

**New York City Department of Housing Preservation and Development
Testimony**

**to the New York City Council Committees on Housing and Buildings and Land
Use regarding Oversight of**

the Affordable Housing Development Pipeline and Introductions 362 and 1031

Tuesday September 26, 2023

Good morning, Speaker Adams, Chair Sanchez, Chair Salamanca, and members of the Housing and Buildings and Land Use Committees. I am Adolfo Carrion, Commissioner of the New York City Department of Housing Preservation and Development (HPD). I am joined by my colleagues Ahmed Tigani, First Deputy Commissioner and Chief Diversity Officer, Kim Darga, Deputy Commissioner for Development and Lucy Joffe, Associate Commissioner for Housing Policy. Thank you for the opportunity to be here to discuss HPD's fair housing work as well as the legislation being heard today.

The City is committed to building and preserving low-cost and affordable rental housing in every neighborhood to help address our longstanding housing shortage and to affirmatively further fair housing. In October 2020, we released Where We Live NYC ("Where We Live"), the City's comprehensive fair housing plan. Where We Live was based on six years of work including community engagement, data analysis, policy analysis and goal setting. Our charge in that process was to identify "meaningful actions...[to] overcome patterns of segregation and foster communities free from barriers that restrict access to opportunity based on protected characteristics." During the community engagement phase of developing Where We Live, the agency held more than 62 community conversations across the five boroughs in 15 languages. In addition to these conversations, we established new avenues of communication with the public through a set of interactive online tools that enabled us to hear from people who traditionally have been left out of the conversation. We spoke to more than 700 New Yorkers and 150 organizations in formulating this plan.

The essence of fair housing is having meaningful choice. Every New Yorker should have access to housing in the neighborhood that best fits their needs. And yet, it was very clear through our Where We Live NYC analysis that too many New Yorkers face a wide range of obstacles to fair housing and, as we discussed in the plan in detail, our city is still very segregated, especially by race. Consequently, we committed to a multi-pronged approach to achieving our fair housing goals, as expressed in the six goals, 25 strategies and 81 commitments in the plan.

Most relevant to today's hearing and the proposed legislation is the goal to "facilitate equitable housing development in New York City and the region." We need to build more housing citywide to alleviate our extreme housing shortage. The Mayor and this administration have set a moonshot goal of facilitating the development of 500,000 new homes over the next 10 years to address this crisis. To achieve our fair housing goals, where we build and the types of housing we build matters. New York is a diverse city, and with that diversity comes a wide range of housing needs and wants. Some New Yorkers value living near their preferred school or accessible public transportation, some want to be near their jobs, doctors, churches, synagogues, or mosques, parks and other public spaces, and family and friends. To ensure that all New Yorkers can choose the housing and the neighborhood that best fits their needs, there must be housing of all types in every neighborhood. Unfortunately, new housing development has been inconsistent across the city.

In Where We Live, we made twenty commitments toward achieving equitable housing development in the city and the region. Nineteen of those twenty commitments are in progress or already complete. Specifically, we have begun to focus on the parts of the city that lack low-cost housing, and as such are not accessible to low-income New Yorkers, in order to understand the specific obstacles that stand in the way. These "limited affordability areas" are the neighborhoods that have the least amount of low-cost housing, which we define as housing that would be affordable to households earning less than 60 percent of area median income.

We can begin to address the lack of low-cost housing by building new affordable housing in these limited affordability areas. Toward this end, the City rezoned Gowanus and SoHo/NoHo, which will bring up to 3,900 new permanently affordable homes to these neighborhoods. We also added points in the Qualified Allocation Plan for proposals in limited affordability areas; this is the process by which the city sets

out criteria and priorities for the allocation of federal Low Income Housing Tax Credits. We also added limited affordability areas to the Mayor's Management Report so that New Yorkers can track our progress in financing affordable housing in these neighborhoods.

To tackle many of the obstacles to equitable housing development and to achieve our fair housing goals, we need local and state partners. We have been fighting for an as-of-right new construction tax incentive with deeper affordability because it is one of our primary tools for developing affordable homes in the city's high-cost neighborhoods. We have been advocating for changes at the state level to create a path to legalize existing basements and create new accessory dwelling units. The Department of City Planning is leading collaborative work on the City of Yes for Housing Opportunity text amendments to simplify and modernize the Zoning Resolution to facilitate equitable housing development, citywide. We also need legislative and regulatory action at the local and state level and the support of elected leaders and their constituents for neighborhood-wide and project-specific land use actions.

The success of Where We Live was driven by the participation of a wide range of New Yorkers, advocates and elected officials. We are committed, over and above our legal requirement, to complete the next iteration of Where We Live NYC. We released this plan in October 2020, and equitable housing development will remain at the forefront of our strategy. We will continue to do the community engagement, data analysis, policy analysis and policy development required to meaningfully assess the progress we've made and advance our fair housing goals even further. We look forward to working closely with the Council, our partners at the state level, and members of the public to ensure that we bring the same level of data-driven decision-making, community engagement, and accountability to our next round of commitments.

At this time, we would like to turn to the legislation which is the subject of today's hearing. On Int. 362, we agree that transparency into HPD's programs and processes is important, and we look forward to working with the Council to ensure that New Yorkers understand the process for financing affordable housing. While the bill contains some reporting requirements that HPD cannot fulfill based on our current systems and the availability of information that only can be obtained at certain times

during the development cycle, we already report most of this data and look forward to working with you to make sure this information is as current and as accessible as possible at any moment.

We support the goals of Int. 1031. We welcome accountability and partnership with the Council to achieve our fair housing goals. We look forward to working with the you to address these critical issues.

We are grateful for the productive work we have been able to accomplish with this committee and the Council, especially as we together address the critical housing needs of New Yorkers. Thank you for the opportunity to testify today, and we look forward to your questions.



JUMAANE D. WILLIAMS

**TESTIMONY OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEES ON HOUSING AND
BUILDINGS AND LAND USE
SEPTEMBER 26, 2023**

Good morning,

My name is Jumaane D. Williams, and I am the Public Advocate for the City of New York. I would like to thank Chairs Sanchez and Salamanca and members of the Committees on Housing and Buildings and Land Use for holding this important hearing on affordable housing in New York City.

Exacerbated by the COVID-19 pandemic, the housing crisis in New York City has progressively worsened over the past few years. The cost of rent and necessary goods like groceries have increased across all five boroughs making it more difficult for everyday New Yorkers to meet the standard cost of living; today, New York City is the most rent-burdened metro area in the U.S. with more than 50% of New Yorkers spending more than thirty percent of their income on rent, a third paying more than fifty percent of their income. But instead of recognizing these sacrifices, the struggle to make ends meet, the Rent Guidelines Board has voted to increase rents for the past two consecutive years. These hikes coincide with our rent-stabilized housing stock disappearing, evictions on the rise and budget cuts for our housing agencies amidst continued rates of understaffing.

A number of solutions have been discussed from building more affordable housing to the conversion of commercial office buildings to the legalization of accessory dwelling units (ADUs). While I do support these endeavors, we must ensure that throughout these discussions, deep and accessible affordability is prioritized. With a worsening homelessness crisis and an influx of asylum migrants into our city, it is imperative that we uplift our most vulnerable. That means renewing investments in NYCHA, ensuring that our supportive housing is servicing at-risk populations, that our social services are fully staffed and equipped with the resources necessary to support New Yorkers and migrants alike- not cut so deeply they cannot function.

Our State partners must also aid New York City by passing common-sense measures like Good Cause Eviction, the Housing Access Voucher Program (HAVP), modifying the Multiple Dwelling Law for facilitated conversions of commercial buildings and accessory dwelling units, and enacting AffordabilityPLUS to modernize HPD's lending abilities.



JUMAANE D. WILLIAMS

I have been a housing advocate throughout my entire career and this crisis we face today is the worst it has ever been since I started as an organizer. We owe our constituents, our neighbors, families and friends housing that is liveable and affordable. I look forward to hearing the discussions that take place today, thank you all for your time and attention.

The Real Estate Board of New York to The New York City Council Committee on Housing & Buildings Regarding the Affordable Housing Development Pipeline

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY thanks Chair Sanchez and members of the committee for the opportunity to testify today on a slate of bills regarding an affordable housing development pipeline and the creation of a fair housing plan.

New York City is in the throes of a housing crisis, marked by a severe lack of new production and, consequently, an absence of affordable housing needed to meet the city's diverse socioeconomic needs. REBNY's most recent [Construction Pipeline report](#) shows that in Q2 2023, 3,088 proposed multiple dwelling units were listed on job filings, representing a 60% decrease from the same period last year. Notably, the number of proposed units in Q2 2023 is 15% below the overall median and 29% below the average since Q1 2008.

Furthermore, according to REBNY's latest [Multi-Family Foundation Report](#) that provides a real time understanding of construction projects that are beginning work, there were 25 new filings in May 2023, remaining well below the monthly average of 83 filings in the first five months of 2022. Moreover, there were 413 filings in the first five months of 2022 and only 120 filings in the same period in 2023, representing a staggering 72% decline.

According to the [Department of City Planning](#): "Irrespective of the considerable spikes in 2015 and 2022 and NYC's contribution to the region's total permits, the overall production per capita in the region for the decade fell behind fast-growing U.S. metros, namely those in the Sunbelt like Orlando, Houston, Dallas-Fort Worth, Phoenix, and Atlanta." We are also behind metro regions like San Francisco-San Jose and Washington DC.

REBNY appreciates the Council's commitment to addressing the lack of affordable housing in New York City and to maximize the public benefit derived from new City-financed housing development. While increasing affordable housing reporting requirements and mandating the creation of an affordable housing plan would strengthen our understanding of the city's long-term housing needs, such measures alone will not adequately address the acute shortage of housing that drives the city's affordability crisis. To effectively tackle this crisis and develop lasting solutions, we must adopt a comprehensive approach that fosters collaboration amongst the city, state, and private sector.

BILL: Intro 362

TOPIC: The bill would require HPD to submit quarterly reports to the Council regarding affordable housing development projects that involve any form of City financial assistance.

SPONSORS: Council Members Salamanca, Louis, Hanif, Ayala, Restler, Abreu, Richardson Jordan, Sanchez and Riley

REBNY supports the Council's aims to better understand how the city invests in affordable housing and who benefits most from these investments. Improvements to HPD's reporting data will support more informed policymaking. The reporting requirements in this bill should be additive, not duplicative, to information already collected under Local Law 44 of 2012, and the Council should consider the utility of a quarterly report versus providing additional information in alignment with open data access. However, New York City's affordability crisis will persist without tools that allow supply to contend with demand.

BILL: Intro 1031

TOPIC: The bill would require HPD and DCP, with cooperation from any other relevant agency, to create and submit to the Mayor and the Speaker of the Council a fair housing plan every five years, with the first plan due January 2025.

SPONSORS: The Speaker (Council Member Adams) and Council Members Sanchez, Salamanca, Riley, Louis, Ayala, Powers, Abreu, Avilés, Bottcher, Cabán, De La Rosa, Dinowitz, Farías, Feliz, Gennaro, Gutiérrez, Hanif, Hudson, Joseph, Krishnan, Mealy, Menin, Moya, Narcisse, Nurse, Ossé, Restler, Rivera, Stevens, Ung, Velázquez, Williams, Won and Brewer

Like Intro 362, REBNY appreciates the Council's aim to improve New York City's affordable housing pipeline through production targets and a strategic equity framework. However, this bill is only one part of a larger solution.

As aforementioned, new construction has plummeted in recent years. Creating new housing requires collaboration between state and local governments and the private sector. To generate new affordable housing opportunities for New Yorkers, the State must create an as-of-right tax abatement. According to [NYU Furman Center](#), the majority of multifamily units, nearly 70%, completed between 2010 and 2020 were built using a 421-a exemption. Very few units are built without some form of support. The lapse of 421a in June 2022 has stalled the City's already low rate of housing production.

In addition, it is essential to understand how this measure will be enforced. Clear mechanics for enforcement and accountability must be in place to ensure the goals outlined in the bills are met. Intro 362 would require a citywide assessment of the total number and type of units that need to be produced or preserved to achieve affordable access to housing by households of all socioeconomic levels. Key questions to answer will include

how the Council and Mayor ensure that their determined number of units will be built, what happens if one or both agencies fail to submit the plan, and what happens targets fall short. It is incumbent upon DCP and HPD to develop robust internal reporting procedures.

The Council's proposed bills are just one part of a broader strategy that is critically necessary to tackle the affordable housing crisis effectively and efficiently. REBNY looks forward to working with this Committee and the entire City Council to make meaningful progress in ensuring every New York City resident has access to safe, affordable housing.

Thank you for your time and consideration.

CONTACT:

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Real Estate Board of New York



PUBLIC TESTIMONY OF THE WATERFRONT ALLIANCE

September 26, 2023

New York City Council Committee on Land Use and Committee on Housing and Buildings Oversight Hearing RE: Fair Housing and Affordable Housing Development.

Thank you for the opportunity to testify. Waterfront Alliance strongly supports the work of Association for Neighborhood and Housing Development (ANHD) and the Thriving Communities Coalition (TCC) in the call for a more equitable and systemic approach to planning in New York City to address the growing housing crisis.

Waterfront Alliance is an alliance of more than 1,100 organizations, businesses, and individuals, and we are the leader in waterfront revitalization, climate resilience, and advocacy for the New York-New Jersey Harbor region. We spearhead the Rise to Resilience coalition of 100+ groups advocating for making climate resilience an urgent policy priority and run the Waterfront Edge Design Guidelines (WEDG) program for promoting innovation in climate design - including housing.

We join our partners in applauding Speaker Adams, Council Member Salamanca, Council Member Sanchez, and the additional council member co-sponsors for this legislation that requires the City to regularly create Fair Housing plans.

The current housing crisis could have been predicted. Decades of disinvestment and racial marginalization led to inequitable planning decisions that created a crisis for many residents in New York as they seek to access affordable, safe, and quality housing. Breaking past the status quo requires us to move beyond decades of broken zoning and land use regimes causing displacement, displacement, and the deepening of inequities, and move towards nuanced housing production using the appropriate data and methodology to inform its fair housing plan. To do this, we need to improve this specific reform with additional reforms to strengthen community visioning, implementation, and accountability to ensure the success in creating fair housing for all.

We agree with the ANHD and the TCC in that the Fair Housing Plan legislation is an important step in creating the equity-focused planning. This legislation provides a new level of analysis that looks at questions of displacement and preservation alongside development and sets recommendations rooted in explicit racial and economic equity goals, which our government and our communities can then use as a transparent basis for decision-making.

However, as we begin to solve for this housing crisis, we should not let fix the broken standards of the past continue to cause disinvestment of critical housing infrastructure and planning in the future. In a time when the effects of climate change are becoming more severe in our region, with the increase in extreme rainfall events, extreme heat, and additional flood risks, it is critical that the Fair Housing Plan



Legislation also requires design strategies that protect residents from the impending climate risks and vulnerabilities. Activities such as siting, structural modification, and nature-based or integrated flood protection strategies should be included for adaptive management over time.

Building or retrofitting housing to withstand extreme weather events is a cost-effective way of adapting to a changing climate. In a city where flooding is considered among the biggest climate hazards to residents, this legislation should also consider requiring developers to move beyond the local design codes, which include outdated flood maps and data and may not fully address the flood risk, even if they do incorporate freeboard or sea level rise. Vulnerability assessments are necessary when developing additional housing.

The housing crisis will be exacerbated by the climate crisis in the historically disinvested neighborhoods who currently do not have the ability to withstand the increasing systems of extreme weather. By not accounting for building for climate resilience, we risk further marginalizing these neighborhoods. However, we believe this legislation is a fundamental step in moving us towards equity focused, comprehensive planning citywide. We look forward to working with the Speaker and the Council in the months and years ahead to build on this in ways that would:

- Empower communities with the resources, capacity, and process they need to put forward local land use plans for how they can best meet climate resilient housing goals.
- Expand this type of analysis and equity-focused goal setting to a host of other issue areas, such as economic development and responding to climate change.
- Strengthen implementation to ensure these equitable targets can be met.

We thank the Speaker and the Council for this important and forward-looking legislation and looking forward to building on its legacy together.

NYSFAH Testimony **Committees on Land Use and Housing and Buildings**

26 September 2023

NYSFAH is the trade association for New York's affordable housing industry statewide. Its 400 members include for-profit and nonprofit developers, lenders, investors, attorneys, architects and others active in the financing, construction, and operation of affordable housing. Together, NYSFAH's members are responsible for the vast majority of the affordable housing built across the City and State that uses federal, state and local subsidies and incentives. Founded in 1998, NYSFAH is the nation's largest affordable housing trade group.

