



THE CITY OF NEW YORK  
**OFFICE OF THE PRESIDENT**  
BOROUGH OF MANHATTAN

**SCOTT M. STRINGER**  
BOROUGH PRESIDENT

August 19, 2013

Mathew M. Wambua  
Commissioner  
NYC Housing, Preservation and Development  
100 Gold Street  
New York, NY 10038

Re: 40 Riverside Boulevard

Dear Commissioner Wambua:

I write about the proposed affordable housing plan for 40 Riverside Center, which will create 55 affordable units on Site "K" in the Riverside South Development Plan. The creation of a mixed income residential community was an integral part of the original Large Scale Development approvals in 1992. Unfortunately, the proposed plan fails to meet this standard.

The proposed building creates a separate entrance and core for the affordable housing units, effectively segregating them from the rest of the building. Such segregation creates the potential for unequal treatment in the construction and maintenance of both the individual housing units and larger building section. The inclusionary housing program specifically requires that affordable units be equally distributed across the building. While exemptions from this requirement may be appropriate for affordable units with unique programs, such as supportive or senior housing, no such unique program exists at this site.

Therefore, I ask that you not approve the affordable housing plan as proposed and instead work with the developer to create an even distribution of the affordable units.

Additionally, the original plan required that 12% of the total units be constructed as affordable. These units were financed by the upzoning granted in 1992. The developer was then encouraged to seek additional affordability by participating in other affordable housing programs.



I ask that as you consider the proposed affordable housing plan, you make sure that the developer is not 'double dipping' by seeking inclusionary or 421-a financing for units they were already required to construct. Any participation in these programs must result in an increased total number of units.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Stringer". The signature is fluid and cursive, with the first name "Scott" and last name "Stringer" clearly distinguishable.

Scott M. Stringer  
Manhattan Borough President