



City of New York
DEPARTMENT OF
HOUSING PRESERVATION AND DEVELOPMENT
100 GOLD STREET, NEW YORK, N.Y. 10038
nyc.gov/hpd

**Testimony of the New York City Department of Housing Preservation and Development
to the New York City Committee on Housing and Buildings regarding Social Housing**

Tuesday, June 3, 2025

Good morning, Chair Sanchez and members of the New York City Council Committee on Housing and Buildings. My name is Lucy Joffe, and I am the Deputy Commissioner for Policy & Strategy at the New York City Department of Housing Preservation and Development. I am joined by Stephen Erdman, the Assistant Commissioner of Homeownership Opportunities and Preservation. Thank you for the opportunity to testify today about social housing.

Though there is no single, global definition of social housing, we think shared language is important. At its core, social housing is based on the foundation that everyone has a right to housing, including the most vulnerable. Social housing models typically focus on some combination of affordability, social equity or inclusivity, and resident representation. They reflect a broader focus beyond just building places to live, but on creating homes in communities where people can thrive.

Similarly, HPD's mission is to promote quality and affordability in the city's housing, and diversity and strength in the city's neighborhoods. We see the principles of social housing embedded in our mission and the work that we do everyday. We are here today to discuss the ways that HPD enacts the principles of social housing through our work and our efforts to innovate over time to make New York City more affordable, equitable, and accessible. We see today as an opportunity to discuss whether and how certain additional tools or interventions would help improve our work in this area.

As you all know well, New York City is facing an unprecedented housing crisis. Our overall rental vacancy rate is shockingly low according to the 2023 New York City Housing and Vacancy Survey at just 1.41% and is even more dire for the lowest-cost homes. The statistic that keeps me up at night is the almost \$1,500 gap between median rent and median asking rent. In practice this means that the "typical" New Yorker who needs to leave their current home would be faced with an almost inconceivable and destabilizing monthly increase. We know that the members of this committee share our sense of urgency. Therefore, we must balance our focus on new approaches with the need to build and preserve as much affordable housing as we can with the resources we have.

While the principles of social housing guide much of HPD's work from neighborhood planning to rental assistance programs, we are going to focus today specifically on HPD's work to build and preserve affordable housing.

Principle 1: Affordability – HPD finances new construction and preservation requiring long-term or permanent affordability.

To create new affordable housing, we work with a range of partners, nonprofits (including Community Land Trusts (CLTs) and for-profits, to identify properties that may be feasible to acquire and redevelop. As we all know, property in New York City is expensive to purchase; acquisition, carrying, and predevelopment costs can be prohibitively expensive. We have developed several pathways to minimize that burden when there is a viable path to affordable housing on a reasonable timeline. Nonprofits and M/WBEs may receive assistance from the New York City Acquisition Loan Fund when acquiring property directly for affordable housing. Alternatively, Neighborhood Restore may acquire and hold certain property on an interim basis until it can be developed into affordable housing. In both cases, our partners typically form nonprofit housing development fund corporations (HDFCs), established under the Private Housing Finance Law to provide affordable housing, to serve as the legal ownership entities. The City, with the Council's support, can then provide the HDFCs with property tax exemptions to help offset some of the reasonable carrying costs. Most other cities do not have these tools, but they have been central to HPD's ability to build and preserve affordable housing for decades. We are committed to continuing to innovate in this area, but we want to ensure that any new tools improve upon our existing resources, making our work more efficient and effective. HPD then provides different types of financial assistance or other incentives in exchange for long-term and permanent affordability restrictions. HPD has spent years refining and developing a robust set of tools for ensuring these restrictions remain in place for the foreseeable future. Affordability restrictions are memorialized through regulatory agreements that impose restrictions as well as through requirements that the owner either maintain or enter rental units into rent stabilized with New York State Homes and Community Renewal. HPD has determined that these legally binding protections are the best way to ensure that these homes remain affordable. HPD also structures our below-market financing with deferred principal and interest payments due at the end of the term to create an incentive for the borrower to extend affordability.

HPD's regulatory requirements and financing terms are consistent for all borrowers, whether for-profit or non-profit. For example, a project on a Community Land Trust has a CLT incorporated as an HDFC, and the CLT and borrower enter into a regulatory agreement with HPD, binding them to our affordability requirements. In transactions without a CLT, the owner is also typically an HDFC, and the parties also enter into a binding regulatory agreement. These program tools and structures allow the agency to work with a wide range of partners to achieve the same public benefit through our housing projects. While we seek out mission-driven partners with strong track records of performance, we do not rely on the good will or mission of the organizations with which we work to achieve our housing goals; we dictate the terms through binding legal agreements.

Principle 2: Social Equity and inclusivity - HPD leverages a variety of tools to promote mixed-income housing and further fair housing goals.

HPD has been a leading voice on fair housing and are currently in the process of developing Where We Live 2025, our next comprehensive fair housing plan. Through Where We Live, we have been transparent about the challenges we continue to face in breaking down obstacles to housing choice and segregation.

We aim to achieve greater social equity through the income diversity within our buildings, where we build, and the types of housing we finance.

Through our term sheets, we aim to serve New Yorkers at a wide range of incomes in the buildings we finance, a hallmark of many social housing models. Most of our programs serve households earning between 30% and 100% of area median income. With additional support from our rental assistance programs, we are able to serve New Yorkers at even lower incomes than our programs otherwise require. Income diversity is both more inclusive and helps create long-term building-level financial stability.

We also now prioritize building more affordable housing in “Limited Affordability Areas,” or parts of the city that lack low-cost housing, so that New Yorkers have the ability to decide where to live, regardless of income. City of Yes will make it easier to build and preserve low-cost and affordable housing in neighborhoods that currently lack it.

Mixed-income housing, in a wider range of neighborhoods across the City, furthers our equity goals and allow us to achieve greater integration beyond what is available in market-rate housing, and we have worked for years to bring down costs to make this work more efficient and effective.

Principle 3: Resident Representation: HPD develops resilient communities through a combination of strong tenant protections and shared equity models that create capacity for community stewardship.

Rent stabilization has long provided tenants with a critical set of legal rights such as the right to certain services and repairs and the right to a lease renewal. These protections have helped many New Yorkers remain stably housed despite changing conditions around them.

HPD also promotes resident representation through a variety of shared equity approaches, including support for CLTs. Currently, HPD has 1,200 units on CLT-owned land that have been financed or are in the pipeline. Through projects like the ReAL Edgemere CLT, HPD has worked with partners to develop a model of community-led ownership of eight acres of city-owned land that will offer long-term affordability and support sustainable land stewardship. We are continuously collaborating through workshops and focus groups, which allows us to gather valuable input as partners.

HPD devotes significant staff and financial resources to supporting limited equity HDFC coops, Mitchell Lamas, and financing new affordable homeownership opportunities through programs like Open Door and the Affordable Neighborhood Cooperative Program, often in partnership with the Council. HPD provides financing and also ensures that these coops have the resources they need to hire coop monitors, who provide oversight, technical assistance, and financial management support to ensure the coop’s long-term stability and longevity. Through these programs, the City is providing New Yorkers with the opportunity for economic stability and resiliency through affordable homeownership.

HPD has also focused on strengthening the ecosystem of partners that can support our mission. HPD prioritizes mission-driven ownership and has worked to remove many of the obstacles that smaller, non-profit and minority- and women-owned businesses (M/WBEs) face in the affordable housing industry. Non-profit and M/WBEs have exclusive access to the New York City Acquisition Fund, mentioned above, to help secure sites, obtain bridge loans to help fund pre-development costs, and technical assistance to navigate the development process and identify public sites. And, RFPs for public sites require that non-profits and M/WBEs make up at least 25% of the development team.

Areas of Council Collaboration:

We are always looking for ways to improve our work including how to expand our social housing work. When we're evaluating new tools or approaches, we consider whether those new tools help us advance our mission, impact our ability to advance our pipeline, and will result in more effective and efficient use of public dollars.

Regarding Int. No. 78 As discussed, we are focused on ensuring that nonprofits can also participate on HPD's affordable housing development projects. We have dedicated resources to removing obstacles they may face and toward growing their capacity. However, given the urgency of our work to build and preserve as much affordable housing as we can, our commitment to other mission-driven entities including but not limited to small businesses and M/WBEs, and that we have tools to ensure the social housing benefits of our work across all types of partners, we believe that the risks of limiting our bench of potential affordable housing development partners and slowing down the production of affordable housing and our pipeline outweigh the benefits. The Law Department has also identified legal challenges with codifying this requirement into law that need to be further explored.

Regarding Int. No. 350 We hope our testimony today sheds more light on our commitment to shared housing and to working with the Council to identify the tools that can move our work forward. We do, however, believe that HPD is best positioned to continue this work. We also believe that a separate City agency engaged in the development and preservation of affordable housing risks duplicating and siloing work that is already central to HPD's mission and would be more costly and less efficient.

Regarding Int. No. 570 would HPD believes that we can currently have existing tools and resources, largely unique to New York City, that allow us to acquire, hold and dispose of land. While land banks can add an important new aspect to other cities' work, we believe that compared to our current approach it could result in increased costs, delays and a duplication of functions. We are happy to continue to discussing gaps in our current tools that might be served by a land bank or other such tool, so that we can focus on opportunities that make our current work more efficient and effective.

Regarding Int. No. 902 We believe that a narrowly tailored Community Opportunity to Purchase Act (COPA) could help ensure that responsible and competent owners have an opportunity to intervene when distressed buildings are put up for sale stabilizing these properties and protecting against bad actors. Any such approach would have to be both narrowly targeted and well-tailored for our housing market, to minimize operational and administrative challenges for the agency and any prospective buyers and negative impacts on the housing market.

Regarding Proposed Int. Nos. 1006-A and 1007-A (Nurse) Regarding Int. 1006-A, we appreciate the Council's intent to continue to support the growth of CLTs in our City by ensuring that our definition of CLTs enable non-housing uses. We support this goal, and in fact some of our CLT housing projects include non-housing components, such as our CLT initiative in Edgemere. We are discussing non-housing-related aspects of this bill with other City Agencies. Regarding Int. 1007-A, we would like to further discuss with you the goal of defining in statute a specific version of this structure. The Law Department is reviewing 1006-A and 1007-A to ensure that they are aligned with our shared goals for setting CLTs up to thrive, and we look forward to these continued discussions.

Our work is strengthened through partnership with the Council, and we look forward to working together to refine our approaches to delivering social housing for New Yorkers in service of our shared goals. HPD

is deeply committed to the vision of social housing and believes that through continued partnership with the Council and alignment on our shared goals, we can continue to expand and strengthen social housing that is equitable, integrated, community controlled and affordable for all New Yorkers. We look forward to our continued collaboration with the Council and all our partners in this critical work.



New York City Department of Finance

Testimony on Introduction 1034 of 2024

Good morning, Chair Sanchez and the members on the Committee on Housing. My name is Jake Capistran, and I am the Deputy Chief of Staff and Director of Legislative Affairs for the New York City Department of Finance.

I am here today to discuss Introduction 1034, sponsored by Councilmember Menin. Intro 1034 would require the Department of Finance to notify eligible households of our senior citizen rent increase exemption and disabled citizen rent increase exemption, better known as our rent freeze programs. Additionally, there are notification requirements for renewal applications, removal applications, and third-party notices.

Overall, the Department of Finance supports the intent of this proposed legislation in furtherance of our shared goal to notify and enroll as many eligible New Yorkers as possible. As we understand it, the most significant action contemplated in this legislation for our agency is the requirement for us to mail all eligible heads of households and landlords information on our rent freeze programs.

Unfortunately, we do not have access to the necessary information to be able to identify eligible heads of households and therefore we would not be able to meet this requirement.

We can, however, provide rent freeze notices to landlords that have registered rent-stabilized units. This would be a new notification for the agency and one we would welcome.

Lastly, we have an existing notification process for renewal, removal, and third-party notices for program participants.

We strongly support efforts to increase participation, and we look forward to working through the legislative process with the Council on this proposal.

I would like to thank you all for the opportunity to testify and I am happy to answer any questions.



**NEW YORK CITY DEPARTMENT OF BUILDINGS
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING AND BUILDINGS
JUNE 3, 2025**

Intro 1296 would expand the allowable color of sidewalk shed parapet panels to include approved or alternative artwork through the City Canvas program. Currently, the City Canvas program, administered by the Department of Cultural Affairs, allows for the display of artwork on temporary protective structures such as sidewalk sheds and construction fences which aims to improve the visual appeal of construction sites and provide opportunities for artists and cultural organizations to create and display work. The Department interprets Intro 1296 as allowing for a broader application of the City Canvas program, which we support, and not a modification of existing requirements that provide for the use of mesh parapet panels. As such, the Department does not object to allowing parapet panels, which are permitted to be of mesh material, to display approved artwork provided that such panels comply with applicable code requirements.



JUMAANE D. WILLIAMS

**TESTIMONY OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON
HOUSING AND BUILDINGS
JUNE 3, 2025**

Good morning,

I am Jumaane D. Williams, Public Advocate for the City of New York. I thank Chair Sanchez and the members of the Committee on Housing and Buildings for holding this hearing today.

There's been a lot of discussion in recent years about social housing – what it means, how it would look, how it could be funded. But despite the wealth of conversations, there is no single defining vision for “social housing”. In NYC, proposals for social housing have centered around three main goals: 1) insulating housing from market forces, 2) promoting social equality, 3) enabling residents to exercise democratic control over their housing.¹

The COVID-19 pandemic exacerbated the housing crisis in both New York city and state, leaving many unable to pay their rent and at risk of eviction. Property owners and other landlords seeking to turn a profit during the pandemic sold inhabited properties, leaving tenants in these buildings at higher risk of eviction and displacement – a risk further compounded by almost five years of uninterrupted rent hikes.

Res. 374 calls on the New York State Legislature to pass and the Governor to sign legislation mandating that any owner intending to sell a multi-unit residential dwelling must first make a fairly appraised offer of sale to the tenants within the residence before making any sale offers to third parties. Tenants would then have an opportunity to sell their interests to a community non-profit or community land trust that would then own and maintain the building. This would place these properties in the hands of those who have a vested interest in maintaining residents in their homes and would restore security and stability in the lives of tenants. By enacting this law, New York stands to boost homeownership, preserve affordable units and further mitigate displacement amidst a housing and homelessness crisis.

The resolution regarding the Tenant Opportunity to Purchase Act, however, is just one of the pieces of legislation being heard today – all aimed at building the underlying infrastructure for

¹ “Presentation: Social Housing 101”. *NYC Department of Housing Preservation and Development*. February 2021.



JUMAANE D. WILLIAMS

social housing programs. Council Member Nurse's bills (Int. 1006 and Int. 1007) regarding community land trusts (CLTs) would define provision of services for CLTs under the charter. This would further permit City agencies to enter into regulatory agreements with CLTs for uses beyond housing – such as manufacturing and commercial uses for open space and community gardening.

The creation of a public land bank, as proposed by Council Member Brewer in Int. 570, would further facilitate the acquiring, warehousing and transferring of real property to develop, rehabilitate and preserve affordable housing. I hope to also see the state move forward with A.9088 and its accompanying Senate counterpart S.8494, which would create a public benefit corporation for the construction, acquisition, and rehabilitation of permanently affordable housing. With the federal Department of Housing and Urban Development understaffed and underresourced, the coordination of state and city efforts is more important than ever.

Finally, I would be remiss in failing to mention that public housing – our Mitchell Lama buildings and NYCHA facilities – is social housing. We cannot ever lose sight of that. We must re-invest in NYCHA and ensure that our Mitchell Lama buildings remain affordable, accessible and livable. It is not enough to build new affordable housing, we must also preserve our existing affordable housing stock and ensure that New Yorkers can remain in their homes. Thank you.



ANHD
50 Broad Street, Suite 1402
New York, NY 10004
Tel: (212) 747-1117

Testimony Before the New York City Council Committee on Housing and Buildings Committee on Intros 78, 350, and 902, and Reso 374

June 3, 2025

Thank you to Chair Sanchez and the members of the Housing and Buildings Committee for holding this hearing on the bills and resolutions related to social housing.

About the Association for Neighborhood and Housing Development (ANHD)

ANHD is one of the City's lead policy, advocacy, technical assistance, and capacity-building organizations. We maintain a membership of 80+ neighborhood-based and city-wide nonprofit organizations that have affordable housing and/or equitable economic development as a central component of their mission. We are an essential citywide voice, bridging the power and impact of our member groups to build community power and ensure the right to affordable housing and thriving, equitable neighborhoods for all New Yorkers. We value justice, equity, and opportunity, and we believe in the importance of movement building that centers marginalized communities in our work.

ANHD's work directly supports the needs of our members who develop, manage, and organize to preserve affordable housing, and who fight to bring equity into low-wealth and historically disinvested communities in New York City. Our groups rely on us for technical assistance and capacity-building resources that allow them to maximize their resources, skills, and impact. The support services, research, analysis, public education, and coalition building we do helps to identify patterns of local neighborhood experiences and uplift citywide priorities and needs. Our work translates into the capacity to win new programs, policies, and systems that ensure the creation and preservation of deeply and permanently affordable housing, and economic justice.

Overview

As we continue to face an affordable housing and homelessness crisis, we must commit to building and preserving affordable housing for those who need it most. ANHD members have always provided housing, services, and organizing support in low and moderate income, primarily BIPOC communities.

For decades, these nonprofit, mission-driven developers and community development corporations (CDCs) were the primary partners working with the government to build and preserve affordable housing in neighborhoods devastated by disinvestment and predatory practices. While for-profit developers have entered the affordable housing space in recent years, mission-driven nonprofits remain essential. They consistently deliver deeper levels of

affordability, reinvest developer fees into community programs, and prioritize long-term stewardship over short-term profit.

These developers are uniquely positioned to maximize the public benefit of public land and resources. Their commitment is rooted in addressing community needs, not economic gain, and in ensuring that housing remains permanently affordable and community-controlled.

Many of the bills being heard today would provide critical tools to fight speculation, develop more equitably, transfer distressed buildings to trusted stewards, and ensure that public resources are directed where they're needed most.

Int. 78

ANHD strongly supports Int. 78. City-owned land should be transferred to trusted community stewards—mission-driven nonprofit developers and community land trusts (CLTs)—to ensure that public land serves the public good by creating deeply and permanently affordable housing.

Historically, New York City has too often awarded public land to for-profit developers, even when nonprofit, community-based developers proposed more affordable and equitable options. We are well past the years when the city owned thousands of in rem properties. Public land is an increasingly scarce and valuable resource. When acquisition costs are removed, it becomes possible to achieve significantly deeper levels of affordability. Yet this potential is routinely lost to private interests that prioritize profit over community needs.

Int. 78 would help correct this imbalance. It requires that publicly owned sites be developed as 100% permanently affordable housing and placed under the stewardship of mission-driven, not-for-profit entities or CLTs—ensuring long-term accountability, affordability, and community control.

This legislation is a vital step toward building a more just and sustainable housing system—one rooted in social housing that answers to people, not profit.

Int. 350

ANHD supports Int. 350, which would require the Department of Housing Preservation and Development, in collaboration with the Department of City Planning, the Department of Social Services and any other appropriate city agency, to conduct a feasibility study on the establishment of an agency that would focus exclusively on the promotion and development of social housing and report on the findings of the study.

We need bold ideas to get us out of our longstanding housing and homelessness crisis. By bringing together multiple stakeholders, including non-profit developers and CLTs, to analyze existing and new tools and models of affordable housing development, this bill will help further the creation of a more equitable housing plan for New York City.

Int. 570

ANHD supports Int. 570, which would establish a land bank for New York City that would be tasked with acquiring, warehousing and transferring real property to develop, rehabilitate and preserve affordable housing.

ANHD members have worked to develop and use a range of previous tools to facilitate the acquisition of private distressed property, but have often been outpaced and outfinanced in a frequently speculative market. The land bank would provide a more sustainable and flexible mechanism to quickly move buildings out of the hands of bad actors, while allowing time for preservation purchasers to put together realistic financing and avoiding the requirement that individual non-profit developers take on undue risk or stretch beyond their capacity to purchase liens or debt.

Int. 902

ANHD supports Int. 902 and the mission of ensuring that community-focused, mission-driven non-profit developers and CLTs have the first opportunity to purchase apartment buildings when they are put up for sale. As rents continue to skyrocket across New York City, many tenants are being pushed toward housing insecurity. Non-profit developers and CLTs exist to preserve affordability and keep tenants in their homes, rather than prioritizing profit. Their goal is to create long-term stability by treating housing as a human right—not a commodity. Non-profit developers and CLTs purpose is to keep the buildings affordable and tenants in their homes.

The Community Opportunity to Purchase Act (COPA) creates a right of first offer for a list of pre-qualified developers, including primarily non-profits, MWBEs, as well as those using a CLT ownership structure, when landlords decide to sell their buildings. While it is important the legislation has a right of first offer, we think it should also include a right of first refusal. Right of first offer requires that the owner must give the interested party an offer before listing the building. However, if the party rejects the offer, the owner can list the building and is not required to have the interested party match it. The right of first refusal gives more power by requiring that the interested party the ability to match an offer from a potential buyer. This would allow one of the above mentioned parties to have a real opportunity to acquire the building.

That is why we support the passage of the Community Opportunity to Purchase Act (COPA), which would help ensure buildings for sale are transferred to mission-driven stewards committed to long-term affordability and tenant stability.

Res. 374

ANHD supports the passage of Res. 374, which supports the State Legislature's Tenant Opportunity to Purchase Act (TOPA) legislation. New Yorkers are increasingly rent burdened with many paying over 30 percent of their income while also having little control over their homes (CSS, [2023](#)). Subsequently, homelessness and evictions have been on the rise, and many tenants are suffering from a lack of heat, hot water, lack of repairs, and buildings not

being cleaned. It's time for the City to urge the State to support TOPA, so that tenants have the power to control and improve their living conditions. TOPA creates tangible pathways for tenants to work with community-rooted organizations to stabilize their homes while also expanding permanently affordable housing.

It is also important to note that TOPA laws exist in other states like San Francisco and Washington D.C. where they have successfully created thousands of units of both rental and limited equity cooperatives. New York must follow their lead and enact similar legislation to protect tenants and preserve affordability in our communities.

TOPA can be an important tool in sustaining affordable housing, and give tenants the power to control and improve their living conditions.

However, it's critical that TOPA should be a well funded program so that it can not only live on paper but work well in practice.

We thank the Council for holding this important hearing and urge you to advance these bills to help move New York City closer to the equitable, affordable housing system our communities deserve.

Thank you for the opportunity to testify. If you have any questions or for more information, please contact Will Depoo at will.d@anhd.org.

*New York City Council's Committee on Housing and Buildings
June 2nd, 2025*

Thank you for the opportunity to testify at today's social housing hearing. Our names are Oksana Mironova, Samuel Stein, and Izhiah Thompson, and we are housing policy analysts at the Community Service Society of New York (CSS). CSS has worked with and for New Yorkers since 1843 to promote economic opportunity and champion an equitable city and state. We work to address urgent issues facing low-income New Yorkers, including the city's chronic unaffordability crisis.

The Community Land Act is a set of bills that gives community land trusts (CLTs) and other nonprofits a fighting chance to develop and preserve affordable housing, as well as community and commercial spaces. It includes **Intro 902**, the Community Opportunity to Purchase Act (COPA), which gives CLTs and other nonprofits a first right to purchase multifamily buildings when landlords sell. It also includes **Intro 78**, Public Land for Public Good, which prioritizes CLTs and other nonprofits in public land dispositions, as well as the **Resolution 374**, in support of the state Tenant Opportunity to Purchase Act (TOPA).

We also call on the City Council to pass:

- the Land Bank Bill (Intro 570), which can work with community land trusts and other responsible property owners to acquire distressed properties, and ultimately replace our unjust tax lien system.
- Intros 1006 and 1007, which will expand the legal definition and regulatory agreements for CLTs to include community and commercial uses.
- Intro 350, to study the feasibility of creating a social housing agency on the city level.
- Reso 777 in support of the state Social Housing Development Authority bill.

We know COPA works. San Francisco passed a similar law in 2019, backed by the San Francisco CLT and the local CDCs. In the years since, the law has proven effective, especially in preserving affordability in rent-controlled buildings. For example, the Mission Economic Development Agency—founded in 1973 to promote equitable economic development for working-class Latino households in San Francisco's Mission District—has successfully closed [eight](#) COPA-facilitated purchases, each one in close partnership with the building's tenants.

Similarly, we have proof of concept for Public Land for Public Good. Extensive research by [the US Department of Housing and Urban Development](#) has shown that mission-driven developers are much more likely to preserve affordability for the long-term in subsidized housing, as compared to for-profits. Given the high cost of land across New York, city agencies should not be disposing city land for private gain.

Thank you again for the opportunity to testify. If you have any questions or want to discuss further, please reach out to us at omironova@cssny.org, sstein@cssny.org, and ithompson@CSSNY.org.

The Real Estate Board of New York to The Committee on Housing and Buildings: Oversight - Social Housing

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 the Committee on Housing and Buildings for the opportunity to voice support for an amendment to Local Law 157 of 2016. Thank you to the committee for the opportunity to also provide feedback regarding the package of bills related to social housing (Intros 78, 350, 570, 902, 1034, 1006, and 1007).

Support for Amendment of Local Law 157 of 2016

REBNY supports Int. 1281-2025, sponsored by Council Members Eric Dinowitz, Erik Bottcher, and Robert Holden, which responsibly delays the mandate for natural gas alarm installation until the necessary equipment is both available and affordable.

Local Law 157 of 2016 required the installation of natural gas alarms in dwelling units on May 1 of the year after the department establishes applicable standards and rules for those alarms. This bill would postpone that mandate to take effect one year after the Department of Buildings determines that natural gas alarms are sufficiently available and affordable, but no earlier than January 1, 2027. REBNY strongly supports this common-sense measure. Supply chain disruptions, acknowledged publicly by the manufacturers of these devices, have caused significant delays in the production and distribution of compliant natural gas alarms. Imposing a mandate before this equipment is readily accessible would place an undue burden on property owners and managers, while failing to achieve the law's underlying safety goals. This legislation ensures that the requirement can be implemented effectively and equitably, once the necessary infrastructure is in place.

Challenges and Opportunities with Social Housing

As the city continues to face a deepening housing crisis, it is key that policy solutions be inclusive, evidence-based, and grounded in practical experience. We want to express our concerns about elements of the proposed legislation that could inadvertently limit housing production, increase costs, and undermine long-standing public-private partnerships that have delivered thousands of affordable homes to New Yorkers.

Bill-specific feedback is as follows:

Intro 0078-2024: Disposition of Real Property to the City

Subject: A local law to amend the New York City charter, in relation to the disposition of real property of the city.

Sponsors: Council Members Lincoln Restler, Sandy Nurse, Tiffany Cabán, Shekar Krishnan, Pierina Ana Sanchez, Darlene Mealy, Carlina Rivera , Crystal Hudson, Alexa Avilés, Chi A. Ossé, Gale A. Brewer, Jennifer Gutiérrez, Shaun Abreu, Carmen N. De La Rosa, Julie Won, Christopher Marte, Amanda Farías, Shahana K. Hanif, Erik D. Bottcher, Justin L. Brannan, Rita C. Joseph, Nantasha M. Williams, Mercedes Narcisse, Yusef Salaam, Selvena N. Brooks-Powers, Diana I. Ayala, Chris Banks, Keith Powers , Rafael Salamanca, Jr., (in conjunction with the Brooklyn Borough President)

This bill would require that when the city disposes of land for affordable housing, or for any other public use or purpose, it prioritizes not-for-profit developers and community land trusts as a preference category.

REBNY appreciates and supports the use of land banks and community land trusts as stabilization tools, such as the successful use of land banks in Kingston and Albany to deal with swaths of vacant properties that were foreclosed during the last recession with the help of public-private partnerships.

Affordable units are challenging to maintain regardless of ownership, and the rents obtained often do not cover operational costs. While we appreciate that the bill has been amended to not exclude private developers altogether, we continue to recommend that prioritizing public-private partnerships is the best way to leverage the skill sets and mission of each side of that equation to stimulate much needed housing at scale.

Intro 0350-2024: Study on the feasibility of establishing a social housing agency and the repeal of this local law upon the expiration thereof.

Subject: A Local Law in relation to a study on the feasibility of establishing a social housing agency and the repeal of this local law upon the expiration thereof.

Sponsors: Council Members Sandy Nurse, Lincoln Restler, Julie Won, Shahana K. Hanif, Crystal Hudson, Tiffany Cabán, Alexa Avilés, Carlina Rivera

This bill would require the Department of Housing Preservation and Development, in collaboration with the Department of City Planning, the Department of Social Services, and any other appropriate city agency, to conduct a feasibility study on the establishment of an agency that would focus exclusively on the promotion and development of social housing and report on the findings of the study. The report would address several topics, including the governance and funding of the proposed agency, the strategies the agency could use to create new social housing, and legal and practical barriers to the establishment of the agency and to the creation of social housing.

REBNY supports utilizing data-driven policy to solve the most pressing concerns of our city and there is no more pressing concern than solving our housing crisis. While well intentioned, we caution whether this is the best usage of city resources. Given existing staffing shortages at HPD and uncertainty around federal funding that covers the staff lines at HPD and City Planning responsible for this type of planning, it may not be feasible at this time.

Intro 0570-2024: Establishment of NYC Land Bank

Subject: A local law to amend the administrative code of the city of New York in relation to creating a land bank.

Sponsors: Council Members Gale Brewer, Shahana K. Hanif, Pierina Ana Sanchez, Sandy Nurse, Julie Won, Erik D. Bottcher, Lincoln Restler, Crystal Hudson, Tiffany Cabán, Nantasha M. Williams, Alexa Avilés, Shekar Krishnan, Carlina Rivera, Kamillah Hanks, Diana I. Ayala, Amanda Farías, Chris Banks, Lynn C. Schulman, Chi A. Ossé, Althea V. Stevens, Rita C. Joseph, Selvena N. Brooks-Powers, Jennifer Gutiérrez, Keith Powers

This bill would establish a land bank for New York City, which would be tasked with acquiring, warehousing and transferring real property to develop, rehabilitate and preserve affordable housing. The bill would require that when conveying, leasing as lessor or otherwise disposing of real property for a use that would result in the creation or preservation of affordable housing units, the land corporation shall prioritize disposition to a community land trust, a community housing development organization or a nonprofit organization, and shall prioritize disposition for a proposed use that will maximize the number of affordable housing units at the zoning lot containing the property and the affordability of such units.

As referenced above, land banks can be successful tools for stabilizing neighborhoods and producing housing. However, their success is predicated on available government resources and the establishment of such program should be viewed through today's lens of fiscal uncertainty stemming from present and anticipated federal changes in funding toward these types of initiatives.

Intro 0902-2024: Community Opportunity to Purchase Act

Subject: A local law to amend the administrative code of the City of New York, in relation to giving qualified entities a first opportunity to purchase and an opportunity to submit an offer to purchase certain residential buildings when offered for sale.