Pipeline Oversight

To the credit of HPD and HDC, 2023 was a banner year for the financing of affordable housing, with record levels of production, particularly of extremely low income and supportive units. The affordable housing industry is proud to partner with New York City to house the most vulnerable New Yorkers.

Furthermore, we are working in partnership with the Administration to make the development process more efficient in order to maximize taxpayer resources. The longer it takes from closing to conversion, the more expensive projects are, as high interest rates on construction financing are a major burden on project budgets. By making the lease-up and loan conversion processes more efficient, we will preserve City capital and mitigate the effects of rising interest and insurance rates.

[**Int 0362-2022**](#) - CM Salamanca - Requiring the department of housing preservation and development to report on the disposition of city property for affordable housing development.

NYSFAH supports transparency around affordable housing finance and development. However, HPD has insufficient development staff at present and we are concerned that the proposed legislation would take time away from moving projects through the pipeline. Currently, Local Law 44 requires reporting on housing development projects and HPD also reports quarterly on the health of the housing pipeline. Given the large number of reports that local laws require HPD to produce already, it may be helpful to pair this legislation with the removal of existing less important requirements. It is impossible to speculate on or predict the housing pipeline until projects are completed because there are too many factors that impact production along the way.

[**Int 1031-2023**](#) - Speaker Adams - A fair housing plan, and to repeal local law number 133 for the year 2018, in relation to affordable housing plans.

NYSFAH supports the goals of this proposal; every community should allow the development of affordable housing. New York State has the most segregated school system in America, and this is largely a function of a segregated housing stock.



NEW YORK STATE ASSOCIATION FOR AFFORDABLE HOUSING

However, without state legislation, this legislation will not have teeth. More plans and more studies will not result in change on the ground without a builder's remedy or an as-of-right mechanism to allow affordable and mixed-income housing in high opportunity neighborhoods.

We need a broad, citywide target for overall production that sets simple, minimum targets for each Council District. It is also well within the power of the Council to solve the political problem of member deference without further plans and studies. To address the escalating housing crisis, we will need every Councilmember to bring fair housing to their district and be part of a solution that prioritizes the needs of New Yorkers that are in desperate need of safe, quality, affordable housing.

For questions regarding this testimony, please contact Jolie Milstein, President and CEO, at jmilstein@nysafah.org.



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September 27, 2023

Testimony in support of Intro No. 1031-2023 - Fair Housing Plan

Thank you Speaker Adrienne Adams, Chair Pierina Sanchez, Chair Rafael Salamanca Jr., and all the co-sponsors of Intro No. 1031-2023 for holding this hearing to discuss the importance of creating a comprehensive framework for addressing our City’s housing crisis. We are grateful for the opportunity to submit this testimony in support of Intro No. 1031-2023 to establish a Fair Housing Plan for the City.

My name is Maulin Mehta, and I am New York Director at Regional Plan Association (RPA), a role with big shoes to fill as Council Member Sanchez was my predecessor! RPA is a non-profit research, planning and advocacy organization that has been serving the NYC metropolitan region for over a century. We are driven by our values of health, equity, sustainability and prosperity to ensure the region works for everyone who calls it home. While we are known for our generational long-term plans, we work everyday to deliver insights and promote new projects and policies that will improve quality of life.

In our [Fourth Regional Plan](#), released in 2017, we provided a framework and set of recommendations to help make the region more affordable for everyone. The various recommendations center around the need to build more housing to keep up with demand, prevent displacement, and address our region’s history of segregation by furthering fair housing. As we noted in our 2017 report, [Pushed Out: Housing Displacement in an Unaffordable Region](#), displacement had become more and more a risk for low and moderate-income residents in amenity rich neighborhoods.

And the affordability crisis has only gotten worse post-pandemic, forcing more households to grapple with housing insecurity as the true cost of living continues to go up. Within our region, New York City has the highest proportion of households who are cost burdened - 48% - of which more than half are severely burdened ([See Figure 1](#)). Moreover, while segregation has declined in our region over the last decade - mirroring trends we see nationally - the New York region still has the highest level of Black-White and Asian-White segregation, and second highest level of Latino-White segregation of the twelve largest metro areas. ([See Figure 2](#))

Fair share systems – which require localities to calculate and meet affordable housing obligations – already exist in other parts of the tri-state region. While not perfect, New Jersey is considered to have the most robust, specifically since its enforcement was turned back to the judicial system in 2015. New Jersey’s fair share housing framework, known as the Mount Laurel doctrine, helped facilitate the state’s greater housing production, and affordable housing in particular. [A recent analysis](#) revealed that the last round of Mount Laurel is associated with adding 69,000 multifamily

units between 2015-2022 across 349 municipalities (i.e., 12.4 units per 1,000 residents). Unfortunately, New York does not have a similar framework in place, and so we have been unable to meet our housing needs to protect vulnerable New Yorkers from displacement.

That is why we have been so supportive of efforts to create a more comprehensive framework to address housing and other pressing issues confronting us today. Building off the [Inclusive City](#) work that Council Member Sanchez led in 2017-2018 during her time at RPA, we have been actively working with the [Thriving Communities Coalition](#) to find ways to reform land-use to better coordinate and plan for our future.

In the most recent State budget session, Governor Hochul proposed a statewide framework to address our housing crisis through growth targets and mechanisms to ensure all communities were doing their part to solve the problem. RPA, along with a number of partners through our [New York Neighbors](#) coalition, were actively engaged in trying to get that proposal approved. Unfortunately, that effort did not succeed in part due to entrenched ideas that communities can avoid their fair share of housing to support low and moderate income households who want access to better opportunities.

It turns to localities to continue to drive programs and policies to help create equitable housing policies that build more types of housing across more communities, especially those with good infrastructure and access to opportunities and amenities that have otherwise avoided adequate housing development. The Fair Housing Plan would create metrics and a framework for equitable housing growth, helping ensure that all entities approach housing development with an emphasis on sustainability and support for disadvantaged communities. The citywide assessment around displacement risk, climate vulnerability, infrastructure capacity and others in formulating community district level needs is critical to identifying implementation steps.

We are especially grateful for the inclusion of assessments that would identify the needs of specific vulnerable groups. For example, we know that [60% of older residents](#) in the region experience a much higher rate of housing cost burden, and that it is difficult in many places to build the type of modern, accessible and affordable housing needed to accommodate their goal to [age in place](#). Having a plan to help tackle housing disparities with a more granular understanding of various groups will be critical for advocates to help support development projects meeting the plan's goals across the City.

One of the biggest challenges we face is the ad hoc approach with which we approach planning. We have a fragmented system, with many processes and reporting requirements that do not necessarily speak to each other. Centering planning on addressing some of our most pressing equity issues would begin to address this coordination issue. We would like to see this effort go further in the following ways:

- Ensure community engagement and planning is properly funded and staffed to educate or train community boards and residents to engage more fully in the Plan's development.
 - Link the citywide needs assessment with other challenges the city, state and region is grappling with including transportation, [climate change](#), economic development, etc. - so that efforts we are undertaking can be more equitably addressed with collaboration outside the City's borders.
- [\(See Figure 3\)](#)

- Similarly to what other advocates have expressed - incorporate additional indicators beyond what is analyzed through the EDDE so that we can more comprehensively assess the factors and investments needed to improve quality of life and access to opportunity.
- Identify efforts - through Charter Reform or otherwise - that would help commit funding and streamline development and foster interagency coordination that aligns with the Fair Housing Plan. This is especially critical since, as noted in the committee report, the City has lost over half a million low-rent apartments from 2008 - 2021 and we are far from meeting the pace and scale needed to address our housing crisis.

Thank you for your time and consideration of this testimony. As always, RPA stands ready to serve as a resource to help implement ideas like this that will help create a more equitable City and region.

Maulin Mehta, AICP

New York Director

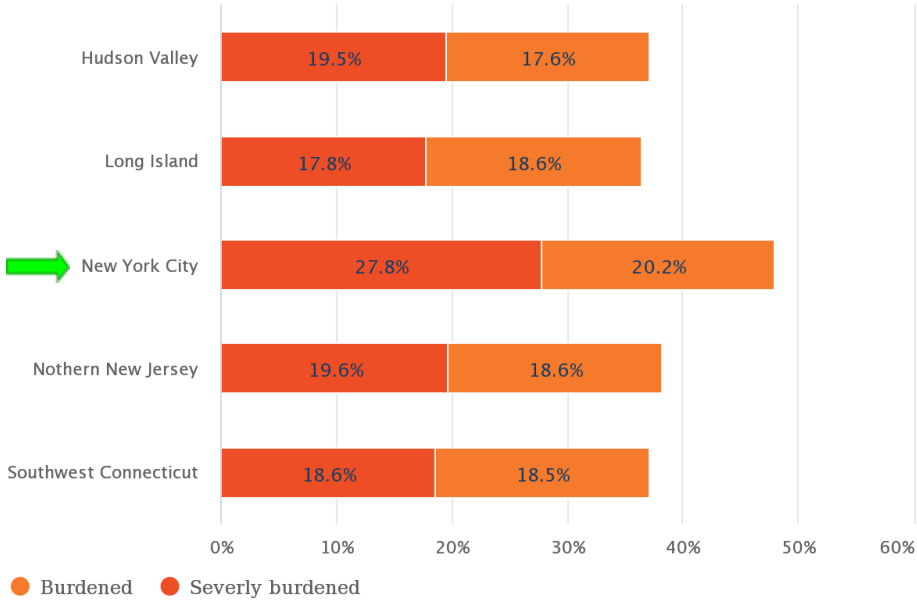
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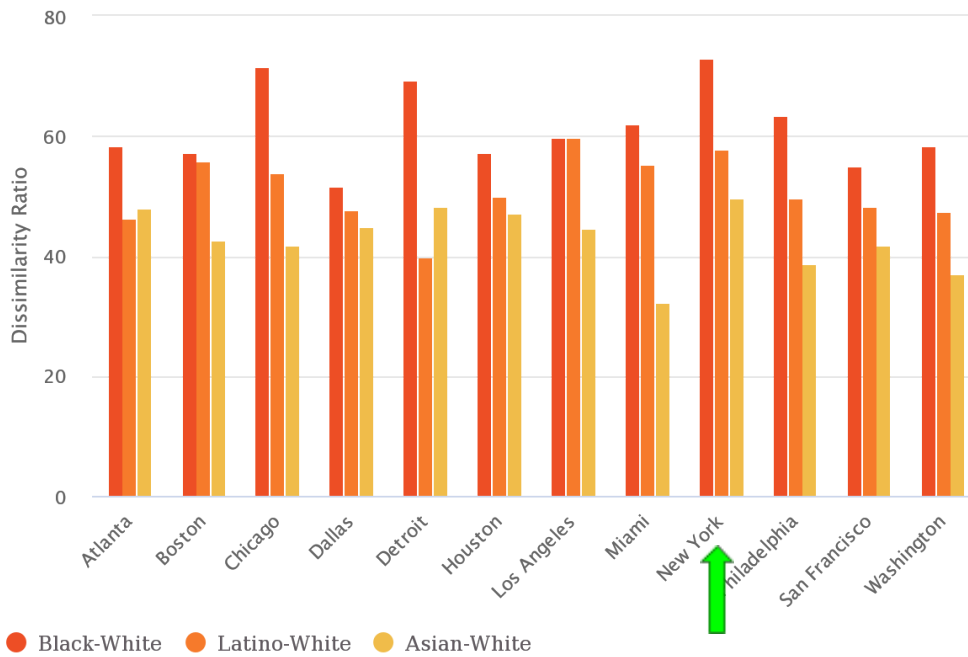


FIGURE 1: New York Region Housing Cost Burden by Subregion



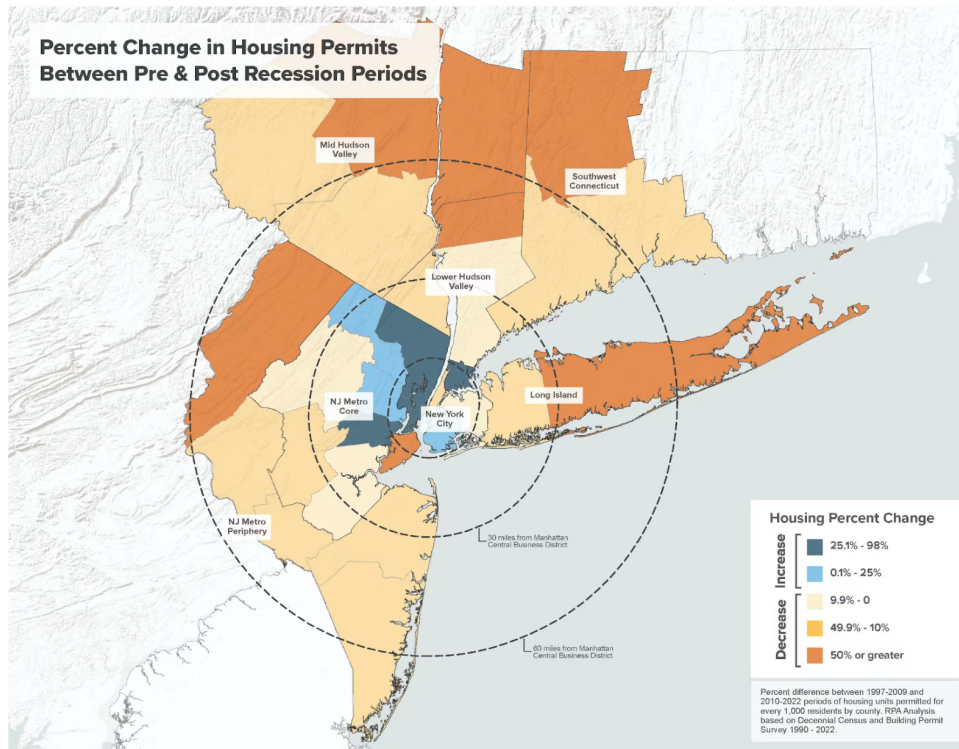
IPUMS, US Census 2021

FIGURE 2: Dissimilarity Index Examining Segregation Across Large Metro Regions (2020)



Brown University, Diversity and Disparities

FIGURE 3 - Policy Choices & Housing Permits in the Region (1990-2022)



Pre & Post Recession Housing Growth

The largest percent increase of new housing growth during the post-recession period (2010-2022) came from counties in northern New Jersey (Union, Hudson, Bergen, Essex, and Passaic) and from New York City (Bronx and Kings). In proportion to population size, New Jersey Metro Core issued the greatest amount of permits, with an increase of 25% during the post-recession period. In spite of these gains, overall housing permits within the Metropolitan area are yet to recover from the steep declines experienced in 2009, with the greatest per capita reductions happening in Long Island and the Mid-Hudson Valley at 57% and 43%, respectively.

Testimony of Brendan Cheney, New York Housing Conference

**New York City Council Committee on Housing and Buildings and Committee on Land Use
Oversight Hearing – Fair Housing and Affordable Housing Development**

September 26, 2023

Good afternoon. My name is Brendan Cheney. I am Director of Policy and Communications at the New York Housing Conference (NYHC). I would like to thank Committee Chairs Salamanca and Sanchez as well as the other members of the Committees on Land Use and Housing and Buildings for the opportunity to testify today.

NYHC is a nonprofit affordable housing policy and advocacy organization. As a broad-based coalition, our mission is to advance City, State and Federal policies and funding to support the development and preservation of decent and affordable housing for all New Yorkers.

Today's hearing focuses on fair housing and affordable housing in New York City. We applaud Council Speaker Adrienne Adams, and Committee Chairs Salamanca and Sanchez for their leadership on this issue. And we support the aim of Intro. 1031 in increasing production of affordable housing in each community district and holding the administration accountable to achieving this goal.

We are in an affordable housing crisis and we need more housing and more affordable housing to fight the crisis. The city can do a better job of planning for housing and affordable housing development across the city so that every neighborhood is doing their part to solve the housing crisis.

Our New York City Housing Tracker shows that housing production and affordable housing production is not shared equally across the city. Between 2014 – 2022, 16 City Council districts produced more than 2,000 units of new affordable housing – mostly in neighborhoods in the South Bronx, Central Brooklyn, East River waterfront in Brooklyn and Queens, and Southeast Queens. Meanwhile, 17 districts produced fewer than 400 units over that time, with nine districts producing less than 200 units over the nine years. This disparity needs to change.

The proposed fair housing legislation would require the city to produce a plan that shows housing needs and planned housing production by community district across the city. Setting neighborhood targets will encourage more production and push all neighborhoods to do their part. This level of planning, however, should also include strategies for achieving higher production in some neighborhoods, including upzonings to allow for multifamily housing – duplexes and row houses for example – in more neighborhoods.

