.

We applaud your mindset in reducing red tape and dedicating real resources to reducing development timelines, as well as for the special attention the Department has given to affordable and supportive housing in other areas. We simply want to see this exciting new initiative apply to all sizes of supportive and affordable housing, which we see as second to none in terms of public importance and transformational human impact.

Thank you for your consideration.

Sincerely,

Ascendant Neighborhood Development Corporation
Association for Neighborhood & Housing Development (ANHD)
Banana Kelly
Breaking Ground
The Center for NYC Neighborhoods
Community League of the Heights
Community Preservation Corporation (CPC)
ConRock Construction
Cooper Square Committee
Cypress Hills Local Development Corporation
Dattner Architects
Enterprise Community Partners
Fifth Avenue Committee
Gateway Housing
Gotham Organization
Habitat for Humanity
Hope Community, Inc.
The Hudson Companies
Hudson River Housing
IMPACCT Brooklyn
The Interfaith Assembly on Homelessness and Housing
LiveOn NY
MBD Community Housing Corp.
MEGA Contracting

MHANY Management Inc.
Neighborhood Restore HDfC
New Destiny Housing Corporation
New York Housing Conference
New York State Association for Affordable Housing (NYSFAFH)
NYC Housing Partnership
Omni New York
Phipps Houses
RiseBoro
Rockabill Development
Services for the UnderServed, Inc.
Shams DaBaron, Da Homeless Hero
SKA Marin
SMJ Development
SoBro
St. Nicks Alliance
The Supportive Housing Network of New York (SHNNY)
University Neighborhood Housing Program
West Side Federation for Senior and Supportive Housing (WSFSSH)

Cc: Deputy Mayor Vicki Been
Commissioner Louise Carroll, Department of Housing Preservation & Development