Sponsors: Council Member Carlina Rivera, Sandy Nurse, Kamillah Hanks, Lincoln Restler, Tiffany Cabán, Crystal Hudson, Yusef Salaam, Shaun Abreu, Alexa Avilés, Shekar Krishnan, Chi A. Ossé, Carmen N. De La Rosa, Julie Won, Rita C. Joseph, Nantasha M. Williams, Gale A. Brewer, Pierina Ana Sanchez, Chris Banks, Jennifer Gutiérrez, Amanda Farías, Mercedes Narcisse, Diana I. Ayala, Shahana K. Hanif, Erik D. Bottcher, Selvena N. Brooks-Powers, Keith Powers, Farah N. Louis, Oswald Feliz, Rafael Salamanca, Jr., (by request of the Brooklyn Borough President)

REBNY strongly objects to the framework espoused in this bill. This bill would give qualified entities a first opportunity to purchase and an opportunity to submit an offer to purchase certain residential buildings when offered for sale. The bill would require building owners to notify the Department of Housing Preservation and Development and a list of qualified entities when their buildings will be listed for sale. The entities would have the opportunity to submit the first offer and match any competing offers for the property.

Increasing affordable homeownership opportunities for New Yorkers is an important policy objective. Unfortunately, this bill does not accomplish that goal and instead prioritizes one type of business model over another in an overreach into private property transactions, raising a number of legal concerns along the way. First, this bill raises the very same legal concerns that existed in 2005 when the City Council passed the Tenant Empowerment Act. That bill, like this one, was deemed preempted under State and Federal Law for being overly broad and for failing to take into consideration certain statutory rights of first refusal.

Additionally, there is no consideration whatsoever on the interplay with the Martin Act, since these transactions could be considered a syndication if the non-profit takes a penny from the tenants or any other third party for that matter to effectuate the sale, thereby subjecting these parties to enforcement actions by the New York Attorney General, who has recently taken an aggressive stance against syndicates, including those involving affordable housing.

The bill also raises serious scope and implementation concerns. The program is incredibly far reaching in subject properties, with purchase timelines that may be seen as too long and unworkable to interfere with reasonable backed expectations for the transfers of property. In addition to interfering with the private marketplace, they also do not help non for profits, as the timelines are not consistent with the timing to negotiate necessary tax exemptions and financing to make the purchase work with subsidy.

There's no regulatory regime to handle contract disputes, and it does not carve out buildings in foreclosure or mortgage default that may be operating on court ordered timelines different to the ones laid out in this bill.

The number of eligible properties coupled with no funding mechanism would leave HPD resource starved to implement, then forces an overzealous and punitive penalty structure on private property owners who are unable to comply with a system that cannot be set up.

Lastly, the list of qualified owners are just nonprofits. This doesn't help put buildings into the hands of tenants. It just assumes a nonprofit is a better landlord. The exclusion of any private entity and any private-public entity from the qualified entities list is both pernicious and based on false valuation of good versus bad for business practices.

Intro 1006-2024: Defining community land trusts for the provision of services in addition to housing that benefit the local community.

Subject: A Local Law to amend the administrative code of the city of New York, in relation to defining community land trusts for the provision of services in addition to housing that benefit the local community.

Sponsors: Council Members Sandy Nurse, Tiffany Cabán, Jennifer Gutiérrez, Nantasha M. Williams, Carlina Rivera

This bill would define Community Land Trust (CLT) as a non-profit, community-run organization that can acquire and develop land with the goal of promoting permanent affordable housing and stabilizing housing markets. They would be established in the City to be entities that cover more uses beneficial to the local community beyond housing, such as manufacturing and commercial uses, as well as the development of open space and community gardening.

Community land trusts are typically singularly minded when they are established. We welcome a discussion to understand if the intent of the bill is to allow multiple types of CLTs to be created, or to allow a single CLT to cover multiple uses and purposes in its portfolio. If the latter, we express concern with the appropriateness of such a model, especially since successful CLTs require government funding, and whether that is the appropriate model to manage a multitude of land uses with different regulatory requirements, concerns, and public policy objectives.

Intro 1007-2024: Community land trust regulatory agreements for the provision of services in addition to housing that benefit the local community.

Subject: A Local Law to amend the administrative code of the city of New York, in relation to community land trust regulatory agreements for the provision of services in addition to housing that benefit the local community.

Sponsors: Council Members Sandy Nurse, Lincoln Restler, Tiffany Cabán, Nantasha M. Williams, Carlina Rivera

This bill would permit City agencies to enter into regulatory agreements with Community Land Trusts (CLT) that cover more uses beneficial to the local community beyond housing, such as manufacturing and commercial uses, the development of open space and community gardening. REBNY appreciates the intent behind supporting Community Land Trusts (CLTs) as a tool to promote affordable housing and community development. However, we are concerned that this bill grants overly broad authority to City agencies to enter into regulatory agreements with CLTs for a wide range of non-housing uses—including manufacturing, commercial activities, and open space—without sufficient oversight or accountability. Expanding CLTs' scope in this manner risks diverting public resources away from urgently needed housing production and raises questions about the appropriate role of non-governmental entities in managing and controlling long-term land use decisions. Any such agreements must be carefully evaluated to ensure transparency, alignment with citywide planning goals, and a clear focus on maximizing the production of deeply affordable housing.

Intro 1034-2024: Notices in connection with rent increase exemptions, real property tax abatements, and exemptions from payments in lieu of taxes for certain properties occupied by senior citizens or persons with disabilities.

Subject: A Local Law to amend the administrative code of the city of New York, in relation to notices in connection with rent increase exemptions, real property tax abatements, and exemptions from payments in lieu of taxes for certain properties occupied by senior citizens or persons with disabilities

Sponsors: Julie Menin, James F. Gennaro, Inna Vernikov

This bill would require that relevant agencies provide: (1) notices to tenants in connection with eligibility for senior citizen and disability rent increase exemptions (SCRIE and DRIE); (2) notices to landlords in connection with eligibility for real property tax abatements and eligibility for exemptions from payments in lieu of taxes for certain properties occupied by senior citizens or persons with disabilities; and (3) notices to designated third parties about exemption renewal and transfers. REBNY supports this legislation as a key step toward improving awareness and access to financial relief programs for seniors and individuals with disabilities.

Res. 0374-2024: Mandating that any owner intending to sell a multi-unit residential dwelling must first make a fairly appraised offer of sale to the tenants within the residence before making any sale offers to third parties.

Sponsors: Public Advocate Jumanne Williams and Council Members Farah N. Louis, Crystal Hudson, Alexa Avilés, Rita C. Joseph, Nantasha M. Williams, Julie Won, Shaun Abreu, Yusef Salaam, Chi A. Ossé, Lincoln Restler, Diana I. Ayala, Shekar Krishnan, Sandy Nurse, Jennifer Gutiérrez, Shahana K. Hanif, Chris Banks, Pierina Ana Sanchez, Tiffany Cabán, Carlina Rivera

This resolution is in favor of a statewide bill referred to as the Tenant Opportunity to Purchase Act, or TOPA. Like COPA, TOPA would severely undermine the residential building transaction market, putting at risk much needed housing production, limiting tax revenue to the State, and significantly extending the timeline to complete transactions.

Additionally, there is no consideration whatsoever on the interplay with the Martin Act, New York state's 'blue sky' anti-fraud law. Under this law, since these transactions could be considered a syndication if the non-profit takes a penny from the tenants or any other third party to effectuate the sale, it could thereby subject these parties to enforcement actions by the New York Attorney General, who has recently taken an aggressive stance against syndicates, including those involving affordable housing.

REBNY supports increased affordable homeownership opportunities in New York, like the recently adopted *Affordable Housing Retention Act* sponsored by Habitat for Humanity and approved in this year's state budget. However, the timeline outlined in TOPA is far too lengthy and limits the pool of potential buyers for private property transactions. The bill exempts non-profits but requires an

affirmative application for exemption without regard for how long it would take for an application to be put together. The timelines also appear unrealistic for tenants when attorneys specializing in these types of deals share it typically takes two years of planning with a property owner that volunteers for such arrangement.

Res. 0777-2025: Creating a public benefit corporation for the construction, acquisition, and rehabilitation of permanently affordable housing (A.9088/S.8494).

Sponsors: Council Members Christopher Marte, Crystal Hudson, Shahana K. Hanif, Chi A. Ossé, Pierina Ana Sanchez, Lincoln Restler, Alexa Avilés, Sandy Nurse, Carmen N. De La Rosa, Tiffany Cabán, Jennifer Gutiérrez, Nantasha M. Williams, Chris Banks, Carlina Rivera

REBNY supports a comprehensive, all-hands-on-deck approach to addressing New York City’s housing crisis—one that leverages the strengths of both the private and public sectors. Effectively expanding affordable housing opportunities will require a broad set of tools and strategies that reflect the complexity of the challenges.

However, the success and scalability of government-driven housing programs will ultimately depend on two key factors: adequate and sustained funding, and thoughtful program design that promotes long-term viability. At present, both state and city resources are constrained, and any new initiative must take into account the fiscal realities facing our public agencies. It is critical that we prioritize policies that not only set ambitious goals but are also grounded in the financial and operational capacity necessary to achieve them.

REBNY thanks the Committee on Housing and Buildings for consideration of these points and would welcome the opportunity to work with the City Council to improve the legislation to address these concerns.

CONTACT:

Dev Awasthi

Vice President of Government Affairs

Real Estate Board of New York

dawasthi@rebny.com



WRITTEN TESTIMONY FOR THE NEW YORK CITY COUNCIL, COMMITTEE ON
HOUSING AND BUILDINGS, PUBLIC HEARING BY BROOKLYN LEGAL SERVICES
CORPORATION A

June 3, 2025

Testimony in Support of the Community Land Act

Dear Chair Sanchez and members of the Committee on Housing and Buildings,

My name is Jessica Rose, I am the Executive Director of Brooklyn Legal Services Corporation A (“Brooklyn A”), and I am testifying on behalf of our organization. Thank you for the opportunity to submit testimony in **support of the Community Land Act**, a package of urgently-needed policies to bring land and housing into permanently affordable community control. Brooklyn A provides critical city-wide legal services to thousands of low-income tenants facing eviction, low-income homeowners facing foreclosure, and small business owners and nonprofit organizations grappling with their commercial leases each year. Brooklyn A is also a member of the New York City Community Land Initiative (NYCCLI), an alliance of grassroots, affordable housing, environmental and economic justice organizations working to promote community land trusts (“CLTs”) for deeply- and permanently-affordable housing, commercial and community spaces, and other neighborhood-led development.

We urge this Committee and the City Council to pass the Community Land Act, comprised of: Public Land for Public Good (Intro 78), the Community Opportunity to Purchase Act (COPA) (Intro 902) and the Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (Reso 374). These bills will help level the playing field for organizations like ours to meet our communities’ housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

Brooklyn A is uniquely situated to understand the gravity of the City’s housing and affordability crisis due to our work across residential tenant defense, fighting foreclosures, and community and economic development supporting small businesses and community organizations.

building communities ensuring opportunity achieving justice.

In Fiscal Year 2024, our **Tenant Advocacy** work handled nearly 3,000 cases to maintain housing stability for low-income tenants, and supported 52 tenant associations to fight for habitable living conditions. Across the board, we have seen: an increase in evictions, which have returned to their pre-pandemic levels, with a staggering 440% increase in active eviction cases from March 2020 to March 2024 according to the New York City Comptroller¹; rising rents; and more affordable units being removed from the market altogether.

In our **Foreclosure Prevention** work, we have seen similarly bleak trends. All homeowners across the city are feeling the crunch of rising housing costs: a report from the New York State Comptroller found that in 2022, New York City homeowners' property taxes were a higher percentage of their shelter costs compared to the national average.² The Office also found that New York State households had the third highest rate (28%) of housing cost-burden in the United States—meaning households that spend more than 30% of their income on housing.³ Foreclosures disproportionately affect communities of color, who have faced historic barriers to property ownership and accumulation of wealth. Additionally, Black and Latine homeowners have substantially lower return on investment due in part to a higher rate of distressed sales caused by foreclosure.⁴

NYC must take bold action to address our city's affordability crisis, combat speculation and displacement, and advance racial equity in housing and land use. Collective land ownership through CLTs is one of the most effective ways to achieve this. By removing land from the speculative market and placing it under the direction of organizations that are mission-driven and guided by the local community, CLTs can create long-term, deeply affordable housing, without displacement. Through our collaboration with CLTs in the NYCCLI coalition, and years of experience working with non-profit affordable housing developers dedicated to centering people over profit, we know that the infrastructure is in place to take advantage of the Community Land Act. The City Council has made essential investments in CLTs and support organizations – helping them build internal capacity and educate and organize community members. However, the number of active CLTs in New York City has grown in the past decade from two to more than 20. It is time for City Council to expand on this success by enacting policies that help communities acquire and develop land for deeply, permanently affordable housing and community uses.

¹ "Evictions Up, Representation Down," by the Office of New York City Comptroller Brad Lander, May 2025. https://comptroller.nyc.gov/reports/evictions-up-representation-down/#_edn1 1.

² "The Cost of Living in New York City: Housing," by the Office of the New York State Comptroller, January 2024. <https://www.osc.ny.gov/files/reports/osdc/pdf/report-17-2024.pdf> 1.

³ "New Yorkers in Need: The Housing Insecurity Crisis," by New York State Comptroller Thomas P. DiNapoli, February 2024. <https://www.osc.ny.gov/files/reports/pdf/new-york-housing-insecurity.pdf> 6.

⁴ "NBER Working Paper Series: Racial Disparities in Housing Returns," by the National Bureau of Economic Research, Revised March 2024. <http://www.nber.org/papers/w29306> 1.

1. Pass the Community Land Act (Int 0078-2024; Int 0902-2024; Res 0374-2024)

The Community Land Act gives us a chance to enshrine people-centered priorities in our law and practice by helping community organizations take land off the speculative market and provide the deeply affordable housing our communities need, and allowing more families and neighbors to avoid eviction, foreclosure, and displacement.

Specifically, the Community Land Act legislative package includes the following:

Public Land for Public Good ([Intro 78](#)) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of [2023](#), for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city’s remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.

Community Opportunity to Purchase Act ([Intro 902](#)), which would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, COPA would help curb speculation and expand the supply of permanently-affordable, community-controlled housing. COPA would be most impactful if implemented alongside the ***Tenant Opportunity to Purchase Act at the State level*** ([Reso 374](#)), which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing.

Our coalition has submitted proposed changes to the COPA bill to the lead sponsor, Council Member Carlina Rivera, in order to make the law more effective. To improve the current bill, we recommend that the Council:

- Add a clear right of first refusal for qualified nonprofits: As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Include Vacant Property: We urge the City Council also to expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

2. Expand the legal definition of and tools for CLTs for more services and land uses

Brooklyn A supports hundreds of small businesses and community-based organizations across the city each year, and we see first-hand how many are struggling against ballooning rents. CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. We encourage the City Council to continue working with members of the NYCCLI coalition to ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of housing, reflect the city’s CLT growing sector, and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods.

We appreciate the Committee on Housing and Buildings holding this hearing to discuss urgently-needed strategies to address the urgent housing and affordability crisis facing our city, including expanding community-controlled, deeply affordable housing; strengthening tenant rights; and ensuring funding to house the most vulnerable tenants. Thank you for the opportunity to submit testimony, and we look forward to continuing to work together to advance Community Land Trusts citywide.

Thank you,

Jessica A. Rose, Esq.

Executive Director

Brooklyn Legal Services Corporation A

jrose@bka.org



Testimony Before the New York City Council Housing and Buildings Committee: Regarding Social Housing, Fiscal Year 2026

June 6, 2025

Introduction

My name is Yvette Chen and I am the Program Manager for Neighborhood Development for the Center for NYC Neighborhoods. I would like to thank Chair Pierina Sanchez and members of the City Council Committee on Housing and Buildings for holding this important hearing regarding social housing.

About the Center for NYC Neighborhoods

The Center promotes and protects affordable homeownership in New York so that middle- and working-class families are able to live in strong, thriving communities. Established by public and private partners, the Center meets the diverse needs of homeowners throughout New York state by offering free, high-quality housing services. Since our founding in 2008, our network has assisted over 200,000 homeowners. We have provided more than \$60 million in funding to community-based partners. Major funding sources for this work include the New York City Department of Housing Preservation and Development, and the Office of the State Attorney General, along with other public and private funders. Additionally since 2021, the Center's subsidiary, Sustainable Neighborhoods, has administered the New York State Homeowner Assistance Fund, in partnership with New York State Homes and Community Renewal (HCR), which has distributed federal relief dollars to homeowners affected by the pandemic who are struggling with housing payments.

Our organization is committed to identifying and securing affordable housing opportunities for New Yorkers—especially households identified as Black, Indigenous, and People of Color (BIPOC). We are currently focused on creating pathways to homeownership, with the goal of helping BIPOC households maintain or become homeowners through our WORTH Initiative, in partnership with LISC and NHS NYC.

Social Housing Bills

We support the following piece of legislation currently under consideration by the city council:

Intro. No. 78 (Restler), in relation to the disposition of real property of the city.

This bill would require that when the city disposes of land for affordable housing, or for any other public use or purpose, it prioritizes not-for-profit developers and community land trusts. Introduced by Councilmember Restler, this bill reforms the city's process for disposing of real property by prioritizing non-profit developers and CLTs when the land is intended for affordable housing. From our research, the extremely limited supply of land is one of the major challenges to developing affordable housing. CLTs and non profits consistently build at higher levels of affordability and can help alleviate the shortage of affordable housing.



Int. No. 350 (Nurse), in relation to a study on the feasibility of establishing a social housing agency and the repeal of this local law upon the expiration thereof.

This bill would require the Department of Housing Preservation and Development, in collaboration with the Department of City Planning, the Department of Social Services and any other appropriate city agency, to conduct a feasibility study on the establishment of an agency that would focus exclusively on the promotion and development of social housing and report on the findings of the study. The report would address a number of topics, including the governance and funding of the proposed agency, the strategies the agency could use to create new social housing and legal and practical barriers to the establishment of the agency and to the creation of social housing.

Int. No. 570 (Brewer), in relation to creating a land bank

This bill would establish a land bank for New York City, which would be tasked with acquiring, warehousing and transferring real property to develop, rehabilitate and preserve affordable housing.

Int. No. 902 (Rivera), in relation to giving qualified entities a first opportunity to purchase and an opportunity to submit an offer to purchase certain residential buildings when offered for sale

This bill would give qualified entities a first opportunity to purchase and an opportunity to submit an offer to purchase certain residential buildings when offered for sale. The bill would require building owners to notify the Department of Housing Preservation and Development and a list of qualified entities when their buildings will be listed for sale. The entities would have the opportunity to submit the first offer and match any competing offers for the property.

The Community Opportunity to Purchase Act or Intro 902, implemented along with the *Tenant Opportunity to Purchase Act* at the State level or Res 374 at the state level, helps tenants stay in their neighborhoods instead of being subject to displacement. It provides a much needed pathway to permanently affordable homeownership and wealth building. COPA levels the playing field for qualified CLTs and nonprofits, so they are more easily able to acquire and preserve buildings and expand permanently affordable housing in gentrifying neighborhoods. There is precedence for COPA and TOPA in Washington, DC, San Francisco, and other jurisdictions. In DC, over 16,000 units have been preserved under TOPA and more than 4,000 units of affordable limited equity co-operatives have been created. The Center has analyzed properties sold earlier in this decade and we are developing a tool in order to determine the areas which could have seen the greatest increase in homeownership opportunities with a TOPA/COPA program.

Proposed Int. No. 1007-A (Nurse), in relation to community land trust regulatory agreements for the provision of services in addition to housing that benefit the local community



A Community Land Trust (CLT) is a non-profit, community-run organization that can acquire and develop land with the goal of promoting permanent affordable housing and stabilizing housing markets. This bill would define CLTs that are established in the City to be entities that cover more uses beneficial to the local community beyond housing, such as manufacturing and commercial uses, as well as the development of open space and community gardening. 1007-A would permit City agencies to enter into regulatory agreements with CLTs that cover more uses beneficial to the local community beyond housing, such as manufacturing and commercial uses, the development of open space and community gardening.

Encouraging Equitable and Sustainable ADU Development

In addition to creating new homeownership opportunities through social housing, we must also invest in sustaining existing homeowners — particularly low- to moderate-income households — at risk of displacement. We support the sustained funding for ADU and Basements technical assistance and staff — which will help homeowners create ADUs, such as basement apartments and backyard cottages. To ensure these efforts are successful, this year’s budget should include funding for nonprofit community-based organizations (CBOs) to provide the necessary guidance on zoning laws compliance, financing, design requirements, and construction.

Financial aid or incentives should be available to support ADU projects, which will create affordable rental options while providing needed financial support for homeowners. Streamlining administrative procedures is also critical to making the process accessible to immigrants, limited English proficiency (LEP) households, and low- to moderate-income (LMI) families.

We support \$4 million in the budget to support technical assistance to help homeowners navigate the process of creating ADUs. Finally, we urge the creation of an Office of Small Homes to oversee basement conversions and provide focused support to 1-4 family homeowners, ensuring small property owners have the support they need.

Foreclosures Still Remain A Threat - and Communities of Color are More Vulnerable

BIPOC communities are facing foreclosure challenges across NY State and are in need of services to preserve their homes. The impacts of the 2008 mortgage foreclosure crisis are still felt across the state, with a high concentration of mortgage distress in New York City’s BIPOC neighborhoods. Even more concerning are the disparities between white homeowners and their Black and Brown neighbors: in 2023, over twice as many Black and Brown New York families were behind on their home loans, (14%) compared to non-Hispanic white homeowners (7%).

Through the Foreclosure Prevention Program, the Center funds, coordinates, and administers a citywide network of housing counseling and legal services organizations to provide homeowner stabilization services across New York City. These 28 partners achieve positive outcomes for homeowners, annually assisting more than 2,000 clients through this program and preventing hundreds of foreclosures,



ensuring the protection of intergenerational wealth and that homeowners can age in place. These services are offered in every neighborhood of NYC, with a majority of clients served in Brooklyn and Queens. Of the clients served, 60% identify as Black/African American and 9% identify as Hispanic/Latino. Free services include foreclosure prevention, loss mitigation, financial counseling, estate planning, tangled title assistance, property tax assistance, representation in a foreclosure case, and access to loan and grant products.

Families are facing massive increases in groceries, rent, gas, utility services, and much more — leading to economic instability that can adversely impact homeownership retention. The foreclosure prevention program provides families struggling to stay afloat with the services needed to remain in their homes. It is important now more than ever to preserve the level of homeownership for families of color in neighborhoods across NYC.

Continue to Fund Homeowner Services in the FY 2026 City Budget

The Center for NYC Neighborhoods has developed innovative, high-quality services to help keep New York City homeowners in their homes, with a track record of success on behalf of LMI homeowners. The Center was founded to address the foreclosure crisis of the Great Recession and grew to address Hurricane Sandy; our services are critical in times of crisis. This year, the Center requested City Council funding to support several initiatives to assist homeowners across New York City with an emphasis on adapting programs to address BIPOC families at risk of losing their homes. Our original ask was for an increase over last year’s funding to help us meet the full demand for our services. At this point we ask to increase our current funding in order to serve at-risk homeowners.

Specifically, City Council funding would support our comprehensive suite of homeownership services, including the following:

- **Homeowner Hub:** Our Hub is a frontline service for homeowners seeking specialist advice and referrals for more comprehensive services. Our hotline operates at full capacity and can be reached via 311 or through our HomeownerHelp website.
- **Foreclosure Prevention Services:** The Center serves homeowners by providing foreclosure counseling, homeownership counseling, property tax counseling, estate planning services, and reverse mortgage counseling for seniors that help them remain in their homes. Some services are provided in-house, such as the Center’s Escalations program, while others are provided through our Network Partners.
- **Homeowner Help Desk:** Community-based outreach that connects homeowners with free attorneys and housing counselors to help stabilize homeownership across the city. The Homeowner Help Desk delivers free advice and solutions to homeowners who are in crisis and have nowhere else to go for assistance. Its primary goals are to bring housing counseling,



financial counseling, and legal services directly to vulnerable homeowners; raise awareness around scam prevention and programs and assistance available to NYC homeowners.

- **The Black Homeownership Project:** A research, programmatic, and policy advocacy initiative from The Center for New York City Neighborhoods that seeks to stabilize and increase Black homeownership in New York City, grow Black wealth, and provide high-quality housing and legal services to Black New Yorkers. Funding would facilitate a citywide expansion of much-needed estate planning services, with a geographical priority for services in Southeast Queens, the North Bronx, Central and South Brooklyn. Expanded estate planning services designed to engage Black homeowners and their families would align with and leverage the much needed proposals championed by Speaker Adams to help BIPOC New Yorkers protect their assets and home equity.
- **Interboro Community Land Trust:** While residents on the CLT own their houses and buildings, Interboro owns the land underneath the properties, thereby ensuring in perpetuity the affordability of the homes for current and future lower-income households and the preservation of public subsidies and private investment. In addition, to ensure the success and empowerment of CLT homeowners, Interboro provides stewardship in the form of ongoing supports (e.g., homeownership and financial counseling, foreclosure prevention, referrals to contractors) and safeguards a collaborative decision-making structure that allows for homeowners' participation in the governance of the CLT. Interboro is also a critical partner with the HPD, setting standards and processes that help to grow and guide all CLTs in New York City.
- **A Greener NYC:** The Center for New York City Neighborhoods has played a leading role in promoting sustainability and resilience initiatives among New York City's low- and moderate-income homeowners. At present, the Center is directing a NYSERDA-funded program, the Clean Energy Hub, in Brooklyn and the Bronx, working in partnership with the Association for Affordable Energy. These resources can reduce energy waste, lower utility bills, improve indoor air quality, and reduce drafts, making homes warmer in the winter and cooler in the summer.

Support HPD in expediting renewal of its housing preservation contracts

The Center remains committed to its role as a key partner in providing services to New York City's homeowners. However, the Center and its Network Partners can only complete this work when City contracts and agreements are executed and in place.¹ As mission driven organizations, we, for years, have provided valuable services to vulnerable populations but are facing a reality where we will not be able to do so unless our government funds us to do so.

Conclusion

We look forward to partnering with the City Council to protect affordable homeownership. Thank you for the opportunity to testify today.

¹ Speaker Adams highlighted this issue in her State of the City address, noting "our city's non-profit organizations..." are impacted "...when government routinely fails to make contract payments on time."

**Testimony to the New York City Council
Committee on Housing and Buildings
on behalf of
Chinatown Community Land trust**

June 3, 2025

“Testimony in Support of the Community Land Act”

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for the opportunity to submit testimony in **support of the Community Land Act and other key proposals to expand resident-led affordable housing and community land stewardship**. My name is Jack Hsia and I am an organizer with the Chinatown Community Land Trust, which is working to establish a Community Land Trust in Manhattan’s historic Chinatown. Chinatown CLT is also a member of the New York City Community Land Initiative (NYCCLI), an alliance of grassroots, affordable housing, environmental and economic justice organizations working to promote community land trusts (CLTs) for deeply- and permanently-affordable housing, commercial and community spaces, and other neighborhood-led development.

We urge this Committee and the City Council to pass the **Community Land Act**, a package of urgently-needed policies to bring land and housing into permanently affordable community control. These bills will help level the playing field for organizations like ours to meet our communities’ housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

We also support the other bills and resolutions being discussed today that will advance community stewardship of land for long-term affordability. We urge the Council to **pass Intros 1006 and 1007, which will expand the legal definition and regulatory agreements for CLTs** to include land uses beyond housing such as commercial, community, and open space. We also strongly support **Reso-777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro-350 to study the feasibility of creating a social housing agency**.

Although NYC’s Chinatown and many neighborhoods like ours were originally formed due to restrictive and racist land use policies, we created vibrant, healthy, and successful communities that have now made our neighborhoods desirable on speculative markets.

The Community Land Act would not only protect the people in neighborhoods like Chinatown, but uplift our city as a whole. Chinatown is literally City Hall's neighbor. My dad was once a food delivery worker for our family's restaurant, which delivered cheap and delicious food to public servants and Wall Street workers alike. When I got my first job out of college as a public servant, my office was down the street in the SDNY building, and I think as many of you and your staffers can relate, I relied heavily on Chinatown to feed me and stay afloat. All of the communities and neighborhoods represented here today have their own unique contributions that are too often overlooked.

1. Housing insecurity

Despite our contributions to this city, my neighbors, colleagues here today, and I are under the constant threat of housing insecurity. Chinatown has one of the lowest rates of homeownership, 15%, in New York City, and no new affordable units have been built in the last 30 years. This systemic neglect has long-term social and economic ramifications for our neighborhood, with extreme fire hazards being just one of them. These problems are driving our neighborhood's rapid decline, and it is time for a change.

The housing affordability crisis is dire. Despite two generations of my family being able to call Chinatown a home, I'm a lawyer and I cannot afford to live in Chinatown on my own when rents are \$3000-\$5000 a month. For my generation, and people younger than me, we don't know when we will be priced out of New York City, and housing is becoming increasingly unaffordable nationwide because of speculation. We have to take action now and it begins with these bills.

2. Community say in land use matters

The Chinatown CLT is actively trying to combat some of these housing and neighborhood problems, and the Community Land Act can help us create more stability and give our neighbors more of a say of what happens in our community. For example, even though multiple homeless shelters have been proposed and built in our communities, when our own neighbors are displaced by fires or other emergencies, they still struggle to find temporary housing in the neighborhood and can end up placed in shelters across the city. This is especially difficult for monolingual senior residents, who make up a significant portion of the local population. The Chinatown CLT has leased a property that can serve as emergency housing, allowing displaced community members to remain in their neighborhood as they work to rebuild their lives after a fire. We are currently in the process of securing capital funding to bring this project to life.

We the community demand the opportunity to decide how land in our community is used - whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the community.

3. Pass the Community Land Act

Passage of the Community Land Act will help our organizations take land off the speculative market and provide the deeply affordable housing our communities need to combat housing insecurity. Specifically, the Community Land Act legislative package includes the following:

- a. ***Public Land for Public Good*** ([Intro 78](#)) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of [2023](#), for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city’s remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.
- b. We also support the ***Tenant Opportunity to Purchase Act at the State level*** ([Reso 374](#)), which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing.

We can see how TOPA laws have helped preserve housing for Chinatown residents of DC. Despite many others of their neighbors being priced and developed out of their neighborhood, Wah Luck House, home to hundreds of Asian American tenants, many of whom are seniors, in DC Chinatown have managed to hold onto their housing due to a community based organization owning the ground lease. NYC Chinatown residents want access to the same tools.

Many of our tenants are low income and may not have the resources to buy their buildings outright, however TOPA would enable organizations like the Chinatown CLT to assist by leveraging our resources to support our neighbors, and develop more affordable ownership in Chinatown.