However, we want to suggest that housing targets include minimum targets only. No neighborhood should be let off the hook to build more housing. Even the neighborhoods that are building the most should want more housing to tackle our crisis. It is important to remember that housing is being built where there are siting opportunities and where development is financially feasible. Both zoning and tax policy are important to incentivize housing production.

We also suggest that the fair housing reporting include barriers to achieving the necessary housing production. As part of the discussion, it will be necessary to understand not only what housing is necessary, but what stands in the way to achieving that level of production.

Requiring this report will hold the administration accountable to build more housing and build it more equitably throughout the city. But we also encourage the Council to be held accountable. The Council must support adding housing supply in every neighborhood.

The Council, under the leadership of Speaker Adams, has fought for housing with notable successes, including in Throggs Neck, Halletts North, and Innovation Queens. However, there is still often a fight for every project. If we are truly fighting for fair housing, for housing and affordable housing in every neighborhood, the Council must approach rezonings with a citywide lens and stand united to adding housing supply everywhere. Individual Council members should advocate for the best deal possible, but the Council should always be united to support housing and add housing supply.

Finally, the Council should support the forthcoming zoning text amendments for housing, which will eliminate parking minimums, provide a zoning bonus for affordable housing, support transit-oriented development and accessory dwelling units, convert empty offices into housing, and support higher density in town centers. Without zoning changes to allow for more housing and the easing of costly restrictions and zoning barriers, we will see the same patterns of development. We strongly urge the adoption of zoning reforms.

The Council should also support a tax incentive that would require affordable housing in market rate rental housing developments. Without a tax incentive, important tools like Mandatory Inclusionary Housing, will not be effective in producing housing outside of low-income neighborhoods. Many neighborhoods, especially higher income neighborhoods, will be off the hook for producing any affordable housing absent a real estate tax incentive. It is likely that only luxury condos will be built in these neighborhoods.

When considering affordable housing production, it is helpful to think of the tools we have in NYC to create affordable housing opportunities: 1) our capital financing programs delivered through HPD are investments in low-income neighborhoods and on publicly-owned land to build and preserve affordable housing; 2) our zoning code can be reformed to encourage growth citywide or to rezone specific neighborhoods or specific sites through private applications (the latter two trigger Mandatory Inclusionary Housing and generate affordable housing); and 3) our tax code can incentivize developers to build rental housing and require affordable housing through tax benefits. This last tool is critical in leveraging development in strong markets to include affordable housing through mandates.

We thank the Council for this important hearing and the opportunity to testify today.

Testimony on Fair Housing Plan Legislation (Intro 1031) from The Association for Neighborhood & Housing Development (ANHD)

9/26/23



Thank you to Chairs Salamanca and Sanchez, and to the members of the committee for the opportunity to testify today. My name is Emily Goldstein, and I am the Director of Organizing & Advocacy at the Association for Neighborhood & Housing Development (ANHD). We are 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 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 has long called for a more equitable and intentional planning system in NYC. We applaud Speaker Adams, Council Member Salamanca, Council Member Sanchez, and the over 30 council member co-sponsors for this legislation requiring the City to create Fair Housing plans on a regular basis.

Our city's geography of inequality didn't happen by chance; it was the predictable outcome of decades of planning decisions that only served to reinforce racial and economic disparities - a pattern that continues to this day. Breaking that mold will require proactive, deliberative planning to achieve clear equity-oriented goals. This means recognizing the differences between communities and neighborhoods and placing the needs of marginalized communities front and center in the City's policy, budgeting, and land use decisions.

The Fair Housing Plan legislation is an important step in that direction - and represents the type of equity-focused planning that we need to be moving towards citywide. This legislation provides a new level of analysis that looks at questions of displacement and preservation alongside development and sets recommendations rooted in explicit racial and economic equity goals, which our government and our communities can then use as a transparent basis for decision-making.

ANHD is particularly pleased to see explicit goals around:

- Facilitating an equitable distribution of market-rate and affordable housing development across the city
- Preserving affordable housing and preventing displacement of city residents
- Making equitable investments to address discrimination, segregation and poverty, especially in neighborhoods with a history of those issues

We strongly support the approach of allocating citywide housing targets among all the community districts based on specific criteria - including housing production over the previous

10 years and displacement risk. ANHD has long advocated for this type of nuanced approach, that - as opposed to establishing blanket and uniform targets - takes into account the differences in needs and risks across communities and seeks to correct for long-standing disparities and address these needs with the right tools in the right places. This is an approach that recognizes that fair housing must include a *right to stay* in a chosen neighborhood, alongside the right to move to neighborhoods of choice. This approach is reflected in the legislations strategic equity framework goals for:

- Increasing affordable housing production in high-opportunity community districts that haven't done their part
- Focusing on preservation and anti-displacement resources in high displacement risk community districts
- Increasing the amount of neighborhood equity investments in underserved community districts, especially those that have experienced significant housing development

To best achieve these goals, we believe this legislation should be strengthened in a few key areas.

First and foremost we want to ensure that these targets are not just aspirational. We need to strengthen accountability and reporting to understand how City agencies, the City Council, and all our levels of government are working towards meeting these goals - including identifying the various obstacles that might stand in the way, and resources needed to overcome them. The annual report on the City's progress should be broken down by Community District and for each district include:

- An assessment on how targets have been met - for all the target areas identified
- An assessment of obstacles to achieving these targets including via policy, budget, land use and zoning decisions
- An assessment of how these goals and targets have been met for different groups, including seniors, households experiencing homelessness, households in need of supportive housing, and Extremely Low-Income (ELI), Very Low-Income (VLI), and Low-Income (LI) households
- A report on actions taken by the City Council to achieve these targets

In addition, we should strengthen the methodology around identifying "high opportunity" community districts to go beyond the metrics identified in the Equitable Development Data Explorer, to ensure that we are correctly identifying high cost, exclusive, amenity and service rich Community Districts, where affordable housing options must be increased. This methodology should be established through a mandated collaborative process with stakeholders that factors in housing cost, housing production, and displacement risk in addition to access to amenities and services.

Lastly, we appreciate that this legislation defines affordable units as 60% AMI or below - recognizing the increasing disconnect between AMI levels and the actual income of New York households. This legislation should further target the desperate need for housing affordable to

those at the lowest income levels, by establishing targets at different AMI levels (ELI, VI, and LI) based on the identified need established through analysis.

We believe this legislation is a fundamental step in moving us towards equity focused, comprehensive planning citywide. We look forward to working with the Speaker and the Council in the months and years ahead to build on this in ways that would:

- Empower communities with the resources, capacity, and process they need to put forward local land use plans for how they can best meet these housing goals
- Expand this type of analysis and equity-focused goal setting to a host of other issue areas, such as economic development and responding to climate change
- Strengthen implementation to ensure these equitable targets can be met

We thank the Speaker and the Council for this important and forward looking legislation and looking forward to building on its legacy together. ANHD will continue to fight alongside our member organizations and our partners in the Thriving Communities Coalition to fundamentally transform our City's land use and planning systems into tools that can empower BIPOC communities and build a more equitable New York for all of us.

September 26, 2023

AIA New York Testimony to the City Council Committee on Housing and Buildings on Intro 1031

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for holding this hearing today. I am Bria Donohue, Government Affairs Manager at AIA New York. We represent architects and design professionals committed to positively impacting the physical and social qualities of our city.

AIA New York strongly supports the City Council's efforts to create a fair housing plan. Intro 1031 will require city agencies, specifically HPD, DCP, and DOB, to put together a report on social indicators, equity, true cost of living measures, and fair housing every five years. The data and assessment needed for this report – such as, analysis of housing units produced, displacement risk and vulnerability, infrastructure capacity, and climate change vulnerability – will demand resources from city agencies that we are concerned they do not have the capacity to allocate at this time to an additional project.

While we are supportive of this well-intentioned plan, implementation is key to the success of this proposal, and funding is the essential element missing from this bill. For city agencies to effectively develop a fair housing plan, they require adequate funding and staffing. City agencies are already overburdened and struggling with limited staff capacity, so requiring additional reporting and analysis risks further delaying work and not providing the desired outcome for the city.

This bill is a great opportunity to increase transparency on citywide data related to fair housing and a citywide assessment of the need and supply of affordable housing, but the lack of financial support for agencies makes the bill's intentions a challenge to achieve, particularly in the desired timeline. Mayor Adams' recent announcement on impending budget cuts of 15% to all city agencies by FY2025 as well as a hiring freeze only exacerbates these challenges.

A Fair Housing Plan will add significant value to New York City and our understanding of the city's need for affordable housing. It is vital that the city funds its agencies accordingly to produce this valuable assessment and catch up to other states who have already been conducting similar analysis.



Statewide Affordable and Fair Housing Roundtable
Joint Hearing on Intro 1031 (Fair Housing Framework)
September 26, 2023

Thank you to Chair Salamanca and Chair Sanchez for the opportunity to testify today on Intro 1031, also known as Speaker Adams' Fair Housing Framework.

My name is Mbacke Thiam. I am the Housing and Health Community Organizer at Center for Independence of the Disabled, NY (CIDNY). We are a nonprofit organization founded in 1978. CIDNY is part of the Independent Living Centers movement, a national network of grassroots and community-based organizations that enhance opportunities for all people with disabilities to direct their own lives. CIDNY is the voice of people with disabilities in New York City. We support Intro 1031 for a fair housing plan every five years.

Safe, Affordable and Accessible Housing

We commend Speaker Adams for recognizing the importance of using a fair housing lens to address New York City's housing crisis. Intro 1031 changes the course of the City's deplorable history of housing discrimination by providing an equitable and just framework to ensure every New Yorker has access to safe, affordable, and accessible housing.

As a member of the Statewide Affordable and Fair Housing Roundtable, we fully support legislation that confronts New York's legacy of discrimination and segregation by making equitable housing investments, particularly for low-income New Yorkers in amenity-rich neighborhoods.

We wish to highlight suggested additions in several areas to ensure that the approach to affirmatively furthering fair housing (AFFH) and addressing our affordable housing crisis is as strong as it can be.

Ensuring Greater Accountability

While this framework has commendable goals, its success is up to the City Council. Even the most well-informed fair housing plan has the potential to be sidelined, both by individual members blocking projects in their districts, and by the Council as a whole, by not providing adequate resources and tools to create new housing.



As such, we urge the City Council to build enforcement mechanisms into this framework, and to take steps to combat member deference regarding zoning or project approvals. It is also crucial that the agencies tasked with creating this report have the resources they need to achieve adequate staffing levels, ensure staff are properly trained, execute the report itself and facilitate new development projects in the pipeline.

We are also concerned about the long runway outlined by this bill. With the first report set to be released in 2026, the City must begin working towards its equitable development goals now.

Flexibility in Fair Housing Goals

Currently, this legislation proposes to codify what our fair housing goals should be. We agree that the listed goals, like combatting discrimination and improving voucher utilization should be a part of this report. However, we believe this legislation should be less prescriptive in listing our fair housing goals, to allow for flexibility in the future as our goals inevitably change over time.

Further Fair Housing in Other Ways

Beyond data gathering, the City can take several tangible actions to eliminate discrimination and open access to housing already on the market. The following action steps can be implemented this year by the City Council to affirmatively further fair housing:

- The City should guarantee the inspection of construction plans and new developments to ensure compliance with applicable accessibility requirements and the abandonment of "self-certification" by architects, engineers, or developers.
- The City Council has already passed protections for people with criminal records in employment. Council members ought to pass legislation prohibiting discrimination in housing based on conviction records and open housing access for more than 745,924 New Yorkers and their families.
- Council members can include fair housing protections in legislation that will legalize and regulate the production of safe, habitable, and environmentally sound Accessory Dwelling Units (ADUs), which have the potential to expand the housing supply and create more inclusive communities.
- New York City can affirmatively further fair housing by fortifying the law by strengthening existing source of income provisions in New York City Human Rights Law Housing providers continue to invent and implement new policies that create barriers for people utilizing housing subsidies provided by the City and



other government agencies. We recommend providing additional guidance on how housing providers' minimum income and credit score policies requirements may be discriminatory based on lawful source of income and possibly other protected characteristics.

- Council members can enact the "Co-op Disclosure" bill, which would require housing cooperatives to provide the reason(s) for rejecting a prospective buyer/renter upon request and in writing.
- We recommend implementing an enforcement mechanism into this bill in the event that the data collected and reported on indicates non-compliance with fair housing laws and other applicable laws.
- We recommend that this bill incorporates specific and affirmative steps for housing providers to take in order to increase access to housing for all New Yorkers.
- The City can fully fund agencies tasked with enforcing fair housing laws, such as the City Commission on Human Rights, the Department of Housing and Preservation, as well as the Fair Housing Justice Center (FHJC), the City's only qualified full-service fair housing organization.

We support collecting data, identifying barriers to fair housing, and engaging with communities. However, these efforts are already established by the Federal Affirmatively Furthering Fair Housing rule, which requires HPD to create a comprehensive Assessment of Fair Housing (AFH) in the City. To require HPD, which is already severely understaffed, to work on what amounts to another new fair housing report is a duplicative effort that will take away from existing staff time. We hope that the proposed legislation can be refined to better support the AFH efforts already in place, in addition to the implementation of the actionable items mentioned above.

Thank you for the opportunity to testify today, and we look forward to working with you to ensure that New York City is an affordable, accessible, and equitable place to live for everyone.

Mbacke Thiam, He/Him/His

Housing, Health & CAN Community Organizer
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September 26, 2023

Community Housing Improvement Program Testimony on Int 1031-2023 Fair Housing Plan Testimony

Thank you for holding this hearing today. I am Adam Roberts, Policy Director for the Community Housing Improvement Program, also known as CHIP. We represent New York's housing providers, including apartment building owners and managers. While we strongly support the idea of a Fair Housing Plan, the plan outlined in Int 1031 is too limited in its scope to provide an adequate understanding of the city's affordable housing needs.

Glaringly, the bill limits its definition of "low-income affordable housing" so that NYCHA buildings and buildings with rent-stabilized apartments are not included. As our members provide and operate rent-stabilized housing, this is deeply concerning. Rent-stabilized housing is a critical source of hundreds of thousands of affordable apartments.

This bill, if significantly amended, would provide much-needed data on the city's rent-stabilized housing. We do not know how many rent-stabilized apartments exist, as HPD's Housing and Vacancy Survey and the Department of Finance's Real Income and Expense Reports provide different estimates. We also do not know how many additional rent-stabilized apartments could be built. Currently, NYCHA is replacing some less dense developments with denser ones that hold more apartments. A fair housing plan should examine how many more apartments could be built if rent-stabilized buildings could pursue a similar strategy.

Furthermore, the city is not collecting data on the financial needs of rent-stabilized tenants. This would be valuable information to understand if rent-stabilization is actually benefiting low-income renters, as well as if reforms should be implemented to prioritize affordable housing for those who need it. It is important to note that rent-stabilized tenants have no income threshold, meaning wealthy tenants often live in rent-stabilized housing.

Lastly, this legislation does not require reporting on the condition of affordable housing, including rent-stabilized apartments. Over the last few years, policy changes in Albany have caused funding for renovating rent-stabilized apartments to evaporate. As a result, tens of thousands of apartments are vacant and others have necessary maintenance deferred. Not only should New Yorkers be entitled to more affordable housing, but that housing should be safe.

While we think this bill could be improved, we applaud the council for beginning the conversation about the need for better data on affordable housing. We look forward to working with the council to ensure the best data is collected. Thank you again for holding this hearing.



**Testimony of Patrick Boyle
Senior Director, Enterprise Community Partners
On Behalf of Enterprise Community Partners, Inc.**

**For the New York City Council Committee on Housing & Buildings and Committee on
Land Use**

September 26, 2023

My name is Patrick Boyle and I am the Senior Director in the New York office of Enterprise Community Partners, which is a national nonprofit that exists to make a good home possible for the millions of families without one. We support community development organizations on the ground, aggregate and invest capital for impact, advance housing policy at every level of government, and build and manage communities ourselves. Since our New York office opened in 1987, we have committed more than \$5.3 billion in equity, loans and grants to affordable housing and community to create or preserve nearly 84,000 affordable homes across New York State.

On behalf of Enterprise, thank you to Speaker Adams, Chair Sanchez and Chair Salamanca for the opportunity to submit today's testimony.

