Anthony Viola,
Chairperson

Kiana Diaz,
District Manager

September 19, 2026

VIA ELECTRONIC SUBMISSION

NYC Dept. of Housing Preservation and Development (HPD)
NYC Dept. of City Planning (DCP)
New York, NY

Re: Comment Regarding NYC Fair Housing Growth Strategy Draft Report (2026)

Community Board 12-Manhattan ("CB12M" or the "Board") writes in relation to the "*NYC Fair Housing Growth Strategy Draft Report"* published on August 19, 2026, by the NYC Dept. of Housing Preservation and Development ("HPD") and the NYC Dept. of City Planning ("DCP").[1]

Pursuant to Local Law 167 of 2023 ("Local Law 167"),[2] the City must periodically develop and publish a Fair Housing Growth Strategy ("FHGS"), the first of which is due October 1, 2026. The strategy is advisory in nature and intended to inform the City's broader "*Where We Live NYC*" plan ("WWL NYC"), which among other things, calls upon the City to develop a plan for equitable housing development in each of the City's 59 community districts. In response to public feedback, the WWL NYC 2025 report expressly stated that the City would engage community boards when developing a: citywide assessment of long-term housing needs; five-year housing production targets; and an assessment of the obstacles to fair housing and strategies to overcome such challenges.[3] Regrettably, the City has failed to satisfy this commitment in a meaningful way as engagement with community boards and the public has been limited and poorly timed.

Given the time constraints, the Board has focused on elevating key concerns regarding what it views as deficient public and community board engagement, as well as concerns about the strategy itself. Additionally, the Board has highlighted the issues and questions that it feels the FHGS must address in order to be most helpful to our efforts and comply with local law. The Board also takes this opportunity to formally request that HPD and DCP commit to at least two meetings per year dedicated to discussing the data-gathering and analysis behind both reports so future iterations better capture CB12M's district-specific needs.

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[1] *NYC Fair Housing Growth Strategy Draft Report* (Aug. 19, 2026), *available at* https://wherewelive.cityofnewyork.us/wp-content/uploads/2026/08/Fair-Housing-Growth-Strategy_Draft-Report.pdf.
[2] New York City Council, Local Law 167 of 2023, *available at* https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6202971&GUID=05B58613-959E-49B4-A9EA-2D80EA50456E&Options=ID|Text|&Search=167.
[3] *Where We Live NYC 2020 and 2025 Materials*, 2025 Report - Appendix B, *available at* https://wherewelive.cityofnewyork.us/process-plans/plans/.

I. Timing of Public Comment Period

As a threshold matter, the Board wishes to express disappointment with the City's decision to publish the draft report on August 19, 2026, and only accept public comment through September 19, 2026. When the Board shared its concerns about the timing and duration of the public comment period with HPD staff, the Board was told that little could be done because the City must meet a legally mandated October 1 publication deadline. *The Board finds this defense unpersuasive as decisions regarding when to publish the draft report and solicit public comment were entirely within the City's control and, thus, could have been scheduled differently*.

In fact, materials from a May 6, 2026, briefing posted on the initiative's website, indicated that the draft report was to be released in June/July, followed by a second public briefing and "office hours" opportunities in July, and a public comment opportunity in August.[4] While problematic given that community boards do not meet over the summer, that timeline would have given boards more opportunity to analyze the plan and prepare a comment letter focused more on the substance of the report. The fact that the comment period now closes in mid-September does nothing to make up for the much shorter window within which boards must evaluate the draft report and prepare a response. *At a minimum, the City should have notified boards and the public that the initiative's timeline had significantly changed*.

II. Limited Community Board and Public Engagement

While the Board appreciates that HPD staff was responsive to our request for a presentation about the draft report, *there should have been significantly more engagement with community boards throughout the development of the report* and certainly more than only two public briefings once the draft report was published.

We would also be remiss not to mention that the briefings and draft report were not made available in languages other than English. This appears to mirror the failure to translate documents from the WWL NYC 2020 and 2025 reports, which the FHGS is intended to supplement. *Given that the WWL NYC and FHGS reports are both now legally mandated, the Board urges that the City invest in translating past and future materials into NYC's top 10 most spoken languages besides English to ensure more New Yorkers can engage in the process.*

Additionally, the Board stresses the importance of engaging groups that face additional challenges securing safe and affordable housing that meets their unique needs including, but not limited to, New Yorkers living with disabilities, seniors, formerly homeless individuals and families, and those with supportive housing needs.