- c. ***Permanently Abolishing the NYC Tax Lien Sale*** and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes. To advance this goal we call on the ***City Council to pass Int. 0570-2024, which creates a land bank*** that can replace the tax lien trust, steward properties, and work with community land trusts and other responsible property owners to acquire them for the purpose of maintaining permanent affordability. We have submitted proposed changes to Int 057 to give the land bank a clearer mission to work with CLTs, engage in non-housing land revitalization, and make it more accountable to public oversight by changing the proposed board structure. We are happy to continue to work with the lead sponsor to ensure these changes are implemented.

4. Empower agencies to partner with CLTs stewarding all kinds of properties

CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. Passing **Intros 1006 and 1007** will ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of housing, reflect the city’s CLT growing sector and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods.

As discussed above, Chinatown CLT is currently working to develop a local site that can be used as emergency housing for local residents displaced by fire and other emergencies. We also hope to steward land that can be used for green space, acquire multi-use properties that can also allow small businesses to continue providing valuable contributions to our neighborhood, and preserve and develop sites for community centers and cultural events.

5. Support social housing development and preservation (Res-777, Int-350)

We also support **Reso 777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro 350 to study the feasibility of creating a social housing agency.**

We thank the City Council for its vital support and urge you to fund the Citywide CLT Initiative in the FY2026 budget.

We appreciate the Committee on Housing and Buildings holding this hearing to discuss urgently-needed strategies to address the urgent housing crisis facing our city, including expanding community-controlled, deeply affordable housing, strengthening tenant rights, and

ensuring funding to house the most vulnerable tenants. Thank you for the opportunity to submit testimony, and we look forward to continuing to work together to advance Community Land Trusts citywide.

For more information, contact:

Jack Hsia

z.jackhsia@gmail.com

Chinatown Community Land Trust

217 Park Row #9

New York, NY 10038

Testimony on Social Housing and Associated Legislation

06/03/2025

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

CIDNY advocates for people with disabilities in the five boroughs of New York City. We hereby testify on "Social Housing and Associated Legislation."

Affordable Housing

CIDNY strongly supports:

- [Int. No. 78](#) (Restler), in relation to the disposition of real property of the city.
- [Int. No. 570](#) (Brewer), in relation to creating a land bank
- [Proposed Int. No. 1006-A](#) and [Proposed Int. No. 1007-A](#) (Nurse), in relation to defining community land trusts for the provision of services in addition to housing that benefit the local community

These bills favor community-based organizations and developers having priority access to city land for public housing. They encourage local developers to purchase land to provide affordable housing as they mandate the city to prioritize the local non-profits and community developers. I think the initiatives are excellent for making our city more affordable.

Accessibility of Public Housing:

We cannot advocate for affordable housing without fighting for accessible housing too. We need accessible housing for more inclusion of people with disabilities and seniors in the housing programs that the City and the State are implementing. NYCHA and Housing Connect should have reserved units for people with mobility, visual, and sensory impairments. The expansion will help reduce waiting times. Thousands of disabled consumers have been on the waiting list for years.

Many people with disabilities in NYCHA and HPD are forced to live in buildings without basic accessibility standards; e.g., lack of elevators, entrances without ramps, bathrooms without grab bars, etc.

The City needs to fund and expand housing programs for the seniors and disabled New Yorkers. Some programs like Senior Citizen Rent Increase Exemption (SCRIE) and Disability Rent Increase Exemption (DRIE), which help freeze rents, are very important for our community. That is why we support the following:

- **S3563 / A2367** (Cleare / Epstein): Permits other qualifying members of a household to qualify the household for DRIE when they are not the head of household.
- **S1457A / A5344** (Kavanagh / Glick): Would increase the maximum income threshold for SCRIE, DRIE, Senior Citizen Homeowners Exemption and Disabled Homeowners Exemption (DHE) eligibility to \$67,000 and index it to inflation thereafter.

These bills, if passed, will play a huge role in expanding and developing the rental support and inhabitation of people with disabilities and seniors, by limiting the eligibility to \$67,000 and accepting qualified household members.

Community Development:

We also support:

- [Res. No. 374](#) (Public Advocate Williams), Resolution calling on the New York State Legislature to pass and the Governor to sign, legislation mandating that any owner intending to sell a multi-unit residential dwelling, must first make a fairly appraised offer of sale to the tenants within the residence before making any sale offers to third parties.
- [Res. No. 777](#) (Marte) Resolution calling on the New York State Legislature to pass, and the Governor to sign, A.9088/S.8494, in relation to creating a public benefit corporation for the construction, acquisition, and rehabilitation of permanently affordable housing.

These bills help local development of public housing for affordable, accessible and community-driven achievements. They prioritize projects that address the real needs of low-income New Yorkers, people with disabilities and seniors.

We thank the City Council for providing us with the opportunity to testify. This testimony is supported by Dr. Sharon McLennon Wier, Executive Director of CIDNY.

Thank you,
Mbacke



Council of New York Cooperatives & Condominiums

INFORMATION, EDUCATION AND ADVOCACY

Testimony in Support of Intro 1281-2025

Hearing of the Committee of Housing and Buildings
June 3, 2025

The Council of New York Cooperatives & Condominiums (CNYC Inc.) is a membership organization that has provided information, education, and advocacy for New York City's housing cooperatives and condominiums for the last 45 years. Cooperatives and condominiums are communities of homeowners who have consented to comply with the community's governing documents, including rules set by their duly elected board of directors or managers. The boards are comprised of volunteer homeowners.

More than 170,000 New York families make their homes in CNYC member buildings, which span the full economic spectrum. For most cooperative and condominium homeowners, their home is also their most significant investment. As a result, their primary concerns are their financial security, safety, and quality of life. They are committed to New York City and have invested heavily in its future. We are here on their behalf and appreciate the opportunity to submit testimony on Intro 1281-2025 before the committee today.

In February 2024, when the Department of Buildings adopted rules regulating the installation of natural gas leak detectors in accordance with Local Law 157, cooperatives and condominiums began to search the marketplace for available models. Due to the requirement that the devices be either battery-operated and placed within one foot of the ceiling or hard-wired, there was only one cost-effective option: the DeNova. The most commonly used natural gas leak detectors in other municipalities did not meet the City's requirements. Co-op and condo boards, as well as large property management firms, waited for

an alternative to be developed. Towards the end of 2024, most began to place orders for the only acceptable battery-operated option, the DeNova. They quickly found the DeNova were backordered and challenging to obtain.

Here is what active and engaged cooperative board members from across New York City had to say yesterday:

“Our managing agent was able to purchase..., well to pre-pay \$4,507.43 for x60 Denova Detect Natural Gas Alarm DD62ONV with 10-year battery. Two months later on June 2nd the order is not able to be fulfilled due to short supply. There is no confirmed date when this purchase will be completed.”

- Board President of a 54 unit cooperative in Riverdale

“Our property manager [at a large property management firm] says that our order for gas leak detectors has been delayed. She tells me that none of [her company’s] buildings have received any gas detectors.”

-Board President of a 120 unit cooperative in Downtown Brooklyn

“Our coop has searched for the detectors and continually come up against a wall: 'currently out of stock' or 'on back order'. We would very much appreciate an extra year to be in compliance.”

-Board Member of a 8 unit cooperative in Park Slope

“We were part of a bulk order that was placed by the sponsor of our building, they have many other buildings, [but] our order was recalled, with no future delivery date. An extra year of compliance would be extremely beneficial, as we also have many other LL projects this year and next year.”

-Board President of a 520 unit cooperative in Forest Hills

“We purchased the Denova natural gas detector and they are on backorder....It would be good for all buildings to have the extra year so that

installation can go smoothly. It seems that there are other ways to comply with the law.”

-Board President of a 12 unit cooperative in Jackson Heights

“We - very fortunately - were able to get ours ordered and they were not the recalled model. However, we were not sure if we were going to receive the alarms on time. Indeed, we did not receive them by the deadline.

In addition, [we have found] installation is also a challenge... we're meeting obstacles with [rental] residents....

This should be taken into consideration by the City. While it seems perfectly rational to expect [rental] residents to comply with regulations, especially where gas is concerned, there are those who do not want to comply, making it more difficult and slowing the process.

For our cooperative, we needed to wait to purchase the alarms in order to include them in our annual budget, which is already tight. I would imagine with the administration's tariffs, the cost of the alarms will now increase and an extension will support those cooperatives who now have to adjust their budget to accommodate the increase.

The safety measure is an excellent initiative, but... its planning and scoping [are not helpful].”

-Board President of a 48 unit cooperative in Morningside Heights

“Our managing agent ordered gas leak detectors for our building months ago and they still have not arrived. We have no information about when we will have them. We would greatly appreciate an extension to get this done!”

-Board President of a 17 unit cooperative on the Upper West Side

CNYC's member buildings are governed by volunteer Board members who seek to "do the right thing" and comply with all City rules and regulations as expeditiously as possible while following best practices. The Board Members quoted above all attend CNYC's two-hour discussion groups every five weeks, at which they learn about and discuss new and pending legislation, rules, and

regulations, as well as issues they have encountered at their buildings. They subscribe to and read our eblasts, which contain information and updates on compliance requirements. If these cooperative and condominium boards are unable to comply with a rule, it is unlikely that less engaged cooperatives and condominiums have been able to do so.

CNYC strongly supports Intro 1281. The extension will enable widespread compliance with the well-intentioned, safety-oriented goal of the legislation without unnecessary penalties and violations.



Testimony in support of the Community Land Act and other key proposals to expand resident-led affordable housing and community land stewardship.

Presented to the NYC Council's Committee on Housing and Buildings with respect to the Hearing on Social Housing, held Tuesday June 3, 2025.

Collective for
Community, Culture
and Environment

info@collectiveforcce.com
collectiveforcce.com

Members

Eve Baron
Leslie Boden
Meta Brunzema
Paula Luria Caplan
Jocelyne Chait
Devyani Guha
Jill Hamberg
Eva Hanhardt
Zehra Kuz
Mercedes Narciso
Jina Porter
Yvette Shiffman
Evren Uzer von Busch
Laura Wolf-Powers
Ayse Yonder

My name is Jocelyne Chait. I am an urban planner and a founding member of the Collective for Community, Culture and Environment (CCCE), an all-women urban planning and architecture consultancy based in NYC. Our 14 members and 13 affiliates bring extensive knowledge and experience in community-based planning, affordable housing, sustainable development, environmental advocacy, architecture, and public health to our practice. Many of us have spent years working with local communities throughout New York City to address critical housing affordability needs, increase tenant protections, encourage equitable development, and prevent displacement. We recognize the depth and extent of the affordable housing crisis, not only through our own work, but also through data on the increasing number of families and individuals in NYC's shelter system and the increasing number of unhoused individuals, many with considerable mental health needs, living in the most precarious conditions on our streets, in our subway system, and in our parks.

While housing has been developed in New York City in recent years it has mostly been at the higher end of the rent spectrum and has not benefited the city's low- and moderate-income residents who experience high rent burdens, increasing overcrowding and displacement. The 2023 NYC Housing and Vacancy Survey reported a historically low rental vacancy rate of 1.4% for NYC, with apartments renting at the lowest rent levels - below \$1,100 per month – at an extremely low vacancy rate of 0.39%.

New York City is not alone in facing this crisis. America as a whole has a serious housing problem. Not so much one of supply – housing will always be built in areas that guarantee a good return on investment by corporate real estate interests. No, the problem, for many low- and moderate-income and homeless families and individuals, is one of affordability. As long as housing is treated as a commodity, exacting the



Collective for
Community, Culture
and Environment

info@collectiveforcce.com
collectiveforcce.com

Page 2/5

highest price on the market, and returning the highest profit on investment, it will continue to serve the interests of a wealthy minority and fail to address the shelter needs of all Americans.

Merely increasing the supply of housing, largely through private development, as in New York City's recently adopted City of Yes for Housing Opportunity plan, will do nothing to alleviate the crisis.

A major correction in federal housing policy is needed at this time, to both increase housing security throughout the United States and reverse the tide of homelessness.

Yet, affordable housing was not uppermost in either the Democratic or Republican presidential campaigns of 2024. Nor is it a priority for the current Trump administration, which is bent on cutting back staff and programs at the Department of Housing and Urban Development (HUD) - which oversees much of affordable housing development - as part of DOGE's slash and burn efforts to reduce government spending.

According to a report from the NYU Furman Center - "State of New York City's Housing and Neighborhoods in 2024" - released Thursday, June 5, 2025, Trump's proposed federal budget could cut housing programs in New York City by up to 42%. This would have severe consequences for low-income tenants citywide, including those in public housing.

We need to return to the social housing efforts of the 1930s, built on European models and championed by Catherine Bauer and other 'housers,' which advocated housing for people, not profit, and led to passage of the 1937 Federal Housing Act, establishing the nation's public housing system. While public housing provided a safety net for many low-, moderate- and middle-income Americans, construction of new public housing effectively ended in the late 1990s with the Faircloth Amendment. All new funding went to housing vouchers and development in the private market, primarily through Low Income



Collective for
Community, Culture
and Environment

info@collectiveforcce.com
collectiveforcce.com

Page 3/5

Housing Tax Credits. In addition, debilitating cutbacks in federal funding for the operation and maintenance of existing public housing developments in recent decades has resulted in serious deterioration of physical infrastructure in many instances and created untenable and unhealthy conditions for tenants.

Absent any federal directive to resolve the affordable housing crisis, states and local municipalities around the country have stepped forward in recent years with social housing policies and strategies of their own that center housing as a public good, with an emphasis on deeply affordable rents, permanent affordability, and opportunities for community ownership. Examples include creation of a Social Housing Developer in Seattle, Washington; creation of a land bank program in Chattanooga, Tennessee; and creation of community land trusts in St. Paul, Minnesota and Burlington, Vermont.

Current efforts in New York State and New York City build on our own rich history of social housing including: the State Mitchell-Lama program; new York City's Cooper Square Community Land Trust, formed in 1994; and housing for the working-class built by labor unions such as the Amalgamated Clothing Workers of America (ACWA) and the United Housing Federation from the 1930s to the 1970s. Creation in New York City since the 1970s of a strong community-based non-profit housing development and management sector has also contributed substantially to these efforts.

In this moment of crisis, we need to do more.

We urge the Committee on Housing and Buildings and the City Council to pass the **Community Land Act**, a package of urgently needed policies to bring land and housing into community control and establish permanent affordability. The Act includes **Intro 78, Public Land for Public Good**, which prioritizes Community Land Trusts and other



Collective for
Community, Culture
and Environment

info@collectiveforcce.com
collectiveforcce.com

Page 4/5

nonprofits in public land dispositions; **Intro 902, the Community Opportunity to Purchase Act (COPA)**, which gives CLTs and other nonprofits a first right to purchase multifamily buildings when landlords sell; and **Resolution 374**, in support of **S401**, the NYS Tenant Opportunity to Purchase Act (TOPA).

In addition, we urge the City Council to pass:

- **Resolution 777** in support of the NYS bill (**S5674/A6265**) to establish a statewide Social Housing Development Authority;
- **Intro 350**, to study the feasibility of creating a social housing agency on the city level.
- **Intro 570, the Land Bank Bill**, allowing community land trusts and other responsible property owners to acquire distressed properties; and
- **Intros 1006 and 1007**, empowering City agencies to work with CLTs on projects that include land uses beyond housing such as commercial, community, and open space.

A robust social housing program in New York City and New York State, providing a range of permanently affordable, community-controlled housing solutions, coupled with preservation of existing affordable housing, would not conflict with market rate housing development nor wealth generation through homeownership but would provide the critical third leg of an equitable housing market stool.

Such actions must be supported and expanded in light of threatened staff and funding cutbacks and evisceration of fair housing protections at the federal level.

It is an indictment that the richest nation in the world cannot adequately house all of its citizens. It is unconscionable that it does not



Collective for
Community, Culture
and Environment

info@collectiveforcce.com
collectiveforcce.com

Page 5/5

consider housing as a human right, available to all, including the very poor, and not a commodity to be traded on the open market.

Widespread housing insecurity in the United States, particularly in cities such as New York, affects public health as well as local economies.

Indeed, lack of affordable housing is one of the main causes for people moving out of New York. We need to face this crisis with comprehensive affordable housing strategies rather than purely market solutions.

We have a moral obligation to do so. We cannot afford to do less.

Respectfully submitted, June 6, 2025

Good afternoon Chair Sanchez and members of the committee. Thank you for holding this hearing today. I am Vijay Dandapani, President and CEO of the Hotel Association of New York, also known as HANYC. I am here to testify in support of Int. 1281 introduced by Council Member Dinowitz and thus far supported by 13 other CMs. This bill would delay the implementation of the natural gas detector requirement in Local Law 157-2016.

Local Law 157-2016 requires that DOB, “establishes or adopts a standard governing the installation and location of natural gas alarms.” This standard is the National Fire Protection Association (“NFPA”) standard 715, which requires interconnected alarm systems. These alarm systems ought to be the industry standard. However, only a single company can meet these requirements. Otherwise, hotels and other buildings would need to install “line operated gas detecting systems.” These wired systems require that major work be performed throughout hotels.

In order to install these wired systems, hotels would need to remove or drill through walls, floors, and ceilings of occupied hotels. This would severely disrupt both guests and workers as in order to safely perform this extensive work hotels would need to be emptied of guests and workers for weeks.

This requirement comes at a particularly inopportune time for the hotel industry which is still to recover from the Covid pandemic and now under a double whammy from some of the policies of the Federal administration. Most hotels lack the financial wherewithal to suddenly pay for such major work, let alone close for weeks.

Int. 1281 would address this problem by delaying implementation until DOB determines that sufficient non-wired alarms are available. The bill would give one year from DOB’s determination that the devices are available, allowing hotels enough time to prepare for installing them. By being wireless, these alarms would be safer to install.

For these reasons, we strongly urge the Council to pass this bill immediately. Thank you very much for your time

Harlem Housing Advocacy Group, Inc.

P.O. Box 2741, New York, NY 10027 hello@hhaginc.org www.hhaginc.org

3rd June 2025

Committee on Housing and Buildings—**Social Housing**

Dear Committee on Housing and Buildings:

Thank you for holding this hearing to address the affordability in housing crisis in the City of New York on bills re **Social Housing**: Int no. 78, Int no.350, Int no. 570, Int no. 571, Int no. 902 (tenant opportunity to purchase), proposed Int no 1006-A and proposed Int no. 1007-A, Int no. 1034, Int no. 1281, Int no. 1296 and Res no. 374 and Res no. 777 calling on the New York State legislature to pass ...

The Committee on Housing and Buildings does not yet address the financing measures inherent in the New York State Private Housing Finance Law (and HPD as the supervising agency in the City of New York) that it depends upon to enact these bills re **Social Housing**.

In order to prevent fraud and corruption, there must be Transparency and Accountability. Sponsors and Developers must be required to disclose partnerships and contracts to all program stakeholders.

All corporations, sole proprietorships, non-profits, sponsors, developers, etc. participating in any public/private affordable housing Participation Loan Programs (PLP) with the City of New York Department of Housing Preservation and Development (HPD), including HPD, DHS and NYCHA, such contracts must be disclosed in the Passport Contracts Database:

https://passport.cityofnewyork.us/page.aspx/en/rfp/request_browse_public pursuant to Local Law No. 76, effective January 1, 2019, requiring information about city contracts to be available online for public access to include agency name, program, contractor name, contract category, contract number, contract scope and contract amount.

These measures will prevent non-profits and developers (ELH Management, Settlement Housing Fund, Riseboro, UHAB, et al.) from mismanaging buildings into foreclosure.

Please note our Advocacy Letter and the Resolution adopted June 17, 2021.

Respectfully submitted.

Affordable Neighborhood Cooperative Program (ANCP) created and administered by the Department of Housing Preservation and Development (HPD) and its Participation Loan Program, under the auspices of Article 11 and Article 15 of the New York State Private Housing Finance Law. These programs are actually predatory lending schemes masquerading as affordable housing programs.

HPD arranges sponsor/developer [Neighborhood Restore, Settlement Housing Fund, SHUHAB, UHAB (Urban Homesteading Assistance Board), Finger Management, Wavecrest Management] access to public monies ostensibly to provide affordable housing to residents. In fact, sponsors and developers are enriched and residents are left with damaged property and unmanageable debt. The predatory lending scheme threatens the retirements of workers vested in City of New York pension funds that are guaranteeing these programs i.e. “economically targeted investments”.

Furthermore, residents are subjected to “breaches of law” **that include deprivation of rights under the 5th Amendment to the U.S. Constitution**, mortgage fraud, inverse condemnation, regulatory taking (ultra vires, unjust enrichment) and violations of Truth in Lending Laws.

For example, in the City of New York, 644 Riverside Drive is saddled with a \$46 million dollar mortgage, 540-550 West 144th Street saddled with a \$14 million mortgage, 50 West 112th Street, 86 West 119th Street, 477 West 142nd Street, 544 East 13th Street and other buildings are at risk.

Since Fall of 2004, The Residents of 936-938 St, Nicholas Avenue have suffered the perpetuation of a fraudulent refurbishing/renovation that has resulted in a “sick” building that needs to be made whole. Renovation was not performed per the Scope of Work. Inferior [poisonous] building material was used. The shoddy work has resulted in creating environmental and structural conditions that effect residents’ health, morbidity and mortality. The building is mold infested, seen and unseen. Respiratory, cardiovascular, pulmonary illness and broken hearts abound.

For example, in this fifty-one (51) unit building, eighteen (18) residents have died from initial symptoms that include respiratory distresses and memory loss. The contractor was given a deposit of \$3,912,000.00 without scope of work compliance.

Residents have recently learned that the building’s lack of a Certificate for Occupancy is a violation of the City of New York Multiple Dwellings Law §301. How/Why was a mortgage granted without a Certificate of Occupancy?

Things cannot continue this way.

The **Job No. 103324653** which was/is the permit for the 2002-2004 construction work in 938 St. Nicholas Avenue, Block 2107, Lot 20 is still **Open** at the City of New York Department of Buildings (DOB). The Work remains Incomplete. The Contractor willfully misfiled the Job so that it did not reflect the true cost of the Scope of Work and compliance with the Multiple Dwellings Law. There was No Certificate of Occupancy in 2006. There is NO Certificate of Occupancy NOW. How/Why was a mortgage granted without a Certificate of Occupancy?

Please note the document file for the foreclosure action that commenced in 2013 under the auspices of Judge Joan Madden and dismissed dated July 31, 2018: "Ordered that plaintiff's foreclosure action is dismissed in its entirety without prejudice; and it is further Ordered that the temporary receivership of Daniel R. Milstein is terminated and Mr. Milstein shall be fully discharged as Receiver upon court approval of his final accounting":

850011 – 2013--

<https://iapps.courts.state.ny.us/nyscef/DocumentList?docketId=P7AHkVkAJoalJnTcmWwrEA==&display=all&courtType=New%20York%20County%20Supreme%20Court&resultsPageNum=1>

Unfortunately, the mortgage note was transferred to a new lender for the third time during the dismissed foreclosure action. The new lender served the building and shareholders with a new foreclosure action on Wednesday, 5th September 2018. It is assigned **Index No. 850233-2018--** New York County Supreme Court

Short Caption: 938 ST. NICHOLAS AVENUE LENDER LLC, - v. - 936-938
CLIFFCREST HOUSING DEVELOPMENT FUND CORPORATION et al

Case Type: Real Property - Mortgage Foreclosure - Commercial

Case Status: Pre-RJI;

<https://iapps.courts.state.ny.us/nyscef/DocumentList?docketId=YjmbXxmT0PYGZOFID8uTig==&display=all&courtType=New%20York%20County%20Supreme%20Court&resultsPageNum=1>

The Managing Member of 938 ST. NICHOLAS AVENUE LENDER LLC, Mr. David Aviram, is also the Principal and Director of Acquisitions for Maverick Real Estate Partners (www.maverickrep.com), "a private equity fund manager that acquires loans, mechanic's liens and judgments secured by real estate"

We ask that the HPD Corruption Investigation begin with 1) 938 St. Nicholas Avenue, NY, NY 10032 (now in foreclosure; tenants face eviction); 2) 640 and 644 Riverside Drive, NY, NY 10031; 3) 20 and 22 Mount Morris Park West, NY, NY 10027; 4) 544 East 13th Street, NY, NY 10009. A thorough investigation of each of these buildings will most likely expose the criminality of fraud and fraudulent inducement.

Please note the unresolved testimonies from the following hearings:

City of New York Council Hearings held by the Housing and Buildings Committee on the Third Party Transfer Program, **26th April 2018** (Committee Report, 7p; Testimony, 275p; Transcript, 209p):

<https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3465116&GUID=1BC54EFF-A8C0-4A4A-B278-E939E85D17A8&Options=&Search=>

and **22nd July 2019** (Committee Report, 15p; TPT Hearing Slides, 34p; TPT. Hearing Testimony, 266p; TPT Hearing Testimony (Con't), 1p; TPT Hearing Transcript, 271p); <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=>

1st November 2023, Committee on Oversight and Investigations; Note video at 2:30 re HPD, UHAB, Third Party Transfer (TPT); Testimony, ; Transcript, <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6379859&GUID=2AF2C863-1483-4E45-B52D-1507FA5F24BB&Options=&Search=>

30th September 2024, Committee on Housing and Buildings, Oversight - Third Party Transfer Program, 250 Broadway - Committee Room, 14th Floor: Oversight - Third Party Transfer Program.

<https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6865151&GUID=BCBAB298-E485-4FA8-8378-EFF5DF2B3ED7&Options=&Search=> **Attachments:** 1. Committee Report, 2. Hearing Testimony, 3. Hearing Transcript; **Video:** 03:25:15, NYCC-PV-250-14_240930-132212.mp4

Thank you for reading this letter. You must employ every resource you can muster to assist our efforts to end HPD corruption, judicial malfeasance and malpractice.

We look forward to hearing from you very soon.

Sincerely,

M.E. Greene-Cohen, Founding Executive Director

Harlem Housing Advocacy Group, Inc. P.O. Box 2741, New York, NY 10027,
hello@hhaginc.org www.hhaginc.org

Four Freedoms Democratic Club

A Resolution to Amend Local Law No. 76, (Council Int. No. 1324-A of 2016), of the City of New York, passed by the Council on April 25, 2017, approved by the Mayor on May 10, 2017, effective January 1, 2019.

Whereas the City of New York Department of Housing Preservation and Development (HPD) Participation Loan Program (PLP) is not transparent and does not fulfill its fiduciary duty as “supervisory agency” for Housing Development Fund Corporations (HDFCs) as mandated by Article 11, § 572 (14) of the New York State Private Housing Finance Law.

Whereas many of HPD’s public/private partnerships, ostensibly providing affordable housing programs for low and moderate income residents, cause much suffering for residents and are in fact predatory lending schemes masquerading as affordable housing programs.

Whereas any criminality of corruption, fraud and fraudulent inducement must be exposed and eradicated.

Whereas efficient affordable housing programs for low and moderate income residents of the City of New York cannot succeed without eradicating corruption and waste.

Whereas past failures and injustices in HPD’s public/private partnerships must be examined and adjudicated.

Whereas all HPD affordable housing Participation Loan Program (PLP) contracts with nonprofits, sponsors and developers must be listed and be easily retrieved in the Passport Contracts Database.

Whereas HPD’s public/private partnerships must promote transparency and accountability.

Be it resolved that the Four Freedoms Democratic Club take action, call for hearings and amend Local Law 76 as follows:

All corporations, sole proprietorships, non-profits, sponsors, developers, etc. participating in any public/private affordable housing Participation Loan Programs (PLP) with the City of New York Department of Housing Preservation and Development (HPD), including HPD, DHS and NYCHA, such contracts must be disclosed in the Passport Contracts Database:

https://passport.cityofnewyork.us/page.aspx/en/rfp/request_browse_public pursuant to Local Law No. 76, effective January 1, 2019, requiring information about city contracts to be available online for public access **to include agency name, program, contractor name, contract category, contract number, contract scope and contract amount.**

Adopted: June 17, 2021

Written Testimony
Interboro Community Land Trust
City Council Committee on Housing and Buildings Hearing
June 3, 2025

Introduction

Thank you, Chair Sanchez and Housing and Buildings Committee members, for this opportunity to submit testimony in support of the **Community Land Act** and other key bills and resolutions that aim to curb unbridled speculation in the residential housing marketplace, expand opportunities for resident-controlled permanently-affordable housing, and support and strengthen community land trusts.

My name is John Edward Dallas. I'm the Director of Interboro Community Land Trust, the city's first and, so far, only CLT with a citywide catchment area—hence the name Interboro. Balancing permanent affordability, equity building, and neighborhood stability, Interboro supports New Yorkers and strengthens communities through the development and stewardship of permanently-affordable homes for ownership by low- and moderate-income households across the five boroughs.

Formed in 2016, Interboro is a collaboration between four mission-driven nonprofit affordable-housing organizations: Center for NYC Neighborhoods, Habitat for Humanity NYC and Westchester County, Mutual Housing Association of New York (MHANY), and Urban Homesteading Assistance Board (UHAB).

We have 450-plus homeownership units (which will be permanently affordable and simultaneously individual, intergenerational, and community asset-building opportunities) in our pipeline. The majority of these units will be in limited-equity housing cooperatives; the remainder will be 1- to 3-family homes. They will span three boroughs—Brooklyn, Queens, and The Bronx—and 13 City Council Districts. Furthermore, of the 1,200 housing units on community land trusts that HPD has financed or plans to finance, over one-third of these permanently-affordable, resident-owned homes are Interboro projects.

Interboro is also a member of the New York City Community Land Initiative (NYCCLI), an alliance of grassroots, affordable housing, environmental and economic justice organizations working to promote community land trusts (CLTs) for deeply- and permanently-affordable housing, commercial and community spaces, and other neighborhood-led development.

This testimony stands in support of these bills and resolutions under discussion at today's hearing:

- [Intro 78](#)
- [Intro 902](#)
- [Reso 374](#)
- [Intro 570](#)
- [Intro 1006-A](#)
- [Intro 1007-A](#)

Community Land Act

We urge this Committee and the City Council to pass the **Community Land Act**, a bundle of proposed and urgently-needed legislative actions that includes two bills, **Public Land for Public Good** ([Intro 78](#)) and the **Community Opportunity to Purchase Act (COPA)** ([Intro 902](#)), and a **resolution in support of the Tenant Opportunity to Purchase Act (TOPA)** ([Reso 374](#)).

Public Land for Public Good would require the City to prioritize nonprofit developers, such as CLTs, when disposing of City-owned land. This preferential treatment would ensure that public land, which is dwindling and increasingly valuable in a hot real-estate market and amid rampant speculation, is maximized by serving public needs and providing public benefits. These include the creation and preservation of permanently-affordable community-controlled housing on community land trusts.

As an example of what this prioritization looks like in practice, we call your attention to our partner Habitat’s Claremont House homeownership project. It represents the first time HPD selected a team proposing the CLT model for homeownership in response to a Request for Proposals to create affordable housing on vacant, City-owned land. As a result of the City’s exclusive preference for a CLT and a team of nonprofit housing developers, 40-plus new homeownership opportunities for lower-income households will be created in the south Bronx in a 100 percent affordable residential building.

