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September 8, 2026

Hon. Zohran K. Mamdani
Mayor, City of New York
City Hall
New York, NY 10003

Hon. Dina Levy, Commissioner
NYC Department of Housing Preservation and Development
100 Gold Street
New York, NY 10038

Hon. Sideya Sherman, Director
NYC Department of City Planning
120 Broadway
New York, NY 10271

Where We Live NYC
Fair Housing Growth Strategy
Draft Report Feedback
via WhereWeLiveNYC2025@hpd.nyc.gov and
wherewelivenyc@hpd.nyc.gov

Re: Where We Live NYC Fair Housing Growth Strategy Draft Report

Dear Mayor Mamdani, Commissioner Levy, Director Sherman, and Where We Live NYC Fair Housing Growth Strategy Team,

I write in response to the recently issued *Where We Live NYC Fair Housing Growth Strategy* draft report, and the call for feedback from the public. Village Preservation has several serious concerns about the draft plan, both overarchingly and as it would apply specifically to Community Boards 2 and 3, Manhattan, the community boards in which we work.

To summarize, the draft report proposes to:

- *Set a goal of adding 700,000 new units of housing in NYC by 2030, or an increase of 20%, with subsequent policies and land use actions to follow to realize these goals*
- *Of those 700,000 new units, 75% or 525,000 would be market rate, and 25% or 175,000 would be income-restricted, also termed "affordable." This would include:*

    - *70% of those "affordable" units (17.5% of the total units produced) or 122,500 units would be for households with incomes of above 60% of Area Median Income (AMI). This means required incomes would start at just slightly below median income for NYC, with no limit to the upper range. Required incomes would also therefore start at <u>above</u> the median income for NYC renter households, and go up to well over twice the median NYC renter household income or even higher.*
    - *30% of those "affordable" units (7.5% of the total units produced) or 52,500 units, which the report calls "deeply affordable," would be for households with incomes at 60% of Area Median Income (AMI) or below, which means up to just slightly below median income for NYC, and up to above the median income for NYC renter households. Of those:*
        - *Half (3.75% of the total units produced) or 26,250 units would be for households experiencing homelessness*

- *The report then proposes goals for how many units of housing should be added to each community board over the next five years, with an overall increase of about 10%, and subsequent to-be-determined land use actions to realize these goals. Targets for each Community Board are determined by:*
    - *Total number of housing units*
    - *Whether each Community Board is in the low, moderate, or high growth one-third cohort of community boards citywide*
    - *Whether each community board is a "limited affordability area," with those that are receving higher growth targets*

Trying to address the very serious problem of housing affordability in our city, as well as seeking to comprehensively plan for our city's growth, are not only laudable but necessary goals. However, we believe this draft report and its proposals have serious flaws in their approach and assumptions in several key respects.

Overarchingly, a goal of 20% housing growth in roughly ten years in our city seems both woefully unrealistic and profoundly ill-advised. That is the equivalent of adding roughly a Philadelphia to New York City over approximately a decade, or an entire borough (nearly the entirety of

Queens, the city's largest borough, or roughly the equivalent of adding both The Bronx and Staten Island) without adding any land. It is impossible to imagine that our city and neighborhoods would be prepared to absorb that level of growth, given the high rate of utilization of much of our infrastructure, and the problems it currently has handling the demands upon it. This includes mass transit, sewage systems, electrical grid, roadway infrastructure, and healthcare systems, which are currently inadequate in many respects and under considerable strain, indicating they are not equipped to handle current demand, much less a rapid increase of 20% or more. To even contemplate that level of growth, without a plan and proven ability to commensurately expand infrastructure capacity to meet it, would seem to exemplify poor planning and invite disaster.

