



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

Date: March 31, 2026

City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271
Via email: planningrules@planning.nyc.gov

AND

Board of Standards and Appeals
22 Reade Street Room/Floor: 1st Floor
New York, New York 10007

RE: Comments on Affordable Housing Fast Track Amendments

Dear City Planning Commission and Board of Standards and Appeals,

The Historic Districts Council is the citywide advocate for New York's historic neighborhoods. We work to ensure the preservation of significant historic neighborhoods, buildings and public spaces in New York City, uphold the integrity of the New York City Landmarks Law and further the preservation ethic. HDC believes preservation and development can go hand in hand, especially in cases where preservation can be used to maintain existing affordable housing or be a tool to create new housing in historic structures.

[According to HDC's own report in 2025](#), it has been widely noted that "forty percent of the buildings in Manhattan could not be built today," because they don't conform to current zoning standards. Reinvesting in historic affordable housing by converting overbuilt but underutilized existing buildings into new housing, yields more housing units than new construction could achieve. Such buildings could range anywhere from office buildings to hotels, schools, and so much more.

Additionally, we know from landlords, tenants, and policy makers, that much of our affordable housing stock in historic neighborhoods is in danger of being lost. The buildings in which much of this housing is located face decades of deferred maintenance, much needed repairs and modernization, and shrinking capital funding sources, especially at the federal level. Many of the affordable housing projects were important turning points in history during which communities created new models of housing that were run by and beneficial to them, especially during times of financial crises.

The current “Fast Track” program does not consider supporting existing models of the affordable housing landscape in the city such as rent-stabilized buildings, shelters, and supportive housing, it only incentivizes the creation of new housing at the expense of all else. [According to a report by PlaceEconomics for the Landmarks Conservancy](#), the densest neighborhoods in New York City are historic districts across all five boroughs. By scapegoating and displacing neighborhoods with a large amount of existing affordable housing in the name of new housing buildings, the city will create more problems than it may fix.

Much of this housing was built 50 to 100 years ago and is located in neighborhoods with substantial intact historic fabric that could be eligible for listing on the National Register of Historic Places. Unlike NYC landmark designation, which protects valuable historic fabric but does not offer building owners any financial benefits, listing on the National Register can provide access to federal and state historic tax credits, which can be a significant source of capital subsidy for renovating older buildings. HDC is working actively to identify these places and help list them on the National Register now so they can access these tools.

HDC supports the creation of new affordable housing alongside the preservation of existing historic housing. In solidarity with our fellow preservation groups, we believe that Fast Track must result in meaningful affordability, driven by history and community revitalization. The city must not use means like Fast Track to accelerate development that primarily benefits luxury housing and erases existing affordable units.

Sincerely,



Frampton Tolbert
Executive Director