Not only will residents be co-op shareholders and therefore co-owners of their building (and in greater control of their “housing destiny”), and have the opportunity to build personal and intergenerational wealth. They also will enjoy amenities such as a rear, community room, wellness gym, and hydroponic center. (For more information, click [here](#).)

To improve **Public Land for Public Good**, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.

COPA would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, **COPA** would help curb speculation and expand the supply of permanently-affordable, community-controlled housing.

COPA would be most impactful if implemented alongside the **TOPA**, which would enable tenants to partner with CLTs and other mission-driven nonprofits to create, preserve, and steward permanently-affordable resident-centric housing.

We support the following proposed changes to the **COPA** bill that have been submitted to the lead sponsor, Councilmember Carlina Rivera, in order to make the legislation more effective:

- Addition of a clear right of first refusal for qualified nonprofits. As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Inclusion of “Vacant Property.” We urge the City Council also to expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

In sum, passage of the **CLA** will foster and accelerate the channeling of City-owned land and privately-owned residential housing to control by lower-income households, permanent affordability, sustainable homeownership, and nonprofit stewards such as community land trust. Therefore, we once again urge this Committee and the City Council to pass the **Community Land Act**.

Land Bank Bill

We also call on the City Council to pass the **Land Bank Bill ([Intro 570](#))**. Passage of this legislation is a key component of the concerted effort to permanently abolish the tax lien sale and replace it with an equitable system that prioritizes keeping tax-distressed low- and moderate-income New Yorkers in their home, preserving their occupancy, ownership, and asset — rather than enriching and empowering private investors.

Intro 570, if enacted, would replace the tax lien trust with a public land bank that would work with mission-driven nonprofit organizations such as community land trusts to acquire land for the purpose of maintaining permanent affordability and lifting up resident engagement and control. We support proposed changes to the bill that would give the land bank a clearer mission to work with CLTs, engage in non-housing land revitalization, and make it more accountable to public oversight.

Taken together, the **Community Land Act** and the **Land Bank Bill** will ensure that the City is maximizing and prioritizing its land and affordable-housing resources (such as property-tax breaks and low-interest or forgivable loans) for the community as opposed to for-profit corporations and developers. For-profit developers rarely build housing that is affordable to most New Yorkers. When they do, they are heavily and disproportionately (as well as perhaps unnecessarily) subsidized by city government using public dollars to ensure they make a profit on their housing projects.

The CLA will help level the playing field for nonprofit affordable-housing organizations like ours. The Interboro partnership’s mission is to build, preserve, and steward housing that in perpetuity provides residential and economic stability and a sense of belonging, security, and self-determination to increasingly beleaguered low- and moderate- income households. Without access to no- or low-cost public land, our mission is close to impossible.

Intros 1006-A and 1007-A

We also strongly support two other bills being discussed today, [Intro 1006-A](#) and [Intro 1007-A](#). Both of these pieces of legislation center and advance locally what has been well established for many years beyond NYC and throughout the nation: community land trusts can be used to meet and achieve a wide range of community needs in addition to housing.

These bills will expand the legal definition and regulatory agreements for CLTs to include land uses beyond housing such as commercial, community, and open space. Passage of this pair of complementary bills NYC will constitute bold steps to address our city's triple affordable rental/homeownership/commercial crisis, driven by unbridled speculation and lingering racial and economic inequity in housing and land use.

With examples abounding in localities throughout the country, collective ownership of, for example, community centers and gardens and industrial and manufacturing spaces is feasible and achievable through the community land trust model, which ensures that the land beneath these community projects is never sold on the open market, but instead if held in trust in perpetuity for the community by the CLT.

The classic CLT model is based on a split-ownership structure. Under this bifurcation, the CLT owns the land beneath all the properties, leasing it long-term and at an affordable, sustainable price to, for example, businesses that own their buildings. These separate and co-existing ownerships coupled with a ground lease make the community land trust model an effective mechanism to meet the urgent need of local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods and remain community assets.

Citywide CLT Initiative

Finally, we would like to take this opportunity to ask the Council to support the creation of new homeownership opportunities for low- and moderate-income New Yorkers by doubling funding of the Citywide CLT Initiative to \$3 million.

Launched in FY2020, this Council-funded initiative supports the formation, expansion, and stabilization of community land trusts in their mission to create, preserve, and steward permanently-affordable, resident-controlled housing, as well as commercial, community, and green spaces and other community assets, in low-income NYC neighborhoods increasingly facing or at risk of gentrification.

Enhanced funding of the initiative will support 20 CLTs and allied organizations and their activities and services such as community outreach and education, tenant and community organizing, grassroots leadership development, legal and technical assistance, CLT incubation and property acquisition, participatory neighborhood planning, and community stewardship of land and housing.

As we touched on earlier in our testimony, in the community land trust model, a community land trust, a community-controlled not-for-profit organization, owns the land beneath the

properties located on it and leases the land to, for example, limited-equity housing co-ops and single-family homeowners who own their buildings and houses, respectively.

Through this split-ownership structure a community land trust ensures that the co-op units and homes remain affordable in perpetuity for future generations of lower-income land-trust residents. The CLT withholds the land from the speculative market, caps the resale prices of homes, and retains and recycles the initial investment of taxpayer dollars.

Today there are few options for lower-income New Yorkers to own homes, shutting off a critical path to building wealth and putting down roots in a neighborhood. With the city in the midst of an unprecedented affordable housing crisis, often the only option is to pay increasingly costly rents or to move out of the city entirely.

By doubling the funding of the Citywide CLT initiative to \$3 million, the Council would be simultaneously investing in and furthering a full gamut of critical equity-focused housing objectives, ranging from strengthening neighborhoods by allowing more families to remain in the communities they have long called home, to expanding affordable homeownership and fostering the creation, preservation, and stewardship of homes that are permanently affordable to lower-income households, to closing the racial homeownership gap and promoting intergenerational wealth-building.

Closing

We deeply appreciate the Committee on Housing and Buildings holding this hearing. Once again, thank you, Chair Sanchez and Housing and Buildings Committee members, for this opportunity to submit testimony in support of the **Community Land Act** and other key bills and resolutions that aim to curb unbridled speculation in the residential housing marketplace, expand opportunities for resident-controlled permanently-affordable housing, and support and strengthen community land trusts.

For more information, contact John Edward Dallas at john.edward.dallas@interboroclt.org



**Testimony to the New York City Council
Committee on Housing and Buildings**

June 3, 2025

“Testimony in Support of the Community Land Act”

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for holding today’s hearing and for the opportunity to testify. My name is Will Spisak and I am a Senior Policy Strategist at New Economy Project, a citywide economic justice organization. Our mission is to build an economy that works for all, rooted in cooperation, racial and neighborhood equity, and ecological sustainability. For 30 years, we have worked with community groups to challenge corporations that harm communities and perpetuate inequality and poverty, and to advance cooperative and community-led development through public banking, community land trusts, worker and financial cooperatives, and other democratically controlled initiatives.

More than 20 CLTs are organizing across the five boroughs—up from just two CLTs a decade ago. Through CLTs, communities collectively own and steward land, ensuring it is used for permanently affordable housing and other critical needs. CLTs are a flexible, proven model to protect public subsidy in affordable housing and advance neighborhood-led development without displacement. New York City’s CLTs are stewarding more than 1,200 deeply affordable rental apartments and shared equity cooperatives, as well as community and commercial hubs, green spaces, and other vital infrastructure in low income neighborhoods of color.

I’m pleased to testify today to urge the Committee and Council to pass the Community Land Act, an urgently-needed set of policies that would help qualified nonprofits, including community land trusts (CLTs), bring land and housing into permanently affordable community ownership. The Act includes three bills being discussed today: Public Land for Public Good (**Intro 78**), the Community Opportunity to Purchase Act (COPA) (**Intro 902**) and the Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (**Reso 374**). We also support the Land Bank Bill (**Intro 570**). Together, these measures will give community land trusts (CLTs) and other nonprofits vital opportunities to meet their communities’ housing and economic development needs, combat displacement of low-income New Yorkers, and build lasting community wealth.

We ask the Council to also pass **Intros 1006 and 1007**, expanding the definition of CLTs to ensure that city agencies are empowered to work with CLTs meeting a wide range of community needs, including and not limited to housing.

Finally, we urge the City Council to **fund the Citywide CLT Initiative at \$3 million in the FY2026 budget**. We are pleased that Speaker Adams and the Council committed to doubling this urgently needed funding for CLT operations and organizing, to support the growing number of CLTs reaching next stages of growth and land management. Enhanced funding will support 21 organizations, including grassroots CLTs and citywide technical assistance providers, to meet the growing and urgent need for CLTs.

The Community Land Act includes:

- **Public Land for Public Good ([Intro 78](#))**, which would require New York City to prioritize CLTs and nonprofit developers when disposing of city-owned land, to ensure public land is used for permanently affordable housing and other public benefit. We recommend amending Intro 78 to explicitly allow joint ventures between nonprofits and mission-aligned developers including MWBEs, and to pass the bill this year.

Public land is an increasingly precious resource that must be prioritized for the public good. For decades, the city has effectively prioritized for-profit developers when transferring public land—contributing to market-rate development, extraction of public subsidies over time, and displacement pressures in low-income Black and Brown communities. A [2019 analysis](#) by the Association for Neighborhood and Housing Development found that nonprofits consistently develop more deeply affordable housing than their for-profit counterparts. A [2023 NYCCLI analysis](#) we co-conducted found that, from 2019 to 2023, 48% of nonprofit-developed housing units were affordable to extremely low income households, compared to just 28% of for-profit units.

- **Community Opportunity to Purchase Act, or COPA ([Intro 902](#))**, which would give CLTs and other qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in [Washington, D.C., San Francisco, and other jurisdictions](#), COPA would help curb speculation and expand the supply of permanently-affordable, community-controlled housing. We also urge the Council to pass a resolution calling on the state to enact the **Tenant Opportunity to Purchase Act (TOPA)** at the state level ([Reso 374](#)), to enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing statewide.

To ensure nonprofits can meaningfully exercise their COPA rights, the Council must amend COPA before passage, adding an explicit right of first refusal for qualified nonprofits, to ensure they have the right to purchase a property on the same terms as a competing third-party offer. This type of provision is standard in COPA and TOPA

statutes across the country and essential to their effectiveness. We urge the Council to also expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

Dozens of tenant associations are currently working with CLTs and other nonprofits to negotiate community purchases of their buildings. These tenants and groups are willing and able to move projects forward and urgently need COPA to bring landlords to the table.

- **Permanently Abolishing the NYC Tax Lien Sale**, which harms and destabilizes low-income and Black and Brown communities. The Council must move beyond reforming the lien sale and end this predatory policy, once and for all, and replace it with an equitable, rational system that preserves affordable housing and keeps New Yorkers in their homes.

To advance this goal we call on the City Council to **pass Intro 570**, which creates a land bank that can replace the tax lien trust, steward properties, and work with CLTs and other entities to maintain permanent affordability. We have provided detailed suggestions to bill sponsors to strengthen the proposed land bank’s governance structure and ensure that land bank dispositions prioritize social housing and community-led economic development. These changes include prioritizing CLTs and nonprofits in all land bank dispositions (not just for affordable housing); prioritizing permanent affordability in all housing dispositions; and ensuring CLT representation on the land bank’s governing board.

The Community Land Act has generated tremendous momentum since the Committee’s 2023 hearing on the bills. More than 150 community, housing and environmental justice organizations endorse the legislative package and are actively working toward its passage. Thousands of New Yorkers have submitted postcards calling on the City Council to pass the bills. [Polling](#) shows New York voters overwhelmingly support social housing, and [82% of New Yorkers](#) support a Tenant Opportunity to Purchase.

Nearly two-thirds of City Council Members co-sponsor the bills, and we have coordinated in-depth policy briefings for Council Members and staff—showcasing successful local projects that the Community Land Act would multiply across New York; engaging San Francisco and Washington, D.C., legislators and housing providers to share their experiences and lessons learned over years of COPA and TOPA implementation; and more. We have provided detailed information about the bills to the City Council and administration, answering questions about the bills and discussing pathways forward.

The Community Land Act is broadly popular, well-studied, and modeled on proven approaches to create and preserve permanently affordable housing and community space. The City Council must act this year to ensure the bills’ passage.

In the face of federal disinvestment and an increasingly dire affordability crisis, New York City must take bold action to combat displacement and expand the supply of truly affordable, resident-led housing. Collective land ownership through CLTs is one of the most effective ways to achieve these goals.

Thank you again for the opportunity to testify today.

NYC COMMUNITY LAND ACT



The NYC Community Land Initiative (NYCCLI) calls on the New York City Council to pass the Community Land Act – an urgently-needed legislative package that generates permanently-affordable social housing and neighborhood-led development without displacement. Together, these policies address our city’s housing crisis, build community wealth, and advance racial and neighborhood equity.

The Community Land Act includes:

- ▀ **Community Opportunity to Purchase Act (Intro 902)** – giving community land trusts (CLTs) and other qualified nonprofits a first chance to buy multifamily residential buildings when a landlord sells. Modeled on successful legislation in other cities, the bill helps level the playing field for mission-driven nonprofits to acquire, develop, and preserve permanently-affordable housing.
- ▀ **Public Land for Public Good (Intro 78)** – prioritizing CLTs and not-for-profit developers when the City disposes of public land. The bill will help ensure that public land is used to provide permanently-affordable housing and meet other critical needs.
- ▀ **Tenant Opportunity to Purchase Resolution (Reso 374)** – calling on New York State to enact legislation giving tenants a first right to collectively buy their buildings when a landlord sells.
- ▀ **Permanently abolishing and replacing the NYC Lien Sale** – which has fueled speculation and displacement in BIPOC communities – and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes.

For more information, contact Will Spisak at will@neweconomynyc.org, or visit www.nyccli.org.



Send an email to your Council Member today!

NYC
community land
initiative



NYC COMMUNITY LAND ACT

Supporting Organizations

89th Street Tenants Unidos Association
AD—WO
Affordable Housing is For All (AHIFA)
A. Philip Randolph Square Neighborhood Alliance
Art Against Displacement
Asian Americans for Equality
Association for Neighborhood and Housing Development (ANHD)
Astoria Not for Sale
Bailey's Cafe
Biotech Without Borders
Black Trans Media
Blacklining Foundation
Bronx Community Land Trust
Brooklyn Cooperative Federal Credit Union
Brooklyn Level Up
The Brotherhood Sister Sol
Brownsville Partnership
Caribbean Equality Project
Carroll Gardens Association
Catholic Migration Services
Center for Family Life in Sunset Park
Center for New York City Neighborhoods
Chhaya CDC
Chinatown CLT
The Chocolate Factory Theater
Churches United for Fair Housing
Citizen Action of New York
Columbia University White Coats for Black Lives
Community Allies
Community and Worker Ownership Project at CUNY School of Labor and Urban Studies
Community Resource Exchange
Community Service Society of New York
Community Solutions
Community Voices Heard
Cooper Square Committee
Cooper Square Community Land Trust
Cooper Square Mutual Housing Association II, HDFC
Cooperative Economics Alliance of NYC
Crown Heights Tenant Union
Custom Collaborative
CUNY School of Law Community & Economic Development Clinic
DSA Queens Housing Working Group
East Harlem/El Barrio Community Land Trust
East New York Community Land Trust
East New York 4 Gardens
East River Park Action
El Puente de Williamsburg
F.E.A.S.T. Organization
Flatbush Tenant Coalition
The Flatbush Workshop for Design
For the Many
Goddard Riverside
Greater Jamaica Development Corporation
Green Map System
Grow Brownsville
GrowHouse NYC
The Health & Housing Consortium
Hester Street
Housing Conservation Coordinators
Housing Court Answers
Housing Justice for All
Housing Organizers for People Empowerment of East Brooklyn (HOPE)
Housing Rights Initiative
Housing Rights Project at CUNY Law

Housing Works
Hudson Valley Justice Center
IMPACCT Brooklyn
Inclusiv
Southside United HDFC- Los Sures
League of Independent Theater
LEAPS (Limited Equity and Affordability at Penn South)
Lower East Side People's Federal Credit Union
Malikah
MinKwon Center for Community Action
Mothers on the Move / Madres en Movimiento
The Mothership NYC
Mott Haven Port Morris Community Land Stewards
Neighborhood Housing Services of Brooklyn CDC, Inc.
New Destiny Housing Corp.
New Economy Project
New Immigrant Community Empowerment
New York City Community Land Initiative
NYC Youth Sports Podcast Show INC.
New Yorkers for Culture & Arts
NY Muslim Organizing Collective
North Queensview Homes Inc.
North Star Fund
Northern Manhattan Community Land Trust
Northwest Bronx Community and Clergy Coalition
Not One More Block
NYC Arts in Education Roundtable
NYC HDFC
Opera House Tenants Union
Parsons Housing Justice Lab
Picture the Homeless
Pratt Center for Community Development
Public Ceramics
Q Gardens Community Farm
ReAL Edgemere Community Land Trust
Right to Counsel NYC Coalition
Riverside Edgecombe Neighborhood Association
Save63Tiffany
South Bronx Unite
Stabilizing NYC
St. Nicks Alliance
STooPS Art & Community
Street Vendor Project, Urban Justice Center
Strycker's Bay Neighborhood Council
The Supportive Housing Network of New York
TakeBackNYC
TakeRoot Justice
Tenants and Neighbors
Tenants Political Action Committee
Theatre of the Oppressed NYC
This Land is Ours Community Land Trust
Urban Homesteading Assistance Board
United Neighbors Organization
Universe City
Urban Justice Center - Safety Net Project
Village Preservation
WE ACT for Environmental Justice
We Are Not Afraid Community Resource Center
We Stay/Nos Quedamos
Western Queens Community Land Trust
Woodside on the Move
Youth Ministries for Peace and Justice
YUMYODA

[LIST IN FORMATION]



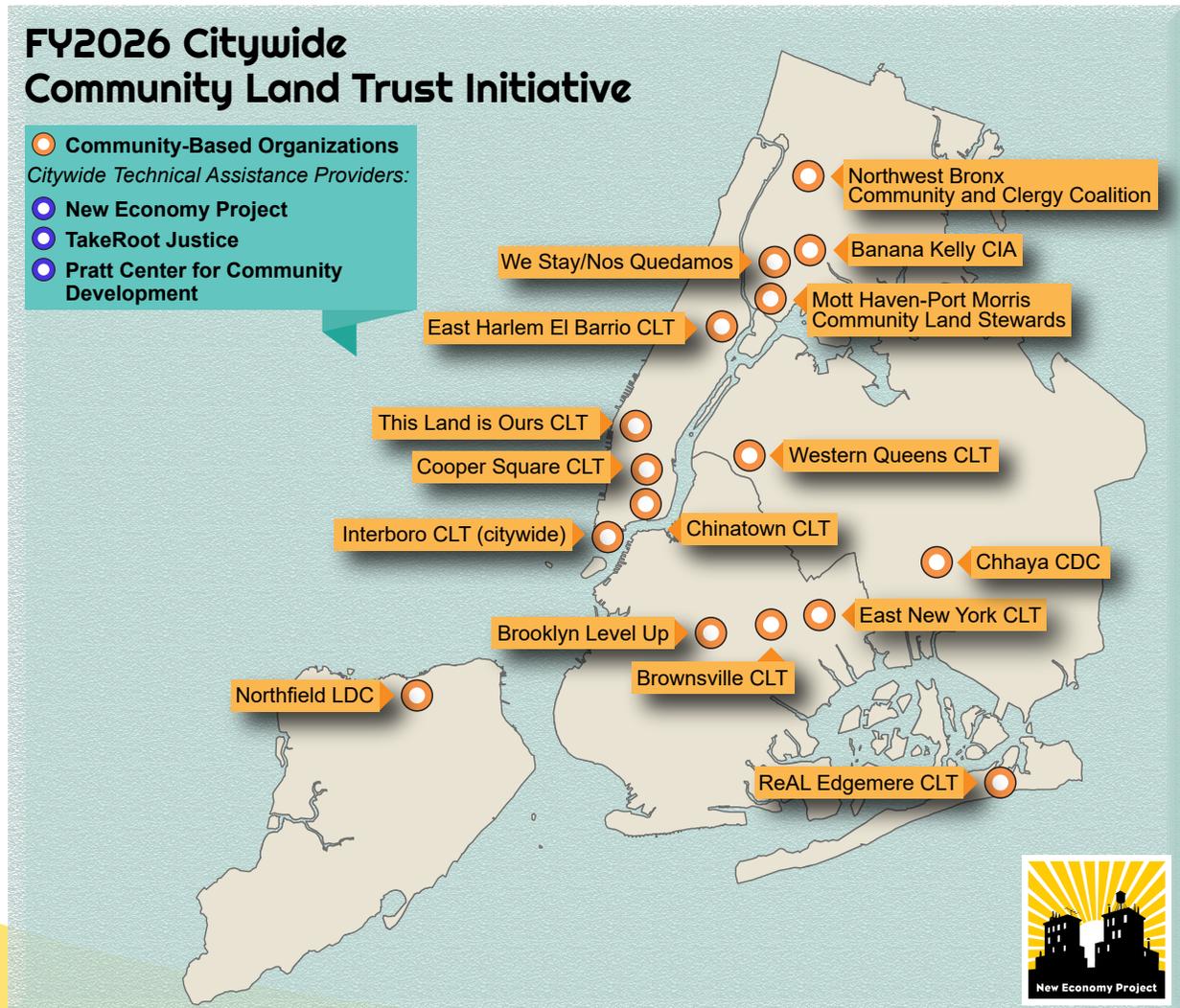
Community Land Trust Initiative

FY2026 Discretionary Funding Request

The **citywide Community Land Trust Initiative** seeks **\$3 million** in FY2026 City Council discretionary funding to support 19 organizations working to develop community land trusts (CLTs) and permanently-affordable housing, commercial and community spaces. The CLT Initiative delivers in-depth education, organizing, and legal and technical assistance to support the formation and expansion of CLTs in low-income, Black and brown neighborhoods. By taking land and housing off the speculative market, CLTs combat displacement and address root causes of NYC's deepening affordability crisis.

Launched in FY2020, the CLT Initiative has catalyzed the growth of grassroots CLTs across the five boroughs; organized and educated thousands of New Yorkers; and brought land and housing into permanently affordable community control.

NEW! Explore our interactive map of CLTs, including their catchment areas, properties, and community demographics: neweconomy.org/cltmap.



Enhanced funding of \$3 million in FY2026 will help us meet the growing demand for CLTs. In FY26, the CLT initiative will:

- ◆ Support the growth of 16 CLTs, half of which are stewarding or in active stages of acquiring property for deeply affordable housing and other needs.
- ◆ Expand organizing and technical assistance for emerging and established CLTs citywide.
- ◆ Provide 65 legal and technical assistance engagements to CLTs on matters, such as incorporation, bylaws, property acquisition, developer partnerships, and financing
- ◆ Conduct 200+ organizing, education, and planning sessions – in multiple languages – for tenants, homeowners, small businesses, and other stakeholders.
- ◆ Train 100 CLT leaders and residents on community and tenant governance, and produce popular education material to support intergenerational organizing.
- ◆ Organize with tenants seeking to take collective ownership of buildings, in partnership with Stabilizing NYC and other coalitions.

The CLT Initiative is urgently needed to address New York’s affordability crisis and combat displacement. With Initiative support, CLTs will continue to create and preserve thousands of permanently affordable homes – including rental, shared equity, and supportive housing. CLTs also will develop community and cultural spaces, affordable storefronts for small and worker-owned businesses, community solar projects, and other infrastructure.

CLTs preserve public investment and affordability over generations. Manhattan’s Cooper Square CLT and East Harlem El Barrio CLT steward more than 400 deeply affordable apartments, as well as storefronts for two dozen community-serving small businesses. East New York CLT, Mott Haven Port Morris Community Land Stewards, Bronx CLT, ReAL Edgemere CLT, and others are stewarding their first properties – stabilizing multifamily buildings, developing vacant City land, and more.



New Economy Project coordinates the citywide CLT initiative.
For more information, contact Will Spisak at will@neweconomynyc.org.

Learn more about NYC’s CLT movement at nyccli.org

NYC community land initiative



Public Land for Public Good - Int. 78

Frequently Asked Questions

What is the Public Land for Public Good Act (Int. 78), and how does it work?

[Int. 78](#) requires New York City to prioritize qualified community land trusts (CLTs) and nonprofit developers when disposing of city-owned property. The bill will help ensure that public land – a precious public resource – is used for permanently and deeply affordable housing and other community needs. Int. 78 is co-sponsored by 33 City Council co-sponsors and supported by 115 community, tenant, and affordable housing organizations and coalitions, including the NYC Community Land Initiative (NYCCLI), ANHD, and Housing Justice for All.

How will Intro 78 benefit New Yorkers?

New York City currently awards most of its public land to for-profit developers, even though nonprofit developers consistently provide longer-term and more deeply affordable housing. Between July 2014 and June 2018, NYC awarded [75% of public land projects to for-profits](#), according to ANHD. The city's reliance on for-profit developers has contributed to the worsening affordability crisis and displacement of low income Black and brown New Yorkers. A new analysis by NYCCLI found that the majority of homes built on formerly public land in East New York, Brownsville, Mott Haven/Port Morris and East Harlem are unaffordable to median-income households in those communities.

By contrast, NYCCLI found that nonprofits selected for public land dispositions built homes for extremely low-income households (those earning 0-30% of area median income) at nearly *twice the rate* as their for-profit counterparts, from 2014 to 2023.

By giving nonprofits a chance to develop more public land, Int. 78 will increase the supply of deeply affordable housing – as well as commercial, community and green spaces – that New Yorkers need. The city's growing CLT movement will bring more land into community ownership, shielding it from speculators and giving residents a say in their neighborhood's development. CLTs and other nonprofits will safeguard housing affordability over generations – long after regulatory agreements expire.

How many nonprofit developers and CLTs exist in NYC?

New York City has a robust and longstanding nonprofit development sector, including 25 that are currently on NYC Department of Housing Preservation and Development's Qualified

Preservation Buyers List. NYC is also home to more than 20 CLTs, one-third of which are stewarding affordable housing and commercial properties or are in active stages of acquiring land.

CLTs are community-governed nonprofits that own land and ensure it is used for permanently affordable housing and other community needs. While some CLTs have in-house development expertise, others partner with nonprofit and for-profit developers to acquire, rehabilitate or build affordable housing and other community facilities. The CLT model is flexible and supports rental and shared equity housing, as well as commercial and other community development. Through ongoing organizing and stewardship, CLTs provide an additional level of oversight and accountability to community members.

At least 225 CLTs exist across the U.S., and they are a proven model to stabilize housing, protect long-term affordability and public subsidy, and build collective community wealth.

Does Int. 78 exclude for-profits, such as M/WBEs, from public land dispositions?

No. For-profit developers remain eligible to bid on requests for proposals (RFPs) to develop city-owned land. If nonprofit-led proposals are not submitted or do not meet the city's project requirements, the city can award RFPs to for-profit applicants.

Additionally, nonprofit and for-profit developers often collaborate on projects, and Int. 78 will expand such partnerships. Several local CLTs, for example, are working with for-profit partners – including M/WBEs providing architecture, construction, and project management support – to develop vacant public lots in their communities.

NYCCLI supports the addition of language to Int. 78 providing that nonprofit-led partnerships – including joint ventures with a minimum of 51% nonprofit ownership – are prioritized for public land dispositions.

Sources:

Association for Neighborhood & Housing Development, Center for NYC Neighborhoods, Community Service Society, Mutual Housing Association of New York, Make the Road New York, and Vocal New York. “Right to a Roof: Demands for an Integrated Housing Plan to End Homelessness and Promote Racial Equity.” ANHD. February 2021.

<https://anhd.org/report/right-roof#:~:text=Leading%20community%20organizations%20from%20across,to%20end%20homelessness%20and%20promote>.

NYC Community Land Initiative. “*Analysis of NYC Public Land Dispositions, 2014-2023*.” (Forthcoming November 2023).

Sosa-Kalter, Stephanie. “Maximizing the Value of New York City-Financed Affordable Housing.” Association for Neighborhood & Housing Development. October 2019.

<https://anhd.org/report/maximizing-public-value-new-york-city-financed-affordable-housing>.

For more information and a list of endorsers, visit nyccli.org/CLA.

NYC community land initiative



Community Opportunity to Purchase Act (COPA) - Int. 902

Frequently Asked Questions

What is COPA and how does it work?

The Community Opportunity to Purchase Act (COPA) is a proven tool to expand and preserve the supply of affordable housing and combat displacement. NYC [Int. 902](#) is modeled on successful Opportunity to Purchase legislation implemented in San Francisco, Washington, D.C., and other jurisdictions and co-sponsored by 32 City Council Members. More than 120 community, tenant, and affordable housing organizations and coalitions – including the NYC Community Land Initiative (NYCCLI), ANHD, and Housing Justice for All – support COPA.

COPA gives qualified nonprofits, including community land trusts (CLTs), a first chance to bid on multifamily properties when a landlord sells. Specifically, Int. 902 creates a process and timeframe for nonprofits to make competitive offers:

- Before putting an apartment building up for sale, a landlord must notify the NYC Department of Housing Preservation and Development (HPD) of its intent to sell and provide basic information about the building's rent roll and finances.
- Qualified nonprofits have 60 days to notify the owner and HPD of an intent to purchase and 120 days to make a competitive offer on the building.
- If a nonprofit does not express intent to purchase, or if a nonprofit's offer is rejected, the landlord can sell the property on the open market.

How will COPA benefit New Yorkers?

COPA will address NYC's housing crisis by giving nonprofits new tools to stabilize and increase the supply of affordable homes. As [reported by the New York Times](#), unchecked real estate speculation has led to landlords overborrowing, cutting services, and deregulating over 150,000 affordable apartments between 1993 and 2018. [House flipping](#) and [predatory cash buyers](#) have drastically reduced the stock of affordable homes in NYC, particularly in Black and brown neighborhoods.

NYC nonprofits have a strong track record preserving deeply affordable, high quality housing. By giving qualified nonprofits a first opportunity to purchase, COPA will slow speculative sales that have destabilized Black and brown working class communities, fueling gentrification and driving the homelessness crisis for decades. Many nonprofit developers and CLTs are already working

with organized tenants to interrupt speculative sales and take ownership of buildings. COPA would bolster these efforts and help foster the policy, funding and technical assistance ecosystem needed for them to succeed.

What type of nonprofits/CLTs will be eligible for this early opportunity to purchase?

New York City has a robust and longstanding nonprofit housing sector, which stands to grow by leaps and bounds with the enactment of COPA. Qualified nonprofits under Int. 902 include the 25 nonprofit developers currently on NYC's Qualified Preservation Buyers List, as well as CLTs, which are neighborhood-based nonprofits that own land and ensure housing stays permanently affordable and community-governed. There are more than 20 CLTs across the five boroughs.

