



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

April 23, 2025

Dear Charter Commission Members:

I am Frampton Tolbert, Executive Director of the Historic Districts Council. Thank you for allowing the Historic Districts Council to submit testimony to the Commission. HDC is the citywide advocate for New York's historic neighborhoods. We represent a constituency of more than 500 Community Partner organizations to help them preserve the places that matter to them.

Part of the Charter Commission's role is to review our existing land use processes and propose changes to those systems. HDC strongly supports new housing and believes that preservation should be seen as a tool to make that happen, especially through adaptive reuse projects and contextual development. We cannot build ourselves out of this problem. As Dan Garonick has said 90% of buildings that will exist in 2050 already exist so we need to incentivize their reuse for housing, especially affordable housing.

But that is not why we are here today as the charter is not necessarily the place to create these incentives and resources. We understand that one thing the Commission may do is identify how to streamline the Uniform Land Use Review Procedure (ULURP), the process for major land use decisions in the city.

ULURP is one of the main ways that community members and stakeholders can be involved in land use decisions. The process allows several entities to weigh in on proposals including Community Boards (advisory), the Borough President (advisory) and City Council (binding). The Charter Commission's current plan may be to eliminate some or all of this review.

HDC opposes a plan that would diminish or eliminate public participation. Efforts to shut the public out of processes that shape their lives and communities follow a dangerous local and national trend of dismantling civic structures and perpetuating the idea that only the wealthy and connected can or should make decisions about the neighborhoods that matter to us.

HDC is a longtime advocate for public processes. For more than 50 years, we have reviewed all major applications at the Landmarks Preservation Commission, because we believe community input makes our city more livable for all. We have seen time and again how public testimony has

added vital information to the public record, and helped shape projects into even better versions of themselves.

Community boards are already advisory, so removing their thoughtful review would only dampen civic engagement in the city. The Borough President's role is similarly advisory and equally important. With their staff of land use experts and planners, Borough Presidents are well positioned to consider all aspects of a project and make thoughtful recommendations to improve a project.

HDC believes that we may need to improve ULURP so that small-time developers and property owners can create projects and more housing in a process that mostly benefits large developers who have the time and resources to fund these projects and timelines. But the solution as some suggest is not to stifle community participation. The Public is not the problem. HDC urges the Commission not to eliminate public participation in land use review processes.

Sincerely,

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Executive Director

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