Int. 1031-2023: Fair Housing Plan

Advancing fair housing is central to Enterprise's work. As part of those efforts, in 2017, we convened a group of diverse organizations to assess and develop a comprehensive shared fair housing platform. The resulting report, Closing the Divide: Creating Equitable, Inclusive and Affordable Communities, has been a guiding framework since, and participating organizations continue to meet as the Statewide Affordable and Fair Housing Roundtable, co-convened with the Fair Housing Justice Center. Additionally, Enterprise played a leading role in organizing the Statewide Source of Income Coalition, which successfully fought to implement State law banning source of income discrimination and we continue to measure resulting impact.

We view fair housing not as a separate pillar of housing policy removed from other priorities like housing supply, preservation and tenants' rights, but rather the guiding principle that should drive all aspects of housing policy and opportunity. To that end, we applaud the Council and Speaker Adams for your attention to fair housing and agree with the spirit of Int. 1031-2023, namely expanding equitable housing investment in every community in our city.

We offer the following feedback and recommendations to strengthen the approach, as we believe that a fair housing plan encompassing all of New York City must be more comprehensive and deliberate in effective execution.

Thinking Beyond Supply

The most significant provisions of Int. 1031-2023 relate to housing supply metrics, namely the citywide assessment of the number and type of housing units needed to be produced and preserved and the citywide housing production targets. These two aspects of the proposal are the clearest in detail and in the described implementation process. Elsewhere in the legislation, the agencies are asked to report on policy progress for all other fair housing goals and outcomes, and a few limited examples are provided.

Housing supply and preservation, including which community districts are producing their fair share of affordable housing versus which are not, is an aspect of fair housing need but not its totality. To that end, we recommend a plan that looks beyond housing units and is more descriptive of its goals and requirements in the following areas:

- *Source of Income Discrimination.* Enterprise's work with the State's Fair Housing Testing program shows that refusal to rent based on lawful source of income remains pervasive and underenforced.
- *Upward Economic Mobility.* More coordinated resources are needed to ensure families have mobility, a pathway to financial independence, and the ability to better their circumstances beyond simply obtaining a rent restricted apartment.
- *Justice System Involvement.* Opening up housing opportunities to those who have had past justice-system involvement is important when recognizing the affordable housing need of this population.
- *Community Comprehensive Planning.* As described in the Closing the Divide report as well as the city's Where We Live report, comprehensive planning encompasses more than just the siting of affordable units, and includes strategies to improve access to good schools, green space, community facility areas, city services, healthy food options and more.

Community Opposition and Resources

This well-intentioned plan should also tackle the barriers to accomplishing goals. The reporting required by Int. 1031-2023 would be valuable, but without changes in scope, it will largely remain confirmation of what is already instinctively known about where affordable housing is being produced and where more is needed.

A plan that will bring about the fair housing changes the city needs must also include consideration of the role that community opposition and resistance play in preventing the creation and placement of vitally needed affordable housing and supportive housing. There are districts in the city that are effectively closed for meaningful development.

Agency Resources

Both the Department of Housing Preservation and Development and the Department of City Planning will require adequate staffing levels and resources to both assemble the proposed plan itself, report out on progress, and work towards its goals. The additional required resources must be funded to meet the need.

Enterprise again thanks the Speaker, the Chairs and the full Council, for thinking seriously about a fair housing plan. We encourage further conversations to make such a proposal as meaningful as possible and look forward to doing our part.



**Fair Housing Justice Center, Co-leader of the
Statewide Affordable and Fair Housing Roundtable
Testimony Template for Joint Hearing on Intro 1031 (Fair Housing Framework)
September 26, 2023**

My name is Britny McKenzie, and I am the Policy Manager at Fair Housing Justice Center, Inc. (FHJC). I appreciate the opportunity to provide this written testimony to the New York City Council's Committee on General Welfare and the Committee on Housing and Buildings (Jointly with the committee on Land Use) regarding Intro 1031, also known as Speaker Adams' Fair Housing Framework.

The FHJC's mission is to eliminate housing discrimination, promote policies that foster open, accessible, and inclusive communities, and strengthen the enforcement of fair housing laws. The FHJC provides free counseling on fair housing rights, investigative assistance, testing, referrals to administrative agencies and cooperating attorneys, and files enforcement actions to stop and prevent housing discrimination. The FHJC is a full-service fair housing program that conducts proactive testing investigations to find and eliminate systemic housing discrimination.

The FHJC has assisted thousands of individuals and organizations with housing discrimination complaints to exercise their fair housing rights over the past eighteen years. These investigations have led to over 150 legal challenges to discriminatory housing policies and practices by private housing providers and government agencies to bring them into compliance with fair housing laws. As a result of the FHJC's work, over 80,000 housing units have been opened to previously excluded people, and more than \$52 million in monetary damages and penalties have been recovered.

We commend Speaker Adams for recognizing the importance of using a fair housing lens to address New York City's housing crisis. Consideration of the deplorable history of housing discrimination provides an equitable and just framework to ensure every New Yorker has access to safe, affordable, and inclusive communities.

As a member of the Statewide Affordable and Fair Housing Roundtable, we fully support legislation that confronts New York's legacy of discrimination and segregation by making equitable housing investments, particularly for low-income New Yorkers in amenity-rich neighborhoods. With that being said, we wish to highlight suggested additions in several areas to ensure that our city's approach to affirmatively furthering fair housing (AFFH) and addressing our affordable housing crisis is as strong as it can be.

Ensuring Greater Accountability

While this framework has commendable goals, its success is up to the City Council. Even the most well-informed fair housing plan has the potential to be sidelined, both by individual members blocking projects in their districts, and by the council as a whole not providing adequate resources and tools to create new housing.

As such, we urge the City Council to build enforcement mechanisms into this framework and to take steps to combat member deference regarding zoning or project approvals. It is also crucial that the agencies tasked with creating this report have the resources they need to achieve adequate staffing levels, ensure staff are properly trained, execute the report itself and facilitate new development projects in the pipeline.

We are also concerned about the long runway outlined by this bill. With the first report set to be released in 2026, the City must begin working towards its equitable development goals now.

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Currently, this legislation proposes to codify what our fair housing goals should be. We agree that the listed goals, like combatting discrimination and improving voucher utilization should be a part of this report however, we believe this legislation should be less prescriptive in listing our fair housing goals, to allow for flexibility in the future as our goals inevitably change over time.

Further Fair Housing in Other Ways

Beyond data gathering, the City can take several tangible actions to eliminate discrimination and open access to housing already on the market. See the following actions steps that can be implemented this year by the City Council to affirmatively further fair housing below:

- The City should guarantee the inspection of construction plans and new developments to ensure compliance with applicable accessibility requirements and the abandonment of "self-certification" by architects, engineers, or developers.
- The City Council has already passed protections for people with criminal records in employment. Council members ought to pass legislation prohibiting discrimination in housing based on Conviction Records and open housing access for more than 745,924 New Yorkers and their families.
- Council members can include fair housing protections in legislation that will legalize and regulate the production of safe, habitable, and environmentally sound Accessory Dwelling Units (ADUs), which have the potential to expand the housing supply and create more inclusive communities.
- New York City can affirmatively further fair housing by fortifying the law by strengthening existing source of income provisions in New York City Human Rights Law Housing providers continue to invent and implement new policies that create barriers for people utilizing housing subsidies provided by the City and other government agencies. We recommend providing additional guidance on how housing providers' minimum

income and credit score policies requirements may be discriminatory based on lawful source of income and possibly other protected characteristics.

- Council members can enact the "Co-op Disclosure" bill, which would require housing cooperatives to provide the reason(s) for rejecting a prospective buyer/renter upon request and in writing.
- We recommend implementing an enforcement mechanism into this bill in the event that the data collected and reported on indicates non-compliance with fair housing laws and other applicable laws.
- Lastly, we recommend that this bill incorporates specific and affirmative steps for housing providers to take in order to increase access to housing for all New Yorkers.
- The City can fully fund agencies tasked with enforcing fair housing laws, such as the City Commission on Human Rights, the Department of Housing and Preservation, as well as the Fair Housing Justice Center (FHJC), the City's only qualified full-service fair housing organization.

We support collecting data, identifying barriers to fair housing, and engaging with communities. However, these efforts are already established by the Federal Affirmatively Furthering Fair Housing rule, which requires HPD to create a comprehensive Assessment of Fair Housing (AFH) in the City. To require HPD, which is already severely understaffed, to work on what amounts to another new fair housing report is a duplicative effort that will take away from existing staff time. We hope that the proposed legislation can be refined to better support the AFH efforts already in place, in addition to the implementation of the actionable items mentioned above. Thank you for the opportunity to testify today, and we look forward to working with you to ensure that New York City is an affordable, inclusive and equitable place to live for everyone.

Spoken Testimony by Paul Epstein, Co-chair, Inwood Legal Action, on Int. 1031-2023, Speaker Adams's Fair Housing Bill

We have already submitted detailed written testimony on this bill, submitted by ILA Co-chair Paul Epstein. This is a brief version of that testimony that Mr. Epstein plans to deliver via Zoom at the public hearing on this bill on September 26, 2023. Please refer to our full written testimony for full details on our recommendations to improve this bill.

Inwood Legal Action (ILA) advocates for housing and land use equity, and social and environmental justice, in our Northern Manhattan neighborhood and citywide. As a member of the Racial Impact Study Coalition, we helped develop Local Law 78-2021 and the Equitable Development Data Tool (EDDE) that Int. 1031-2023 would build upon. This bill recognizes that our City's policies can reverse inequality, segregation, housing instability, and homelessness. We were pleased to be quoted in Speaker Adams's release of this bill last May.

However, significant improvements are needed in Int. 1031-2023 before it is enacted. Today I will present a partial summary of our recommendations. Please see our full written testimony, which I have already submitted to the Council, especially the "Detailed Recommendations," for specific information on how to revise this bill and for more information on why each recommended improvement is needed.

SUMMARY OF ILA RECOMMENDATIONS

Each item on this list represents a set of recommendations on the topic addressed.

Mandate further research, consultation and collaboration with experts, external sources including other jurisdictions, and community stakeholders to better define "high-opportunity community districts" and better develop measurements to determine such districts. It is absolutely crucial to get the "quality of life and access to opportunity index" right for fair housing plans to work as intended, but the current indicators in this category of the EDDE are inadequate for this purpose. Our detailed recommendations describe a research and collaboration process that Int. 1031-2023 should require to produce a useful and valid index.

Replace HUD's Area Median Income (AMI) as the basis for determining affordability. AMI for the NYC area is seriously distorted. The use of AMI to determine rents of "affordable" apartments favors relatively higher-income households, who have more housing choice, over lower-income renter households who have little choice and are at the greatest risk of displacement and homelessness. **We recommend renter median income for NYC households (or "RMI" for New York City) instead of AMI.**

Replace a single benchmark and target for "low-income affordable housing units" with multiple targets based on the shortage of affordable rental housing units by income band. Using a single benchmark of 60% of AMI for low-income affordable units is inadequate for identifying the greatest affordability shortfalls and for targeting affordable units to best meet families' needs. Multiple targets by income band would solve this problem.

Require use of the New York City Housing and Vacancy Survey and timely release of the microdata. Delays in release of NYCHVS microdata can lead to fair housing plans and policies based on out-of-date data.

Mandate evaluations and updates of the methodologies and indicators in the EDDE on a regular basis in relation to when Fair Housing Plans are due, which is especially important because data from the EDDE will be significant drivers of fair housing plans.

Require HPD & DCP to regularly identify and budget for expected costs for desirable EDDE upgrades, such as new data collection efforts or increased sample sizes to enable additional indicators to be used. Int. 1031-2023 should require HPD and DCP to regularly identify the costs associated with desired improvements. Then Council can include the added costs in the City budget, when it judges the value of information improvements worth the cost.

Adopt community prevention and resilience frameworks to address risks of climate change. Climate vulnerability includes far more than the flood risk noted in this bill. See our detailed recommendations for a list of climate-related requirements to add to Int. 1031-2023, that follow a twin focus on *resilience* (the ability of people and communities to cope with the effects of climate change) and *prevention* (ways to prevent or reduce greenhouse gas emissions and to prevent or limit loss of life and property damage from climate events).

Annual reports on progress toward fair housing goals should include an assessment and high-level data on the condition of rental housing to ensure that an increase in affordable units does not come at the expense of poor housing maintenance.

Use the True Cost of Living Measure to assess economic security and poverty reduction in the mayor's annual report on "Equity" described in Int. 1031-2023.

For the mayor's "annual report analyzing the social, economic, and environmental health of the city, Int. 1031-2023 should mandate more specific environmental health information and require that it be made easily available to the public. Our detailed recommendations include a list of environmental issues for which data should be provided, and reported on a public online dashboard.

Inwood Legal Action Testimony on Speaker Adams’s Fair Housing Bill, Int. 1031-2023

Inwood Legal Action (ILA) advocates for housing and land use equity, social justice, and environmental improvement in our Northern Manhattan neighborhood and citywide. To have a citywide impact, we participate in several coalitions, including the Racial Impact Study Coalition (RISC). Working with RISC, we helped develop Local Law 78-2021 and the Equitable Development Data Tool (EDDE) that Int. 1031-2023 would build upon. We see promise in Speaker Adams’s approach to fair housing and were pleased to be quoted in her release of this bill last May. However, significant improvements are needed in Int. 1031-2023 before it is enacted. What follows are a summary of our recommendations to improve Int. 1031-2023, a summary of the strengths of the bill as we see it, and our detailed recommendations to improve the bill.

SUMMARY OF ILA RECOMMENDATIONS

Each item on this list represents a set of recommendations on the topic addressed. Please see our “Detailed Recommendations” for specific information on how to revise Int. 1031-2023 and for more information on why each recommended improvement is needed.

Mandate further research, consultation and collaboration with experts, external sources including other jurisdictions, and community stakeholders to better define “high-opportunity community districts” and better develop measurements to determine such districts. It is absolutely crucial to get the “quality of life and access to opportunity index” right for fair housing plans to work as intended, but the current indicators in this category of the EDDE are inadequate for this purpose. Our detailed recommendations describe a research and collaboration process that Int. 1031-2023 should require to produce a useful and valid index.

Replace HUD’s Area Median Income (AMI) as the basis for determining affordability. AMI for the NYC area is seriously distorted. The use of AMI to determine rents of “affordable” apartments favors relatively higher-income households, who have more housing choice, over lower-income renter households who have little choice and are at the greatest risk of displacement and homelessness. **We recommend renter median income for NYC households (or “RMI” for New York City) instead of AMI.**

Replace a single benchmark and target for “low-income affordable housing units” with multiple targets based on the shortage of affordable rental housing units by income band. Using a single benchmark of 60% of AMI for low-income affordable units is inadequate for identifying the greatest affordability shortfalls and for targeting affordable units to best meet families’ needs. Multiple targets by income band would solve this problem.

Require use of the New York City Housing and Vacancy Survey and timely release of the microdata. Delays in release of NYCHVS microdata can lead to fair housing plans and policies based on out-of-date data.

Mandate evaluations and updates of the methodologies and indicators in the EDDE on a regular basis in relation to when Fair Housing Plans are due, which is especially important because data from the EDDE will be significant drivers of fair housing plans

Require HPD & DCP to regularly identify and budget for expected costs for desirable EDDE upgrades, such as new data collection efforts or increased sample sizes to enable additional indicators to be used. Int. 1031-2023 should require HPD and DCP to regularly identify the costs associated with desired improvements, such as when mandated periodic evaluations are done as recommended above. With this information the Council would be able to include the added costs in the City budget, whenever it judges the value of informational improvements worth the cost.

Adopt community prevention and resilience frameworks to address risks of climate change. With respect to climate, Int. 1031-2023 only specifies “climate change vulnerability as measured by the 100-year floodplain.” But climate vulnerability includes far more than flood risk. See our detailed recommendations for a broader list of climate-related requirements to add to Int. 1031-2023, that follow a twin focus on *resilience* (the ability of people and communities to cope with the effects of climate change) and *prevention* (ways to prevent or or reduce greenhouse gas emissions and to prevent or limit loss of life and property damage from climate events).

Annual reports on progress toward fair housing goals should include an assessment and high-level data on the condition of rental housing to ensure that an increase in affordable units does not come at the expense of poor housing maintenance.

Use the True Cost of Living Measure to assess economic security and poverty reduction in the mayor’s annual report on “Equity” described in Int. 1031-2023.

For the mayor’s “annual report analyzing the social, economic, and environmental health of the city, Int. 1031-2023 should mandate more specific environmental health information and require that it be made easily available to the public. Our detailed recommendations include a list of environmental issues for which data should be provided, and reported on a public online dashboard.

SUMMARY OF STRENGTHS OF INT. 1031-2023

Int. 1031-2023 would be an important step toward achieving fair housing in New York City by requiring the city government to go on record with a detailed Fair Housing Plan every five years, and reporting progress against the plan every year. This bill recognizes that our City’s policies can reverse inequality, segregation, housing instability, and homelessness.

