



ANHD Comments on the Fair Housing Growth Strategy

September 9, 2026

The Association for Neighborhood and Housing Development (ANHD) was heavily involved in passing the Fair Housing Framework law in 2023. We have long advocated for a more equitable distribution of new housing development throughout the city and see the Fair Housing Growth Strategy as a key step in advancing this goal and moving us towards a more comprehensive approach to how we plan as a city.

We supported the legislation because of the nuanced and detailed look it mandated in assessing needs and determining targets, not just for housing overall but for *affordable housing*, *deeply affordable housing*, and *housing serving formerly homeless households*. The approach mandated in the law recognizes the difference in housing needs for different groups - including across income levels, rent burden, and housing status - and the need for targeted housing types to best address them.

Having reviewed the draft we have significant concerns that the draft Fair Housing Growth Strategy is not following this mandate and is therefore not fulfilling the intention of this legislation.

We have addressed our comments to the different report sections below.

Long Term Housing Need Assessment

Our largest concern is with the long term housing need assessment (HNA) as it establishes the fundamental data that informs the citywide and community district targets. The current draft report does not seem to undertake the type of analysis that is required by the law.

The legislation states that the long term housing need assessment shall include:

- a citywide assessment of the total number of housing units, affordable housing units, deeply affordable housing units, and housing serving formerly homeless households that such agency determines is needed to provide housing opportunity for households of all socio-economic levels. Such analysis shall consider, among other factors deemed relevant by the administering agency: expected changes in total population, jobs, and housing units; demographic trends in the composition of the city's population, including aging; overcrowding and prevalence of rent burdened households; and other relevant data from the equitable development data tool.

The HNA in the draft report only includes an assessment of the total housing units needed (700,000) and does not include an assessment of affordable housing units, deeply affordable housing units, or housing serving formerly homeless households. While the draft report does include the affordable housing *commitments* in the Mamdani Administration's Block by Block Housing Plan this is not the same as a detailed *assessment* of the city's affordable housing needs.

For this report to be effective the HNA must include a detailed assessment of housing needs for these different types of housing: affordable housing, deeply affordable housing, and housing serving formerly homeless households.

At a minimum, these should be incorporated into the 3-step approach the report takes to identify total housing needs by including some of the considerations specifically named in the legislation. To detail a few examples:

- The 101,000 homes needed to *Achieve a healthier vacancy rate that gives people options*, should be broken down into the number of units needed at the different rent levels displayed on Slide 7 (pulling from the Housing and Vacancy Survey) based on household incomes and rent burdens citywide to determine how many of those 101,000 units would need to be affordable or deeply affordable to achieve a healthy vacancy rate, to be included in the final need assessment for both those housing types.
- The 53,000 homes needed to *House all families and individuals experiencing homelessness* should be included in the total need for housing serving formerly homeless households.
- The 240,000 needed to *Plan for population growth*, should detail what the estimated new population might look like in terms of income and race, among other factors, and what types of housing would be needed to best serve them, with identified needs for affordable and deeply affordable units included in the final needs assessment for both those housing types.

We understand the number of housing units needed across these housing types will likely be larger than the commitments the City has made in Block by Block. But the intention of the legislation is for this report to serve as a data driven planning product that identifies the true housing need in the city, to arrive at a collective understanding of what it will take to actually house those in need, and help guide City policy to get there.

Housing Production Targets

Citywide Targets

These flaws and gaps in the report's HNA then lead directly to the problems in the second section, which provides housing production targets (HPT). Since the HNA was not broken out by housing types, the report is not clear on how the citywide targets set for affordable, deeply affordable, and housing for formerly homeless households are responsive to the city's actual need. Instead the report arrives at these targets by simply setting a formula for a percentage of the total unit need that was identified citywide: 25% of the total citywide need for the affordable targets; 30% of the affordable targets for the deeply affordable targets; 50% of the deeply affordable targets for the housing serving formerly homeless households. No explanation is given for how these percentages were arrived at - nor do they match the commitments made in Block by Block.