Qualified nonprofits must demonstrate a commitment to providing affordable housing for extremely low, very low, and low-income residents; and to ensuring community representation, engagement and accountability. Nonprofits also must demonstrate legal and financial capacity to acquire and manage residential properties, or partner with another entity that has such capacity. HPD will recertify qualified nonprofits every two years and investigate any complaints brought against them, to ensure compliance with COPA's requirements.

How will COPA affect landlords?

Buildings with fewer than three rental units would be exempt from COPA entirely. Sellers of properties subject to COPA still participate in market transactions; they are not forced to accept lower offers. COPA simply creates a process and timeframe for prospective nonprofit purchasers to make competitive offers. COPA allows small landlords to shorten the timeframe if they can show good cause, including financial hardship.

What examples are there of COPA working in other cities?

COPA and TOPA (Tenant Opportunity to Purchase Act) policies have been implemented in Washington, D.C., San Francisco, and seven other jurisdictions throughout the United States, with tremendous results. Washington, D.C.'s TOPA legislation, enacted forty years ago, gives tenants of multifamily buildings a first right to collectively buy their building, on their own or in partnership with a CLT or nonprofit, when it is up for sale. D.C.'s TOPA, combined with preservation funding, has developed or preserved 16,224 units of affordable housing since 2006, according to [a new LISC report](#).

Since San Francisco implemented COPA in 2019, nonprofits have preserved at least 230 units of affordable housing – out of approximately 1,000 units preserved since 2013. The city's [Small Sites Program](#) and other public and private funding sources have helped nonprofits secure COPA acquisitions. For example, the San Francisco CLT recently acquired 285 Turk Street, a 40-unit apartment building in the Tenderloin neighborhood, and will empower the predominantly Black, Filipino, and Indigenous Mayan residents to become co-stewards of the property through a limited equity housing cooperative.

What types of funding will be needed to ensure COPA is successful?

NYC has several funding programs that could be activated and scaled to support COPA implementation. HPD's Neighborhood Pillars Program, which has been on pause, can be reactivated and targeted to support nonprofits and CLTs making COPA purchases. The NYC Acquisition Fund, which already supports nonprofits and M/WBEs, can also provide financing. NYS Homes and Community Renewal could scale up its Community Controlled Housing Program. Other funding sources include the Community Preservation Corporation, philanthropy, and New York's robust network of community development financial institutions (CDFIs).

How could Int. 902 be strengthened?

As currently drafted, the bill does not give nonprofits a "right of first refusal." In other words, if a nonprofit offered to purchase a building at the same price and under the same terms as a for-profit third party, the building landlord would be at liberty to choose the for-profit buyer. NYCCLI supports adding a "right to first refusal" for qualified nonprofits, as provided for in other jurisdictions' COPA/TOPA policies. NYCCLI also supports expanding the definition of "residential property" subject to COPA to include vacant property zoned for 3+ unit buildings.

Sources:

Duranti-Martínez, Julia, and David M. Greenberg. "Stable Homes and Resident Empowerment." Local Initiatives Support Corporation. Published October 2023.
<https://www.lisc.org/our-resources/resource/stable-homes-and-resident-empowerment/>.

Goldberg, Leo, John Baker and Ivy Perez. "The Outsized Power of Cash Buyers in New York City's Housing Market." Center for NYC Neighborhoods. Spring 2020.
https://cnycn.org/wp-content/uploads/2018/04/Center-Flip-Report_April2018.pdf

Mironova, Oksana, Samuel Stein, Celeste Hornbach, and Jacob Udell. "Pathways to Social Housing in New York: 20 policies to shift from private profit to public good," Community Service Society of New York. Published November 2022.
<https://www.cssny.org/publications/entry/pathways-social-housing-new-york-20-policies-private-profit-public-good>.

Trout, Ryan, Davis, Martha, et al. "Sustaining Affordability: The Role of Tenant Opportunity to Purchase Act (TOPA) in Washington, DC," Coalition for Nonprofit Housing and Economic Development. Published October 2023
https://cnhed.org/wp-content/uploads/2023/10/CNHED_TOPAStudy_FINAL.pdf

For more information and a list of endorsers, visit nyccli.org/CLA.

Updated October 2023



New York Apartment Association

New York City Council
Committee on Housing and Buildings
Testimony of the New York Apartment Association re: Intro 1281

The New York Apartment Association (NYAA) represents diverse members who own and manage nearly 1 million affordable housing units in the NYC metropolitan area. We thank Chair Sanchez and the Committee for giving us the opportunity to testify on behalf of our members in support of Intro 1281 and to Council Member Dinowitz for his sponsorship.

Intro 1281 is an essential amendment to Local Law 157 of 2016. It rightly delays the installation deadline for natural gas detectors across residential buildings, aligning the mandate with market conditions, product safety, and the broader economic climate. In doing so, it upholds the law's intent without burdening property owners with an unworkable timeline or exposing them to liability for factors beyond their control.

Local Law 157, enacted in 2016, triggered a detector installation requirement only after a national standard was issued. That standard, National Fire Protection Association 715-2023, was finalized in 2022, and DOB's March 2024 rulemaking set a compliance deadline of May 1, 2025. But the market has not kept pace. Only one device—the DeNova DD622NCV—meets the NFPA's strict siting and power requirements. It must be placed within 3 to 10 feet of gas appliances and no more than 12 inches from the ceiling.

DeNova's recall of over 26,000 units for failure to alert after gas detection underscores the stakes involved and potential consequences for hastily manufacturing these devices in response to the influx of demand. DeNova's manufacturer, New Cosmos, is currently unable to meet demand. Production in Mexico is at capacity, and even with a planned restart of a Japanese facility, delays could stretch nine months or more. Orders placed last fall are only now being fulfilled; new orders won't arrive until this fall or later.

Crucially, Intro 1281 acknowledges that enforcing the current deadline is not feasible due to the aforementioned supply constraints. According to field reports and supplier outreach, bulk inventory is nonexistent, which could potentially become even more constrained amid growing tariff uncertainty. Tariffs on Mexican goods have reintroduced volatility into an already fragile supply chain. If enacted, they could increase the per-unit cost of detectors by as much as 20–30%, placing even greater pressure on small property owners. Even where detectors are available, through retail outlets, prices are 40% above wholesale and the number of detectors available, even at that increased price, is insufficient for the number of multifamily dwellings.

Intro 1281 does not abandon the mandate. It enforces it after DOB confirms market readiness and mandates annual reporting beginning in 2026. It offers compliance flexibility for large



New York Apartment Association

buildings, allowing zoned detection systems with central monitoring. And by codifying a delay until at least January 1, 2027, it builds predictability into a chaotic supply landscape.

Intro 1281 is a targeted, thoughtful solution to an urgent problem. It preserves public safety, shields owners from unreasonable liability, and ensures that compliance is grounded in market capacity. Like Local Law 138 before it, this amendment is a necessary recalibration.

The Council should pass Intro 1281 without delay.

On behalf of the New York Apartment Association, thank you for the opportunity to provide testimony and thank you for continuing to serve the great City of New York. Please do not hesitate to contact us if you.

June 3, 2025

RE: Testimony of the New York Apartment Association to the NYC Council Committee of Housing and Buildings on Int. 902-2024 and Int. 1281-2025

This testimony is submitted on behalf of the New York Apartment Association (NYAA), whose members own and operate more than half a million rent stabilized apartments throughout NYC. Our diverse membership consists of long-term owners and operators of rental housing, most of which is subject to rent-stabilization and built before 1974. These buildings do not receive tax abatements or other subsidies in exchange for providing quality housing at below market rents. Our mission is to ensure the rental housing stock is abundant, safe, and desirable to live in so that New York can be affordable for generations to come. We thank Chair Sanchez and the Committee for giving us the opportunity to testify on behalf of our members.

Testimony in Opposition to Int. 902-2024

While we agree that creating and preserving affordable housing opportunities for low-income households is an important goal, we are opposed to Int. 902-2024. The type of “opportunity to purchase” program created under this bill has been implemented in other cities and has not been able to achieve the intended result at the necessary scale. The end result is often a program that adds additional regulatory burdens without any benefit.

The research on existing community opportunity to purchase (COPA) programs generally point to two main elements for success: (1) streamlined timeframes for nonprofits to exercise any right of first purchase or first refusal and secure financing; and (2) allocation of significant resources provided by the city to operate the program (i.e., funding for COPA financing, funding for professional support of nonprofits participating in COPA, and increases in city administrative staff). However, even when these elements are present, there can still be uncertainty around requirements and procedures under the COPA program, which leads to the constant potential for litigation in every transaction. Issues regarding time frames, required disclosures, pricing, and countless other issues present significant risk of added costs and delay in every transaction.

Lessons from COPA in San Francisco

The City of San Francisco passed a community opportunity to purchase act (COPA) in 2019. The goal and intent of that legislation is essentially the same as the goal and intent of Int. 902, to preserve permanently affordable rental housing through nonprofit ownership in a highly competitive real estate market. The SF COPA program is also set up in a similar manner to the framework of Int. 902: give qualified nonprofits a right of first offer and a right of first refusal for multifamily buildings that are being sold. But that is where the similarities end. When getting into the details, COPA SF has much shorter and less disruptive timeframes than Int. 902 and was

initially paired with significant funding resources for nonprofits in order to be able to secure financing and close on transactions within streamlined timeframes that are competitive with private lenders.

The Local Initiatives Support Coalition (LISC) published an analysis of San Francisco’s COPA system in 2023¹, which found that such a program could be used without negatively impacting building values or the real estate sales market when the timeframes for nonprofits to participate are in line with normal business practices and there is financial support for financing the transactions. When passing its COPA legislation, the City of San Francisco allocated an initial pool of funding to an affordability fund (the San Francisco Housing Accelerator Fund (SFHAF)) designated to underwrite and provide financing for transactions under the COPA program. A quote from one person involved in the SF affordable housing industry is illustrative of the reasons for ensuring the program was funded at the outset:

“If you don’t have financing in place or developers with capacity to do these deals, it does look like you just want to frustrate landlords and give them extra paperwork,” said one practitioner, who also cautioned against COPA and TOPA acting as mere “lip service” for community and tenant ownership or affordability goals: “On the other hand, this is why cities may want to pass COPA or TOPA without funding, because it can look like you’re taking action without having to make any actual investment.”

Although SF allocated a one-time grant of a relatively modest amount when the COPA program started, the lack of funding appropriations since then have resulted in minimal program usage, and a target on smaller properties in low-income neighborhoods, instead of preserving affordable housing in high-income and gentrifying areas where increasing rents are creating displacement pressures on long-term community residents. Without establishing the necessary funding availability and infrastructure, COPA programs are unable to fulfill their intended goals of preserving affordable housing in neighborhoods where low-income households are struggling to remain in place.

The LISC report also notes the importance of relatively streamlined timelines in San Francisco’s COPA program to avoid potential legal challenges to the law and limit the negative impact on sales activity and building values from such a program. Perhaps even more importantly, the report found that the dedicated funding infrastructure behind SF’s COPA program was able to meet those streamlined frames, which is evidence that longer timeframes are not necessary for a COPA program to be successful.

One of SFHAF’s significant contributions has been the speed of its underwriting, which typically ranges from 60 to 90 days, allowing nonprofits to compete with market buyers. This rapid financing was crucial for enabling nonprofits to work within San Francisco’s streamlined COPA timeline of just 30 days, a relatively short window that reduced the likelihood of legal challenges that would have

¹ <https://www.lisc.org/our-resources/resource/stable-homes-and-resident-empowerment/>

blocked COPA implementation. Said former Council of Community Housing Organizations co-director Peter Cohen, “The San Francisco Housing Accelerator Fund was an essential piece of the puzzle, and a really good partner. Access to fast money is the only way for nonprofits to take advantage of that 30-day window.”

The SF COPA program is an excellent case study for other cities to learn from: nonprofits were able to take advantage of the program, and their lenders were able to adapt to more market-based timeframes for financing. There is no reason why NYC cannot replicate the successes of the SF COPA program (and avoid its failures). But the current version of Int. 902 is vastly different, with significantly longer timeframes and no complimentary funding mechanism for nonprofits to be able to participate. Without a dedicated fund that can provide financing for nonprofits to participate, there is no length of time that would make a program successful.

SF COPA Timing Compared to Int. 902

| | SF First Right to Purchase | NYC Intro 902 |
|-------------------------------------|--|---|
| Notice of Intent to Exercise Right | 5 days after Notice from Owner | 60 days after Notice from Owner |
| Offer to Purchase | 25 Days from Notice of Intent | 120 days after Notice from Owner |
| Secure Financing and Close Contract | 60 Days | Not Specified |
| Total Time Frame | 90 Days | 180 days (assuming 60 days to secure financing and no extensions granted) |
| | | |
| | SF Right of First Refusal* | NYC Intro 902 |
| Notice of Intent to Exercise Right | N/A | N/A |
| Accept Offer to Purchase | 5 Days from Notice of Bona Fide Offer | 120 Days from Notice of Bona Fide Offer |
| Secure Financing and Close Contract | Same Terms and Conditions as Offer | Same Terms and Conditions as Offer |
| Total Time Frame | 65 days (assumes 60 days for securing financing) | 180 days (assumes 60 days for securing financing) |
| | | |
| | *SF right of first refusal limited to entities that submitted an offer under first right to purchase | |

Under the current time frames set forth in Int. 902, a property owner looking to sell their building could be delayed up to 180 days from listing the building for sale, and another 180 days from accepting a bona fide offer to purchase from a third party. Adding a one-year delay to the process of selling a building has tremendous negative consequences for the seller, any potential buyer, and the tenants who are occupying the building during the sales process. SF COPA achieves the same goal of Int. 902 without creating as much disruption to the sales market or leaving tenants in limbo.

Interaction with Other Real Estate Transfer Programs

Aside from the practical and policy concerns with Int. 902, there are also significant legal concerns with the restrictions the bill places on the ability of owners to sell their property and the loss in building value due to the additional risk for any sale.

The timeframes in the bill would also conflict with other pre-existing programs that provide tax relief and other incentives associated with real estate transactions, such as the federal 1031 exchange program. The bill’s current 120-day notice periods—which can be extended at agency discretion—would not only freeze the City’s multifamily real-estate sales market, but would



deprive both sellers and purchasers of rights under federal laws, subjecting the bill to challenge under federal preemption principles. A few examples of these conflicts are below:

- The time frames allowed to exercise either right (i.e., first purchase or first refusal) would prevent both sellers and buyers of New York City multifamily properties from participating in exchange transactions under Internal Revenue Code 1031, given the strict time limitations to which 1031 exchanges are subject.
- Certain New York City buyers and sellers would also be prevented from participating in opportunity zone investments that have similarly strict timing requirements.
- The bill would also prevent, or severely interfere with, both in-process and potential installment sales contracts as permitted by Federal Internal Revenue Service rules to spread the effect of gains taxes over time.

As a result of these concerns over the bill’s current time frames and the lack of funding available for nonprofits who wish to participate, NYAA is opposed to Int. 902. While there are other details in the bill that must also be addressed, such as what constitutes “an action that will result in the sale of the residential building” that triggers the notice of sale requirement, the two major components of funding and timing must be addressed first and foremost. Without conforming time frames of the bill to create a more streamlined program, or a discussion of where the significant amount of funding comes from that is necessary for a COPA program to be successful, addressing the more intricate details would be premature.

We look forward to working with the Council and the bill sponsor on amendments and the complimentary components to ensure that the goal of preserving affordable housing can be achieved without further disrupting an already distressed housing market.

Testimony in Support of Int. 1281-2025

Int. 1281 is an essential amendment to Local Law 157 of 2016. It rightly delays the installation deadline for natural gas detectors across residential buildings, aligning the mandate with market conditions, product safety, and the broader economic climate. In doing so, it upholds the law’s intent without burdening property owners with an unworkable timeline or exposing them to liability for factors beyond their control.

Local Law 157, enacted in 2016, triggered a detector installation requirement only after a national standard was issued. That standard, National Fire Protection Association 715-2023, was finalized in 2022, and DOB’s March 2024 rulemaking set a compliance deadline of May 1, 2025. But the market has not kept pace. Only one device—the DeNova DD622NCV—meets the NFPA’s strict siting and power requirements. It must be placed within 3 to 10 feet of gas appliances and no more than 12 inches from the ceiling.

DeNova’s recall of over 26,000 units for failure to alert after gas detection underscores the stakes involved and potential consequences for hastily manufacturing these devices in response to the



influx of demand. DeNova's manufacturer, New Cosmos, is currently unable to meet demand. Production in Mexico is at capacity, and even with a planned restart of a Japanese facility, delays could stretch nine months or more. Orders placed last fall are only now being fulfilled; new orders won't arrive until this fall or later.

Crucially, Int. 1281 acknowledges that enforcing the current deadline is not feasible due to the aforementioned supply constraints. According to field reports and supplier outreach, bulk inventory is nonexistent, which could potentially become even more constrained amid growing tariff uncertainty. Tariffs on Mexican goods have reintroduced volatility into an already fragile supply chain. If enacted, they could increase the per-unit cost of detectors by as much as 20–30%, placing even greater pressure on small property owners. Even where detectors are available, through retail outlets, prices are 40% above wholesale and the number of detectors available, even at that increased price, is insufficient for the number of multifamily dwellings.

Int. 1281 does not abandon the mandate. It enforces it after DOB confirms market readiness and mandates annual reporting beginning in 2026. It offers compliance flexibility for large buildings, allowing zoned detection systems with central monitoring. And by codifying a delay until at least January 1, 2027, it builds predictability into a chaotic supply landscape.

Int. 1281 is a targeted, thoughtful solution to an urgent problem. It preserves public safety, shields owners from unreasonable liability, and ensures that compliance is grounded in market capacity. Like Local Law 138 before it, this amendment is a necessary recalibration.

We thank Councilmember Dinowitz for his sponsorship of this bill, and urge the Council to pass Int. 1281 without delay.

On behalf of NYAA, thank you for the opportunity to provide testimony and thank you for continuing to serve the great City of New York.

**Testimony to the New York City Council
Committee on Housing and Buildings**
By the Northern Manhattan Community Land Trust

Submitted June 5, 2025, for the Record of the June 3, 2025 Committee Hearing

Testimony in Support of the Community Land Act

To: Chair Sanchez and Members of the Committee on Housing and Buildings
From: The Board of Directors, Northern Manhattan Community Land Trust
Submitted by Paul Epstein, Director At Large

We at the Northern Manhattan Community Land Trust (NMCLT), a member of the New York City Community Land Initiative (NYCCLI), a coalition of community land trusts (CLTs) are working with residents of Washington Heights and Inwood for community control of land to end speculation that drives up housing costs, and to achieve deeply- and permanently-affordable housing, commercial and community spaces, and other neighborhood-led development, and to fight unsafe conditions and maintenance neglect in rent regulated housing.

We urge this Committee and the City Council to pass the **Community Land Act**, a group of urgently-needed policies to bring land and housing into permanent and affordable community control. The Act includes three bills discussed at the June 3, 2025 hearing: **Public Land for Public Good (Intro 78)**, the **Community Opportunity to Purchase Act (COPA) (Intro 902)** and the **Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (Reso 374)**. In addition, we call on the City Council to pass **the Land Bank Bill (Intro 570)**. These bills will help level the playing field for organizations like ours to meet our communities' housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

We also support the other bills and resolutions discussed at the June 3rd hearing that will advance community stewardship of land for long-term affordability. We urge the Council to **pass Intros 1006 and 1007, which will empower City agencies to work with CLTs** on projects that include land uses beyond housing such as commercial, community, and open space. We also strongly support **Reso-777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro-350 to study the feasibility of creating a social housing agency**.

New York City must act boldly to address our city's affordability crisis; combat unsafe housing conditions, speculation, and displacement; and advance racial equity in housing and land use. Collective land ownership through CLTs is one of the most effective ways to achieve these aims. In Northern Manhattan, we are working with residents eager to take control of their housing from neglectful for-profit landlords before those property owners sell their buildings to other neglectful speculators. Community control of land and housing will end speculation and empower residents to assure safe, healthy conditions are achieved and maintained, and housing stays permanently affordable.

The City Council has already made some investments in CLTs and support organizations. Citywide, the number of active CLTs has grown in the past decade from two to more than 20. City Council must expand on this success by enacting policies to help communities acquire and develop land for deeply affordable, permanently affordable, housing and community uses. Council has also secured City and State commitments of \$5 billion when it passed “City for All” legislation, which can be leveraged for deeply-affordable community-controlled housing with passage of the Community Land Act bills.

1. Pass the Community Land Act (Int 0078-2024; Int 0902-2024; Res 0374-2024)

Passage of the Community Land Act will help CLTs take land off the speculative market and provide the deeply affordable, well-maintained housing our communities need. Northern Manhattan has the largest concentration of rent-stabilized housing in the city. Unfortunately, that also means we have a large concentration of housing owned by neglectful property owners who ignore serious code violations, do not make needed repairs, force tenants to live in unsafe and unhealthy conditions, warehouse vacant apartments, and illegally raise rents. They squeeze their buildings for profits until they can sell to another speculator likely to treat tenants just as badly. Some buildings are currently in foreclosure, ripe for speculators to grab at fire sale prices.

The Community Land Act bills can turn these problems into opportunities. In Northern Manhattan, in particular, the COPA bill (*Community Opportunity to Purchase Act, described below*) would be a game changer to break the cycle of housing sales from one over-leveraged, neglectful speculator to another, enabling residents and CLTs to work with qualified nonprofit development partners to purchase buildings, make needed renovations, and make apartments affordable either as rent-regulated units or limited-equity co-ops. Renewable 99-year land leases with CLTs would provide stronger, more durable, and more permanent affordability protections than current City and State regulations. This approach would also provide an excellent use of housing preservation funds from the City for All commitments to be sure the needed capital is available to take community control to scale.

Also, the Public Land for Public Good bill speaks to the core of a CLT’s purpose. And while there is not currently a lot of available unused City-owned land in Northern Manhattan, passage of this bill would be an excellent complement to COPA for when the City government decides it no longer needs land it owns in our area, or when the City takes control of more land. In other parts of NYC, more public land is available for housing and community uses. So we support our sister CLTs that can make more immediate use of this bill.

In more detail, the Community Land Act legislative package includes the following:

Public Land for Public Good (Intro 78) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of [2023](#), for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city’s remaining land resources—and any new land it acquires—should be maximized for public

benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.

Community Opportunity to Purchase Act (Intro 902), which would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, COPA would help curb speculation and expand the supply of permanently-affordable, community-controlled housing. COPA would be most impactful if implemented alongside the ***Tenant Opportunity to Purchase Act at the State level (Reso 374)***, which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing.

Our coalition has submitted proposed changes to the COPA bill to the lead sponsor, Council Member Carlina Rivera, in order to make the law more effective. To improve the current bill, we recommend that the Council:

- Add a clear right of first refusal for qualified nonprofits: As currently drafted, the bill does not provide qualified entities a clear right of first refusal, in other words, the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Include Vacant Property: We urge the City Council also to expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

Permanently Abolishing the NYC Tax Lien Sale and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes. To advance this goal we call on the ***City Council to pass Int. 0570-2024, which creates a land bank*** that can replace the tax lien trust, steward properties, and work with community land trusts and other responsible property owners to acquire them for the purpose of maintaining permanent affordability. Our coalition has submitted proposed changes to Int 057 to give the land bank a clearer mission to work with CLTs, engage in non-housing land revitalization, and make it more accountable to public oversight by changing the proposed board structure. Our coalition is happy to continue to work with the lead sponsor to ensure these changes are implemented.

2. Empower agencies to partner with CLTs to steward all kinds of properties

CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. Passing **Intros 1006 and 1007** will ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of

housing, reflect the city's growing CLT sector and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods. Northern Manhattan has seen a loss of local businesses due to rising commercial rents, and grass roots groups and even some incorporated nonprofits face a dearth of space available for community meetings and activities, and must scramble and beg for space every time they plan an event, especially an indoor event. We would welcome passage of these bills to enable NMCLT to increase the availability of land for non-housing community uses, as determined by the community.

3. Support social housing development and preservation (Res-777, Int-350)

We also support **Reso 777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro 350 to study the feasibility of creating a social housing agency**.

We appreciate the Committee on Housing and Buildings holding its June 3, 2025 hearing to discuss urgently-needed strategies to address the housing crisis facing our city, including expanding community-controlled, deeply affordable housing, strengthening tenant rights, and ensuring funding to house the most vulnerable community residents. Thank you for the opportunity to submit testimony, and we look forward to continuing to work together to advance Community Land Trusts citywide.

For more information, contact:
Paul Epstein, Director At Large
Northern Manhattan Community Land Trust
Paul@RTMteam.net

TEMPLATE SCRIPT: June 3rd Testimony on the CLA to City Council

Note: 2 minutes of speaking typically equals 250-300 words

Good afternoon, Chair Sanchez and committee members. Thank you for the opportunity to testify in support of proposed legislation to advance Community Land Trusts (“CLTs”). I am [Melanie Reyes] from [We Stay/Nos Quedamos], which [operates a Community Land Trust (CLT) that centers resident leadership and long-term affordability. We are working collaboratively with tenants to improve their living conditions, address issues and ensure that they have a voice in decisions affecting their homes. Through structures like our emerging Advisory Committee, residents are directly involved in shaping how their building is owned and operated]. We are also members of NYCCLI, a coalition of CLTs and advocates—many you’re hearing from today.

To truly combat the affordability crisis, displacement, and homelessness, the city must bring land and housing into permanently affordable community control. We urge City Council to pass the **Community Land Act**, which includes three proposals being discussed today: **Public Land for Public Good, COPA, and a resolution supporting TOPA in Albany**. The Community Land Act also calls to **Permanently Abolish the NYC Tax Lien Sale** and replace it with an equitable system, which could be accomplished through the creation of a land bank. Together, these policies would protect and maximize city land and subsidies for public benefit, level the playing field for nonprofits and CLTs to meet community housing and economic needs, and help vulnerable New Yorkers stay in their homes and neighborhoods.

[One priority bill in the Community Land Act is the Tenant Opportunity to Purchase Act (TOPA), which would give tenants a meaningful seat at the table when their building is up for sale by allowing them to assign their purchasing rights to a nonprofit or Community Land Trust. At Nos Quedamos, we’re strengthening tenant voice and collective governance through an Advisory Committee, so residents have real input. TOPA would expand this model citywide, ensuring that tenants have power in decisions about their housing and that buildings remain permanently affordable and community-controlled]

We also support the bills to expand the city’s legal definitions of CLTs beyond housing, which will advance permanently affordable commercial, community, and open space.

Thank you for your time.



**NYSFAH Testimony
New York City Council
Committee on Housing and Buildings
June 3, 2025**

Chairman Sanchez and members of the Housing and Buildings Committee, thank you for the opportunity to offer comments on behalf of the New York State Association for Affordable Housing (NYSFAH) for the June 3, 2025, hearing.

As a trade organization representing both for-profit and not-for-profit affordable housing developers across New York State, NYSAFAH is poised to offer a unique perspective proposed housing legislation. Our members are committed to expanding and preserving high-quality, income-targeted housing in communities throughout the five boroughs.

Partnerships between for-profit and not-for-profit developers have become increasingly important in the competitive affordable housing landscape. These partnerships can significantly enhance a project's competitiveness for tax credit awards, PILOTs and other funding that supports its feasibility and reduces financing gaps.

Not-for-profit developers offer deep community ties and experience in supportive housing and tenant engagement, which complements the financial and development strengths of for-profit partners. These partnerships leverage respective strengths to deliver high-quality affordable housing, often more effectively than either could alone. NYSAFAH supports strengthening the role of trusted not-for-profit developers in affordable housing development.

PROPOSALS OF CONCERN

Intro 78, which adds a mandate that prioritizes not-for-profit bids and offers for City property. The disposition of City property should be governed by the most efficient processes possible. Already, agency capacity issues and review requirements delay selection of qualified bids and offers. If a not-for-profit bid is deemed unsatisfactory after a review process, the agency would have to fully restart vetting with the remaining applicants in the pool.

Further, Intro 78 does not account for the for-profit and not-for-profit partnership model or should otherwise clarify such eligibility of a joint bid. We are also concerned that after years of policy to improve their standing in City contracting and RFPs, MWBE entities would be negatively impacted if their application status is diminished by this change in policy.

Intro 902, known as the Community Opportunity to Purchase Act. By limiting the pool of eligible developers to not-for-profit organizations, Intro 902 does not account for not-for-profit and for-profit partnerships, undermining a successful model for affordable housing development. Importantly, this bill does not provide additional financial resources to support not-for-profit developers in purchasing property on their own and threatens to force the reallocation of capital from the existing HPD pipeline towards this new program, causing delays in projects already facing long runways. Private financing on its own would not fill these gaps, since the nature of many not-for-profit balance sheets often present challenges to banks due to internal policies and industry regulation.

Additionally, the mechanics of the proposal are onerous. A 180-day review period threatens to distort an already difficult market. Steep fines proposed in the bill may have unintended consequences, such as penalizing not-for-profit property owners looking to sell.

Finally, the proposed bill places an enormous administrative burden on HPD to maintain an accurate and updated Qualified Entity list, to track notices, and to enforce compliance. Given HPD's current staffing and budget limitations, we are concerned about its ability to administer this program at the scale envisioned, especially absent additional targeted resources.

SUPPORT FOR INTRO 1281

NYSAFAH would like to share its support of Intro 1281. Our members intend to comply with Local Law 157 of 2016, but the supply of natural gas detectors approved for installation by the City of New York falls well short of the demand created by the statute. Building owners and managers have been told to expect delays in shipment of these devices for at least several months, until such time as the sole manufacturer of approved devices can increase production and navigate the changing tariff landscape. This lack of available product has, therefore, resulted in unintended noncompliance with properties across the city, since the current installation deadline for natural gas detectors has already passed. We ask that you approve this common-sense proposal which will allow more natural gas detectors to come to market and delay compliance deadlines until these devices are readily available for purchase and installation.

Thank you for your consideration.

Contact: Jolie Milstein, NYSAFAH President/CEO, at jmilstein@nysafah.org or (646) 473-1208.

June 3, 2025

New York City Council
Committee on Housing & Buildings
City Hall
New York, New York 10007

RE: Testimony on Intro. No. 902 (Rivera)

The New York State Association of REALTORS®, Inc. (NYSAR) thanks the New York City Council's Committee on Housing & Buildings for the opportunity to submit testimony on Int. No. 902. NYSAR is a not-for-profit trade organization representing more than 61,000 of New York State's licensed real estate professionals, including approximately 13,000 licensed real estate professionals in New York City.

NYSAR **strongly opposes Int. No. 902**, which would establish a right of first opportunity to purchase for qualified entities, prior to a building with 3 or more units being listed for sale. If enacted, the bill would, severely impair the ability of our members and other licensed real estate professionals to effectively and efficiently serve consumers looking to buy and sell multifamily properties in New York City.

