

SUSAN PALMER MARSALL

September 9, 2026

City Planning Commission
c/o Calendar Information Office
120 Broadway, 31st Floor
New York, NY 10271

Re: Written Testimony — ELURP and AHAB Proposed Rules

Dear Chair and Commissioners:

I am writing as a New York City resident and as someone who has been deeply involved in neighborhood and land-use issues in Chelsea. I currently serve as President of the Council of Chelsea Block Associations (CCBA) and as a Director of the 300 West 18th & 19th Streets Block Association. I am submitting these comments in my individual capacity as a city resident, and not on behalf of either organization.

I live directly across the street from Fulton Houses. My perspective on land-use policy is therefore informed both by living in a neighborhood experiencing significant development pressures and by years of participating in community review of projects that can have substantial impacts on surrounding residents.

I support the City's efforts to produce more affordable housing and to eliminate unnecessary delay and bureaucracy in the land-use process. At the same time, I am concerned that an expedited process must not become a process in which meaningful community participation and accountability are diminished.

I recognize that the underlying Charter amendments establishing ELURP and AHAB were approved by voters in November 2025. My concern today is with how those changes are implemented through these rules—and, in particular, whether the implementation preserves meaningful public participation, local knowledge, transparency, and accountability in land-use decision-making.

The proposed ELURP process retains Community Board and Borough President review, but those reviews remain advisory, while the City Planning Commission's subsequent decision is final. That makes it especially important that the Community Board process be more than a procedural step that an application passes through on its way to a final decision.

Community Boards are one of the principal places where the City's land-use process incorporates the knowledge and experience of people who actually live in affected neighborhoods. They hear from residents, property owners, tenants, civic organizations,

and other stakeholders who understand the cumulative and often very local consequences of development. That information may not be apparent from an application, a planning analysis, or an environmental review.

For that reason, I urge the Commission to ensure that the rules preserve the substance of community participation, not simply its existence on the timeline. Community Boards should have clear, timely information about applications; adequate opportunity to understand and discuss them publicly; and assurance that their recommendations and the issues they raise will be meaningfully considered as part of the CPC's final decision.

I am also concerned about the broader shift in the balance of authority that these changes represent. Expediting review may be appropriate for genuinely modest projects, but the designation of an action as eligible for an expedited process should not itself become a mechanism for reducing public scrutiny of decisions with significant neighborhood consequences. The rules should be clear and narrowly applied, with transparency about why an application qualifies for ELURP and what avenues of public review remain available.

The same principle applies to AHAB. Affordable housing is an urgent and essential citywide priority, but it should not be framed as being in opposition to meaningful democratic land-use review. We should be able to pursue both: building the affordable housing New Yorkers need and maintaining a land-use process in which affected communities, boroughwide interests, and citywide interests are all able to be heard and considered.

The purpose of an expedited process should be to eliminate unnecessary delay—not to diminish the ability of communities to understand, evaluate, and respond to decisions that will shape their neighborhoods.

I therefore urge the Commission to adopt rules that preserve meaningful community participation, transparency, and accountability as these new Charter provisions are implemented.

Thank you for considering my comments.

Sincerely,

Susan Palmer Marshall
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