The basic approach of this bill makes sense: to identify community districts that are “high displacement-risk districts,” “high-opportunity districts,” and “underserved community districts” for targeting different kinds of initiatives, specifically:

- Increasing production and preservation of low-income affordable housing and voucher use in high-opportunity districts;
- Increasing the number of low-income affordable housing units preserved and the availability and effectiveness of anti-displacement resources in high displacement-risk districts;
- Increasing neighborhood equity investments in underserved community districts, especially those that have experienced significant housing development.

This bill would build on Local Law 78-2021, which established the Equitable Development Data Tool (known online as Equitable Development Data Explorer, or EDDE) which includes valuable data for every community district on housing, demographics, economic security, and other factors.

The bill would use EDDE's Displacement Risk Index (DRI) (also known as the "Displacement Risk Map" online) to identify high-displacement risk community districts. This is sound, as the DRI was developed by HPD and DCP in consultation with a coalition of stakeholders and tested against eviction data to select the best formula for the index among alternatives.

DETAILED ILA RECOMMENDATIONS FOR IMPROVING INT. 1031-2023

Our recommended improvements would strengthen the fair housing planning and reporting envisioned in Int. 1031-2023, and ensure that the plans produced in accordance with the bill, if implemented, will truly increase fair, equitable, and affordable housing in the city.

Mandate further research and consultation with experts, external sources including other jurisdictions, and community stakeholders to better define "high-opportunity community districts" and better develop measurements to determine such districts. The current bill defines these districts as those with "a majority of their areas within the top 2 quintiles of an aggregate index of the quality of life and access to opportunity indicators identified in the equitable development data tool." However, the tool (EDDE) does not currently have such an index. While the EDDE does have a variety of indicators in a category titled "quality of life and access to opportunity" it is not clear that these are the best available indicators to determine "high opportunity" for fair housing purposes. **Getting this index "right" is crucially important** for fair housing plans to work as intended to produce affordability and equity where it is most needed. So HPD, DCP, and any other agencies involved should look beyond indicators currently in the EDDE or readily available from city government sources, and explore sources external to NYC, such as relevant indices from other jurisdictions. HPD and DCP should also consult experts and engage stakeholders in a research and collaboration process such as we describe below.

- **Int. 1031-2023 should mandate HPD, DCP, and other agencies involved in developing the index to consult sources outside NYC**, such as the examples below, **as well as NYC sources, and consult experts** in these matters including sociologists, economists, statisticians, planners, researchers, and policy analysts who have developed or worked with indicators or indices such as these, and methodologies to produce such indices.
 - *Examples of external sources that may be useful:* Indicators and indices of quality of life and opportunity exist for countries (e.g., Human Development Index, World Happiness Report), for cities worldwide (e.g., Global Liveability Index¹ by the Economist Intelligence Unit of The Economist magazine), for U.S. states, cities, and counties (e.g., Annie E. Casey Foundation's Kids Count Data Center² of child and youth well-being), and for neighborhoods and census tracts (e.g., Opportunity

¹ The Economist Intelligence Unit's Global Liveability Index ranks 173 cities by combining ratings of indicators in five categories: stability, healthcare, culture & environment, education, and infrastructure. See <https://www.eiu.com/n/campaigns/global-liveability-index-2023/>

² The AECF Kids Count Data Center: <https://datacenter.aecf.org/>

Atlas³ focusing on child social and economic mobility; Opportunity Mapping by Portland, OR;⁴ Access to Opportunity Index of Seattle, WA⁵).

- While not all data used in indices from external sources may be available for NYC at the scales needed, some likely will be (e.g., Census data, especially from the ACS) and can widen the options of potentially useful indicators to choose from to create a better NYC index. A product of this research and consultation would be a list of indicators deemed as potentially useful for the purposes of this bill and practical for NYC (i.e., data are available at the needed scale).
- Developing an aggregate index of opportunity also requires subjective judgments concerning the relative importance of different types of opportunity (e.g., for healthy living, good education, economic success or mobility, access to transit, access to quality recreation and cultural resources). Therefore:
 - **Int. 1031-2023 should mandate a public engagement process to help identify indicators from possibilities identified as practical for NYC and to weight or combine them into an index** that New Yorkers will widely view as valid for identifying high-opportunity districts.
 - Stakeholders engaged should also be asked to identify additional indicators they believe would make the index work better to identify opportunity, even indicators not currently “practical” for NYC due to data limitations. Those additional indicators would become part of a research agenda for HPD and DCP to explore how they might be able to obtain future data to include the indicators in an improved version of the index for future fair housing plans.
 - Stakeholders engaged should include advocacy groups that have focused on these and related issues (e.g., the Racial Impact Study Coalition whose advocacy led to passage of Local Law 78-2021 and creation of the Equitable Development Data Tool) and people representing a broad range of NYC’s demographic and geographic population.
- While the research, consultation, and engagement will add time and effort to fair housing planning, it need not delay issuance of the first Fair Housing Plan, especially if index development is viewed as iterative, to be improved in successive planning cycles.
 - **Int. 1031-2023 should mandate that revisions to improve the index be made during each planning cycle** as more indicators and data become available, engagement is increased and made more representative, and various options for improving the index are statistically tested.

Replace HUD’s Area Median Income (AMI) as the basis for determining affordability. AMI for the NYC area is seriously distorted, greatly overstating actual NYC median income, and underestimating the great need for

³ Opportunity Atlas (<https://www.opportunityatlas.org/>), a project of Opportunity Insights, a multi-university research team based at Harvard University (<https://opportunityinsights.org/team/>), has been used, for example, on a project to evaluate methods to increase housing voucher use in high-opportunity neighborhoods in Seattle and King County, WA (https://opportunityinsights.org/wp-content/uploads/2019/08/cmt0_summary.pdf)

⁴ Portland, OR, Opportunity Mapping: <https://www.portland.gov/phb/opportunity-mapping>

⁵ As in Int. 1031, Seattle uses indices of displacement risk and access to opportunity for equity-focused planning. See: <https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/2035EquityAnalysisSummary.pdf> (esp. pp. 2-3), and the Seattle 2035 Growth and Equity Strategy, Table 4 (p.14), for Access to Opportunity Indicators at <https://www.seattle.gov/documents/departments/opcd/ongoinginitiatives/seattlescomprehensiveplan/finalgrowthandequityanalysis.pdf>

deeper affordability.⁶ The use of AMI in determining the distribution of rents of “affordable” apartments favors relatively higher-income households, who have more housing choice, over lower-income renter households who have little choice and are at the greatest risk of displacement and homelessness.

- **Int. 1031-2023 should mandate use of an accurate, undistorted household income standard as the basis for affordability in fair housing plans. We recommend *renter median income for NYC households* (or “RMI” for New York City),** both to remove the distortion in HUD’s AMI formula and to focus on households that rent their homes, which generally have lower incomes, higher housing cost burdens, and a greater need for increased housing choice that fairer, more equitable housing would provide.

Replace a single benchmark and target for “low-income affordable housing units” with multiple targets based on the shortage of affordable rental housing units by income band. Low-income affordable housing is defined in Int. 1031-2023 as units affordable to households with incomes less than 60% of AMI, adjusted by household size. While 60% is better than the 80% of AMI used by HPD for the upper limit of low-income affordability, it is inadequate for showing where the greatest shortfalls are and for setting targets for addressing the greatest needs. **We recommend, instead, that Int. 1031-2023 require the following analysis and reporting in all fair housing plans and annual progress reports or updates, on a citywide and community district basis:**

- Compare the number of households at income bands of below 30% of AMI; 30–50% AMI; and 50-80% AMI with the number of housing units affordable for each of these income bands. Conduct this analysis for rental households and all households, and, estimate the shortfall of affordable units by income band for renter households and all households.⁷ (If another household income standard, such as “RMI,” is adopted to replace AMI, income bands could be adjusted as appropriate.)
- **Track and report on targets for increasing the number of affordable rental housing units and all housing units by income band and for reducing the shortfall of rental housing and all housing units by income band.** These statistics will enable better public understanding of the need for deep affordability and could strengthen public support for low-income housing.
- **Int. 1031-2023 should similarly require annual and quarterly reports,** reviewed in oversight hearings by the Council such as during or preceding City budget hearings **to identify, analyze, and address the level of progress or regression in achieving targets for reducing shortfalls** of affordable units by income band.

Mandate evaluations and updates of the methodologies and indicators in the EDDE on a regular basis in relation to when Fair Housing Plans are due. Local Law 78 of 2021 stipulates that HPD and DCP “shall update the methodologies and indicators comprising the equitable development data tool as new data sources and analytical tools are developed.” But there is no update schedule in that law. Given that data from the tool

⁶ ANHD provides a good description of the NYC area AMI distortion and overstatement at <https://anhd.org/report/new-york-citys-ami-problem-and-housing-we-actually-need> (e.g., AMI was overstated by more than \$26,000 for a family of 3 in 2022). Also, HPD & DCP added a footnote to the EDDE that explains that in NYC, because housing costs are so high, HUD’s AMI income limits are not calculated using New Yorkers’ incomes, but instead are based on income needed to afford currently available market rate housing.

⁷ Researchers at Louisiana State University Shreveport proposed a similar approach to identifying affordable housing shortfalls, including use of alternative income measures focused more on rental households, at <https://acsdatacommunity.prb.org/discussion-forum/m/2023-acs-conference-files/215/download>

(EDDE) would be significant drivers of fair housing plans, **Int. 1031-2023 should specify times, in relation to when fair housing plans are due, by when methodologies, indicators, and indices are evaluated and updated** to improve the EDDE and its indices (e.g., by one or two years before each plan is due).

- The mandated evaluations should include consultation with stakeholders (e.g., interested Council Members and advocacy groups) concerning how they want the EDDE and its indices to be improved.
- Int. 1031-2023 should also specify that HPD and DCP should report on the EDDE website what update needs and opportunities they found in each required evaluation, and what changes to methodologies, indicators, and indices (e.g., the aggregate indices specified in Int. 1031) they made as a result.

Require HPD & DCP to regularly identify and budget for expected costs for desirable EDDE upgrades, such as new data collection efforts or increased sample sizes to enable additional indicators to be used. It is likely that some improvements to EDDE desired by stakeholders or City agencies will require added costs. For example, new indicators may be desired to improve the displacement risk index or the quality of life and access to opportunity index. In some cases, these indicators may become useful in EDDE and its indices if existing data collection efforts are expanded, for example, if additional questions are added to the New York City Housing and Vacancy Survey (NYCHVS) or the sample size for the NYCHVS (or for specific survey questions) is increased so statistically significant data will become available at the needed geographic scales or for racial and ethnic groups. In other cases, entirely new data collection efforts may be needed. **Int. 1031-2023 should require HPD and DCP to regularly identify the costs associated with these desired improvements**, such as when mandated periodic evaluations are done as recommended above.

- With this information the Council would then be in a position to include added costs in the City budget, whenever it judges the value of informational improvements worth the cost.

Require use of the New York City Housing and Vacancy Survey and timely release of the microdata. The New York City Housing and Vacancy Survey is an essential recurring study that has been used for decades by housing researchers and analysts, and is used, by law, to help renew rent regulation. The microdata provide extremely valuable unique information that has been used for research and policy analysis over the years. For example, it can be used to determine the risk of homelessness. However, release of the 2021 microdata (for the most recent NYCHVS) was delayed, only released this summer. Such delays hamper analysis and use in housing policy. For example, the last EDDE update was earlier this year, so EDDE community data taken from the NYCHVS are now six years old, based on the last NYCHVS in 2017. That includes an EDDE indicator used in the Displacement Risk Index, which is so important to the approach to fair housing used in Int. 1031-2023.

- **Int. 1031-2023 should mandate that the NYCHVS be a required source for fair housing plans and reports, and that HPD be required to release the microdata for each survey on a timely basis** (e.g., a deadline of some number of months after the survey) in a widely used format that is broadly accessible to the public, such as a csv format.
- **Int. 1031-2023 should also require HPD to conduct quality reviews of the NYCHVS and to budget for quality improvements and other modifications** to the survey. This will help the Council to provide sufficient funding to assure a reliable sample and to conduct internal analyses that inform housing policy.

Adopt community prevention and resilience frameworks to address risks of climate change. With respect to climate, Int. 1031-2023 only specifies “climate change vulnerability as measured by the 100-year floodplain.” Climate change vulnerability includes far more than flood risk, as it can stem from many risks such as air pollution, drought, extreme heat and humidity, and fires. And as heavy storms in recent years have demonstrated, climate-fueled heavy rainfall can cause damaging, deadly flooding even outside mapped flood zones, including inland low-lying areas, neighborhoods built over filled wetlands, and basements. And while climate risk affects the ability to assure the maintenance and value of housing, it also more broadly stresses other infrastructure (e.g., sewers, sewage treatment plants, roadways, subways); public health, safety, and services; personal incomes and social supports; and the ability, cost, and time to recover from disasters. Thus, fair housing plans should use a wider lens than flood risk to housing. Instead, Int. 1031-2023 should adopt both a *resilience* lens and a *prevention* lens.

A *resilience* lens considers the ability of people and communities to cope with the effects of climate change by resisting, absorbing, accommodating, avoiding, adapting to, transforming, and recovering from the effects of a wide range of environmental hazards and events, including disasters, on people’s well-being. A community resilience lens makes visible the unequal impacts of climate change: socially vulnerable people recover more slowly and lack resources to accelerate their recovery.

A *prevention* lens recognizes that governments, communities, developers, and residents have opportunities to contribute in a variety of ways to preventing or reducing greenhouse gas emissions and that all plans and policies should, where possible, require or encourage them to do so. A prevention lens also means *harm prevention* by taking actions to prevent or limit loss of life and property damage from climate events (e.g., managing retreat from floodplains, reducing neighborhood heat vulnerability).

Our specific recommendations, which involve resilience, prevention, or both, are:

- **In Int. 1031-2023, change “Climate change vulnerability as measured by the 100-year floodplain” to “Climate change vulnerability and risks as reflected in measures of community prevention and resilience.”** Resilience measures should focus on impacts on people’s welfare, not only physical assets; recovery capacity; and distributional impacts or equity effects of protection and mitigation efforts and benefits. Prevention measures should focus on prevention and reduction of greenhouse gas emissions and extent of implementation of harm prevention initiatives.
- **Int. 1031-2023 should require community prevention and resilience measures be used both to help develop fair housing plans and to assess housing plans and policies.**
- **With respect to flood zones, Int. 1031-2023 should:**
 - Acknowledge that the “100-year floodplain” continually increases in size as climate change advances, and **require the City to update its flood maps at least once in every five-year planning cycle**, based on the work of the NYC Panel on Climate Change (NPCC), FEMA, and the International Panel on Climate Change (IPCC), so each fair housing plan will use updated flood maps in considering climate risk.
 - **Promote a policy of managed retreat**, from no public or private development investment in new or renovated buildings in floodplains, to voluntary buyouts of existing structures in floodplains (mandatory for damaged structures), to building wetlands and similar soft solutions in abandoned

floodplain property to absorb storm surge and provide protection and even recreation for people and communities inland of floodplains. There is a large literature and numerous precedents for managed retreat practices, from Staten Island after Sandy to examples across the country.⁸

- **Int. 1031-2023 should acknowledge that green building practices** that minimize greenhouse gas emissions in design, construction, operation, and resident uses of buildings, housing units, building systems and power sources, appliances, and amenities, should not be limited to expensive housing but **should become the norm for all new housing (and eventually renovated housing)** for people of all incomes, **and should require that fair housing plans promote policies to move the city’s housing stock in that direction.**
- In addition to climate change prevention and resilience policies directly related to land use and housing, **Int. 1031-2023 should encourage aligning fair housing plans with as many City climate change prevention and resilience policies and practices as possible** that may exist at the time the plans are developed, whether those involve, for example, zero-waste or waste reduction (e.g., waste prevention, reuse, recycling, and composting), reduction of neighborhood vulnerability to extreme heat, reduction of transportation emissions, or even reduction of demand for consumer goods.⁹
- **Int. 1031-2023 should require a public process to develop measures of community resilience and prevention**, including consultation with experts, advocates, researchers, scientists, and relevant government entities. Resilience and prevention measures could, for example, include or be modeled after:
 - Direct measures of implementation and outcomes of any emission prevention, harm prevention, and resilience policies and practices promoted in fair housing plans, such as measures related to policies and practices described above.
 - Measures published by the U.S. Census Bureau which can help identify communities most at-risk of harm due to environmental hazards and disasters;¹⁰
 - Measures published by other government entities such as NYC DEP and DOHMH, which maintains the Environmental and Health Data Portal¹¹, including, for example, real-time air quality data and analyses based on the New York Community Air Survey (NYCCAS)¹² and a Heat Vulnerability Index (HVI);¹³
 - Measures developed by various researchers such as Bill Anderson Fund Fellows (minority scholars who research and promote policies to protect those most vulnerable to climate change);¹⁴

⁸ Koelle, Timothy (compiler), Inwood Legal Action. “Managed Retreat Precedents and References with Excerpts” at:

<https://docs.google.com/document/d/17GQE8pWOGF3VAPxA53m-N4-wl4k0HyGt/edit?usp=sharing&oid=105411797953579229347&rtpof=true&sd=true>

⁹ Manhattan Solid Waste Advisory Board (2022). “Consumer Demand and Climate Change” at:

<https://drive.google.com/file/d/15q2ksa8xar99PGHN9pU-aPHVNWiz0QQW/view>

¹⁰ Census Bureau’s Community Resilience Estimates:

<https://www.census.gov/programs-surveys/community-resilience-estimates.html>

¹¹ About the Environmental & Health Data Portal: <https://a816-dohbsp.nyc.gov/IndicatorPublic/beta/about/>

¹² NYCCAS: <https://a816-dohbsp.nyc.gov/IndicatorPublic/beta/key-topics/airquality/nyccas/>

¹³ HVI: <https://a816-dohbsp.nyc.gov/IndicatorPublic/beta/key-topics/climatehealth/hvi/> The EDDE uses the HVI score by district as an indicator of Quality of Life and Access to Opportunity.