Beyond that, the plan is premised upon several flawed assumptions and approaches, including:

- **That adding large amounts of new housing, no matter how expensive, will improve the affordability of New York's housing, especially for those who need assistance most**. Multiple studies contradict this claim, a foundational premise of the report. Adding large amounts of new housing in already built-up residential areas also has the potential to destroy more affordable housing, replacing it with more expensive housing. It may also actually reduce the number of units of housing, by replacing a larger number of smaller units in smaller buildings with a smaller number of very expensive units in much larger buildings.
- **The claim that the city suffers from an overall housing shortage, as opposed to a shortage and ever-shrinking pool of affordable housing**. This claim largely rests upon a 2023 housing and vacancy survey, which found a 1.4% overall housing vacancy rate in NYC. However, that survey failed to explain how NYC could have a historically low housing vacancy rate when the city has more housing units now than it's ever had, and more housing units per person than it's ever had. It also failed to explain how the housing vacancy rate could have declined so precipitously from its highest rate in more than 60 years, of 4.54% in 2021, to 1.4% in 2023, even though during that same period the city lost 220,000 people and added about 80,000 units of housing. That survey is also now more than three years out of date, and has yet to be updated, with city records and census figures showing NYC population holding steady or declining during

the intervening period, and tens of thousands of new units of housing having been added citywide. It should also be noted that prior periods of reported low housing vacancy rates, such as 1968, have not correlated with increases in housing unaffordability in New York City.

- **That all parts of New York City can add housing at a similar rate to a small number of high growth areas, like Hudson Yards, Long Island City, Downtown Brooklyn, Gowanus, the Williamsburg/Greenpoint waterfront, and Mott Haven/the South Bronx, without severe negative impacts and substantial downsides**. The report fails to acknowledge that virtually all of the high-growth rates cited for replication are located in formerly industrial or commercial areas with underutilized land that created unique opportunities for new large-scale residential development. To achieve similar rates of new housing construction in existing developed residential neighborhoods would require substantial demolition of existing housing — likely to disproportionately be older, Naturally Occurring Affordable Housing — and vastly out-of-scale new construction. This means accelerated displacement and loss of existing, more affordable housing.
- **That all parts of New York City have or could reasonably have the capacity to accommodate the levels of added housing described**. It should be noted that Queens Community Board 2, which contains Long Island City ("the fastest growing urban neighborhood in America"), had a 21.9% increase in population between 2010 and 2020, while Manhattan Community Board 4, which contains Hudson Yards ("the largest private real estate development in United States history"), had a 21.2% increase in housing units – each roughly commensurate with what the plan proposes for every community board in New York City over a ten year period. They each also had extremely robust increases in mass transit capacity, additions of public parkland, and expansions of other essential infrastructure to accommodate this rapid growth, which took place largely on land with few if any active uses or residents previously. Claiming that every community board in New York City has the land and capacity to add a Long Island City or a Hudson Yards, and that the City could provide the commensurate infrastructure to support it, strains credulity.
- **That the base for projecting how much housing growth each community board should accommodate fails to meaningfully account for the total amount of housing which exists in a**

community board, and the existing density of that housing. The draft plan calls upon what are some of the most densely developed housing environments in the country to add substantially more housing, and often at a higher rate than those areas which are considerably less densely built out. Community Boards 2, 3, 4, 6, 7, 8, and 10 Manhattan have far and away the greatest existing density of housing in New York City, and have a greater housing density than virtually any place else in the country. And yet the plan calls for them to add substantially greater density, and to do so at a rate as much as -- and in many cases more than -- community boards currently just <u>one-tenth</u> as densely built out with housing, or even less.

In light of all of the above, we have serious concerns about the proposed projected housing increases over the next five years for Community Boards 2 and 3, Manhattan, in which we work. There the plan proposes:

- Community Board 2 --
    - Housing growth 5 year target: 5,970 units (10% increase), including:
        - 4,480 market rate units
        - 1,040 "affordable" units at 61% of AMI and above
        - 450 "deeply affordable" units at 60% of AMI and below, of which
            - 225 are for households experiencing homelessness

- Community Board 3 --
    - Housing growth 5 year target: 7,405 units (8.75% increase), including:
        - 5,555 market rate units
        - 1,295 "affordable" units at 61% of AMI and above
        - 555 "deeply affordable" units at 60% of AMI and below, of which
            - 280 are for households experiencing homelessness

To understand what this could mean, we looked at recent or current developments in each Community Board, and calculated what these targeted housing growth levels would translate into in terms of real potential developments.

