THE NEW YORK LANDMARKS CONSERVANCY

September 18, 2026

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY REGARDING THE FAIR HOUSING GROWTH STRATEGY DRAFT REPORT

The New York Landmarks Conservancy is a 53-year-old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods. Historic buildings benefit New York by providing affordable housing, creating jobs, encouraging economic activity, and improving quality-of-life.

We have a long record of supporting existing housing that is affordable and the conversion of underutilized commercial, institutional and other types of buildings into more affordable housing. We support comprehensive planning that creates certainty for New Yorkers.

But we cannot support the Fair Housing Growth Strategy Report. This strategy will lead to the demolition of buildings in historic districts and surrounding areas, especially the older smaller buildings that often contain less expensive apartments. These buildings play an important role in New York's neighborhoods, contributing to affordability and sustainability.

The Local Law that required the City to produce this report called for housing targets for each Community District. The law instructed that the targets be determined by using planning criteria such as transit and job access, open space, and public services. But the report didn't do that. Instead of looking back at recent neighborhood rezonings and environmental reviews, and basing reasonable, nuanced growth targets on this past work, the strategy applies a nearly one-size-fits-all approach to the entire City. It established housing targets based solely on recent new construction. Then it set a five-year, City-wide target and applied it, roughly evenly, to the entire City, regardless of existing conditions.

Many neighborhoods which have historic districts are already the densest and the most crowded. They are almost completely built-out and will not be able to accommodate the new construction targets without extensive demolition. The Fair Housing Growth formula does not recognize this. The targets will put more development pressure on these historic districts and surrounding areas, especially the older, smaller buildings that often contain smaller, less expensive apartments.

The Upper East Side had 138,922 units in 2020 and 140,545 housing units in 2025, showing net growth of 1,623 units and growing 1.2% in the most recent five-year period. The report is calling for this neighborhood to grow 9.1% in the next five year period, or an increase of 12,725 units by 2030. This would be an 800% increase in housing unit growth for the district.

The Upper West Side also faces great challenges. It had 126,397 units in 2020 and 127,215 units in 2025. This means that in the most recent five- year period the district added 818

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net units, growing 0.6%. The report is calling for the UWS to grow 7.9% in the next five year period, or an increase of 10,075 units. That would be a 1,200% increase in housing unit growth for the district.

The Conservancy supports appropriate new construction in historic districts and we have testified in favor of many such proposals at the Landmarks Commission. However, adding the equivalent of another borough to the entire City or a few hundred supertall towers to any neighborhood will put untenable strains on infrastructure and services.

These targets are unrealistic. The City should go back to the drawing board and create targets that are substantive and reflect real world conditions to plan for growth in neighborhoods that can accommodate it. Thank you for the opportunity to express the Conservancy's views.

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