¹⁴ Examine the work and scholars of the Bill Anderson Fund at: <https://billandersonfund.org>

- Measures developed or used by environmental policy advocates such as WeAct, which analyzed the HVI by neighborhood to develop an Extreme Heat Policy Agenda.¹⁵

Annual reports on progress toward fair housing goals should include an assessment and high-level data on the condition of rental housing to ensure that an increase in affordable units does not come at the expense of poor housing maintenance. Serious problems of tenants not receiving adequate maintenance and repairs in both public and private rent-regulated or income-restricted housing are well known and longstanding. Though NYCHA has active programs to improve conditions in some of their developments, there are still significant repair backlogs across the system. Some private landlords have taken advantage of limited HPD code enforcement resources to game the system, self-certifying that they have removed violations when their repairs have been non-existent or cheap, shoddy, and not up to standard (e.g., painting over mold, rather than properly removing it and repairing leaks that cause mold before patching and painting). When HPD takes some of the most egregious cases to housing court, landlords drag out cases until they can settle for pennies on the dollar before they make repairs, which may still be shoddy. Landlord groups assert that the lower they must keep their rents, the worse housing conditions will become. Therefore:

- **Int. 1031-2023 should require that annual fair housing progress reports include an overall assessment of the state of rental housing maintenance in the city, including a select set of key indicators to show the extent of improvement or deterioration.** The assessment should report on public and private housing separately, and should especially focus on rent-regulated and income-restricted housing. While the assessment might draw on HPD's and NYCHA's extensive housing maintenance databases, **at least some indicators that should be especially highlighted should be based on reports from tenants themselves on conditions and maintenance deficiencies in their own apartments**, such as the surveys of occupants on maintenance deficiencies done as part of the NYC Housing and Vacancy Survey. Data from tenant surveys are important to determine whether performance trends based on data from government systems are reflected in the reality of tenants' lived experiences in their homes.
- The intent of this recommendation is not to recreate or replace the extensive reporting on housing maintenance by HPD and NYCHA in, for example, the Mayor's Management Report. Instead, the idea is to provide a high level picture of the condition and maintenance of rent-regulated and income-restricted housing to juxtapose against fair housing progress. The intent is to help council members, tenants, and other stakeholders assess whether more equitable and affordable housing is also higher-quality, better maintained housing, or whether a worsening maintenance picture detracts from fair housing progress.

Use the True Cost of Living Measure to assess economic security, equity, and poverty reduction. The current bill mandates annual reporting on the "true cost of living measure" as well as on fair housing, and also references and updates existing requirements for annual reporting on economic "equity," poverty, and poverty reduction efforts. However, the section on reporting on "equity," including poverty and poverty reduction, does not specify using the true cost of living measure. This will likely underestimate the numbers and percentages of people, overall and by race, in NYC who struggle to make ends meet, and thus create misunderstandings about who is in need.

¹⁵ WeACT Extreme Heat Policy Agenda:

<https://www.weact.org/wp-content/uploads/2023/07/2023-Extreme-Heat-Policy-Agenda-FINAL.pdf>

- **Int. 1031-2023 should mandate that this “Equity” report use the true cost of living measure to measure poverty and assess poverty reduction efforts**, make comparisons among population subgroups within NYC by race, ethnicity, age, and family characteristics, and report on changes in the number of households with incomes below the True Cost of Living standard.
- For purposes of national or regional comparisons with populations outside NYC, separate poverty measurements may also need to be calculated using the standard federal poverty measure. However, **Int. 1031-2023 should mandate that for assessments of equity and poverty reduction efforts within NYC, the “true cost of living measure” for NYC must be used.**
- **Int. 1031-2023 should require the City to annually calculate the true cost of living measure using or modifying the methodology developed by the Center for Women’s Welfare in the University of Washington School of Social Work.**¹⁶ Also require the City agency assigned responsibility for publishing the measure to review and consider feedback on the methodology from New York City nonprofits involved in economic security research (e.g., Community Service Society, Fund for the City of New York, United Way, Urban League).

For the mayor’s “annual report analyzing the social, economic, and environmental health of the city, Int. 1031-2023 should mandate more specific environmental health information and require that it be made easily available to the public. In particular:

- **Int. 1031-2023 should require these reports to include data for a range of environmental health indicators**, including, but not be limited to, baseline geographic and demographic incidence of diseases (e.g., asthma, COPD, heart disease, cancers) caused by air pollution and by other environmental causes (e.g., automotive, building); excessive heat at different times of day; location of lead pipes and parks, vector populations (insects, rodents), measurements of traffic congestion and delays as presented in environmental impact statements, distribution of and numbers using urgent care, cooling centers, hydration stations, public pools, flood safety centers and other health-related facilities across the city vs. demographics; noise levels all across the city as measured by decibel levels at various times of day and week; and quantified transportation-related and building emissions in all areas of the city.
- **Int. 1031-2023 should require these reports to be annually updated with year-to-year data comparisons.** It is important for there to be many data points across all the neighborhoods.
- **Int. 1031-2023 should require these data to be available on a public online dashboard.**

This testimony is respectfully submitted by Inwood Legal Action

Paul Epstein and Cheryl Pahaham, Co-chairs

Maggie Clarke, Karla Fisk, Ted Freed, and Katherine O’Sullivan, Members of the Steering Committee

¹⁶ See “NYC True Cost of Living” at https://selfsufficiencystandard.org/wp-content/uploads/2023/04/NYC2021_Demo.pdf



New York City Council
Fair Housing and Affordable Housing Development
Committee on Land Use Jointly with the Committee on Housing and Buildings
Land Use Chair Salamanca and Housing and Buildings Chair Sanchez
September 26, 2023

My name is Allison Nickerson, and I am the Executive Director of LiveOn NY, a membership agency that represents over 100 non-profits from small, single-site centers to large multi-service organizations serving older adults throughout New York State. Through our work and membership, we represent the 3.2 million older New Yorkers and their caregivers.

LiveOn NY is also home to the Reframing Aging NYC Initiative, part of the national Reframing Aging Initiative aimed to counteract ageism and improve the way policymakers, stakeholders, and the public think about aging and older people. With our members, we work to make New York a better place to age.

Background

The lack of quality affordable housing has quickly become one of the top issues facing our city, and we thank this council for their willingness and action in working to resolve that issue. LiveOn has been working to promote the development of affordable housing for decades. Our seminal 2016 study¹ starkly illustrated the need for affordable housing showing that there are more than two hundred thousand older adults on waiting lists for affordable senior housing, with an average wait time of 7 years to move into one of those apartments. This year we are updating this study and including the amount of new senior affordable housing developed in the intervening years.

Ageism is a key driver in the unique challenges facing New Yorkers as we age. Oftentimes older New Yorkers are locked out of employment due to preexisting notions about their skill or ability, or the misconceptions about accommodations people may need to be productive. This leaves many older New Yorkers without the opportunity to grow their income and unable to keep up with historically high and still rising rents. This is one factor that has lead AARP to estimate that the number of unhoused people over 65 will triple by 2030.²

Additionally, many housing developers do not create apartments that are designed to keep up with our needs as we age, and creating more accessible spaces benefits people at all ages. Universal Design Principles³ have been created that would create spaces that accommodate more New Yorkers' needs and ensure that as New Yorkers age, their homes don't become dangerous or inaccessible. We must work together to ensure affordable and accessible housing is available to all New Yorkers as we age.



Making New York a better place to age

Recommendations

Firstly, we invite the City to utilize our aging policy agenda, [*Aging is Everyone's Business*](#), released by LiveOn NY in partnership with Hunter College Brookdale Center for Healthy Aging, which is a bold policy agenda that provides actionable policy solutions to make New York a better, more equitable place to age.

We must pair older adult housing with services to meet the unique needs of older adults, preserve our independence as we age, and reduce costs associated with Medicaid and Medicare for our government. Housing specifically created for older New Yorkers allows for the creation of unique programs that have far reaching benefits for an individual's quality of life, the ability for someone to remain independent and out of institutionalized care, and for the city and state to save millions in costs related to poor health outcomes. Our members have been pioneers in this space, with SelfHelp as a leader in affordable housing plus services in their SHASAM⁴ model. In a comprehensive 3-year study, this model demonstrated that pairing housing with targeted services can greatly improve quality of life for older New Yorkers and create massive healthcare savings for both the residents and the government.

Additionally, we must encourage accessible development to create apartments that work for all New Yorkers. We should also track how many apartments are being produced that go above and beyond mandated accessibility requirements and proactively feature universal design principles. The city should also increase funding and programs aimed at creating more universally accessible housing.

Furthermore, to address the specific challenges ageism brings to New Yorkers we must work to promote the development of housing specifically for older New Yorkers. We must ensure that we all have access to housing as we age, and with the proposed expansion of AIRS announced last week, we should look into new ways to incentivize the production of affordable housing, specifically for older New Yorkers. We must recognize that ageism compounds all discrimination faced by an individual over their life course, and programs need to target older New Yorkers to adequately combat the impacts of that discrimination.

Proposed Legislation

LiveOn applauds Speaker Adams and Chair Salamanca for the bills being heard today, and Chair Sanchez for her support of these housing initiatives. We wholeheartedly support Intro 362 and 2023, and all efforts to increase both transparency around city-funded housing development and the creation of more affordable and accessible housing throughout New York.

Thank you for the opportunity to testify, and we are excited to continue our partnership with the city council to make New York a better place to age.



Making New York a better place to age

References:

¹"[THROUGH THE ROOF - WAITING LISTS FOR SENIOR HOUSING](https://static1.squarespace.com/static/562a3197e4b0493d4ffd3105/t/5756cc54356fb02fbe7d3032/1465306196938/Through+the+Roof+Senior+Housing+Waitlist+List+Survey+Jan+2016+FINAL.pdf)" - LiveOn NY 2016
<https://static1.squarespace.com/static/562a3197e4b0493d4ffd3105/t/5756cc54356fb02fbe7d3032/1465306196938/Through+the+Roof+Senior+Housing+Waitlist+List+Survey+Jan+2016+FINAL.pdf>

²"[The Graying of America's Homeless: An Alarming Trend](https://www.aarp.org/home-family/your-home/info-2022/americas-homeless-over-50.html)" - AARP 2022
<https://www.aarp.org/home-family/your-home/info-2022/americas-homeless-over-50.html>

³"[What is Universal Design](https://www.nahb.org/other/consumer-resources/what-is-universal-design)" - NHAB
<https://www.nahb.org/other/consumer-resources/what-is-universal-design>

⁴"[Healthy Housing: An Evaluation of Selfhelp Active Services for Aging Model \(SHASAM\)](https://selfhelp.net/wp-content/uploads/2022/03/Selfhelps-Healthy-Housing-White-Paper.pdf)" Selfhelp
<https://selfhelp.net/wp-content/uploads/2022/03/Selfhelps-Healthy-Housing-White-Paper.pdf>

Testimony provided by Allison Nickerson, Executive Director at LiveOn NY For questions, please email ANickerson@LiveOn-NY.org.

LiveOn NY's members provide the core, community-based services that allow older adults to thrive in their communities. With a base of more than 100 community-based organizations serving at least 300,000 older New Yorkers annually. Our members provide services ranging from older adult centers, congregate and home-delivered meals, affordable senior housing with services, elder abuse prevention services, caregiver supports, case management, transportation, and NORCs. LiveOn NY advocates for increased funding for these vital services to improve both the solvency of the system and the overall capacity of community-based service providers.

LiveOn NY also administers a citywide outreach program and staffs a hotline that educates, screens, and helps with benefit enrollment including SNAP, SCRIE, and others, and also administers the Rights and Information for Senior Empowerment (RISE) program to bring critical information directly to older New Yorkers on important topics to help them age well in their communities.

September 27, 2023

Chair Pierina Ana Sanchez
Subcommittee on Housing and Buildings

Chair Rafael Salamanca Jr.
Subcommittee on Land Use

New York City Council

Email Delivery

Re: Speaker Adam's Fair Housing Planning Bill | Int 1031-2023

Dear Chair Sanchez, Chair Salamanca Jr., and Subcommittee Members:

Thank you for this opportunity to provide testimony regarding the Fair Housing Framework legislation.

The Municipal Art Society of New York (MAS) supports the Fair Housing Framework legislation as a significant step in addressing our city's urgent housing crisis.

The Fair Housing Framework incorporates the principles of comprehensive planning, which is something MAS, alongside the Thriving Communities Coalition, has long advocated for to facilitate future decision-making and long-term citywide goals. Comprehensive planning encourages meaningful public dialogue about trade-offs and benefits within a holistic citywide land use plan.

MAS supports comprehensive planning to actively utilize community engagement and create a shared citywide vision for an equitable distribution of affordable housing. Comprehensive planning is critical to strategizing a balance of citywide goals with community needs and is necessary to confront our city's worsening housing crisis and undermining existing inequities.

The proposed targeted citywide housing production goals from the Department of Housing Preservation and Development (HPD) and the Department of City Planning (DCP) will advance equity in the city's housing goals. Utilization of the Equitable Development Data Explorer tool would be valuable in constructing metrics for citywide housing targets. MAS, alongside the Racial Impact Study Coalition, advocated for the creation of this tool to provide public data on equity and disparities across the city.

We encourage the City Council to also consider innovative incentives to mandate an actual increase in the production of affordable housing, for example by exploring the use of bonus FAR and transferable air rights within selected opportunity districts.

However, the success of any new housing initiatives relies in part on an increased capacity at HPD and DCP, including more staff and agency resources.

Thank you for this opportunity to submit written testimony. We would be happy to discuss these comments with your subcommittees.

Yours truly,



Elizabeth Goldstein

President

**The New York City
Council Committee on
Housing and Buildings**

Pierina Ana Sanchez,
Chair
September 26, 2023

Written Testimony

Note: This testimony reflects
the position of Pratt Center for
Community Development and
not necessarily Pratt Institute

Re: Int 0362-2022; Int 1031-2023

Chair Sanchez and members of the Committee on Housing and Buildings, thank you for the opportunity to **submit testimony in support of two bills, Intro 362 and Intro 1031, to advance transparency and equity in housing and planning in New York City.** I am Alexa Kasdan, Executive Director of the Pratt Center for Community Development, which works for a more just, equitable and sustainable New York City in partnership with community-based groups, small businesses, and policymakers. For 60 years, Pratt Center has worked towards a just city, where every neighborhood is healthy, resilient, and allows for all its residents to thrive. Pratt Center believes this can only be achieved by addressing racial, economic, and housing inequalities in New York City.

Requiring HPD to report on the disposition of city property for affordable housing development through **Int. 362 would be a valuable addition to the data the agency is required to report** under Local Law 44 of 2012. Policy researchers such as Pratt Center and our community partners rely on this data to better understand the impact of the city's land disposition and housing policies and practices. This law would be strengthened by requiring additional data related to HPD dispositions, including the entity type of the developer(s) and whether the developer (or any partners in a joint venture) has non-profit status, in order to better assess whether public assets are being maximized for public benefit.