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[4] NYC's Housing Growth Strategy (May 5, 2026), Slide 30 – Timeline, *available at* https://wherewelive.cityofnewyork.us/wp-content/uploads/2026/05/Housing-Growth-Strategy-Public-Briefing_updated.pdf

III. Concerns with the Fair Housing Growth Strategy

Generally, the Board commends the City for demonstrating enthusiasm to increase housing production citywide, especially within districts that have long resisted new development. Further, the Board acknowledges that the current mayoral administration has announced a number of housing-related initiatives intended to improve housing conditions and promote new housing production, including Mayor Zohran Mamdani's Block by Block housing plan.

By requiring the development and publication of a fair housing strategy, even if only advisory in nature, Local Law 167 was intended to ensure that the City periodically conducts a thorough analysis of where past and current housing policy has fallen short of meeting the housing needs of working class and low-income New Yorkers. After carefully reviewing the draft FHGS report, the Board joins trusted community organizations like the Association for Neighborhood & Housing Development in saying that the City has fallen short of complying with the requirements laid out in Local Law 167 of 2023.[5]

Time and again community boards such as ours have highlighted that the formulas used to set the rents for "affordable housing" units rely on Average Median Income ("AMI") rates that are not representative of our community. This is true even of "deeply affordable" units reserved for those earning below 60% of the AMI. CB12M, along with local community-based organizations and the broader Upper Manhattan community, was hopeful that the newly required assessment would necessitate the City to conduct a long-overdue, district-by-district analysis that could then lead to the development of district-specific recommendations beyond simply how many new units should *ideally* be constructed within the next five or 10 years. The strategy also lacks information about the size of the units that should be constructed, which is especially important to our community given the need for more affordable multi-bedroom units over studios and one-bedroom units.

Local Law 167 requires careful analysis of factors beyond simply the number of new units that would be needed in order to meet the anticipated population growth. Specifically, the law requires that the City take into consideration factors like the risk of displacement posed by various types of new housing development, as well as factors like access to transportation, employment opportunities, healthcare facilities, and schools. Further, the concepts outlined in the strategic equity framework, including those relating to climate-change considerations are vague and provide little insight into concrete steps the City can take to address concerns.

While the Board calls upon the City to make every effort to comply with the law's requirements, the Board anticipates that the report is unlikely to change substantially between now and its October 1 publication deadline. *Given that reality, the Board has chosen to highlight where the strategy has fallen short, as well as the types of information that would be most helpful to our efforts, so future versions better meet the*

[5] Association for Neighborhood & Housing Development, "NYC's Draft Fair Housing Growth Strategy Misses the Mark" (Sep. 9, 2026), *available at* https://www.anhd.org/blog/nycs-draft-fair-housing-growth-strategy-misses-the-mark/.

moment.

IV. CB12M Priorities

CB12M supports housing growth when it is genuinely equitable and accompanied by the resources necessary to make that growth sustainable. In our district, housing production should be evaluated together with preservation of existing affordable housing, tenant protections, deeply affordable housing, investment into housing associated with the New York City Housing Authority (or "NYCHA"), accessibility, homelessness, and the capacity of schools, transportation, parks, healthcare, senior services, sanitation, and other community infrastructure.

Accordingly, CB12M respectfully requests that HPD and DCP strengthen the final Fair Housing Growth Strategy by incorporating the following recommendations:

1. Clearly identify and explain CB12M's five-year housing target

The final strategy should clearly state CB12M's five-year housing production target and provide the methodology used to calculate it. The City should distinguish between housing already produced that will be counted toward the current five-year target, as well as units that are under construction and projects that have been approved projects but have not yet broken ground.

2. Account for the Inwood Rezoning Points of Agreement and prior rezoning commitments

CB12M requests a transparent accounting of how the Inwood Rezoning Points of Agreement (2018) and other existing housing commitments are incorporated into the district target. The final report should not treat CB12M as though it is starting from zero. Existing and already approved housing growth should be identified separately from additional growth contemplated by the new strategy.