- Community Board 2, Manhattan

- 5-11 West 13th Street, a 538 ft. tall apartment tower (under construction) with approx. 30 units – ***the plan calls for the construction of the equivalent of <u>200</u> of these within Community Board 2 in five years.***
- 155 West 11th Street, a 17-story apartment block (built 2013) with approx. 75 units – ***the plan calls for the construction of the equivalent of <u>80</u> of these within Community Board 2 in five years***.
- 56 Great Jones Street, a 300 ft. tall tower (under construction) with 94 units – ***the plan calls for the construction of the equivalent of <u>65</u> of these within Community Board 2 in five years***.

- Community Board 3, Manhattan
  - 52 East 4th Street/353 Bowery, a 210 ft. tall 15-story apartment tower (built 2009) with approx. 14 units – ***the plan calls for the construction of the equivalent of almost <u>530</u> of these within Community Board 3 in five years***.
  - 644 East 14th Street, a 240 ft. tall, 24-story apartment tower (built 2026) with approx. 196 units – ***the plan calls for the construction of the equivalent of almost <u>40</u> of these within Community Board 3 in five years***.

Given that these are recently-built or under-construction buildings, they are reasonable models for what could be built under this plan. It's also reasonable to project that the 75% of these units that would be market rate would be astronomically expensive, and unaffordable to all but a tiny slice of New Yorkers. Of the 25% that would be termed "affordable," 70% of those would have income requirements that start at a level too high for the majority of NYC renters (and only increase from there), and start at a level too high for nearly a majority of all NYC households, with the potential to range considerably higher.

It should also be noted that the report's analysis of neighborhood housing growth (or lack thereof) fails to take into account that these levels result from prior city-initiated or approved local and citywide rezonings' failure to deliver promised housing, especially affordable housing. And yet the remedy for this is, presumably, additional city-initiated or approved rezonings.

For example, Community Board 2 (Manhattan) is identified as a "low growth" area, and Community Board 3 (Manhattan) as a "medium growth" in terms of new housing production over the last ten years. But just prior to and during those ten year periods, each of these community boards had mulitple local rezonings that failed to produce the promised housing and affordable housing they were ostensibly designed to deliver. This includes Hudson Square (2013), St. John's Terminal (2016), and SoHo/NoHo (2021) in Community Board 2, and East Village/Lower East Side (2008) and Third Avenue Corridor (2010) in Community Board 3. An additional rezoning in Community Board 3 initiated and approved by the City for a "Tech Hub" at 124 East 14th Street actually facilitated all-commercial development on a large, publicly-owned site previously slated and zoned for affordable housing, which the rezoning and subsequent development then precluded from occurring (Village Preservation strongly opposed this rezoning).

Citywide rezonings which promised more housing and more affordable housing have also failed to deliver on their promises. At 11 West 13th Street, the citywide "City of Yes" rezoning resulted in an under-construction 538 ft. tall tower with only about 30 units of housing, all incredibly expensive and none affordable. The report seems to point toward implementing more of the same policies and actions to address a lack of new housing and affordable housing that have consistently failed to produce the promised results previously.

Village Preservation welcomes comprehensive planning for, and effective strategies to address the growing problem of housing affordability in, our city and neighborhoods. However, we firmly believe that many of the approaches and underlying assumptions in the proposed Fair Housing Growth Strategy Plan are substantially flawed, and if implemented could do great harm to our city and neighborhoods. We therefore urge they be substantially rethought.

We appreciate the opportunity to submit comments and offer feedback upon the draft proposed plan. We hope you will consider them, and that they inform how you proceed.

Sincerely,

Andrew Berman
Executive Director

cc: Manhattan Borough President Brad Hoylman-Sigal

City Council Speaker Julie Menin
City Council Land Use Committee Chair Kevin Riley
City Council Zoning Subcommittee Chair Farah Louis
City Councilmember Chris Marte
City Councilmember Harvey Epstein
City Councilmember Carl Wilson
Community Boards 2 and 3, Manhattan
Assemblymember Grace Lee
David Siffert
Municipal Art Society
New York Landmarks Conservancy
Historic Districts Council
City Club