Land banks and trusts are used by multiple localities in New York State to address the problem of vacant properties by facilitating the sale and transfer of these properties to responsible owners. This bill attempts to expand on that model, by allowing not-for-profit organizations deemed qualified by the Department of Housing Preservation and Development to purchase buildings with 3 or more rental units before they are offered for sale to willing buyers. Unfortunately, the bill is far too expansive in terms of the number of properties to which it would apply.

More than 70 percent of New York City's residential buildings are comprised of 3 or more units.¹ Property owners of these buildings would be required to notify HPD at least 180 days prior to actions taken to sell the building. Once the notice of sale is provided, the bill would establish a 120-day period in which qualified entities may submit offers to purchase the building, during which time, the property owner may not accept any other offers. These timelines would be incredibly disruptive to buyers and sellers alike. Potential buyers may pass on properties if they know they will have to wait on the timelines before their offers can be accepted. Furthermore, requiring notification to, and oversight by HPD would add a burdensome layer of complexity to real estate transactions, particularly those that need to happen expeditiously.

Should this bill become law, an owner of a 3-unit property who accepts a job offer in another state that requires her to relocate across the country within 90 days, might not be able to list her building for at least another 90 days after leaving the state as it is unclear whether this scenario would meet the good cause standard under section 26-855. The legislation fails to adequately account for this and other instances when selling a building in less than 120 days is necessary.

¹ <https://www.valuepenguin.com/new-york-city-renters-statistics>

Additionally, the opportunity to purchase a building at list price would lead property owners to lose income when multiple offers are likely to be placed on a building. This lost income would cost city government tax revenues, as New York City currently receives more than \$1 billion in revenue from real property transfer taxes. Many building owners are not wealthy, corporate entities. Small landlords would be hurt by the delay in the transaction process, which would cost them income in the form of reduced sales prices – and black and Hispanic landlords are more likely than their white counterparts to only own only 1 property².

This legislation would also be very difficult for any city agency to implement, let alone HPD, which according to recent budget testimony has an employee vacancy rate of 15.9%, triple that of other city agencies. Vacancies and understaffing at HPD would undoubtedly complicate the ability of the agency to properly oversee this proposed program, which would impact the sale of many residential buildings.

The bill is also narrow in terms of who would be afforded the first opportunity to purchase these buildings. The preference given to a small group of not-for-profit buyers – deemed qualified by HPD – does little to ensure the preservation or creation of affordable housing in New York City. It cuts out all private, for-profit buyers, many of whom have valuable experience in providing quality, affordable housing. Given this narrow definition of “qualified entity”, the impact this program could have on the preservation of quality, affordable housing is unclear.

Overall Int. 902 represents an unwarranted government intrusion into private real estate transactions that would likely establish unreasonable delays in the sale residential buildings, negatively impacting buyers, sellers, real estate professionals, and state and city coffers. Even if all these negative impacts were absent, HPD lacks the resources to implement the proposed program.

For the above stated reasons, the New York State Association of REALTORS® respectfully requests that the Committee not advance Int. 902. We thank you again for the opportunity to submit testimony.

² According to the Urban Institute, Black and Hispanic landlords are more likely than white landlords to only own 1 property: <https://www.urban.org/urban-wire/black-and-hispanic-landlords-are-facing-great-financial-struggles-because-covid-19-pandemic-they-also-support-their-tenants-higher-rates>

TESTIMONY OF THE QUEENS & BRONX BUILDING ASSOCIATION
OPPOSING INTRO. NOS. 78 AND 902
JUNE 3, 2025

Good morning. I am Robert Altman and testify today in opposition to Intro. Nos. 78 and 902. I testify on behalf of the Queens & Bronx Building Association.

First, Intro. No. 902 is basically the old Intro. 1977 of 2020, which is also Intro. 196 of 2022 with one minor change that does not really change the intent of the bill. Attached is our testimony from a January 2021 hearing. We remain opposed to the bill.

Second, Intro. No. 78 seems to be a cousin to Intro. No. 902 but just with respect to public sales. As a matter of policy, there seems to be an inappropriate bias in a prohibition of sale to a for-profit under (i) the assumption that a non-profit will do a better job, or (ii) the assumption that the non-profit is automatically proposing a better project, or (iii) the assumption that the non-profit will do it cheaper and better. Each sale by the City to an outside organization should be evaluated on its own merits on the proposals presented and if a for-profit has the more meritorious proposal, it should be the award winner over an inferior non-profit proposal. This is both in the best interest of the city and the local community.

TESTIMONY OF THE QUEENS & BRONX BUILDING ASSOCIATION
AND THE BUILDING INDUSTRY ASSOCIATION OF NEW YORK CITY
OPPOSING INTRO. NO. 1977
JANUARY 19, 2021

Good afternoon. I am Robert Altman and testify today in opposition to Intro. No. 1977 on behalf of the Queens & Bronx Building Association and the Building Industry Association of New York City.

Intro. No. 1977 is a misguided bill seeking to interfere with an owner's property rights. It will force owners of buildings with three or more residential units to go through a cumbersome process administered by an overworked agency that has enough issues taking care of its own current mandates. We know elected officials love rent stabilization, formerly rent control. In this instance, the sponsors of this bill want to create sale control. But this is a foolish endeavor and woefully drafted. Let's take a look at how this bill impacts the sale process.

First, one-hundred eighty days before any sale (and whether that is the case is not clear from the bill), an owner must give notice to HPD of its sale, taking a process that can be as little as three weeks and extending it to a certainly unreasonable time of 180 days. Mind you the statute is also misleadingly drafted. It does not state whether the 180 days is from closing or the listing of the property. In fact, it is not until later on that it seems the listing is what the law intends, because of the requirements in moving forward with a contract offer. We can only surmise it is because the bill's author does not want to make clear the exact fullness of this regulatory scheme.

Second, it forces the seller to divulge the economics of the building to the world. This is information that is normally private and only disclosed to serious entities who themselves might be forced by the seller to show their ability to purchase the building at the amount it offers.

Third, the bill actually encourages owners to offer the price at an amount that is higher than what it should go for to see if a private entity would outbid a qualified entity and discourage the qualified entities. And some private entity may meet the price leading to market inflation. And that is probably the exact opposite of what this bill probably wants.

Fourth, the bill provides for a right of first refusal not to a single entity but to a host of different ones. And a notice must go to every qualified entity, which could be in the hundreds! And how does the owner know that all these qualified entity addresses are current? What if notice gets bounced back? Does the owner need to go searching to make sure it does not run afoul of the statute? And that notice must contain the identifying information of the purchaser, something the purchaser may not wish to disclose for various reasons.

Fifth, can someone please explain to me how Section 26-856 works in conjunction with Section 26-853? It seems as if after receiving a good offer quickly in the sales process, an owner can't do anything for 120 days, which is a restraint on alienation of the property. Moreover, depending on the qualified entity, it can place a bid in, but how does anyone know if a qualified entity who can purchase a 10-unit building has the wherewithal to purchase a 200-unit building?

And such a bill begs the question. If a property is purchased by a qualified entity, won't they be looking for tax breaks from the City, possibly even taking properties off the tax rolls. Does the bill's fiscal impact statement take this into account? If so, I would love to know how such a figure was calculated and if the City is really ready to deal with the loss of revenue, especially during COVID.

Frankly, logistically, I can go on and on. But what is the intent of this bill. To lower sales prices? To reduce speculation? If so, it is doing so on the backs of the owners, and this is really "sales control" as I earlier mentioned. And if the City really wants to be fair, it should be

setting aside funds to assist the so-called “qualified entities” in purchasing properties on the free market.

There are lots of reasons to oppose this bill. But let’s get down to a basic principle. In a free and open society shouldn’t an owner have a right to sell its property how it sees fit free of over-regulation. Regulations should exist to make sure that the process of buying and selling is real and not a sham (as some of this existed during the Great Recession). But this bill is not geared towards that. It is interference in the market-place and designed to harm the buyer (who often will have spent significant sums in researching the property) and seller. Forget about its logistical and bureaucratic nightmares and the fact that it creates uncertainty to the sales process. It should be rejected on principle of freedom. Just like we reject the actions of the mob on January 6, 2021, we should reject the over-bureaucratic regulation this bill attempts to impose.



**Testimony to the New York City Council
Committee on Housing and Buildings**

on behalf of

Mott Haven-Port Morris Community Land Stewards and South Bronx Unite

June 4, 2025

“Testimony in Support of the Community Land Act”

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for the opportunity to submit testimony in **support of the Community Land Act and other key proposals to expand resident-led affordable housing and community land stewardship**. My name is Matthew Shore, and I am a Senior Organizer at [South Bronx Unite](#), which supports the [Mott Haven-Port Morris Community Land Stewards](#), a community land trust (CLT) in the South Bronx neighborhoods of Mott Haven and Port Morris. Our CLT was created in 2015 by South Bronx residents to acquire land for public use and to hold it in perpetuity. We seek to ensure that community members retain a stake in our neighborhood and promote pathways to meaningful self-determination for the Mott Haven-Port Morris community. To that end, we successfully reclaimed a vacant former Health & Hospitals Corporation-owned building, formerly known as the Lincoln Recovery Center, and the nearly 23,000 sq ft building will be opening in 2027 as a community hub - named the [HEArts Center](#) (more information in hyperlink, along with the last two pages of this document) - that will offer holistic health, education and arts programming and services in a neighborhood in dire need of more community spaces. Our CLT is also actively pursuing opportunities to activate our community’s inaccessible waterfront to create more green spaces that would address our high rates of asthma and pollution, along with mitigating our community’s persistent flood issues. The Mott Haven-Port Morris Community Land Stewards is also a member of the New York City Community Land Initiative (NYCCLI), an alliance of grassroots, affordable housing, environmental and economic justice organizations working to promote community land trusts (CLTs) for deeply- and permanently-affordable housing, commercial and community spaces, and other neighborhood-led development.

We urge this Committee and the City Council to swiftly pass the **Community Land Act**, a package of urgently-needed policies to bring land and housing into permanently affordable community control. The Act includes three bills being discussed today: **Public Land for Public Good (Intro 78)**, the **Community Opportunity to Purchase Act (COPA) (Intro 902)** and the **Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (Reso 374)**. In addition, we call on the City Council to pass the **Land Bank Bill (Intro 570)**. These bills will help level the playing field for organizations like ours to meet our communities’ housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

We also support the other bills and resolutions being discussed today that will advance community stewardship of land for long-term affordability. We urge the Council to **pass Intros 1006 and 1007, which will expand the legal definition and regulatory agreements for CLTs** to include land uses beyond housing such as commercial, community, and open space. We also

strongly support **Reso-777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro-350 to study the feasibility of creating a social housing agency**.

NYC must take bold action to address our city's affordability crisis, combat speculation and displacement, and advance racial equity in housing and land use. Collective land ownership through CLTs is one of the most effective ways to achieve this. According to ANHD, Bronx Community Board One ranks top five in the City for displacement pressures, ranging from lack of truly affordable housing production, to evictions, and to negligent building conditions. The City Council has made essential investments in CLTs and support organizations – helping us build internal capacity and educate and organize community members, as well as connect with developer partners to move projects forward. Citywide, the number of active CLTs has grown in the past decade from two to more than 20. City Council must expand on this success by enacting policies to help communities acquire and develop land for deeply, permanently affordable housing and community uses.

1. Pass the Community Land Act (Int 0078-2024; Int 0902-2024; Res 0374-2024)

Passage of the Community Land Act will help our organizations take land off the speculative market and provide the deeply affordable housing our communities need. Besides our significant housing conditions, our built environment -highways, waste transfer stations, four peaker power plants, and lack of real green spaces - in Mott Haven and Port Morris isn't conducive to health equity. The Bronx ranks the [unhealthiest](#) of all 62 counties in New York State, and much of the concentration of poor health impacts exist in the South Bronx. If enacted, the Community Land Act, would change this course and ensure we have the ability to develop people-first communities with equitable access to green spaces, intentionally designed community hubs, such as the HEArts Center, and permanent, deeply affordable housing that residents enjoy and feel invested in.

Specifically, the Community Land Act legislative package includes the following:

Public Land for Public Good (Intro 78) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of [2023](#), for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city's remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers, including MWBEs. According to [EJNYC](#), 49% of the City's population lives in an “environmental justice area.” It's also no surprise that 67 percent of the city's total population in historically redlined areas live in environmental justice areas today. As seen in Brooklyn Borough President's [Comprehensive Plan for Brooklyn](#), unfortunately, zipcodes are a determining factor of life expectancy in our city, and that should not be the case. We argue that

one way to undue the harms of environmental racism and top-down planning in our communities is to empower community residents to not only envision how public land should be developed, but to manage the affairs of such properties in perpetuity, ensuring that development is controlled by everyday New Yorkers who have their community's best interests in mind, including the need for more healthy and equitable green spaces, such as parks, urban farms, community gardens, micro forests, etc. With Intro 78 enacted, CLTs such as the Mott Haven-Port Morris Community Land Stewards have a better opportunity to make a dent in our neighborhood's longstanding environmental and health conditions - 1 in 5 children in the South Bronx have asthma - by activating more healthy community spaces that community residents desire.

Community Opportunity to Purchase Act (Intro 902), which would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, COPA would help curb speculation and expand the supply of permanently-affordable, community-controlled housing. COPA would be most impactful if implemented alongside the ***Tenant Opportunity to Purchase Act at the State level (Reso 374)***, which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing. A successful example of tenants organizing in our community, specifically Port Morris, to own their apartment building was reported in this [article](#) in the NY Times in 2022. TOPA-like organizing has been done before, and if enacted, our community would be granted with an easier opportunity to build generational prosperity and strengthen neighborhood preservation. The Bronx ranks lower than the city average for homeownership and housing security, underscoring this bill's importance as it would decrease predatory landlords' power over everyday South Bronxites who deserve affordable housing and dignified living conditions. For example, together with New York Communities for Change, we organized tenants living in three buildings owned by the #6 worst landlord in the city, [David Tennenbaum](#). Residents reported slumlord conditions: mold, rats, broken ceilings and floors, a defective front door in the building, drug dealing in the building, broken pipes, and a nonresponsive landlord. Imagine if working-class communities, who know all too well about these living conditions, could drastically change this course.

Our coalition has submitted proposed changes to the COPA bill to the lead sponsor, Council Member Carlina Rivera, in order to make the law more effective. To improve the current bill, we recommend that the Council:

- Add a clear right of first refusal for qualified nonprofits: As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Include Vacant Property: We urge the City Council also to expand the definition of "Residential Property" subject to COPA to include vacant property zoned for residential buildings with three or more units.

Permanently Abolishing the NYC Tax Lien Sale and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes. To advance this goal we call on the ***City Council to pass Int. 0570-2024, which creates a land bank*** that can replace the tax lien trust, steward properties, and work with community land trusts and other responsible property owners to acquire them for the purpose of maintaining permanent affordability. We have submitted proposed changes to Int 057 to give the land bank a clearer mission to work with CLTs, engage in non-housing land revitalization, and make it more accountable to public oversight by changing the proposed board structure. We are happy to continue to work with the lead sponsor to ensure these changes are implemented.

2. Empower agencies to partner with CLTs stewarding all kinds of properties

CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. Passing **Intros 1006 and 1007** will ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of housing, reflect the city’s CLT growing sector and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods. South Bronx Unite is proud to co-organize NYCCLI’s Green Space Equity Committee, which is comprised of CLTs and nonprofit community organizations citywide that are committed to stewarding land in their neighborhoods, many of which the City identifies as “environmental justice communities,” to advance climate resilience, environmental justice and health equity. In January 2025, we organized a City Council briefing on how Int 78 would enable the scaling up of green space CLTs, along with community spaces and commercial/economic development CLTs across our city, which are committed to addressing our neighborhoods’ holistic needs. In February 2025, we sent the City Council a [sign-on letter](#) about the climate resilience benefits of community land trusts, and over 50 organizations citywide, small and large, signed on, highlighting the holistic benefits CLTs provide to our communities.

Additionally, we thank the City Council for its vital support and urge you to fund the Citywide CLT Initiative at \$3 million in the FY2025 budget. With this enhancement, the initiative will support 20 organizations, including new CLTs in Edgemere, Queens, and Flatbush, Brooklyn, and expand citywide education, organizing, and technical assistance to meet the growing and urgent need for CLTs.

We appreciate the Committee on Housing and Buildings holding this hearing to discuss urgently-needed strategies to address the urgent housing crisis facing our city, including expanding community-controlled, deeply affordable housing, strengthening tenant rights, and ensuring funding to house the most vulnerable tenants. Thank you for the opportunity to submit testimony, and we look forward to continuing to work together to advance Community Land Trusts citywide.

For more information, email Matthew Shore: matthew@southbronxunite.org



MORE INFO

H.E.A.R.T.S COMMUNITY CENTER



HEALTH SERVICES



EDUCATION PROGRAMS



ARTS & CULTURE

**A COMMUNITY CENTER FOR US, BY US.
FOLLOW SOUTH BRONX UNITE 🌻**



✉ devan@southbronxunite.org
🌐 southbronxunite.org

📷 @southbronxunite
📍 127 Lincoln Ave., 2nd Fl.



**South
Bronx
Unite**

CALL TO ACTION!

Help inform what services and programming will be offered at the future HEArts Center within the themes of Health, Education and Arts and Culture. **Complete the 5-minute survey using the QR code.**



USE THE QR CODE TO HAVE YOUR SAY!



COMMUNITY ENVISIONED

This community-envisioned facility will contain offices, meeting areas, a culinary arts kitchen, classrooms, and performance spaces, dedicated for the community and local organizations.



SELECTED BY NYC GOV.

In September 2023, the Mott Haven Port Morris Community Land Stewards and our Joint Venture developer partner were provided a Conditional Designation Letter as the successful applicant to the Request For Proposals issued by New York City Economic Development Corporation.



COMMUNITY CONTROLLED

The land will be fully community-controlled and held in perpetuity for public use, to ensure that residents preserve a stake in our neighborhood and to promote pathways to meaningful self-determination.



 devan@southbronxunite.org
 southbronxunite.org

 @southbronxunite
 127 Lincoln Ave., 2nd Fl.



**South
Bronx
Unite**



SPONY

THE SMALL PROPERTY OWNERS OF NEW YORK

Good morning. My name is Ann Korchak, and I serve as the board president of Small Property Owners of New York (SPONY). Founded in 1984, SPONY is a 100% volunteer, grassroots organization that advocates on behalf of small housing providers navigating the complexities of the New York City housing market.

We have members in every City Council district, and collectively, they operate approximately 5,700 units of housing—primarily in small rent-stabilized buildings and naturally occurring affordable housing found in 1–4 family homes. Our members are the backbone of the city's housing stock, and I'm here today to speak in **opposition to Intro 902**. We view this effort as a deeply unfair burden on small property owners that risks putting us in even greater financial risk.

When a family sells a building, it is often due to the death of a family member, and estate taxes must be settled. The IRS requires these taxes to be paid within nine months of death. The proposed six-month delay in this bill can make it nearly impossible for families to meet the deadline. While the bill includes an exemption in cases of death, that exemption only applies if the property is not held in a corporate structure. Yet most properties are held in corporations or LLCs because of the liability protections they provide. City and State laws encourage this kind of structuring, and this bill would unfairly penalize responsible owners who follow those best practices.

We are also concerned about the operational impact on HPD. The agency is already significantly understaffed and overburdened. How will HPD be able to take on the additional responsibilities required by COPA without jeopardizing its core functions?

- Does HPD have the staff and resources to implement and manage COPA?
- How will it properly notify owners across the city that this law is in effect?
- The bill gives HPD discretion to extend the 180-day timeline—how can owners be assured that bureaucratic delays won't prevent them from completing time-sensitive transactions?

The fines for non-compliance are substantial and do not distinguish between a 4-unit building and a 500-unit building. This is particularly concerning for small property owners operating on tight margins.

Additionally, the requirement for the seller to notify HPD **after** a transaction closes seems misplaced. This responsibility should fall on the new owner, not the seller, who is no longer involved with the property.

Another serious flaw: The bill would prohibit owners from buying out their partners without first offering the property to an approved nonprofit. A transaction between long-standing partners should **not** be treated as a sale under this law. Interfering in these private agreements adds complexity and uncertainty to fundamental property rights.

One of the foundational rights in property ownership is the **Right of Disposition**—the ability to transfer or sell one’s property. COPA would impose unnecessary hurdles to this right, including:

- Added procedural steps
- Slower transaction timelines
- Reduced buyer competition
- Depressed sale prices due to pricing uncertainty and perceived undervaluation

We also ask: What is the projected impact of this bill on city revenues?

- Will these COPA transactions be exempt from property taxes?
- Will they still pay the mortgage recording tax—an important source of funding for the city?

As reported by HPD testimony at the hearing, there are approximately 90,000 buildings across the city that could be affected by this bill, and approximately 25,000 rental buildings are sold annually. That’s a significant number of transactions that could be delayed, derailed, or devalued, harming both small property owners and the city’s fiscal health.

Intro 902 poses significant unintended consequences for small property owners and undermines essential property rights.

Thank you.

Ann Korchak, Board President

Small Property Owners of NY

Submitted via video testimony (partially as I was cut off before I was finished) and uploaded on 6/4/25

TAKEROOT JUSTICE

Testimony Before the New York City Council Committee on Housing and Buildings

Social Housing Hearing, June 3, 2025

Testimony in Support of the Community Land Act

Thank you for accepting this testimony on behalf of the Equitable Neighborhoods practice of TakeRoot Justice. TakeRoot works with grassroots groups, neighborhood organizations and community coalitions to help make sure that people of color, immigrants, and other low-income residents who have built our city are not pushed out in the name of “progress.”

We are a member of the New York City Community Land Initiative (NYCCLI), an alliance of grassroots, affordable housing, environmental and economic justice organizations working to promote community land trusts (CLTs) and neighborhood-led development. NYCCLI members include over 20 CLTs organizing for deeply-affordable social housing, commercial and community spaces, and other needs in low income Black and brown neighborhoods across the five boroughs. Our team supports this growing movement for affordable community-controlled housing, commercial and community spaces through legal services to CLT members of the initiative and other groups exploring the CLT model. Our lawyers, planner, and advocacy coordinator provide everything from education on orientation and incorporation, to transactional representation in governance, transactions and negotiations.

We are also a founding member of the Abolish the Tax Lien Sale Coalition. The Coalition advocates for the full abolition of the NYC lien sale for all properties in the City, and its replacement with systems that (1) preserve homeowners’ and tenants’ ability to stay in their homes, (2) promote racial equity, and (3) support community land trusts.

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for the opportunity to submit testimony in **support of the Community Land Act and other key proposals to expand resident-led affordable housing and community land stewardship.**

We urge this Committee and the City Council to pass the **Community Land Act**, a package of urgently-needed policies to bring land and housing into permanently affordable community control. The Act includes three bills being discussed today: **Public Land for Public Good (Intro 78)**, the **Community Opportunity to Purchase Act (COPA) (Intro 902)** and the **Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (Reso 374)**. In addition, we call on the City Council to pass **the Land Bank Bill (Intro 570)** and permanently

abolish the tax lien sale. These bills and strategies will help level the playing field for organizations like our clients' and partners' to meet our communities' housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

We also support the other bills and resolutions being discussed at the Social Housing hearing that will advance community stewardship of land for long-term affordability. We urge the Council to **pass Intros 1006 and 1007, which will empower City agencies to work with CLTs** on projects that include land uses beyond housing such as commercial, community, and open space. We also strongly support **Reso-777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro-350 to study the feasibility of creating a social housing agency.**

NYC must take bold action to address our city's affordability crisis, combat speculation and displacement, and advance racial equity in housing and land use. Collective land ownership through CLTs is one of the most effective ways to achieve this.

The City Council has made essential investments in CLTs and support organizations – helping our clients and partners build internal capacity and educate and organize community members, as well as connect with developer partners to move projects forward.

Citywide, the number of active CLTs has grown in the past decade from two to more than 20. City Council must expand on this success by enacting policies to help communities acquire and develop land for deeply, permanently affordable housing and community uses.

1. Pass the Community Land Act (Int 0078-2024; Int 0902-2024; Res 0374-2024)

Passage of the Community Land Act will help our organizations take land off the speculative market and provide the deeply affordable housing our communities need

Specifically, the Community Land Act legislative package includes the following:

Public Land for Public Good (Intro 78) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of 2023, for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city's remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.

Community Opportunity to Purchase Act (Intro 902), which would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, COPA would help curb speculation and expand the supply of

permanently-affordable, community-controlled housing. It is crucial that COPA as passed remain as written now: a universal requirement of notice of an owner's intent to take an action that could result in the sale of any 3+ unit residential building that applies *all* sales, not just those that Housing Preservation and Development (HPD) believes are strong candidates for their existing programs.

COPA would be most impactful if implemented alongside the *Tenant Opportunity to Purchase Act at the State level (Reso 374)*, which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing.

Our coalition has submitted proposed changes to the COPA bill to the lead sponsor, Council Member Carlina Rivera, in order to make the law more effective. To improve the current bill, we recommend that the Council:

- Add a clear right of first refusal for qualified nonprofits: As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Include Vacant Property: We urge the City Council also to expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

In addition, an additional Penalty would make the operation of the law more efficient: where an owner proports to sell a building covered by COPA without the required notice to HPD, any deed must be void.

Permanently Abolishing the NYC Tax Lien Sale and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes. To advance this goal we call on the *City Council to pass Int. 0570-2024, which creates a land bank* that can replace the tax lien trust, steward properties, and work with community land trusts and other responsible property owners to acquire them for the purpose of maintaining permanent affordability. We have submitted proposed changes to Int 057 to give the land bank a clearer mission to work with CLTs, engage in non-housing land revitalization, and make it more accountable to public oversight by changing the proposed board structure. We are happy to continue to work with the lead sponsor to ensure these changes are implemented.

2. Empower agencies to partner with CLTs stewarding all kinds of properties

CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. Passing **Intros 1006 and 1007** will ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of housing, reflect the city's CLT growing sector and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods.

3. Support social housing development and preservation (Res-777, Int-350)

We also support Reso 777 in support of the State bill to establish a statewide Social Housing Development Authority to create and preserve deeply affordable housing, and Intro 350 to study the feasibility of creating a social housing agency.

We appreciate the Committee on Housing and Buildings holding this hearing to discuss urgently-needed strategies to address the urgent housing crisis facing our city, including expanding community-controlled, deeply affordable housing, strengthening tenant rights, and ensuring funding to house the most vulnerable tenants. Thank you for the opportunity to submit testimony, and we look forward to continuing to work together to advance Community Land Trusts citywide.

As the Council finalizes its initiative budget for FY26, we also look forward to an increase from \$1.5M to \$3M, which will allow us to expand our services and will allow the expansion of the initiative groups to include emerging CLTs that we have counseled over the last four years who are ready to take steps in their development that require stable staff support.

For more information, contact:
Paula Z. Segal, Esq.
Senior Staff Attorney
Equitable Neighborhoods Practice

TakeRoot Justice
123 William Street, #401/4th Floor
New York NY 10038
psegal@takerootjustice.org
p: (646) 459-3067
f: (212) 619-0653



June 5, 2025

Dear New York City Council Member Sanchez and Members of the Housing and Buildings Committee,

My name is Bonnie Mohan, and I am the Executive Director of The Health & Housing Consortium. Thank you for the opportunity to submit testimony in favor of the **Community Opportunity to Purchase Act (Intro 902)**, **Public Land for Public Good (Intro 78)** and the resolution supporting the **Tenant Opportunity to Purchase Act (Res 374)**.

The Health & Housing Consortium (“the Consortium”) is a collaborative network of healthcare, housing, homeless and social services organizations, and government partners with the shared goal of improving health equity and housing stability. First established in the Bronx in 2011, the Consortium unites these sectors to better serve New Yorkers in need, particularly people with unmet health and housing needs. **Passing the Community Land Act will offer concrete solutions to preserve and promote safe, healthy, and affordable neighborhoods.**

The Consortium has long supported the Community Land Trust (CLT) model and the work of the NYC Community Land Initiative (NYCCLI). At our 2023 **Annual Convening**—attended by over 130 leaders in health and housing that featured opening remarks by Council Member Nurse—we hosted a keynote on the Bronx Community Land Trust, highlighting how it centers local resident input to advance health and housing justice for low-income New Yorkers. In response to ongoing interest in CLTs from our network, we invited NYCCLI to present at our inaugural **Advocacy Spotlight Series** in 2024. During this session, attendees learned about the importance of CLTs in building more equitable systems that protect renters and homeowners, promote racial equity, and strengthen community control of land. We fully support:

- Community Opportunity to Purchase Act (Intro 902), which gives CLTs a first chance to buy multifamily buildings when they go up for sale
- Public Land for Public Good (Intro 78), which prioritizes CLTs and other nonprofits when New York City transfers or sells public land
- Tenant Opportunity to Purchase Resolution (Reso 374), which calls on NYS to give tenants a first right to buy their buildings when landlords sell

The Consortium envisions a world where all people live healthy, fulfilling lives and experience safety and holistic wellbeing in the housing and communities of their choice, with the support they need to thrive. The CLA package will remove land and housing from the speculative market and bring them into permanently affordable, democratic community control. We respectfully urge New York City Council to enact Intro 902, Intro 78, and Resolution 374.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Bonnie Mohan". The signature is written in a cursive, flowing style.

Bonnie Mohan
Co-Founder and Executive Director
The Health & Housing Consortium, Inc.
(646) 844-2919
bmohan@hhconsortium.org
www.healthandhousingconsortium.org



**UHAB Testimony to the New York City Council
Committee on Housing and Buildings**

June 3, 2025

Honorable Chair Sanchez and members of the Committee,

Thank you for holding today's hearing and for the opportunity to testify. My name is Arielle Hersh and I am the Director of Policy and New Projects at UHAB. For 50 years, UHAB has empowered low- and moderate-income residents to take control of their housing and become homeowners in the buildings where they already live. We turn distressed rental housing into lasting affordable co-ops, and provide comprehensive training and technical assistance to keep these homes healthy and stable for the long term. UHAB has created over 25,000 cooperative homes across the five boroughs, predominantly in formerly redlined neighborhoods where rates of homeownership continue to lag behind the rest of the city. UHAB is also a founding member of Interboro CLT, the city's only citywide community land trust, as well as a coalition member of the New York City Community Land Initiative (NYCCLI).

We appreciate the Council's initiative in holding this hearing today to advance social housing in New York City. UHAB is supportive of the Community Land Act and we would like to use our testimony to call specific attention to the need for the Community and Tenant Opportunity to Purchase Act (COPA and TOPA). We also want to make sure we are using this prescient conversation around social housing to focus on the preservation of New York City's existing social housing stock, including limited-equity co-ops like HDFC and Mitchell-Lama co-ops.

First and foremost, it is imperative that we direct attention around social housing to the preservation of existing social housing in New York City like HDFC co-ops. HDFCs form a key bloc of stable, affordable homeownership for 25,000 households across 1,200 buildings in New York City. The majority of shareholders are Black and Hispanic New Yorkers systematically excluded from traditional homeownership opportunities. Many HDFC co-ops were created from the abandonment and disinvestment of New York City's fiscal crisis, and received limited building repairs and training when they converted. For the last 30 years, shareholders have stewarded their buildings through deferred maintenance, fiscal uncertainty, and maintained their buildings despite too little investment from the City.