For this report to be effective the HPT must include targets for affordable housing, deeply affordable housing, and housing serving formerly homeless households that are actually responsive to the needs established in the HNA and are not simply an unexplained percentage of the total need identified.

Community District Targets

When it comes to setting the Community District targets the report again seems to leave out crucial considerations that are required by the law. The legislation states that:

- In determining such targets, the administrating agency shall consider, among other factors it deems relevant:
 - (a) The total number of housing units, affordable housing units, deeply affordable housing units, and housing serving formerly homeless households produced over the previous 10 years;
 - (b) A community district's status as a limited affordability area or a high displacement-risk area;
 - (c) Relevant data from the equitable development data tool or other sources on access to transit, employment opportunities, open space, and other neighborhood amenities and public services; and
 - (d) Impacts associated with climate change.

In setting its Community District targets the report only looks at two of these considerations: the total number of housing units produced over the previous ten years, and the district's status as a limited affordability area.



There is no consideration in the report in the Community District target setting to:

- The number of affordable, deeply affordable, and housing serving formerly homeless households, produced over the previous ten years
- A district's status as a high-displacement risk area
- Any relevant data on access to transit, employment opportunities, open space, and other neighborhood amenities and public services
- Impacts associated with climate change

Leaving out these considerations runs counter to the requirements and intentions of the legislation, which is to provide a nuanced and equity focused distribution of the citywide targets across Community Districts that takes into account a host of planning factors.

For this report to be effective the HPT for Community Districts must include the additional considerations named in the legislation and detail how they inform the targets for all the housing types for each district.

Strategic Equity Framework

The Strategic Equity Framework (SEF) includes a variety of thoughtful proposals to address real barriers to fair housing, aligned with last year's Where We Live report and the Block by Block Housing Plan. However it's notable that this section seems to be mostly disconnected from the HNA and HPT sections that precede it. This is largely because of the gaps in analysis that are missing from the HNA and HPT. To give a few examples:

- To address the issue that *Many NYC neighborhoods only have a few housing types* (Slide 47), the SEF identifies strategies for *Neighborhoods where opportunities are limited based on the housing types available there today* - yet absent the type of detailed analysis we are calling for in the HNA, it isn't clear what neighborhoods these might be.
- To address the issue that *People and neighborhoods need more than just housing* (Slide 55), the SEF identifies strategies for *Neighborhoods with high concentrations of affordable housing*, but again, absent any earlier analysis, it isn't clear what neighborhoods these are.

For this report to be effective the SEF should better respond to the HNA and HPT sections and reference the more detailed assessments and target setting that we are calling for.

Conclusion

ANHD believes in the potential of the Fair Housing Growth Strategy. It is vital and important to set housing targets citywide and across Community Districts to achieve a more equitable distribution of housing development and address long-standing inequities to housing access across income, race, and a host of other demographics. However for the Fair Housing Growth Strategy to truly be effective and fulfill the intention of the legislation, it is imperative that the final draft include:

- **A detailed assessment of housing needs in the HNA for these different types of housing: affordable housing, deeply affordable housing, and housing serving formerly homeless households - as informed by the considerations listed in the legislation.**
- **Targets for affordable housing, deeply affordable housing, and housing serving formerly homeless households in the HPT that are actually responsive to the needs established in the HNA and are not simply an unexplained percentage of the total need identified.**
- **The additional considerations named in the legislation for the HPT for Community Districts with details as to how they inform the targets for all the housing types for each CD.**
- **An SEF that better responds to the HNA and HPT sections and references the more detailed assessments and target setting that we are calling for.**

We understand that the first draft has been released as a slide deck and so might not be presenting all of the full underlying analysis behind it, but it's hard to evaluate and provide productive critique when so much data is missing. We urge HPD and DCP to incorporate our suggestions into the final draft to help achieve a plan that truly advances equity and fair housing for our city.