



488 Madison Avenue, 19th Floor
New York, NY 10022
212 935 3960
MAS.org

November 30, 2023

Mr. Dan Garodnick
Chair and Director
New York City Planning Commission and Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

By Email Delivery

Re: MAS Comments on the City of Yes for Housing Opportunity

Dear Chair Garodnick,

New York City's housing crisis is profound and deep, long in the making, and unquestionably demands to be corrected. From a growing population to increasing costs of construction to dwindling federal subsidies, we know the magnitude and the likely epicenters of the housing crisis. And yet, we have been unable to find the right tools to fix the problem and we have spent more time fighting with each other over this specific proposal or that. Now is the time to put that behind us and move on in a bold way.

MAS applauds the DCP for addressing the issue through a citywide and equity-focused lens. While a zoning text amendment alone will not solve the housing crisis, it is a necessary step toward facilitating the creation of more housing. The City of Yes for Housing Opportunity frames up critical factors in solving the crisis by focusing on citywide solutions and responding to historic patterns of development to find ways to create more housing that will be contextual to each neighborhood.

MAS supports DCP's plan to equitably distribute more housing density across New York City, and is encouraged to see town-centered zoning, transit-oriented development, and provisions for accessory dwelling units and universal affordability preference included in the proposal.

To meet Mayor Adams' goal of 500,000 new units over the next decade and to support residents once units are delivered, New York City must look holistically at the set of mechanisms that strengthen and support our communities. Additionally, the City must support communities by ensuring both social and physical infrastructure are provisioned to meet neighborhood needs when density is increased, taking a [comprehensive planning approach, of which MAS has long been a proponent](#).

Because of the complexity of factors, the affordable housing issue requires a comprehensive and multi-faceted approach that utilizes a broad range of City and State initiatives and funding tools. Tax exemptions like the Affordable Housing Rehabilitation Program are a start but must be partnered with additional incentives that enable and encourage construction, measures that ensure policy and regulations are being utilized as intended, and mechanisms to keep existing affordable units in place.

We look forward to participating in the review of the City of Yes text amendment through the ULURP process in 2024 as well as advocating for other affordable housing funding proposals and incentives at a City and State level to successfully address the New York City's shortage of affordable housing. We will have detailed comments on the City of Yes proposal going forward; however, this is the moment to affirm that the text amendment is laying the groundwork to move us in the right direction.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth Goldstein', with a long horizontal line extending to the right.

Elizabeth Goldstein
President

cc: Maria Torres-Springer, NYC Deputy Mayor for Housing, Economic Development and Workforce