Beyond these reporting requirements, we also stress the need for greater transparency from HPD regarding its portfolio and potentially developable land earlier in the disposition pipeline. As we found in our [Gaining Ground](#) report earlier this year, community-based organizations and Community Land Trusts seeking to create and preserve permanently affordable housing often struggle to get clear and up-to-date information from the city regarding public land assets, their potential for housing development, and disposition plans or status.

We also **urge this Committee and the City Council to pass Int. 1031 to strengthen the city's planning for fair housing.** Decades of zoning and land use policies has resulted in the further destabilization of communities of color in New York City, incentivizing speculation and construction of market-rate and luxury housing which has resulted in displacement of New Yorkers who remained and contributed to this City when no one else would. Pratt Center has long called for more inclusive and equitable practices in land use and zoning through our work, most recently in Thriving Communities Coalition, which has been working towards reform in our land use processes, and the Racial Impact Study Coalition, which successfully resulted in the passing of Int.1572-B, which resulted in the creation the Equitable Development Data Tool (EDDE), which Int.1031 will be dependent on once passed. While we believe land use process reform and more transparent zoning and policy changes that address past planning decisions which have negatively impacted these communities are still needed, advancing fair housing initiatives is also important.

Int. 1031's strategies to further fair housing by preserving existing affordable housing, preventing displacement through the expansion of tenant protections, creating more housing for persons with disabilities, and ensuring more equitable distribution of housing and investments to support communities have been a priority for community groups and advocates in addressing our growing housing crisis. Incorporating these strategies into comprehensive legislation that will allow for addressing housing inequalities on a community district level is a step towards the type of planning and policy Pratt Center and many other coalitions and community groups have been advocating for.

Pratt Center believes the legislation could be more impactful if the following concerns are addressed:

1. The current methodology in the legislation to Identify “high opportunity” areas must go beyond data that is provided in the EDDE. While the EDDE does measure important quality of life factors, its original intent was not to be inclusive of all factors necessary to ensure fair housing. We would like to see collaboration between HPD, DCP, as well as community groups and other stakeholders to ensure that this methodology is strengthened.
2. The legislation must be explicit in ensuring targets for Extremely Low Income (below 30% AMI) , Very Low Income (below 50% AMI) are also met.
3. Annual reporting on the City’s progress with this legislation must be detailed and on a community district level to ensure goals are being met and identify challenges that are impacting progress.
4. Public meetings and engagement should be expanded to ensure that there is sufficient public input on the Fair Housing Plan.

In addition, we recognize that the city engages in fair housing planning and analysis under Federal Affirmatively Furthering Fair Housing (AFFH) requirements and its own Where We Live NYC initiative. The racial justice ballot measures approved by voters in November 2022 also require Racial Equity Plans every two years, and establish a True Cost of Living measure and annual reporting. These various requirements share many important goals. We urge City Council to work with city agencies to ensure that the fair housing planning activities established under Int. 1031 are coordinated and not duplicative with these requirements, and avoid creating administrative burdens that hamper planning and implementation.

We appreciate the Committee on Housing and Buildings holding this hearing to discuss these strategies to address the urgent housing crisis facing our city. Pratt Center looks forward to working with City Council DCP, HPD, and our community partners to ensure the success of both of these pieces of legislation. Building a more just and equitable New York City is at the core of our work and we will continue to advocate for reforms and community resources to ensure all New Yorkers have access to affordable housing, healthy neighborhoods, and economic opportunity.



For more information, contact

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Testimony before the New York City Council
Committee on Housing and Buildings
September 26, 2023

Paul Woody, Chief Real Estate Officer
Project Renewal

Project Renewal's mission is to end the cycle of homelessness by empowering individuals and families to renew their lives with health, homes, and jobs.

www.projectrenewal.org

My name is Paul Woody and I am the Chief Real Estate Officer of Project Renewal, a New York City homeless services nonprofit agency. Thank you for this opportunity to submit testimony.

For more than 55 years, Project Renewal has provided shelter, housing, health care, and employment services to hundreds of thousands of New Yorkers experiencing homelessness, with focus on those affected by mental illness, substance use, and criminal justice involvement. I am grateful to Chair Sanchez and the entire City Council for your support of our programs.

Accelerating the development of affordable housing is imperative. Due to a confluence of factors, including newly-arriving migrants and rising cost of living, our City's shelter census continues to grow. A lack of inventory of affordable housing options makes it incredibly difficult to meaningfully reduce the shelter population.

Per Intro 1031, we support the creation of fair housing plans by HPD and DCP, including five year production targets. Those plans should look for opportunities to mitigate risk for nonprofit developers who are eager to create new housing. Nonprofits take on substantial pre-development costs without any guarantee that a project is feasible, which represents enormous risk. To encourage new, nonprofit-led development the city should consider a backstop fund. We are confident this would expand the pool of committed non-profit developers. We also support NYC's "City of Yes for Housing Opportunity" initiative and its efforts to boost housing production to help meet whatever targets get outlined in Intro 1031.

Project Renewal also supports Intro 362 to require HPD to report on the disposition of city property for affordable housing development. But, the City should survey its *entire* portfolio of land—not just HPD's portfolio—to identify developable sites and assist in the efficient and equitable creation of affordable and supportive housing. City-owned shelter sites are a great place to start.

Our New Providence project in East Midtown is an example of how Project Renewal, working with NYC and Monadnock Development, is addressing the need for new affordable housing by transforming a City-owned shelter into purpose-built shelter and affordable housing. The City will soon transfer the shelter site to Project Renewal to redevelop as a larger facility. The new 21-story, 133,000 square foot building will combine shelter and permanent affordable housing. It will include 171 emergency beds with embedded mental health and substance use programs for single adult women, as well as 130 deeply affordable permanent studio apartments for single adults. A licensed primary care clinic on the first floor will extend health care services to the community and provide continuity of care after clients leave the shelter.

We must ensure New Yorkers who are in shelter or at risk of entering shelter have access to affordable and supportive housing. The biggest challenge is speeding up the creation of housing and creating more opportunities for more types of housing across NYC. Nonprofits like Project Renewal are ready to partner with the City in order to meet the ever-growing needs.

We are grateful to the New York City Council for their support of Project Renewal's services. Thank you, again, for this opportunity to submit testimony.



The Community Preservation Corporation
220 East 42nd St, 16th Floor
New York, New York 10017

**New York City Council Committee on Housing and Buildings
Oversight Hearing – Affordable Housing Development Pipeline
September 26, 2023**

**Testimony delivered by Erin Burns-Maine, Chief of Staff and VP of Policy
On behalf of The Community Preservation Corporation**

Good morning, my name is Erin Burns-Maine, and I am the Chief of Staff and VP of Policy at the Community Preservation Corporation, a nonprofit affordable housing and community revitalization company that was formed in the early 1970s to help New York City and State restore and rebuild communities that had been devastated by deterioration and abandonment.

Today, CPC uses its unique expertise in housing finance and public policy to expand access to housing and drive down the costs of affordable housing production, advance diversity and equity within the affordable housing development industry, and address the effects of climate change in our communities through the financing of sustainable affordable housing. Since our founding, CPC has invested over \$14 billion to finance the creation and preservation of more than 225,000 units of housing through our lending and investing platforms. As a long-term joint lender with HPD, we are a strong partner in the City's efforts to tackle some of the most pressing problems facing communities today. CPC is the largest originating lender in the New York City Retirement Systems permanent loan program and we currently have an active portfolio of 60 HPD construction and permanent loans totaling \$941 million and representing 4,453 units. CPC is also an equity partner in the PACT Renaissance Collaborative, the team selected by NYCHA to renovate and preserve 16 NYCHA properties located in Manhattan.

CPC's affordable housing mission shapes our investments and drives our focus on three goals that elevate urgent community needs: expanding housing access, investing in closing the racial wealth gap, and decarbonizing multifamily housing. We partner with government to support public subsidy and programs that align with these goals while also advocating for commonsense policy to make it easier to build more housing and house more people in New York City – such as reinstating a tax incentive for affordable housing development and rehabilitation, administrative reform to create a more efficient and streamlined system of housing voucher administration, and support for emerging BIPOC developers seeking to build affordable homes.

As an affordable housing lender with a significant footprint in New York City, we have a unique perspective on the city's affordable housing management and development pipeline. Across CPC's portfolio of construction and permanent loans, we are increasingly seeing that projects' underlying economics are impaired or have deteriorated such that they cannot operate and service their debt. We know multiple factors shape this trend – from the current high interest rate environment, increased operating costs, increased insurance premiums, and reduction in rent collection and other lingering economic impacts of the pandemic.

Meanwhile, everyday New Yorkers are struggling with housing affordability and we are reaching a crisis. In addition to continuing to push at the State level for a tax incentive for



The Community Preservation Corporation
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affordable housing, locally we must do whatever possible to address what is within their control – address bureaucratic inefficiencies, advance zoning reform, and enthusiastically support new housing in your districts.

We know that the Departments of Housing Preservation and Development, Buildings, City Planning, Social Services, and the Office of Management and Budget work hard to manage the multistep processes that yield the production and preservation of housing citywide and we appreciate their efforts. Over the last three years CPC has been working directly with emerging BIPOC developers through our ACCESS initiative. We often hear from those developers that the current regulatory processes for new construction and rehabilitation are riddled with inefficiencies that cause unreasonably long delays across a project's lifespan. Large developers with deep balance sheets can afford to wait it out, but for smaller, emerging developers including many M/WBEs, who may lack access to patient capital, the city's delays kill their projects and discourage them from taking on future projects. We were encouraged by the "Get Stuff Built" report released last December that identifies 111 concrete actions that the city can take to facilitate the creation of housing more quickly and we look forward to the city implementing those recommendations. But even if all of the BLAST report recommendations were implemented overnight, consequences of inefficiencies across the affordable housing development pipeline are already severe and need immediate attention. At a time when affordable housing is extremely scarce, the Council must prioritize increasing efficiencies and streamlining processes across the city's affordable housing development pipeline.

In addition to addressing inefficiencies, we all have a role in getting more housing built. We are very supportive of the Mayor's City of Yes for Housing Opportunity zoning reform proposal. For too long, our city's outdated zoning has been a key contributor in our affordable housing crisis. It has limited where, how, and what we can build, and in many cases it has dictated who can live in which neighborhoods. The Mayor's proposed zoning reform will be the most significant overhaul of our city's zoning in decades, increasing housing supply, fueling our economy, and making New York City a much more affordable and equitable place to live.

Big challenges demand big solutions and there is no greater challenge right now for New York than our housing crisis. Mayor Adams and his Administration are giving us thoughtful, ambitious plans that reflect both the gravity of the crisis and the all-of-the-above approach needed to make housing more abundant, accessible, and affordable. We are decades too late to try and solve our housing problems with one silver bullet.

We urge you to work together and support the zoning reforms and to say yes to housing in your district, yes to making the city more affordable, to spurring economic opportunity, to creating jobs, and to making neighborhoods more accessible and equitable. In short, we can do more with more, but we need your help. This is a critical moment and a tipping point for our city - we can't afford not to act.

Thank you for your time and I am happy to take any questions.



**TESTIMONY OF THE RACIAL IMPACT STUDY COALITION
BEFORE THE COMMITTEE ON LAND USE AND
THE COMMITTEE ON HOUSING AND BUILDINGS
IN SUPPORT OF Int. 1031-2023**

The Racial Impact Study Coalition thanks the Chairs for accepting our written testimony in support of **Int. 1031-2023**, and we ask that you take up the opportunity to ensure that the bill moves forward in a way that maintains its commitment to equity and fair housing.

The Racial Impact Study Coalition is a coalition of neighborhood, community-based, and planning groups who came together to ensure that the City of New York meaningfully considers racial impacts in making major land use decisions. Collectively we represent most of the communities that have been impacted by City-initiated rezonings in recent years and a wide spectrum of New York residents. We share a commitment to protecting our communities from racialized displacement and expanding permanently affordable housing to all neighborhoods, and we are excited to see the council taking seriously the urgent need for equity in planning, development, and the creation of affordable housing. We support the legislation proposed by the Speaker and allied council members and hope to work collaboratively with the council to strengthen the bill.

From 2019 through 2021, our coalition worked with the Public Advocate and the council to pass Local Law 78 of 2021 which created the Equitable Development Data Explorer. It was our hope that the tool would become widely used and allow communities to better advocate for our needs as well as be incorporated into formal planning processes. Int. 1031-2023 codifies the EDDE data as central to its methodology, which guarantees that the tool will be robustly maintained and that the metrics used to advance fair housing will be one that was developed in a robust collaboration between the coalition and DCP and HPD. This is precisely the way we hoped the EDDE would become entrenched in city decision-making processes and we are proud that our work provided the backbone of this legislation.

Int. 1031-2023 also incorporates the Displacement Risk Index to identify high displacement-risk community districts. Given that Local Law 78 legally mandates the structure and categories of indicators required by the tool, the use of this index assures community members that displacement risk is calculated using a method developed by HPD and DCP in consultation with a coalition of stakeholders and tested against eviction data to select the best formula for the index among alternatives.

The current bill provides a framework that will advance nuanced strategies based on the needs of each community district. Initiatives to increase and preserve affordable housing will be targeted in High-opportunity districts. High displacement risk communities will be targeted with preservation and anti-displacement initiatives, and underserved communities that have borne the brunt of affordable housing production will be targeted for neighborhood equity investments. *This nuance is vital to the success of the legislation.* Any equity-based planning must take into consideration the conditions of each community district, and blanket housing production goals or targets without nuance will only exacerbate existing inequity. We applaud this aspect of the proposal and acknowledge it is essential that it remains the foundation of the legislation.

The bill should also establish clear metrics for identifying “high opportunity community districts.” The DRI was crafted to identify displacement risk, and a community that reflects a low displacement risk does not necessarily indicate a high quality of life or access to opportunity, only stability relative to other community districts. Similarly, the EDDE does contain indicators on quality of life and access to opportunity, but those indicators largely focus on health outcomes, transit access, and educational attainment. These indicators alone are not likely sufficient to establish “high opportunity” for fair housing purposes. It is absolutely essential that a more robust process is mandated and clearly outlined by the legislation. We have seen time and time again programs and initiatives targeting low-income communities of color for housing production, but one of the strongest parts of this legislation is the inclusion of high-opportunity districts for the production of affordable housing. If the definitions of high-opportunity areas do not accurately reflect the areas that qualitatively have the highest opportunities, there is a substantial risk that the goals of the legislation will be undermined. A robust metric can be developed through a similar iterative process as the collaborative process between RISC and DCP and HPD that produced the current Displacement Risk Index and EDDE.

The Racial Impact Study coalition thanks you for the opportunity to submit testimony and looks forward to working together to produce a bill that will build on the steps towards equity and transparency the council has already taken with the passage with the creation of the Displacement risk index and the EDDE and expand upon them by using the data to enact substantive fair housing policies.

Statewide Affordable and Fair Housing Roundtable

Testimony for Joint Hearing on Intro 1031 (Fair Housing Framework)

September 26, 2023

Thank you to Chair Salamanca and Chair Sanchez for the opportunity to testify today on Intro 1031, also known as Speaker Adams' Fair Housing Framework. We commend Speaker Adams for recognizing the importance of using a fair housing lens to address New York City's housing crisis.

My name is Manon Vergerio and I am the Head of Data & Advocacy at Unlock NYC, a tech nonprofit led by women who have experienced source of income (SOI) discrimination. SOI discrimination, the practice of denying housing to tenants with rental assistance vouchers, is the most pervasive form of illegal housing bias in New York City.¹ While the federal Fair Housing Act does not explicitly ban SOI discrimination, laws at both the New York State and New York City level prohibit landlords from discriminating against housing voucher holders.² **Unfortunately, SOI discrimination remains rampant, and keeps thousands of New Yorkers stuck in homeless shelters. New York City's Fair Housing Framework must address this on-going force of segregation and homelessness.**

As a member of the Statewide Affordable and Fair Housing Roundtable, we fully support legislation that confronts New York's legacy of discrimination and segregation by making equitable housing investments, particularly for low-income New Yorkers in amenity-rich neighborhoods. With that being said, we wish to highlight suggested additions to ensure that our city's approach to affirmatively furthering fair housing (AFFH) and addressing our affordable housing crisis is as strong as it can be.

Strengthen Source of Income Protections

New York City can affirmatively further fair housing by strengthening existing source of income provisions in New York City Human Rights Law.

Brokers and landlords have developed increasingly sophisticated mechanisms to deny housing voucher holders. While real estate ads used to frequently state "No programs," real estate agents are now turning to more deceitful tactics, such as ignoring prospective tenants once they reveal their voucher.³ In the last two years, our organization has received over 1,500 SOI discrimination complaints from more than 500 New Yorkers across all five boroughs. Based on these reports, we have cataloged dozens of denial tactics, ranging from exclusionary income requirements, changing the price of a unit after a voucher holder applies, charging exorbitant holding fees, and other fraudulent practices.

