

**Written Comments on Green Fast Track for
Housing
from The Association for Neighborhood &
Housing Development (ANHD)
2/16/24**



Thank you Chair Garodnick and Commissioners for the opportunity to submit written comments on the proposed Green Fast Track for Housing rule change. The Association for Neighborhood & Housing Development (ANHD) is a membership organization of NYC neighborhood-based housing and economic development groups, including CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development advocates and service providers. Our mission is to build community power to win affordable housing and thriving, equitable neighborhoods for all New Yorkers. We believe housing justice is economic justice is racial justice.

ANHD does not support this rule change as currently written. To better support and incentivize the creation of affordable housing and good paying industrial sector jobs we recommend two modifications:

1. This rule should only apply for actions that will enable majority-affordable developments, particularly in R5-R10 districts
2. This rule should not apply in Manufacturing Districts within Industrial Business Zones

Our concerns are related to two general positions at ANHD:

- Our priority is in incentivizing and making it easier to build mission-driven affordable housing; we do not generally advocate for increased housing supply without this focus
- As part of our industrial advocacy work, we do not wish to make it easier to move residential rezonings/conversions in Industrial Business Zones

ANHD recognizes the need for more housing supply, but this need is not evenly spread across household types. The percentage of households who are rent burdened and severely rent burdened varies dramatically by income. The poorest New Yorkers are the most burdened, the most housing insecure, and face the most difficulty in finding affordable homes. The latest Housing and Vacancy Survey data confirms this: though the overall prevalence of rent burden in New York City declined for the first time in several survey cycles, rent burden levels continued to rise for households making under \$70,000 a year (the median renter household in NYC), with a median rent to income ratio of 54% - meaning the typical renter household in 2023 was severely rent burdened. Among households earning less than \$50,000 who didn't benefit from

means-tested housing, 86% per rent-burdened - while only 9% of households making over \$100,000 were rent-burdened.

These lower-income households are the same ones facing an ever growing wave of evictions and the same ones who are not being served by the vast majority of new housing that is being built. It is imperative that the City focuses its efforts on serving these households, including through zoning, tax incentive programs, and planning mandates that incentivize the creation of majority-affordable housing at rents affordable to low income households. This proposed rule change must take that same approach, by only applying to majority-affordable developments, particularly in R5-R10 districts.

At the same time it is vital that this new housing supply does not come at the expense of good-paying industrial sector jobs. Industrial jobs offer high wages, low barriers to entry, and opportunity pathways for a workforce that is 80% workers of color and over 50% foreign born. Preserving and growing these jobs lies at the heart of a true equitable economic development strategy. Yet the industrial sector remains continually under threat, in part from the shrinking amount of land where industrial uses are allowed and can viably compete with other uses. It is essential that Industrial Business Zones remain as areas for industrial use and one key way to do this is to not make it easier to rezone for residential in IBZs. To help ensure this, this rule should not apply in Manufacturing Districts within Industrial Business Zones

Thank you for your time and consideration.