

September 18, 2026

Hon. Dina Levy, Commissioner
NYC Department of Housing Preservation and Development
100 Gold Street
New York, NY 10038
Delivered via email to WhereWeLiveNYC2025@hpd.nyc.gov

MAS Urges Integrated Approach and Deeper Analysis in NYC's Draft Fair Housing Report

Dear Director Levy:

The Municipal Art Society of New York (MAS) has long advocated for comprehensive, community-based planning to promote equitable growth that includes adequate neighborhood services and climate-resilient infrastructure.

We recognize that the *Fair Housing Growth Strategy* report (FHGS) is part of a larger suite of reports, plans, and policies aimed at addressing the city's housing affordability crisis. We were pleased to see the emphasis on the co-location of parks, retail, and public services in the Strategic Equity Framework. However, we are concerned that the draft report lacks the required level of detail and clarity of research and methodology. And we encourage you to integrate equity, climate, and transit throughout the strategy to guide growth in a responsible way. Our recommendations are outlined below.

Adopt a Comprehensive Planning Approach

The City should establish housing-production targets based not only on the amount of housing built over the past five years, but on a holistic assessment of each community district. Local Law 167 explicitly requires the FHGS to consider access to transit, open space, public services, and climate impacts when establishing community-district housing-production targets. This assessment should also consider existing density and the history of residential segregation. Furthermore, the City should commit to investing in infrastructure in districts with high growth targets but limited existing resources, and it should align infrastructure investments with any related rezoning or housing-production plans. Without an integrated approach, the City risks exacerbating existing inequities and placing additional strain on already overburdened infrastructure.

MAS is pleased to see that the FHGS is closely integrated with the Block-by-Block plan and supports the City's continued efforts to plan for New York City's growth. However, it is difficult to see how the City can equitably add 700,000 units over the next ten years without a citywide comprehensive plan.

Cities across the United States use comprehensive plans to align housing production with land use, public amenities, and transportation infrastructure. Housing growth should not be treated as an end in itself. Rather, the City should pursue growth that considers existing neighborhood density, access to transportation and public amenities, infrastructure capacity, and climate risk when determining where and how new housing should be accommodated.

Provide Greater Specificity and More In-Depth Data

The final FHGS should provide substantially more detail regarding its data sources, assumptions, methodology, and neighborhood-level findings. It should also clearly explain how housing-production targets were established and how those targets will be adjusted to reflect each community district's distinct housing, land-use, demographic, infrastructure, and climate conditions.

Coordinate Across Agencies, Programs, and Plans

The City should coordinate the FHGS across agencies, programs, and planning efforts. It should build upon and integrate new data and research into the goals of Where We Live 2025 and ensure that the Departments of City Planning (DCP) and Housing Preservation and Development (HPD), along with other relevant agencies, are working from shared objectives, data, and implementation timelines. The City should also more closely align the FHGS with HPD's Affordable Housing Fast Track (AHFT) process to advance family-sized apartments in districts that are underperforming in the production of affordable housing.

Strengthen Housing Needs Assessment to Account for Level of Need

At the core of the draft report is the housing needs assessment, which should play a central role in informing intelligent and responsive planning for New York City's housing growth. In the final report, the assessment should provide a more detailed analysis of housing needs and quantify the levels of affordability required in each neighborhood. It should also assess the need for larger, family-sized units, as required by local law.

The draft report's surface-level calculations should be replaced with a detailed analysis of housing opportunities that accounts for each neighborhood's socioeconomic conditions, demographic trends, and prevalence of rent-burdened households. The City should clearly document the data and methodology used to establish its overall target of 700,000 additional homes, as well as the process for adapting targets to reflect neighborhood-specific conditions.

Prioritize Meaningful Affordability

Finally, most of the housing expected to be created by the FHGS will not be affordable to the New Yorkers that need it most. Much like the Block-by-Block and other City efforts to date, the FHGS lacks a sufficient focus on *meaningful* affordability.

Most of the housing envisioned in the draft report will be market-rate, while the "affordable housing" described in these plans will remain unattainable for many low- and middle-income families earning below 60 percent of area median income. We encourage HPD to expand its support for permanently affordable housing through innovative financing mechanisms, including revolving loan funds, as well as neighborhood-embedded models such as community land trusts and limited-equity cooperatives.

The City should establish a clearer framework for directing growth toward neighborhoods where new housing can expand affordability while benefiting from transit access, infrastructure, public services, and other neighborhood amenities.

We urge the Mamdani Administration to undertake a deeper analysis of New Yorkers' housing needs, expand its targets for deeply affordable housing, and publish a comprehensive housing plan. Such a plan



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should integrate currently siloed planning efforts, align housing growth with infrastructure and climate resilience, and ensure that New Yorkers have a meaningful voice in shaping the future of their neighborhoods.

Sincerely,

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