3. Provide a CB12M affordability breakdown

Housing production targets should be accompanied by clear affordability targets by income level. CB12M requests district-level information for extremely low-, very low-, low-, moderate-, and middle-income households, as well as targets for deeply affordable, supportive, senior, family-sized, and accessible housing.

4. Establish a district-level preservation target

New construction must be paired with preservation. CB12M requests a five-year preservation target for the district covering rent-regulated housing, HPD-regulated affordable housing, affordable housing regulated by the NYC Housing Development Corporation, NYCHA, Mitchell-Lama, HDFCs, and other publicly supported housing at risk of loss or deterioration.

5. **Make anti-displacement a measurable fair-housing outcome**

The final plan should include district-level measures of displacement and housing instability, including evictions, Housing Court activity, rent increases, loss of rent-regulated units, tenant harassment, homelessness, and housing-cost burden. CB12M requests annual reporting on these indicators.

6. **Match housing growth with investment in infrastructure and public services**

Housing growth must be accompanied by adequate investment in infrastructure and public services. For CB12M, the City should identify anticipated needs and corresponding investments related to schools, transit, parks and open space, sewer and water infrastructure, streets and sidewalks, healthcare, childcare, senior services, homeless services, community facilities, sanitation, and emergency services.

7. **Integrate NYCHA into the fair-housing growth strategy**

NYCHA residents and developments should be treated as an integral component of the district's housing strategy. CB12M requests a district-level assessment of NYCHA capital needs, repairs, vacancies, accessibility, housing conditions, and planned investment.

8. **Address accessibility and the needs of seniors, families, and people with disabilities**

The final plan should identify measurable housing targets for accessible units, senior housing, family-sized apartments, and supportive housing. Fair housing should include the ability of residents with disabilities, older adults, families with children, and people experiencing homelessness to obtain and remain in appropriate housing within their existing or preferred community.

9. **Provide a public-land and community-facility strategy for CB12M**

The City should provide an inventory of publicly owned or controlled sites in CB12M that could support affordable housing, supportive housing, senior housing, homeless housing, or mixed-use developments incorporating needed community-serving uses.

10. **Create annual Community District accountability reporting**

CB12M requests an annual Fair Housing Growth Report update specific to our Community District that describes the production of new market rate, affordable, and deeply affordable housing (disaggregated by AMI), the number of affordable units preserved, displacement indicators, evictions effectuated and prevented, and homelessness, The report should also detail investment in NYCHA and infrastructure.

11. Coordinate implementation with Block by Block

The City should clearly explain how CB12M's specific community district target relates to the current mayoral administration's Block by Block housing initiative and other HPD/DCP programs. District-level reporting should identify which projects and investments are counted toward each initiative and avoid double-counting.

12. Create opportunities for meaningful community participation

Community boards should remain strategic partners in implementation. CB12M requests regular briefings from HPD and DCP on progress regarding projects other than the FHGS, like upcoming development and land-use actions, affordability outcomes, preservation risks, and infrastructure needs.

V. Conclusion

CB12M supports the City's effort to address the housing crisis and establish a more equitable distribution of housing opportunities throughout New York City. At the same time, Washington Heights and Inwood must not be viewed solely as places where additional housing can be produced.

A successful fair-housing strategy for CB12M must combine new housing with deep affordability, preservation, tenant protection, anti-displacement measures, infrastructure, public services, accessibility, and transparent accountability. The final strategy should recognize the community's existing housing contributions and provide the data and resources necessary for CB12M to monitor implementation.

The Board appreciates the opportunity to provide these comments and looks forward to continued engagement with HPD, DCP, elected officials, residents, and community organizations as the City finalizes and implements the Fair Housing Growth Strategy.

Sincerely,



Anthony Viola
Chairperson
Community Board 12-Manhattan

CC: Indiana Porta, Chair of Housing & Human Services, CB12M
Lisette Taveras, Vice Chair of Housing & Human Services, CB12M

Hon. Zohran Mamdani, Mayor, NYC
Hon. Jumaane Williams, Public Advocate
Hon. Brad Hoylman-Sigal, MBPO
Hon. Julie Menin, Speaker
Hon. Shaun Abreu, Majority Leader
Hon. Carmen De La Rosa, Councilmember