¹ NYC Commission on Human Rights, "Fiscal Year 2022 Annual Report."

² NYC Commission on Human Rights, "Source of Income Discrimination." New York State Attorney General, "Source-of-Income Discrimination."

³ Unlock NYC and Neighbors Together, "An Illusion of Choice: How Source of Income Discrimination and Voucher Policies Perpetuate Housing Inequality."

We recommend providing additional guidance on how housing providers' minimum income and credit score policies requirements may be discriminatory based on lawful source of income, and increasing penalties for housing providers who break the law.

Penalties could include working with the NYS Department of State to revoke broker licenses, preventing discriminatory landlords from accessing tax benefits and government subsidies, and requiring housing providers to set aside units for voucher holders. These enforcement mechanisms could mitigate discrimination and provide pathways to fair housing for voucher holders.

Fund Enforcement Agencies and Fair Housing Organizations

The primary city agency tasked with enforcing anti-discrimination protections, the NYC Commission on Human Rights (CCHR), has been brutally underfunded for years. While advocates organized to win a historical \$1.3 million investment for CCHR's SOI discrimination Unit in the FY24 Executive Budget, the Commission is once again on the chopping block based on the Mayor's latest budget cuts. A 15% cut would be devastating for an agency already working with scarce resources.

The City should fully fund agencies tasked with enforcing fair housing laws, such as the City Commission on Human Rights, the Department of Housing and Preservation, as well as community-based organizations educating voucher holders about their rights, and the Fair Housing Justice Center (FHJC), the City's only qualified full-service fair housing organization.

Left underenforced, SOI discrimination prolongs homelessness, excludes families from high-opportunity areas,⁴ exacerbates segregation,⁵ and negatively impacts both physical and mental wellbeing.⁶ The Speaker's Fair Housing Framework is an exciting opportunity to desegregate New York and tackle a massive barrier to ending our homelessness crisis. We look forward to working with you to ensure that New York City is an affordable, inclusive and equitable place to live for everyone.

Sincerely,

Manon Vergerio

Co-founder and Head of Data & Advocacy, Unlock NYC

manon@weunlock.nyc

⁴ Cunningham et al., "A Pilot Study of Landlord Acceptance of Housing Choice Vouchers."

⁵ Lindsay, James. "Report: Discrimination, Flawed Search Process Hurting Housing Assistance Recipients." Boston Federal Reserve Bank, August 8, 2019.

⁶ The American Psychological Association. "The Impact of Discrimination," 2015.



Testimony to the NYC Council Committees on Housing and Buildings, and Land Use

September 26, 2023

My name is Walter Gersón Rodríguez, Senior Director, Strategic Community Partnerships at Volunteers of America-Greater New York. I would like to thank Speaker Adrienne Adams, Housing and Buildings Chair Pierina Sanchez and Land Use Chair Rafael Salamanca as well as the members of both Committees for the opportunity to submit testimony, and for emphasizing the need for transparency and public input into the development of affordable housing – principles that undergird both Intro 362 and Intro 1031.

Volunteers of America-Greater New York (VOA-Greater New York) is an anti-poverty organization with a rich 125-year history of serving our neighbors in need. Our vision is fueled by our experience as a leading provider of services to families and individuals experiencing homelessness in the greater New York area. Through more than 60 programs located in New York City, Northern New Jersey, and Westchester County—including emergency shelters, transitional housing, and permanent supportive housing—we deliver services to more than 11,000 adults and children annually. We are also the largest provider of residential services for veterans within a coalition that has virtually ended chronic homelessness for veterans in New York City.

Our Solution:

We know that the most prevalent causes of homelessness are a lack of affordable housing, unmet health need, and a lack of jobs that create wealth-generating careers.

More broadly, structural racism and generational poverty are to blame for many of the longstanding barriers to independent living that our neighbors in need face every day. This is why VOA-Greater New York is at the forefront of developing innovative housing, health, and wealth-building services for families and individuals experiencing, or at imminent risk of, homelessness.

HOUSING

VOA-GNY joins the earlier points made by Speaker Adriene Adams: affordable housing demand far outpaces production.

As cited in the NYC Mayor Management Report, in FY23, there was an average of 66,195 individuals in shelter per stay, far outpacing the construction of total affordable housing units.

Increasing the production and preservation of low-income affordable housing and voucher utilization in high-opportunity community districts is a great first step in safeguarding communities from being gentrified. It keeps life-long residents living in a neighborhood that saw them grow.

VOA-GNY advocates for an equitable distribution of supportive housing and services, given that neighborhoods that have faced historical disinvestment, discrimination, segregation, and poverty often experience a saturation of such housing and services.

EQUITY

The social, economic, and environmental health of the city is illustrated by its poverty rates.

According to US Census Bureau 2020 (See appendix below):

- Bronx: 24.4% of 1.427 million live in poverty = 348,188 people
- Brooklyn: 17.8% of 2.577 million live in poverty = 458,706 people
- Queens: 10.3% of 2.271 million live in poverty = 233,913 people
- New York: 16.3% of 1.629 million live in poverty = 265,527 people
- Staten Island: 10.6% of 475,596 live in poverty = 50,413 people

It should be of no surprise that the highest concentration of evictions take place in BIPOC communities. According to a Gothamist's eviction tracker, launched August 10, 2023 using NYC Open Data – findings: ([article](#))

- Since the beginning of 2022, city marshals conducted more than 10,000 evictions.
- Evictions are concentrated in central South Bronx, central Brooklyn, and northern Staten Island.
- The people being evicted are likely to be Black or Latino and earn less than the city's median income.

“Displacement risk and vulnerability” is a critical problem that must be resolved. VOA-GNY advocates for supportive and affordable housing projects to include set-aside units specially for the following populations: seniors, veterans, artists, and those in the service or social services sector. Additional funding for eviction prevention and outreach to residents in hot spot eviction areas is needed.

RACIAL MAKEUP

The racial makeup of the population of the shelter system is primarily of BIPOC. Over 75% of the shelter residents come from the very communities the programs are located in. The neighborhoods shelter residents come from have often been neglected and underinvested for

decades leaving in their wake the conditions for poverty, poor health, and high unemployment rates.

VOA-GNY supports the continued efforts to invest in underserved neighborhoods with a history of discrimination, segregation, and poverty by utilizing an anti-racist framework that encourages uplifting these communities.

In closing, VOA-GNY advocates for the following:

1. An equitable distribution of supportive housing and services, given that neighborhoods that have faced historical disinvestment, discrimination, and segregation.
2. Supportive and affordable housing projects to include set-aside units specially for the following populations: seniors, veterans, artists, and those in the service or social services sector.
3. Investing in neighborhoods with a history of discrimination, segregation and poverty by utilizing an anti-racist framework that encourages uplifting these communities.

We thank the Council for its commitment to transparency and public input into the development of affordable housing, and for holding this hearing.

Thank you.

Respectfully submitted by:

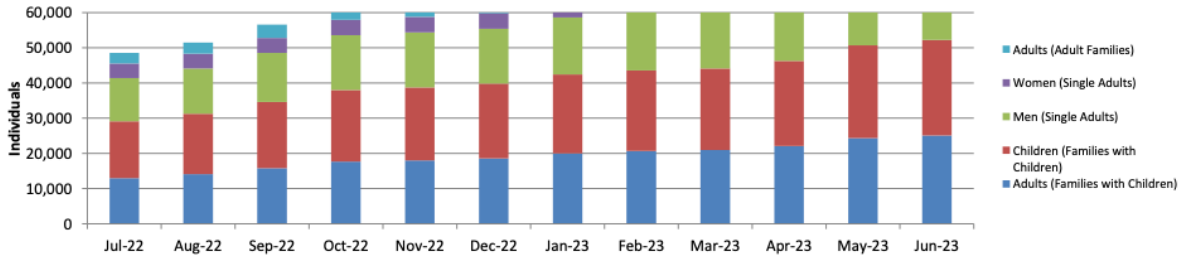
Walter Gersón Rodríguez, Senior Director, Strategic Community Partnerships
Volunteers of America - Greater New York
135 West 50th Street, 9th Floor
New York, NY 10020

APPENDIX

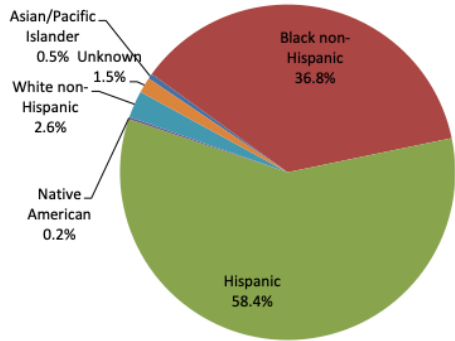
DHS DATA DASHBOARD - FISCAL YEAR 2023

Population

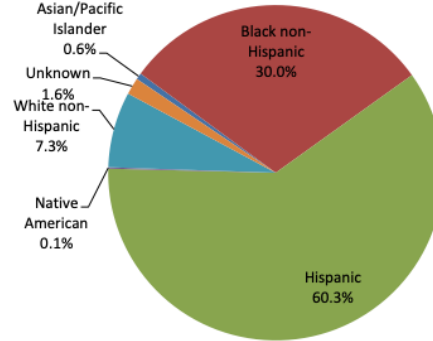
Average Daily Individuals in Shelter, FY 2023



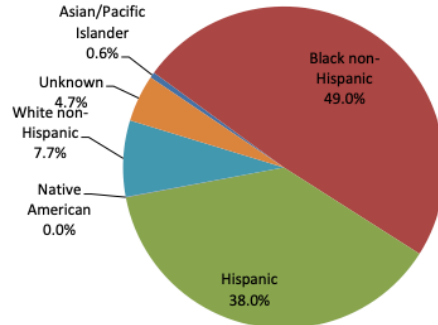
Race/Ethnicity of Families with Children in Shelter (Heads of Households), FY 2023



Race/Ethnicity of Adult Families in Shelter (Heads of Households), FY 2023



Race/Ethnicity of Single Adults in Shelter, FY 2023



Dear City Council Housing and Building Committee's Esteemed Members,

As a long-time New Yorker, I am happy that you are looking to study housing security and affordability in this proposed Fair Housing Plan (Int 1031-2023). In my lifetime as a renter, I moved 9 times over 20 years. I had a harrowing experience with a terrible landlord that, without provocation, made me (and other responsible renters) go to housing court and fight for myself and my young family on a reasonable timetable. So, I understand how renters need protections for housing security and safety, especially from unscrupulous landlords. But, one thing I've learned is that homeowners deserve housing security and stability as well.

My husband and I were fortunate enough to be able to afford our two-family home through the FHA loan program. We have been able to hold onto our home for 10 years so far, with the hope that we can retire here and pass it along to our children— something my parents weren't able to achieve during the red-lining days of this country.

However, between the doubling of property taxes, double-digit increases in utilities and the overall runaway inflation, homeowners like us are suffering and need housing security just as renters do. Homeowners bear the brunt of these costs and can lose their homes more easily to foreclosure than a renter can lose their home to eviction. Most recently, the city took away our rights to home-sharing— something that has kept homeowners afloat for decades. Since the first homes were built here in NYC, people have shared their homes on a short-term basis to help them make ends meet, as well as serve the needs of their local community members. In many ways, this served as a stabilizing force for communities, maintaining economic diversity, as well as a stop-gap to homelessness when people were between homes (keeping them in their local communities and near supports).

Therefore, I'm asking that you **include the study of homeownership of one- and two-family homes in the proposed Fair Housing Plan (Int 1031-2023)**. We are residents of the city, and we deserve fair and equitable housing, too. Thank your for your time.

Best regards,

Gia Sharp
Brooklyn, NY

Testimony to the NYC Council Committee on Housing and Buildings

Int. No. 1031

TUESDAY, SEPTEMBER 26, 2023 – 10:00 AM.

I am a one single family homeowner in North Brooklyn (Council District 33). I am retired and have lived in New York City since 1979. I write to provide testimony with recommendations as to scope of Int. 1031 which I believe will more fully address the housing security and stability for owners of one-and two-family homeowners. I begin by commending the City Council for recognizing the importance of planning to ensure that New Yorkers can remain in their homes, and ways to support to support older New York homeowners who desire to remain in their homes as they age.

My testimony addresses the impact of the passage of Local Law 18 (LL18) and the regulations to LL18 set out late 2022 by the Mayor's Office of Special Enforcement (OSE).

1. LL18 and the NYC Building Code as interpreted by the OSE Will Lead to Housing Displacement

Int. 1031 identifies housing displacement, and the promotion of anti-displacement policies are key areas of focus for NYC's fair housing plan. The legislation notes that this focus will identify initiatives intended to reduce displacement through "targeted inspection and enforcement by the department of housing preservation and development and the department of buildings." Today, owners of one- and two-family homes, who use revenue from short-term rentals to pay mortgages, property taxes, water/sewer, insurance and other expenses are at risk of losing their homes through enforcement of new restrictions on short term rentals. Many one- and two-family homeowners rely were assured by public statements by elected officials, including the LL18 bill sponsor Ben Kallos and others, that LL18 would not impact them. Yet it has impacted them just as severely as the "illegal hotel" the law was intended to eliminate.

I suggest that the impact of LL18 and its interpretation by the OSE be added to the areas of study in any fair housing plan. As a city we cannot address housing affordability by making the homes of one to two-family homeowners unaffordable. Recent news reports have described how investors and private equity firms are now snapping up these properties, and LL18 may accelerate this process. I see this as a very real consequence from the OSE's crackdown on multifamily buildings used for short term rentals. The restrictions now being enforced could acerbated the further loss of housing through renovations and combinations for two family houses to one family buildings by investors (see e.g., <https://www.thecity.nyc/housing/2023/8/24/23843686/100k-apartments-lost-to-house-conversions>).

2. *LL18 and the NYC Building Code as interpreted by the OSE Adversely Impacts Older New Yorkers*

Int 1031 prioritizes housing units that can accommodate New York's aging households. Yet LL18 directly adversely affects older one and two-family homeowners. Recent news reports show that home owners relying upon short term rental income are retired, and we believe that this high percentage is reflected in one- and two-family homeowners in New York City generally. In addition, OSE regulations are particularly difficult for older owners needing to make ends meet through short term rentals. The OSE demands that these owners, who may be more susceptible to infection, share their homes renters without internal locking doors as the OSE requires.

3. *LL18 and the NYC Building Code as interpreted by the OSE, urgently needs to be revisited by the Housing Committee*

Although LL18 is not before the Committee today, I urge the Committee on Housing to consider legislation to address the potential for displacement and the unintended impact on older New Yorker described above by:

Amending LL18-2022 regarding short term rentals (STR) regulations to exempt owner occupied one- and two- family homes, as the law was in fact intended to do.

Respectfully submitted

Kevin Fisher

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1031 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Logan Phares

Address: President St

I represent: Open New York

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 9/26/2023

(PLEASE PRINT)

Name: Raul Rivera

Address: _____

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: 9/26/23

(PLEASE PRINT)

Name: Miya Hernandez

Address: 47th St. Astoria 11105

I represent: Cool Culture

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1031, 362 Res. No. _____

in favor in opposition

Date: 9/26/23

(PLEASE PRINT)

Name: Ryan Monell

Address: 570 Lexington

I represent: REBNY

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Brendan Cheney

Address: _____

I represent: New York Housing Conference

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: 9/26/23

(PLEASE PRINT)

Name: Emily Goldstein

Address: _____

I represent: ANHD

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Assistant Commissioner for Housing Policy

Address: HPP

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: 9/26/23

(PLEASE PRINT)

Name: Erin Burns-Maine, CPC

Address: 220 East 42nd St NY NY

I represent: Community Preservation Corporation

Address: Above

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: 305 960 Ave 11210

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Deputy Commissioner for Development Kim

Address: Darga

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: First Deputy Commissioner Tigani

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Commissioner Carrion of HPD

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Director of Housing Division for DCP

Address: John Magin

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 9/26

(PLEASE PRINT)

Name: Walter Rodriguez

Address: _____

I represent: Volunteers of America - CNY

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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in favor in opposition

Date: 9/26/23

Name: Towah, Kome's a (PLEASE PRINT)

Address: Private

I represent: Self

Address: _____

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**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1031 Res. No. _____

in favor in opposition

Date: 9/26/23

Name: HOWARD SLATKIN (PLEASE PRINT)

Address: 214 ES ST BROOKLYN, NY

I represent: CITIZENS HOUSING + PLANNING COUNCIL

Address: 42 BROADWAY, NY NY 10004

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