As we focus on social housing, we must put preservation at the top of the agenda. HDFC co-ops need a renewed and more equitable property tax abatement, easier access to low-cost loans for energy upgrades and capital needs, and assistance complying with local laws, including Local Law 97.

- **HDFC co-ops need an equitable replacement for the DAMP Tax Cap**, which provides a partial property tax abatement to over 80% of HDFC co-ops and sunset in 2029. To avoid this financial cliff, HDFC co-ops need a new tax abatement that addresses historic inequities (because of the current structure, many HDFCs in the South Bronx and other continually disinvested

neighborhoods received little to no benefit). We have an opportunity to create a better, simpler, and easier to understand tax benefit to sustain affordable HDFC co-ops.

- **HDFC co-ops have suffered from inequitable access to capital for energy upgrades and repairs, and need low-cost City-backed loans to invest in their buildings.** HDFC co-ops are overwhelmingly prewar buildings that have received scattered capital investment since conversion. They need better, faster, and easier access to affordable City-backed loans for capital repairs and energy efficiency upgrades. Too many HDFC co-ops have applied for loans and waited over a year before being assigned an HPD project manager, and face an even longer path to getting the repairs they desperately need.
- **Volunteer-run HDFC boards need specific assistance to comply with new local laws, including Local Law 97.** HDFC co-ops are staffed by volunteer, working-class board members struggling to keep up with new local law compliance, especially laws that focus on building maintenance and inspection. Better coordination with City agencies would help HDFCs get prepared and avoid costly fines intended to penalize bad landlords, not punish working class homeowners. Over 225 HDFC co-ops also need support complying with this year's Local Law 97 deadline, including making applications for the new J-51 tax abatement easier.

We are also here to affirm our support for the Community Land Act (CLA) and urge the Council to pass this essential package of legislation this year. Specifically, the Community Opportunity to Purchase Act (Int. 902) would create a stable pathway for tenants to have a say in what happens to their buildings at the point of sale, and have the opportunity to control their homes. We are especially excited to hear HPD's support for a COPA framework and want to continue to engage on details and specifics of the proposed legislation.

We believe COPA is best as a broad right for tenants in as many building typologies and neighborhoods as possible. In Washington DC—where TOPA has been in place for 45 years—tenant purchases become possible in different neighborhoods as conditions shift, preserving over 16,000 homes in addition to countless tenant associations who have used their TOPA rights to negotiate for repairs and lease protections. In addition to COPA, we need an expanded universe of preservation strategies that build pathways to tenant and community control, including Int. 1063 for the most distressed buildings.

We are also supportive of the proposed amendments to the current COPA bill to make the law more effective, especially for nonprofit preservation purchasers like ours. To improve the bill, we recommend that the Council:

- **Add a clear right of first refusal for qualified nonprofits:** As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- **Include Vacant Property:** We urge the City Council also to expand the definition of "Residential Property" subject to COPA to include vacant property zoned for residential buildings with three or more units.

We are also supportive of the following pieces of legislation discussed in this hearing:

- **Public Land for Public Good (Int. 78)** which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. The city's remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, we recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.
- **Support social housing development and preservation (Res. 777, Int. 350)** including Reso 777 in support of the State bill to establish a statewide Social Housing Development Authority to create and preserve deeply affordable housing, and Intro 350 to study the feasibility of creating a social housing agency at the municipal level.

Thank you again for the opportunity to testify.



May 5, 2025

Committee on Housing and Buildings
New York City Council

Re: Community Land Act: Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78) and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374).

EXECUTIVE DIRECTOR

Andrew Berman

BOARD OF TRUSTEES

PRESIDENT

Trevor Stewart

VICE PRESIDENTS

Jessica Davis
William Abrams

SECRETARY

Allan G. Sperling

TREASURER

Adrienne Ward

PRESIDENT EMERITUS

Arthur Levin

TRUSTEES

Tom Birchard
Richard Blodgett
David Hottenroth
Anita Isola
Christina Kepple
Jeanne Krier
John Lamb
Justine Leguizamo
Leslie Mason
Ruth McCoy
Yukie Ohta
Katherine Schoonover
Jessica Dean Schiffer
Marilyn Sobel
Carole Teller
Linda Yowell
F. Anthony Zunino

232 EAST 11TH STREET

NEW YORK NY 10003

212-475-9585

VILLAGEPRESERVATION.ORG

Dear Council Member Sanchez, and Members of the Housing and Buildings Committee,

I am submitting testimony on behalf of Village Preservation, an organization that serves the neighborhoods of Greenwich Village, NoHo, and the East Village, and would like to express our support for the Community Opportunity to Purchase Act, Public Land for Public Good and the resolution supporting the Tenant Opportunity to Purchase Act.

We regard these acts as significant steps in ensuring that land in our neighborhoods serves the needs of people who live there, rather than that of those looking for an investment vehicle.

Like all neighborhoods in the city, ours struggle with a lack of residential and commercial affordability that leads to the displacement of often long standing members of our community.

And folks in the neighborhood have little say on the matter. Community plans are formulated, neighborhood needs listed, and resolutions issued. But then these are brushed aside and the community has to make due with crumbs off the table of zoning allowances and marked down public land sales that is served by the City to developers in the name of affordability and social justice.

The upzoning of NoHo, SoHo, and Chinatown is illustrative. The City promised that it would produce hundreds of housing units and "affordable housing units" within 10 years and ignored community's demands for deeper affordability and zoning protections, and concerns about speculation and displacement. A third of the way through those 10 years, not a single new housing unit has been produced, and the neighborhood has seen a loss in rent regulated housing.

The knee-jerk relaxation of land use and zoning regulations, and increases in the supply of luxury market-rate housing do not address the problem of

housing affordability where it lies or as communities in need would prefer. And Communities deserve a greater opportunity to determine how neighborhood land can serve their needs.

At a public site on 324 E 5th Street, the community is clamoring for the permanent affordability that a CLT would make possible. At a public site north of the Gansevoort Meat Market, the community is demanding 100% affordability; but the city is insisting on a for-profit luxury development with a marginal affordability requirement. Why? This is public land and should be devoted in perpetuity to the public good.

For that reason, I urge you to enact Intro 902, Intro 78, and Resolution 374. Thank you for your consideration.

Sincerely,
Juan J. Rivero
Special Projects Director



PUBLIC TESTIMONY OF WATERFRONT ALLIANCE

June 3, 2025

New York City Council Committee on Housing and Buildings Oversight Hearing RE: Social Housing

Submitted by Tyler Taba, Director of Resilience, Waterfront Alliance

My name is Tyler Taba, and I am the director of resilience at Waterfront Alliance. Thank you, Chair Sanchez and Council Members, for hosting this hearing today.

Waterfront Alliance is a U.S. based nonprofit organization with over 1,100 partners, dedicated to environmental and economic development, and fostering real change to shorelines, waterfronts, and coastlines across the nation and in the New York-New Jersey region. We are a leader in waterfront revitalization, climate resilience, and advocacy for the New York-New Jersey Harbor region. We convene the Rise to Resilience Coalition of 100+ groups advocating for policy related to climate resilience, we bring education focused on climate resilience to students in NYC DOE schools through our Estuary Explorers program, and we run the national Waterfront Edge Design Guidelines (WEDG®) program for promoting innovation in climate design.

Waterfront Alliance strongly supports the Community Land Act (CLA) bill package, particularly Intro 902 (Community Opportunity to Purchase Act - COPA), Intro 78 (Public Land for Public Good), and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374). These bills are urgently needed to ensure that land use decisions across the city prioritize community needs, combat displacement, and build community-led climate resilience.

New York City is currently grappling with a severe affordability crisis, with a significant number of New Yorkers spending more than half their income on rent. Community Land Trusts (CLTs) are fundamental tools that place the power of land back into the hands of the community, removing it from the speculative market and allowing for collective, community-led decision-making. Historically, many waterfront communities, like the South Bronx, have been subjected to decades of environmental injustice by polluting facilities, undesirable industries, and urban renewal policies, leaving them with disproportionate pollution burdens and a severe lack of climate adaptation infrastructure. These frontline communities often experience higher rates of asthma and respiratory illnesses, increased heat due to fewer trees and more paved surfaces, and greater vulnerability to flooding because of inadequate green spaces and non-functioning waterfronts.

CLTs offer a crucial solution by enabling communities to decide what belongs on their land, fostering developments that prioritize the social infrastructure and well-being of residents over profit. This



includes vital investments in green spaces, resilient waterfronts, and other nature-based solutions that are critical for adapting to climate change. Unlike private developers, CLTs and non-profits are more accountable to the public agenda and can provide deeply affordable housing, health and cultural facilities, and green spaces, all focused on public benefits.

The Mott Haven-Port Morris Community Land Stewards, established by South Bronx Unite, serves as a powerful example of a Community Land Trust actively addressing these challenges in New York City. The Mott Haven-Port Morris neighborhood has been profoundly impacted by environmental injustice and real estate speculation, with new luxury developments rising despite the local average median income of just over \$32,000¹.

South Bronx Unite and the Land Stewards are actively working to:

- Acquire and hold land in perpetuity for public use, ensuring community members maintain a stake in their neighborhood and promoting meaningful self-determination.
- Envision a green waterfront as a network of seven green spaces, which would create healthier environments and critical climate resilience against rising sea levels and strengthening coastal storms. This directly counters the historical use of public land along the waterfront for polluting industries.
- Transform vacant city-owned buildings, such as the former Lincoln Detox Center, into community hubs like the proposed H.E.ARTS (health, education, arts) center.
- Push back against policies that have relegated communities as "dumping grounds" by centering community voices in land use decisions.

The efforts of the Mott Haven-Port Morris Community Land Stewards perfectly illustrate how Public Land for Public Good (Intro 78) could empower CLTs to secure public land for community-led, climate-resilient development. Similarly, COPA (Intro 902) would provide CLTs the opportunity to acquire existing multi-family buildings, taking them out of the speculative market and preserving them as permanently affordable, community-controlled housing that is also resilient to climate impacts.

Waterfront Alliance's WEDG® ([Waterfront Edge Design Guidelines](#)) standard provides best practices for designing resilient, ecological, and accessible waterfront projects. The standard affirms the effectiveness of incorporating nature-based solutions on waterfront sites to help manage stormwater quantity, improve stormwater quality, reduce heat island effects, increase ecology and biodiversity, and absorb flooding and wave damage. Eleven waterfront sites in New York City have achieved WEDG Verification for their stellar resilient design and success in implementing nature-based solutions, including: rain gardens and water-collecting lawns at Brooklyn Bridge Park, three acres of restored wetlands that provide aquatic habitat and help absorb water at Oak Point/McInnis Cement in the Bronx, and protective breakwater reefs that reduce shoreline erosion at Sunset Park Materials Recovery Facility in Brooklyn.

¹ Office of the New York State Comptroller, "The South Bronx: An Economic Snapshot", Report 13-2024, November 2023



Waterfront Alliance strongly recommends that any waterfront or shoreline projects commit to WEDG verification.

The Community Land Act bill package provides critical legislative tools to support the growth and sustainability of CLTs in urban areas like New York City, addressing the root causes of our affordability and climate crisis. By prioritizing community-led development, preserving affordable housing, and enabling the creation of essential green infrastructure and public spaces, the Community Land Act bill package will foster more equitable, healthy, and resilient communities for all New Yorkers. **Waterfront Alliance urges the New York City Council to enact Intro 902, Intro 78, and Resolution 374.**

Thank you, Chair Sanchez and Council Members, for hosting this important hearing today and for your time and consideration of the bills we are supporting today. Waterfront Alliance continues to advocate for climate resilience for all communities, and we look forward to partnering with you.

Tyler Taba

Director of Resilience, Waterfront Alliance

ttaba@waterfrontalliance.org



June 3rd, 2025

Founders

Vernice Miller-Travis
Peggy M. Shepard
Chuck Sutton

Board of Directors

Chair
Jeff Jones

Secretary

Nancy E. Anderson, Ph.D.

Treasurer

Ken P. Mak

Members

Lakeisha M. Aquino
Peter Bokor
Dennis Derryck, Ph.D.
David Evans, Ph.D.
Abiola Fasehun, Esq.
Eric A Goldstein, Esq.
Neetin Gulati
Christy Loper
Sarangi Iyengar
Marielle Villar Martiney
Crystal Romeo Upperman
Vernice Miller-Travis
Phillip Morrow
Dart Westphal

Executive Director

Peggy M. Shepard

Testimony of Cameron Clarke and Annie Carforo at WE ACT for Environmental Justice to the New York City Council Committee on June 3rd regarding the Community Land Act (Community Opportunity to Purchase Act, Tenant Opportunity to Purchase Resolution, Public Land for Public Good Act, and Tax Lien Sale Reform Legislation)

Dear Committee Chair Sanchez, and the Committee on Housing and Buildings:

WE ACT is a membership-based organization headquartered in Harlem and for more than 35 years has served all of Northern Manhattan by building healthy communities by empowering residents to engage in the creation of sound and fair environmental policy. WE ACT, alongside our members, is submitting testimony today in support of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78) and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374) - three urgently needed bills that provide pathways to take property off the speculative market, combat displacement of Black and brown New Yorkers, and grant longtime residents a greater stake in the future of their neighborhoods.

New York City is grappling with a decades-long housing and homelessness crisis as rising costs drive homeownership out of reach for the majority of the population, and rent has far outpaced wages.

At the same time, we are in the midst of a worsening climate crisis that will leave vulnerable communities exposed and at risk. By the 2030s, the New York City Panel on Climate Change (NPCC) projects annual precipitation will increase up to 10 percent, sea levels will rise up to a foot, and the number of days with a heat index over 95 degrees will increase six-fold.¹ Communities of color and low-income neighborhoods are already experiencing disproportionately devastating and deadly impacts from these extreme weather events due to systemic racial and socioeconomic disparities in housing, land use, and access to resources.

Historic and contemporary policies like redlining and disinvestment have left communities of color without necessary infrastructure like parks, green space, and tree canopy. Meanwhile, the targeted proliferation of highways, parking lots, and

¹ Luis Ortiz et al, "NPCC4: Tail risk, climate drivers of extreme heat, and new methods for extreme event projects," *Annals of the New York Academy of Science*, Vol. 1539, Issue 1, Sept. 2024, accessed February 2025 at <https://nyaspubs.onlinelibrary.wiley.com/doi/10.1111/nyas.15180>.



industrial facilities has exacerbated climate-related extreme weather events, leading to hotter temperatures, worse runoff, and higher rates of air pollution.²

The communities we serve in Upper Manhattan, where a majority of residents are black brown and low income, lack amenities like parks, tree canopy, grocery stores, community centers etc... that improve well-being and overall health. However, as speculation and gentrification creep uptown, longtime residents that have long advocated for investments are being displaced by development that is misaligned with their needs. New York City's current approach to development strips local communities of their autonomy and ability to prioritize. Instead, their neighborhoods change based on the bottom line of for profit corporations that view land and property as a commodity rather than a community.

New York City needs a shift so that its laws encourage land stewardship for long-term public benefit rather than short-term private gain. Community land trusts (CLTs), as community-led and resident-run organizations with a vested commitment to affordability, give us an opportunity to decide, and have a say in how the space in our community is used. Their unique tripartite board membership structure consisting of community members, stakeholders or community development experts representing the public interest, and the CLT residents themselves, as well as their land ownership and ground lease model, enables CLTs to serve their community based on their unique needs for decades.

Despite that rapid gentrification in Northern Manhattan, there is still plenty of underutilized land that could be transferred to one of the three local community land trusts and put to productive use based on the community's needs. In spring of 2024, WE ACT volunteers walked every block of Northern Manhattan, tracking vacant lots, abandoned buildings, parking lots and community gardens - all viable properties for transfer to a CLT. In total, we found:

- 392 vacant lots (nearly 3 million sq. ft), 20% of which are city-owned.
- 238 abandoned/deteriorating buildings, totaling over 2,400 residential units.
- 284 parking lots (over 4.5 million sq. ft), many underutilized and potential sites for green spaces or housing.
- 114 community gardens, 22 of which are privately owned and at risk of development

² "Case Studies: Housing Policy, Climate Change, and Health," New York State Climate Impacts Assessment, accessed February 2025 at <https://nysclimateimpacts.org/explore-the-assessment/case-studies/housing-policy-and-health/>



To address both chronic disinvestment and harmful speculation in Northern Manhattan, New York City needs to shift its approach to how it governs land, both a valuable and limited resource. When done in collaboration with residents, development can unlock economic, environmental and health benefits for the community. This survey reveals there is plenty of opportunity to use land to address longstanding needs, if we are willing to rethink how we approach land use as a city.

The Community Land Act is a package of bills currently before the New York City Council that would empower community-driven development by giving nonprofits and community land trusts (CLTs) real leverage in decisions about land use.

The Community Opportunity to Purchase Act (Intro 902) or “COPA” gives community land trusts (CLTs) and other qualified nonprofits a first chance to buy multifamily residential buildings when a landlord sells. Modeled on successful legislation in other cities like San Francisco and D.C, the bill helps level the playing field for mission-driven nonprofits to acquire, develop, and preserve permanently-affordable housing.

Intro 78, or the Public Land for Public Good Act (PLPG), prioritizes CLTs and not-for-profit developers when the City disposes of public land. The bill will help ensure that public land is used to provide permanently-affordable housing and meet other critical needs such as increased greenspace in our communities. Currently, public land dispositions are concentrated in low-income Black and brown neighborhoods, and give away land for pennies on the dollar to private developers who go on to build luxury high rises in the very areas that are desperately in need of affordable housing.

Finally, the Tenant Opportunity to Purchase Resolution (Res 374) calls on New York State to enact legislation giving tenants a first right to collectively buy their building when a landlord sells. If an eligible building owner rejects this offer, they must give tenants the opportunity to match any offer by their party. This legislation, if passed, would give longtime tenants a chance to finally get an ownership stake in the buildings where they have lived for generations.

Taken together, these tenets of the Community Land Act would pave the way for a city that would give tenants and community organizations a chance to fight gentrification and displacement, and to invest in deep and permanently affordable housing for all New Yorkers. In the midst of a housing crisis, we need strong and urgent solutions. So for that reason, **WE ACT for Environmental Justice strongly urges the New York City Council to enact the Community Land Act.**



Cameron Clarke
Campaign Coordinator
WE ACT for Environmental Justice

Annie Carforo
Climate Justice Campaign Manager
WE ACT for Environmental Justice



My name is Memo Salazar; I am the co-chair of the Western Queens Community Land Trust. Although we are in a housing crisis, the city's solution is often to simply build more units, thinking that increasing supply will decrease demand (and lower our rent costs.) The data is clear that this is a fallacy- increasing supply of market-rate apartments just creates more homes for wealthy investors- the "trickle-down economics" theory we believe in is as illogical now as it was when Ronald Reagan proposed it decades ago. (Fun fact: our population has declined by half a million people- combined with the boost in housing we've built, we now have more housing available per capita than we have had since 1980- yet prices keep going up, placing more and more people in the rent-burdened category, if not in actual shelters.)

What we need are more creative ways to build truly affordable housing- of which CLTs lead the pack. It's the only way you're going to get permanently affordable housing in this city today- but given the high cost of land, it's incredibly difficult for these small, grass-roots community organizations to acquire such huge properties without help. The Community Land Act is that help. Both COPA and the Public Land for Public Good are clear paths towards preserving affordable homes.

Keeping public land in the hands of the public is, in 2025, even more crucial- we've got precious few parcels of land left, especially in Queens. Once we give them all away to private developers, that's it. Please preserve what precious few parcels we have left by keeping them out of the realm of private profit via the Public Land for Public Good Act ([INT 78](#)).

WQCLT has explored the purchase of multiple buildings in the past couple of years, working hard with tenants for months- and yet every single time, the owner has placed that building on the market and sold it off before we had a chance to react. COPA ([INT 902](#)) would give us a fighting chance to buy the building and keep people in their homes- a crucial law in a market like NYC's.

Please pass the CLA today- it's been languishing around for too long. We really need your help to do the work that we do.

Sincerely,

Memo Salazar
Co-chair, Western Queens Community Land Trust

Council Member Sanchez and Members of the House and Buildings Committee,

My name is Clint Okayama, and I'm a resident of Astoria, Queens. As a member of the Western Queens Community Land Trust and an affordable housing provider, I am here to testify in favor of Public Land for Public Good (Intro 78). This legislation will protect affordability and preserve the cultural fabric of our city.

I am an LGBTQIA+ activist who is witnessing rocketing land prices across New York. This city is one of the few places that the queer community not only created, but also feels safe in, as the birthplace of modern, global LGBTQIA+ movements.

But, what do we see in the neighborhoods of New York that were once the heartbeat of LGBTQIA+ culture, like the West Village? Blocks of homes only affordable to the world's richest. Meanwhile, over sixty percent of chronically homeless youth are LGBTQIA. I have had so many friends forced out of this city due to a lack of affordability, including queer elders who forged the laws that allow people around the world to love each other, free from discrimination.

As a part of the Community Land Act, Public Land for Public Good would empower local organizations to preserve affordability and cultural identity. These organizations know their neighborhoods better than anybody else, and nobody is as fiercely devoted to fighting for their people. Without them, New York loses the people and identity that has made this city the power of the world.

Please pass the Community Land Act, and Public Land for Public Good. Thank you for your time.

**Testimony to the New York City Council
Committee on Housing and Buildings**

June 3, 2025

Testimony in Support of the Community Land Act

Thank you, Chair Sanchez and members of the Committee on Housing and Buildings, for the opportunity to submit testimony in **support of the Community Land Act and other key proposals to expand resident-led affordable housing and community land stewardship**. My name is Justin Chuang and I am a New York resident and longtime advocate for CLTs. I believe that CLTs provide a strong foundation for preserving and bolstering the communities of marginalized and underrepresented populations across New York, particularly in communities like Chinatown that are facing mass displacement.

I urge this Committee and the City Council to pass the **Community Land Act**, a package of urgently-needed policies to bring land and housing into permanently affordable community control. The Act includes three bills being discussed today: **Public Land for Public Good (Intro 78)**, the **Community Opportunity to Purchase Act (COPA) (Intro 902)** and the **Resolution in support of the Tenant Opportunity to Purchase Act (TOPA) (Reso 374)**. In addition, I call on the City Council to pass **the Land Bank Bill (Intro 570)**. These bills will help community organizations meet communities' housing and economic development needs, and ensure that the City is maximizing its land and affordable housing resources for public benefit.

I also support the other bills and resolutions being discussed today that will advance community stewardship of land for long-term affordability. I urge the Council to **pass Intros 1006 and 1007, which will expand the legal definition and regulatory agreements for CLTs** to include land uses beyond housing such as commercial, community, and open space. I also strongly support **Reso-777 in support of the State bill to establish a statewide Social Housing Development Authority** to create and preserve deeply affordable housing, and **Intro-350 to study the feasibility of creating a social housing agency**.

NYC must take bold action to address our city's affordability crisis, combat speculation and displacement, and advance racial equity in housing and land use. Collective land ownership through CLTs is one of the most effective ways to achieve this. Citywide, the number of active CLTs has grown in the past decade from two to more than 20. City Council must expand on this success by enacting policies to help communities acquire and develop land for deeply, permanently affordable housing and community uses.

1. Pass the Community Land Act (Int 0078-2024; Int 0902-2024; Res 0374-2024)

Passage of the Community Land Act will help our organizations take land off the speculative market and provide the deeply affordable housing our communities need.

Specifically, the Community Land Act legislative package includes the following:

Public Land for Public Good (Intro 78) – which would require NYC to prioritize CLTs and nonprofit developers when disposing of City-owned land, to ensure public land is used for permanently-affordable housing and other public benefits. City-owned land is currently scarce and is increasingly valuable amidst rising land and housing costs. As of [2023](#), for instance, HPD had disposed of nearly all (99.5%) of properties obtained via *in rem* foreclosure since 1994. The city’s remaining land resources—and any new land it acquires—should be maximized for public benefit, yet the majority of requests for proposals for housing development are granted to for-profit entities. Public Land for Public Good would protect city land subsidies by prioritizing them to housing nonprofits and CLTs, which guarantee permanent affordability. To improve the bill, I recommend explicitly allowing joint ventures between nonprofits and other mission aligned developers including MWBEs.

Community Opportunity to Purchase Act (Intro 902), which would give qualified nonprofits the first right to purchase multifamily buildings when a landlord decides to sell. Modeled on legislation that has preserved thousands of affordable homes in Washington, D.C., San Francisco, and other jurisdictions, COPA would help curb speculation and expand the supply of permanently-affordable, community-controlled housing. COPA would be most impactful if implemented alongside the ***Tenant Opportunity to Purchase Act at the State level (Reso 374)***, which would enable tenants to partner with CLTs and mission-driven nonprofits to preserve and create affordable housing.

To improve the current bill, I recommend that the Council:

- Add a clear right of first refusal for qualified nonprofits: As currently drafted, the bill does not provide qualified entities a clear right of first refusal, i.e. the right to buy on the same terms as a competing offer, which is standard in other Community and Tenant Opportunity to Purchase policies.
- Include Vacant Property: I urge the City Council also to expand the definition of “Residential Property” subject to COPA to include vacant property zoned for residential buildings with three or more units.

Permanently Abolishing the NYC Tax Lien Sale and replacing it with an equitable system that engages CLTs to preserve affordable housing and keep New Yorkers in their homes. To advance this goal I call on the ***City Council to pass Int. 0570-2024, which creates a land bank*** that can replace the tax lien trust, steward properties, and work with community land trusts and other responsible property owners to acquire them for the purpose of maintaining permanent affordability.

2. Expand the legal definition of and tools for CLTs for more services and land uses

CLTs are an essential tool for preserving deep affordability of land not just for housing, but for community, commercial, and open space—and for community-led planning to define and plan for those needs. Yet, the sections of the administrative code directing City agencies to work with CLTs are currently too narrow. Passing **Intros 1006 and 1007** will ensure that agencies are empowered to work with CLTs that provide space that meets community needs outside of

housing, reflect the city's CLT growing sector and expand opportunities for local small businesses, community-based organizations, and community members to access stable and affordable space in their neighborhoods.

Thank you,

Justin Chuang

Dear Members of the Housing and Buildings Committee,

My name is Zachary Gallin, a resident of Park Slope and a member of New York City Against Segregated Healthcare (NYCASH), submitting testimony in favor of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78) and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374), three urgently needed bills that provide pathways to take property off the speculative market, combat displacement of Black and brown New Yorkers, and ensure community-led development.

As a physician, I see how my patients do not often have a say in what is built in their New York City neighborhoods. Skyrocketing rents sometimes force patients to choose between housing and other necessities like medical care.

Therefore, community members should have the opportunity to decide how land in our community is used - whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the community.

So for that reason, I strongly urge the New York City Council to enact Intro 902, Intro 78, and Resolution 374. Thank you for your time.

Alexis Foote

[REDACTED]
Jamaica, NY 11430
[REDACTED]

6/05/2025

Dear Chair Sanchez and Committee on Housing and Buildings,

My name is Alexis K Foote, a resident of Far Rockaway, I help create “The Garden by the Bay” and the “ReAL (Residents Acquiring Land) Edgemere Community Land Trust” as a resident, wife, and mom. I have been living in Far Rockaway for over 20 years, and I am in Council Member Selvena Brooks-Powers’s District. A former member of an organization that has been working to stabilize the neighborhoods in Far Rockaway and Rockaway Parkway from the tax lien sale and AML.

The City Council needs to make sure that All of the CLT in New York City have the MONEY to continue to empower their communities, this work is not easy when you have a community dealing with generational traumas like; homelessness, lack of education, lack of resources, domestic violence and your constantly being told by America that you’re not good of enough for stable housing, love, respect, and the right to live freely.

Arverne View was robbed of the opportunity for homeownership and generational wealth by the City of New York; when they sold our complex to L&M, Bluestone, and Triangle Equal. As the Founder and Lead- Applicant of the ReAL Edgemere Community Land Trust

I am here to tell you about my experience dealing with New York City Housing as a neighbor of abandoned properties which are included in this year’s tax lien, and I am someone who has been knocking on doors to do outreach for the 2025 lien sale and several of the housing bills in City Hall. I am submitting testimony in favor of Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78), and the resolution support Tenant Opportunity to Purchase Act (Res 374), three urgently needed bills that provide pathways to take property off the speculative market, combat displacement of black and brown new Yorkers, and ensure community – led development.

I want to share a personal story and highlight how Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78), and the resolution support Tenant Opportunity to Purchase Act (Res 374).

I have lived in Arverne View aka Ocean Village for over 19 years and now as a domestic violence survivor, I am here to tell you that these three bills could have supported my neighbors

and I purchasing our homes. L& M, Triangle Equity, Bluestone, and government officials stole our rent stabilization status during the rescue effects of Hurricane Sandy. If the tenants and I had the Community Opportunity to Purchase Act (Intro 902) and / or Tenant Opportunity to Purchase Act (Res 374), we would all be homeowners right as I type that letter. My neighbors and I want to be homeowners, however, the Community Opportunity to Purchase Act (Intro 902) and / or Tenant Opportunity to Purchase Act (Res 374), We demand the opportunity to decide how land in our community, whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the community. These policies also would suppose businesses like “Bed-Vyne Brew” and “Next Stop Vegan” are being pushed out because of gentrification, the passion and desire to eliminate black, brown, indigenous spaces. These bills would allow the community to buy the spaces that make their communities thrive.

The lien sale is harmful in and of itself, even if some of the recommendations to make it a little better will be implemented it will still be unbelievably bad. Our Black neighbors are six times more likely to be targeted by the tax lien sale. Policies like this are why Black families are leaving the city in droves. The lien sale process creates opportunities for speculators to target us and our neighbors, encouraging sales for less than market value and makes it easy to help deed theft.

It broke my heart to see that there will be families, senior citizens, veterans and more of my neighbors are being displaced by the tax lien sale. My friends and family in Harlem will be displaced by the tax lien sale. This will to an increase homelessness, domestic violence, mental illness, drug abuse, and other social detriment. This increases the wealth gap between white and Black communities when it comes to securing land and housing in communities of color.

I am a member of the Abolish the Tax Lien Sale Coalition; together, we urge you to spend the next few months following the directive of City Council and developing a potential replacement for the lien sale that (1) preserves homeowners’ and tenants’ ability to stay in their homes, (2) promotes racial equity, and (3) supports community land trusts. We look forward to reviewing this alternative when you release it as part of the Task Force’s final recommendations in September.

