Int. 2186 (Johnson), A Local Law to amend the New York city charter, in relation to requiring a comprehensive long-term plan

NYC Council Speaker Corey Johnson City Hall Office New York, NY 10007

February 19, 2021

Dear Council Speaker Johnson:

Our office has recently learned that the New York City Council Committee on Governmental Operations will hold a hearing on Tuesday, February 23 at 10am on Int. 2186 (Johnson), A Local Law to amend the New York city charter, in relation to requiring a comprehensive long-term plan. Manhattan Community Board 1 (CB1) reached out and scheduled a presentation for our February 8, 2021 Land Use, Zoning & Economic Development Committee meeting with Annie Levers, Assistant Deputy Director of the Office of Strategic Initiatives, NYC City Council. The presentation on the proposal was very complex for a single meeting and CB1 has serious concerns regarding this proposal, how engagement is being conducted and the speed at which approval may be sought. Even after our February meeting, we need further information and follow up which will need to be answered and discussed in time for the Board to adopt a March 2021 resolution.

As we understand, each New York City Community Board is not being individually briefed on this proposal, but rather presentations are conducted by request. This in and of itself gets the proposal off on the wrong foot. If this proposal intends to manifest a real opportunity for community-based, representative planning, it must first be vetted by local communities. At this stage, a hearing is being conducted before most Community Boards have had an opportunity to review this proposal.

Since the conception of the modern land use review process in New York City, communities have been at an inherent disadvantage. ULURP, a process designed to ensure community engagement, has been reduced to a process by which Community Boards have a very brief window to comment on near-finalized projects, and which rarely inspires real change. Many concerns have been raised that this long-term comprehensive planning proposal could result in a process that similarly imposes top-down plans onto communities that haven't been involved in the planning itself, but who then have the largely

ceremonial function of providing advisory comment during the final stages. Further, there is concern that after these long-term plans are adopted it would further minimize the role of Community Boards during review of individual applications in the ULURP process, where greater weight may be placed on adherence to these long-term plans rather than guidance from local communities.

Finally, CB1 is particularly concerned by the amount of oversight by the Mayor's Office as part of this proposal, specifically as it relates to community engagement. CB1 has experienced a very challenging track record of engagement by the Mayor's Office in recent years, especially regarding major projects like Borough Based Jails. Though engagement was explicitly promised during earlier stages of the plan, actual community engagement has been at worst nonexistent, and at best poor.

We urge the New York City Council to take pause in consideration of this proposal until local communities have had a real chance to review and develop opinion on it. CB1 is not opposed to the concept of long-term comprehensive planning, but in order for it to be successful it must be rooted in local, community-based planning.

Please contact me if you have any questions or would like to discuss further.

Sincerely,

Tammy Meltzer, Chairperson