



# NOT ALL HOUSING UNITS ARE CREATED EQUAL

**A Report on the Relationship Between Rezoning, Affordable Housing, and Racial Equity in New York City**

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**Association for  
Neighborhood  
& Housing  
Development**



# EXECUTIVE SUMMARY

## FINDINGS & RECOMMENDATIONS

The Association for Neighborhood and Housing Development (ANHD) produced this report to inform communities, community-based organizations, elected officials, government agencies, planners, developers, and allies of the impact of zoning actions on new residential housing and affordability. This report comes at an especially important moment, as a new incoming political landscape will shape the land use and development environment in New York City for the next decade.

Rezoning as tied to residential development have been a contentious issue and an intense topic of debate in New York City over the past two decades. This report seeks to provide data and analysis that inform the public dialogue by considering the geography of new housing production since 2014 in relation to both rezonings and race and income demographics.

This report examines how much new residential construction has been completed within rezoning and non-rezoning areas since 2014, and how the ratio of affordable to market rate housing and the percentage of deeply affordable units have varied between them. We then go further and classify NYC's Community Districts (CDs) into four typologies based on racial and income demographics to consider how

development and the ratio of new affordable to new market rate housing has varied between these typologies.

The ratio of affordable to market rate housing and the percent of affordable housing that is deeply affordable has varied significantly across rezoning types and types of community districts. This ratio matters and is of primary importance to ANHD and our member organizations in considering how effective an action is at producing affordable housing and how its impacts are felt in different neighborhoods.

Unlike the Department of City Planning, we do not start with the assumption that a new unit of housing, regardless of its affordability level, is always a positive, or that its effects filter down to benefit those most in need. We do not believe that any and all additional housing units are necessarily additive and in furtherance of our city's and neighborhood's affordability needs.

**This report finds that agency site rezonings have been most effective at producing a high ratio of affordable to market rate housing, while neighborhood rezonings have been least effective. Only agency site rezonings have created affordable housing at both a higher ratio of affordable to market**



rate units and a larger percentage of deeply affordable units, than the numbers citywide. **Neighborhood rezonings have produced both a smaller ratio of affordable to market rate units and a smaller percentage of deeply affordable units.**

Neighborhood rezonings must be applied carefully, only in neighborhoods with low displacement risk where they would help increase, not decrease, the ratio of affordable to market rate housing. **We find neighborhood rezonings would be most beneficial in Majority White/Moderate- & High-Income community districts and least beneficial in Majority Black Indigenous People of Color/Low Income community districts.**

In analyzing community districts based on racial and income demographics, **we find that only those that are Majority Black Indigenous People of Color (BIPOC) / Low Income have produced affordable housing at a higher ratio than the numbers citywide, and most of that affordability has been achieved outside of neighborhood rezonings.**

Rezonings should only be used in these BIPOC/LI CDs where they would help increase that ratio and increase the percentage of deeply affordable units that serve the needs of the median household – meaning avoiding neighborhood rezonings and focusing on agency site rezonings or deeply affordable private site rezonings instead. Out of the remaining CD types, we find Majority White/Moderate & High Income (W/MHI) community districts

have the largest number of CDs below the citywide affordable to market rate ratio. Applying a broader range of rezonings in these types of CDs – neighborhood, private and agency – would generally help to increase that number.

To determine how much housing has been completed since 2014, this report joined DCP Housing Database data with Housing New York data and filtered to include only those developments with at least a temporary Certificate of Occupancy (additional details are in the Methodology section). To determine where housing was completed by rezoning type we used the zoning map amendments shapefile in the NYC GIS Zoning Features data set, filtered to include only those adopted on or after January 1, 2002. We identified neighborhood rezonings and neighborhood rezoning types by using Leo Goldberg’s work in his 2015 urban planning thesis, *Game of Zones*, and expanded on this to include rezonings approved under Mayor Bill de Blasio. We identified site rezonings as all non-neighborhood rezonings, distinguishing between those initiated by a city agency and those initiated by a private entity. Community district typologies were created using racial and median income demographics from [ANHD’s 2020 Housing Risk Chart](#).

# FINDINGS

- Since 2014, 19% of completed housing units citywide are affordable; 81% are market rate; of the affordable units completed, 28% are deeply affordable (serving 50% AMI and below).
- This ratio of affordable to market rate housing and the percent that is deeply affordable is not equal across rezoning types:
  - Only agency site rezonings and private site rezonings have produced affordable housing at a higher ratio than 19%.
  - Agency site rezonings have by far the highest ratio of affordable to market rate units (59% affordable) and the highest percentage of deeply affordable units (34%).
  - Neighborhood upzonings/hybrid rezonings, non-rezoning areas and neighborhood downzonings have produced affordable housing at a lower ratio than 19%.
  - Neighborhood upzonings/hybrid rezonings and neighborhood downzonings have also produced the lowest percentage of deeply affordable units.
  - While non-rezoned areas have a lower ratio of affordable to market rate units, they have the second highest percentage of deeply affordable units (32%).
- Majority Black Indigenous People of Color/ Low Income (BIPOC/LI) community districts have produced the highest number of affordable units and the highest ratio of affordable to market rate units; these are the only CD types that have produced affordable housing at a higher ratio than 19%, with the highest number of affordable units completed in non-rezoning areas.
- None of the other CDs types have produced affordable housing at a higher ratio than 19%; out of these remaining CD types, Majority White/Moderate & High-Income (W/MHI) community districts have the largest number of CDs below this threshold.

Our findings highlight the fact that different rezoning types have had different outcomes in the ratio of affordable to market rate housing they've produced. This ratio has also varied across community districts as classified by racial and income demographics. Our recommendations are intended to point the way towards an approach to using rezonings as an affordable housing tool that takes both these factors into account. It would mean moving away from a focus on the total number of affordable and market rate units produced and considering instead the impact that the ratio between them can have in different types of neighborhoods.

# RECOMMENDATIONS

**1. Apply more agency site rezonings, with a high ratio of affordable housing and deeply affordable housing, wherever possible.**

**2. Apply neighborhood upzonings/hybrid rezonings where they would bring a higher ratio of affordable housing than exists today, which the data shows is primarily Majority White/ Moderate- & High-Income community districts.**

**3. Do not apply neighborhood upzonings/ hybrid rezonings in neighborhoods where they would bring a lower ratio of affordable housing than is being produced today, which the data shows is primarily Majority Black Indigenous People of Color/Low-Income community districts.**

**4. Approve private site rezonings on a case-by-case basis only where they would bring a higher ratio of affordable housing than exists today.**

ANHD's recommendations center racial and economic equity in the City's decision making and goals - understanding that rezonings are just one tool for affordable housing and they should only be applied where they would do the most good, by bringing a higher ratio of affordable housing than is being produced today with a minimum of negative impact. Any pathway towards a most just and equitable city requires increasing density in whiter, higher income communities and ensuring a portion of that new density is affordable. We cannot continue to place the affordability responsibility on our BIPOC communities. ANHD's hope is that this report provides the diverse and growing number of voices across the city with the information and possible solutions on moving NYC towards a more equitable distribution of development and affordable housing and in furtherance of land-use justice. ■

**The Association for Neighborhood & Housing Development (ANHD)**

[www.anhd.org](http://www.anhd.org)