The bill will allow for underutilized distressed/vacant public land to be activated by CLTs and nonprofits to produce permanently and deeply affordable housing, as well as community, commercial, and green space for public use. The ReAL Edgemere Community Land Trust would benefit from Intros 1006 and 1007; that the ReAL Edgemere Community Land Trust would be able to provide program assistance and amenities for low-income to moderate families. Our families are lacking healing art spaces, and recreational that the Parks Department cannot afford to provide a daily basis for our families in Far Rockaway. Our community as to constantly fight with city agencies to get services like sanitation. We have community member that maintains all the lots until HPD gated all the vacant lots. We need to make sure that these bills also come with

funds in the range of six billion dollars. ReAL Edgemere needs funding to make sure that the bayside of Rockaway have active docks for ferries and personal boats clubs for BIPOC.

I am particularly disappointed that the Task Force does not recommend putting the City in charge of collecting debt on the properties that affect New Yorkers the most:

(1) vacant lots and unoccupied buildings that blight our neighborhoods instead of providing affordable housing and other community-serving space and

(2) properties where tenants pay rent, but landlords do not pay their bills.

I, Mrs. Alexis Kimberly Smallwood-Foote, urge the Task Force to recommend that DOF buy back all outstanding liens on such properties and stop selling any more liens. Provide Real Funding in the Billions to preserve community that have built New York City.

New York City Council Testimonial

Hello members of the City Council, my name is Anna DiTucci and I am a student at the City College of New York. I am here today to advocate for the passing of the Tenant's Opportunity to Purchase Act as well as the Community Opportunity to Purchase Act. Time and time again we've seen working class New Yorkers being forced to move out against their will because they have no other choice. They can't afford the rent anymore. How is it fair that the very thing that makes us New York, our community, is being driven out due to the inflation and gentrification of our neighborhoods? Slumlords are neglecting our buildings while charging us more and more rent each and every year. Many homes are under threat of being foreclosed by the tax lien sale because their landlords have not paid their city taxes. Many tenants don't even know about it. Those in power to make a difference need to hear the cries of the people. Many New Yorkers are struggling on the brink of homelessness each and every day, barely managing to stay afloat. As someone who is also a tenant, I have struggled first-hand with the housing crisis in this city. I am part of a class called Community Based Research, a class dedicated to help solve this crisis. We have reached out to several tenants who have organized together under a community land trust to own their building. They already have won massive victories in their fight against the for-profit landlords that run the housing market with an iron fist. 248 Arlington Avenue, in East New York, has already been the first building to be successfully taken over by their tenants. With the help of the East New York CLT, they purchased their building and now enjoy the fundamental right of owning their homes. It should be like this for every New Yorker. That is why we need the Tenant's Opportunity to Purchase Act as well as the Community Opportunity to Purchase Act to pass, so that people don't have to choose whether to feed their kids or afford rent. The city of New York wants to find solutions to the homelessness crisis, and the solution is very clear. Make housing affordable again. We, as students, workers, and tenants, implore you pass these bills, because Section 8 and Section 9 are not enough. People are put on the backlog and are made to wait years before an opening shows up. We need TOPA and COPA now, so that every New Yorker can live with a peace of mind knowing they have somewhere secure to lay their head at night.

Thank you so much for your time. Sincerely,

Anna DiTucci

[REDACTED]
New York, NY 10026

June 4, 2025

Committee on Housing and Buildings
New York City Council
City Hall
New York, NY 10007

Dear Council Member Sanchez, and Members of the Housing and Buildings Committee,

My name is Benjamin Link, a resident of Central Harlem and a member of WE ACT, submitting testimony in favor of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78), and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374). These urgently needed bills provide pathways to take property off the speculative market, combat displacement of Black and brown New Yorkers, and ensure community-led development.

My neighbors and I do not often have a say in what is built in our neighborhood. In my area, displacement and rising rents are rampant. Block by block, you see incredible inequities. For example, where grassroots organizing has yielded quality housing, such as through Malcolm Shabazz Development Corporation's work around the West 115th–118th area, there is greater inclusion for long-term Harlemites. Yet today, gaining access requires resources and credit that most in Harlem don't have, leading to displacement and an invisible form of gentrification. In the surrounding blocks without such development, residences are often tiny, visibly in disrepair, and still expensive. This drives homelessness and leaves community members vulnerable to extreme weather, crime, and other destabilizing factors. Given housing scarcity, brokers charge excessive fees that further squeeze prospective renters from securing housing in their neighborhoods. My household alone paid nearly \$10,000 just to secure a lease. Many of the worst-off buildings also have insufficient insulation, outdated heating and cooling systems, and deteriorating envelopes, exposing residents both to financial hardship from high utility costs and dangerous living conditions.

We the community demand the opportunity to decide how land in our neighborhood is used, whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the area.

Within our family unit, one of us is pursuing educational dreams at Columbia University as an underrepresented student who has faced exclusion across public and private institutions because of their identity. To support this dream, we took on crushing moving expenses, broker's fees, and exorbitant rent. We pay \$4,900 per month as three working adults, barely staying afloat amid thousands of dollars in debt for basic living costs. We are fortunate to have responsive landlords, but this is not the case for most who often experience indifference, with landlords uninterested in maintenance or tenant well-being beyond collecting rent. This lack of accountability leaves buildings in persistent disrepair, as seen in East Harlem where some landlords warehouse vacant units rather than address tenant needs. Even in comparatively nicer accommodations, pollution and emissions from vendor trucks jockeying for tourist dollars choke our air as we walk the streets near Central Park. Many Harlemites simply tolerate these chronic threats because housing stability is their most urgent concern.

Moreover, private developers tend to pursue high-cost, luxury projects outside of Harlem rather than invest in our community's needs. Development patterns across New York City are very uneven: a few neighborhoods produce the majority of new housing, others build mainly market-rate product, and some produce none. This uneven geography means that much of the new market-rate development over the last decade has been concentrated outside neighborhoods like Central Harlem, highlighting that private development often overlooks our community in favor of more profitable areas.

Intro 78's Public Land for Public Good would compel city agencies to prioritize community-led housing or nonprofit ownership when selling or leasing public parcels, ensuring developments meet local needs rather than private profit. Intro 902's Community Opportunity to Purchase Act would give community land trusts and tenant associations first right of refusal when buildings are put up for sale, allowing us to preserve affordability rather than see displacement. Together, these bills would allow residents to convert disused or underutilized properties into genuinely affordable, community-driven housing with strong tenant protections.

For these reasons, I strongly urge the New York City Council to enact Intro 902, Intro 78, and Resolution 374. Thank you for your time and commitment to preventing further displacement in our communities.

Sincerely,

A handwritten signature in black ink that reads "Benjamin Link". The script is fluid and cursive, with the first letters of "Benjamin" and "Link" being capitalized and prominent.

Benjamin Link

Dear Council Members,

I am writing in support of the Community Land Act, a set of bills (Intros 902 and 78 and Res. 374) that gives community land trusts (CLTs) and other nonprofits a chance at developing affordable housing as well as Intros 350, 570, 1006, 1007, and Res. 777. Although this council made progress towards solving New York's housing shortage with the City of Yes, it recognized at the time that only so much could be done through zoning reform and added money for affordable housing. Even with Mandatory Inclusionary Housing, there are limits as to what the for-profit sector can economically provide for the less well-off among us.

These bills would be an important first step. The Community Land Act would allow CLTs and other non-profits to get first crack at both the purchase of multifamily buildings and public land while also calling upon the state to pass the TOPA (Tenant Opportunity to Purchase Act—A6100/S401), which would give tenants the right to first refusal in a rental that was being sold, thus not forcing them into a bidding war. TOPA laws have been used successfully in Washington, D.C., San Francisco, and Minneapolis. To assist these organizations, which may not have access to the same financing that pro-profit entities do, we have Intro 570, which would create a land bank which could route distressed properties to CLTs and other non-profits. Intros 1006 and 1007 would allow CLTs and other non-profits to diversify their property, securing themselves economically by having diverse revenue streams. This could be especially useful, for example, in residential areas with commercial overlays.

Finally, we have the idea of creating authorities at the state and local level that would support or even build such housing. Res. 777 would urge passage of a state Social Housing Authority Bill-- S5674/A6265, while Intro 350 would call for a feasibility study of creating such an agency at the city level. These agencies could facilitate either building government housing or working with CLTs and other non-profits. This would be consistent with giving this dimension of non-profit/social housing the support and organization it deserves.

June 3, 2025

Dear Council Member Sanchez, and Members of the Housing and Building Committee,

My name is David Lander. I am a resident of Hell's Kitchen. I've lived in the same apartment for 29 years.

I am in favor of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78) and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374)

My apartment is one of two 15-unit buildings that sit side-by-side on West 45th Street. In the time that I have lived there, our building has had four owners. The current owner, a private investment firm, took possession after the previous landlord, lost the building to foreclosure. That landlord, Daniel Ohabshalom, has the distinction of topping the city's list of worst landlords two years in a row!

Four years ago, following weeks without heat and hot water in the middle of a brutal winter, we formed a tenants association. And with the help of the not-for-profit organization Housing Conservation Coordinators, we organized a rent strike and filed a lawsuit against Ohabshalom. Our HP Action is still before the court and we are still on a rent strike.

We are now at a critical juncture. Our building is up for sale yet again. We, the tenants are searching for a partner to help us purchase the building. We have had several conversations with the current landlord, and they tell us they are under no obligation to share any details of the sale or information on a prospective buyer.

If COPA was the law, the landlord would be required to negotiate with us.

Time is of the essence. We hope we can persuade the landlord to sell the building to us or at least allow the tenants to approved the next entity that buys the building, thus allowing us to approve our next landlord. What a concept!

If TOPA was the law, the landlord would be required to negotiate with us.

We need both. Please support both.

Committee on Housing and Buildings
Oversight Hearing: Social Housing
Testimony by Ethel Brown
June 6, 2025

Greetings, my name is Ethel Brown. I am a Bronx native, a grandmother, and I am a leader at Neighbors Together and a member of VOCAL-NY, fighting to end homelessness, and advocating for dignified, permanent, affordable housing in New York. Thanks to the Committee of Housing and Buildings for holding this hearing and allowing the public to testify why community-oriented housing is a such great need in the state of housing today. I've experienced a complicated relationship with my previous landlord that resulted in my family and me facing housing insecurity in the past.

I am writing today in full support of social housing in New York. As the cost of living continues to rise and affordable housing becomes increasingly scarce, social housing offers a viable, equitable solution that ensures every New Yorker, regardless of income, has access to safe, stable, and dignified living conditions. My previous landlord held too much power in dictating the stability for me and my family. My family has been harassed, not due to failure to pay rent or noncompliance with lease terms, but the simple fact that we are not wanted anymore as tenants has made housing in New York a revolving door, but open arms to instability.

Housing is not just a basic need; it is the foundation upon which individuals and families build their lives. People with secure housing can focus on their education, careers, health, and overall well-being, rather than worrying about eviction or rent increases that cost them out of their communities. Social housing provides a safeguard against displacement and gentrification, keeping long-term residents in their homes and preserving the cultural fabric that makes New York so vibrant.

Moreover, social housing is a sustainable model that prioritizes the needs of tenants rather than the profit-driven motives of private landlords. It can incorporate energy-efficient designs, prioritize community-centered development, and foster inclusive neighborhoods that welcome everyone regardless of socioeconomic status. Investment in social housing is an investment in stability, economic mobility, and social justice.

If we truly want a city where opportunity is available to all, we must commit to policies that expand and improve deeply, permanently, housing options, such as social housing. The future of New York depends on ensuring that housing is a right, not a privilege. I urge the leaders of NYS and NYC to support and prioritize initiatives that make this a reality. According to Abraham Maslow, the pyramid of the hierarchy of needs, all are important for all human beings. Still, the

pyramid's base is the psychological need for food, water, shelter, etc., which is a right. You are not balanced if you don't have one or a few. Say yes to Social Housing. Thank you for your time and consideration. I appreciate you allowing me the time to share my vision on Social Housing in New York.

Sincerely,

Ethel Brown

Written Testimony by Fariha Haider

June 3rd, 2025

Chairperson Sanchez and Members of the City Council Committee on Housing and Buildings. Thank you for providing the opportunity to testify. My name is Fariha Haider. I am the daughter of Bangladeshi immigrants, a lifelong resident of Jackson Heights, Queens, and a senior at the City College of New York.

Like many New Yorkers, I am deeply alarmed by the ongoing and worsening housing crisis affecting our communities. In particular, low-income, Black and brown communities have been historically disenfranchised by racist policies and practices, both de facto and de jure, and the legacy continues as we continue to see the displacement of our communities today due to rising costs of living and housing speculation. I urge you all to support the Community Land Act. This legislative package will give tenants, CLTs, and eligible nonprofits, first priority when a landlord sells a building or when the city disposes of public land, as well as replace the predatory NYC Lien Sale, which has fueled speculation and the displacement of low-income homeowners and communities of color, with an equitable system that works with CLTs to preserve affordability so people are not pushed out of their homes when they fall behind on taxes.

As part of my minor in Community Change Studies with the Colin Powell School at City College, I have participated in a Community Based Research class led by professor Hayoung Jeong. As a part of the course, my classmates and I have volunteered with the East New York Community Land Trust, where we went door-to-door, informing homeowners that their home was at risk of tax lien sale, and offering ways to get off the list. One homeowner was especially grateful we stopped by—they told us they had just made a payment the week prior and was planning to make another the next day. They appreciated the outreach, informing them about what was happening with their home. My classmates and I also conducted research, having interviewed several NYC tenant leaders, one of whom is currently at risk of displacement due to their building's expiring Low-Income Housing Tax Credit (LIHTC) status, highlighting how even widely supported programs like LIHTC, which continue to benefit investors such as banks and financial institutions, often fail to provide deep and lasting affordability.

From my interview with Claudia Waterton, it is evident that tenants are just as capable as traditional landlords—if not more so—of owning and managing their own homes. In 2017, Claudia and the residents of her building in Port Morris, Bronx, faced eviction by a new landlord who planned to raise rents after buying the building for \$4 million. The tenants formed a tenant association, and began organizing with the help of community organizers from TakeRoot Justice, against their landlord's attempts to destabilize the building. They found that the landlord was trying to sell the building and sought to increase its value by raising rents before selling for profit, however, after a long legal case, the tenants won protections for rent stabilization.

Claudia recounted to us, "Before we bought the building, our landlord came to us with another seller and the seller was like, *Hey, I can give you guys all this stuff, you know, he's like, You guys want a new rooftop? You guys want your apartments remodeled? I can do that.*" Their response? "We can do that."

And that they did. In February 2022, the nonprofit organization Urban Homesteading Assistance Board (UHAB) purchased the building for \$2.6 million and plans to give ownership over the apartments to the tenants for \$2,500 each. Claudia and her fellow building residents are currently in the rehabilitation stage of the development process, getting necessary repairs and upgrades for their building. For example, the building's boiler had been failing for years and leaking, so the tenants installed a heat pump system instead. Even when they had the boiler system, cold air would enter through the windows, which they have also had to repair. They also purchased new stoves and installed WiFi for a new intercom system. Repairs left include the roof, potentially a solar system once the roof is repaired, and turning on a new hot water system. Next steps for them include finishing all construction work and finally converting into a limited equity co-op.

When asked how things would've been different for them in this process if the Tenant Opportunity to Purchase Act (TOPA) had been passed, Claudia replied, "We would've had the money right away." She acknowledged that the process still would have been slower because of the pandemic but TOPA would have sped things up in securing funding. Passing the Community Land Act is essential for preserving affordable housing and preventing displacement, like tenants of Claudia's building were at risk of. It gives tenants and community organizations the opportunity to purchase their buildings when put up for sale, allowing them to keep their homes. Now is the time to show New Yorkers that their representatives prioritize the well-being of the communities they serve above all else.

Thank you.

Written testimonial by Francisco Rivera, CCNY student.

Hello esteemed council members,

I am here today to urge your full support for the passage of the Tenant Opportunity to Purchase Act (TOPA) and the Community Opportunity to Purchase Act (COPA). These two pieces of legislation would be monumental in shifting the balance of power in New York City's housing market— shifting it away from displacement speculation, and insecurity and toward a vitalization of community, tenant power, and long-term affordability.

I am Francisco Rivera, and I am a student at the City College of New York. In my past spring semester, I have been enrolled in a course that allowed me to connect with tenant organizers representing their buildings. Two notable examples I would like to bring up are 287 Prospect Avenue and 63 Tiffany Place—both in Brooklyn. They serve as powerful examples of what is possible in instances when tenants are given the opening to organize and fight to remain in their homes.

At 287 Prospect Avenue, a 52-unit rent-stabilized building once protected under the 421-a tax break, tenants like Denise Clay have launched a campaign to buy their building and preserve it as permanently affordable housing. They've built working groups, partnered with UHAB, drawn attention from the media and local politicians alike, and built up a sense of spirit and shared initiative amongst their neighbors. They have been faced with deceptive legal tactics from the landlord and fear mongering, yet the tenants have remained on course. They are proof that tenant ownership isn't something rooted in pure ideation—it can be a practical possibility, and it is urgently needed for our communities.

At 63 Tiffany Place, the expiration of LIHTC protections threatened to throw 70 families into an immediate crisis that would disrupt their lives. But under leadership of organizers like John Leyva, the tenants have moved from ideation to a full-fledged plan to purchase their building. They were determined throughout the entire way, and through that determination they have achieved major strides along every step of the tenant purchase roadmap. Their collective action—democratically structured, socially engaged, and politically savvy—has made the building a model for community resilience. Leyva has been kind enough to offer advice to not just other tenants, but also my classmates. He urges people to connect with the much broader tenant movement, take advantage of social media, and seek help from the NYC tenant organizing infrastructure. His organizing efforts show just how replicable their success can be, if tenants are given the tools to replicate their success. And that is why I have prepared this statement today.

The blunt truth of the matter is that these inspiring efforts are still an uphill battle without TOPA and COPA. Both buildings faced or are currently facing financial and legal barriers that delay or can outright impede their progress. Landlords ignore tenants, ignore their calls for negotiation until public rallies put them into the hot seat. Tenants operate out of fear; the fear of eviction, fear of retaliation by those who control their housing situation, and a fear of challenging an authority that the status quo has made people complacent in not challenging. Despite massive

public support and significant outreach, the resources required for ownership transition remain out of reach for so many.

TOPA and COPA would change this. By giving tenants the right, **the first** opportunity to purchase their buildings when they go up for sale, and by offering these nonprofits or tenant groups the same right, the bills would dramatically flip the narrative on New York City's housing crisis mindset. It would provide leverage to tenant groups, REAL leverage in negotiations and a legal framework to make community ownership something that would be considered the norm—and not just a clear exception.

Denise Clay, John Leyva, and hundreds of tenant organizers across the city aren't asking for favors. Millions of tenants aren't being beggars. They want a system that won't devalue them. They want a system that treats them with dignity. They want to change the current system which values profit over people, over the citizens, over *your* constituents. They want a stable state of affairs over a speculative one; they want homes over commodities. New York residents have done their part. Now it's time, as the City Council, for you to please do yours. Do the right thing for our city.

Pass TOPA and COPA. Give New Yorkers the power to own, protect, and preserve their communities. Without our communities, we have no identity. I am asking you, along with many others, to preserve our identity. Preserve what is New York City.

Sincerely,

Francisco Rivera

June 4, 2025

To: The New York City Council
Committee on Housing and Buildings
Councilmember Pierina A. Sanchez, Chair

re: Please do what you can to help COPA (Int. 902) become law

Hello Chair Sanchez and members of the Council's Housing and Buildings Committee. As you know, [the AHRA bill is now state law as of May 8, 2025](#) (the text of the original Sen. Cordell Cleare/AM Harvey Epstein bill [was subsumed into the final ELFA iteration](#)). In light of this, I feel it's important that COPA becomes law. I live in one of the AHRA-eligible buildings, but for the low-income tenants here to feel like someone has our back, we would need a capable nonprofit to hold our hand. For example, UHAB. In a nutshell, for tenants like us to receive maximum help, groups like UHAB need as much power as possible.

Continuing with UHAB as an example: UHAB has worked with mixed status buildings in the past; they are skilled at creating legal structures which can support simultaneous needs. Even so, they realize challenges will likely come up: For example: difficult dynamics for ongoing governance and decision-making, especially when affordable apartments are scattered across a development and are in the minority, as would be the case in an AHRA conversion. The process for converting a building like mine would be "special" under AHRA requirements, and would be lengthy and costly for even experienced groups like UHAB. Both the costs and time-consumption would be above & beyond typical co-op or condo conversions. To the best of my knowledge, if COPA is law, then nonprofit landlords such as UHAB will have far fewer challenges to contend with. I was also told COPA would help tenants to organize and stay organized.

Thanks for accepting my testimony and have a great week.

Hui-Cheng Yong, low-income renter
Constituent of City Council District 3

URGENT & OF IMPORTANCE
FOR THE GREATEST GOOD OF ALL AMERICANS

New York City Council Testimony

For Committee on Housing and Buildings,
Presided by Council Member Pierina Sanchez

Written Testimony (complement to oral) for Public Hearing on Land Use, Housing, of June 3rd, 2025 at 10:00 am, by Jorge R. Paula, a professional in building design, architecture and construction contract management. In order for the City Council to comprehend the conclusion where this all point, to necessary work in order for the current bills to be effectively useful for good, the following longer journey into a tenant's experience is necessary.

Please read in full for actual comprehension of the problem we intend to solve or partially solve by the bills on the table.

The bellow journey will clarify why there are needs that are not even addressed, remaining in urgent need to be tackled in order to solve the Housing Crisis that will continue and/or aggravate if certain elements are never addressed. Rather an increasing pandemic of collapsing housing buildings developing forwards if the core problems are not remedied.

The following journey shall will give you sufficient understanding to awaken an interest to address the problems at the root cause, for which I have some contributions to discuss shall City Council be interested in building towards a permanent solution to the recurring systemic problems in the Housing industry. The story:

1. All buildings have problems at some point, requiring maintenance repair and solutions as soon as detected; that is normal.
2. My home has roof leaks since prior to Oct. 1996, disclosed before signing lease, with specific verbal agreement from the landlord to

permanently repair in the first months. (See attached “2013-11-25 Original 1996 Verbal Agreement 13-12.pdf”)

3. Sustained leaks imply mold, mildew and pathogens of organic bacterial colonies growth. These in turn become airborne, representing a threat to health, specially when sustained long term. This condition was not disclosed.
4. A Preferential Rent was given due to the underlying condition(s).
5. Roof leaks bring in the environmental pollutants from the external environment of NYC, including airborne chemicals from human activity of an array of sorts. These enter the building more abundantly with the rains and interact with the materials and structural components and connections in further accelerated detriment.
6. Buildings structures are known to deteriorate and even acquire structural problems and eventually fail for prolonged mold conditions that erode the materials.
7. After years of kind patience with leaks, mold and all consequential conditions and impacts, I was forced to reach for assistance by the pertaining authorities, and arrived to Housing Court.
8. Knowing nothing about legal proceedings, requesting how to initiate a case, the Housing Court Clerk’s Office representative at the Pro Se window persuaded me saying that: problems never get resolved if I took landlord to court, they just do a temporary “Band-Aid” patch and I would be recurrently in court soon after without permanent solution.
9. The Clerk then offered the solution by saying: to solve the problem you need to touch the pocket of the landlord, and instead of taking the landlord to court, where you can not ask for a money abatement, you can stop paying rent and wait until the landlord takes you to court, then tell the judge why you stopped paying rent.

10. I've been to Housing Court, mediation and/or Appellate Court in three main seasons, practically ten years apart; all originated by the same problem of negligence to permanently repair the agreed problem(s) before and for which lease was signed in 1996. (See mediation case no. 12102004-90 of DHCR, and Housing Court cases index no. 086993/2004, 460/2005, 88884/2013, 060912/2014, 305454/2024 and Appeals Court case 570019/2015)
11. That is a total of seven legal conflicts and around five or more years of legal battles. How many cases are needed for a landlord to solve the same problems?
12. Why does a landlord need to be pushed to fulfill its obligations? And why still does a landlord seek finding "loops" to evade complying with laws and obligations?
13. What is wrong with the system? How are we systemically allowing and endorsing these patterns that are not exclusive to one single landlord, but systemic?
14. If we do not address the problems at the root, we can invest and "develop" all public land to attempt to resolve the "housing problem", and still end simply expanding the same problem via other variants.
15. On my first ever experience before a Housing Court judge, and without hearing a word from my defenses, upon an offer from the landlord's attorney, the judge blatantly stated that I should take the offer, because he did not award that much, and even if I won the case I would lose, because the other side would prevail due to their offer. When the judge himself gives a no-experience citizen such warning, there isn't really any choice but to "settle".
16. That was my first trauma with Housing Court, affecting me still today. And every time I have reached to the authorities for help, after having done everything in my power to kindly resolve things amiably.

The very authorities we are supposed to be protected by burn tenants/customers, our citizens of “We The People”.

17. Around 2012 or 2013 I arrived home after traveling consulting and resolving problems for other buildings overseas, due to my profession, upon arrival from JFK and opening the door to my home to cascades of rain leaks inside and over my home office work and other rooms.
18. How is it that a professional in the architectural and building industry who works to ensure the advancement of civilization via its physical infrastructures that allow progress, can't even arrive to and have a peaceful home?
19. That night, for the first time, I acquired a trauma based intolerance reaction that began manifesting unconsciously during sleep. The stress reaction trauma manifested with clenched teeth, mouth, jaw and fists, tense body from face to feet, cramps, etc.
20. During my 2014 trial testimony of the 2013 case I realized my entire body was shaking due to overwhelm of stress, now while awake and in front of everyone and the judge, as I saw my hair shaking from the corners of my eyes.
21. Later I learned all those conscious and unconscious effects are part of how the body reacts to high levels of stress hormones of Cortisol, Epinephrine and Norepinephrine; making even talking and normal functioning a challenge – as I experienced and evidenced
22. It took me years, until late 2016 and 2017 to mostly dissolve and return to a healthy resting state. That being said, understand that I am the most peaceful tranquil person in my family and social circle, and since childhood my levels of peace attracted others whom through life have said I radiate peace to them.
23. How would a normal less peaceful person have experienced such level of stress? Where are we driving humans, our constituents and

citizens of our own city, world and species with these practices of profit over people, even when it comes to housing and peoples homes?

24. How have we allowed an industry of real estate, landlords and property management to become the terrorists of our own people in our own homeland within the United States of America?
25. What are policies, regulations, codes, laws, etc. actually promoting and endorsing if we are leaving gaps and open doors for people hidden behind incorporated entities and layers upon layers of protection – who claim to help the economy, cause progress, development, create jobs, etc. when all they do is use the system to take from it while alleging to promote good and benefit all?
26. On the 2013, 2014 and 2015 season, after the main case where I finally successfully demonstrated and evidenced the problem before the court, and without prior knowledge about the legal game, having no “counter claim”, I still ended losing financially when I was required to pay for the landlord’s attorney prosecution to me, for the landlord/owner not fulfilling his obligations. And followed by retaliation cases.
27. Eventually, after submitting seemingly too much evidence (probably never read) to the appellate term, they simply concurred and reiterated that I had to pay for the legal fees, per another previous judge on the retaliation cases, as the landlord argued it had nothing to do with the original case, even if a consequence of it. “Divide and conquer”.
28. Having fought for what was right ended costing more, with compounded legal fees through the appeal. Without consulting clients work nor income through the legal process as I had to Pro Se myself, I ended for the first time in my life having to borrow money from Credit Card checks, at a higher rate than any purchase and responsible payments as I did. Thus I acquired a debt that I am still paying for today; all for neglected roof leaks.

29. Why did I have to go Pro Se rather than having an attorney represent me? Without funds for the costs of legal representation, and upon reaching out to Pro Bono services, after much pursuing and waiting to be attended the last attorney I hoped would take my case said: "You are intelligent. You can represent yourself." With that I was dismissed, practically exiled from the assistance much needed and in zero knowledge of the legal industry, despite my knowledge about buildings.
30. Through waiting times in the court room, while other cases were attended to by the judge, I witnessed how attorneys representing tenants are at the lowest levels of competence, so much so that a judge got angry with one of them who was clearly causing more damage to his client and losing a case that a five years old could have better represented.
31. I understood how the financial capacity the collective of tenants inject and empower landlords themselves, intended to capacitate them to care for civilizations infrastructures in the service for all, whom yet breach their obligations, act against the very tenants their services are supposed to serve in society.
32. Landlords use the financial power we collectively and responsibly give against ourselves, including in legal matters; where capable attorneys work for landlords for higher profits, and most rather rookie, inexperienced attorneys defend tenants temporarily as an entry level experiment to acquire experience for themselves.
33. The system is not balanced, and abysmally far away from justice, truth and fairness. Judges are "no saints" either. Many are full of ego, prejudice and acting to their benefit and ease (and profit as they are paid) from overwhelm of the jobs they have chosen for themselves; "Ordering and Deciding" far away from the alleged idea that "justice is blind" in reference to the ideal of having no prejudice and acting justly and in equal just considerations to all. Not true.

34. The above being said, and keeping things to clarity, I believe there are great judges, for I have at least met one once, who declined to see my case in feeling amiable favorable human sentiments towards me. Even if that was in disfavor for me, and ended to a complete opposite type of judge, I will never forget the integrity of that one good judge who behaved ethically and demonstrated inner wisdom and a respect for fairness. I estimate this judge, although I have never seen him and may never see him again. Such are the kind of people I'd love to hold lifetime friendships with.
35. Attorneys are daily in the court and seeing the same judges over and over, of which even if not sustaining personal friendship relationships, they all know each other to a better extent and have been exposed to each other far greatly to have acquired at least professional empathy and a presumed nonexistent yet existent level of caring and allowance and even benefit from those relationships, that rather favor landlords than tenants whom are 'strangers' to judges.
36. A tenant that dare commits to face, challenge a medium size or larger landlord and attain justice, is truly tackling a puzzle of gigantic proportions and a battle of one against multiple teams and inadequacies of the system. It fundamentally constitutes a battle of one human or family (without knowledge of the legal industry) against landlord's teams or armies in the following categories:
- a. Human owner(s), now often multiple via investors, as real estate is being treated as Wall Street investment gambling, even if the property appears under only one or two individuals.
 - b. Owner(s) as entities, often several corporations/entities that seem as others providing them real estate related type of services, yet are their own; each with multiple teams of employees serving the wants of owner(s) for their profit.
 - c. Owner(s) additional team of low pay employees at every property who take care of all the dirty basic work of cleaning and very basic maintenance; whom are also called to testify

against tenants, and pressured to favor the landlord in fear of loosing their jobs; hence their testimony isn't exactly "the truth".

- d. The agent and property management entity... with its own set of several teams, again acting for profit, not to do what is right, just nor serve and protect tenants lives, but to serve landlord and protect them from tenants to whom wrong has been done to when they seek just intervention from the authorities. They are NOT "MANAGING THE BUILDING NEEDS" (nor tenant needs) but **EMPLOYED FOR RISK MANAGEMENT TO PROTECT THE LANDLORD.**
 - i. On a FINANCIAL NOTE, all current rent at ridiculous rates (for anyone who understands the real cost of building construction), are inflated by construct beyond the real fundamental needs, in excess for higher profits AND to cover landlords own multiple layers of laziness and protection while seeking to profit at tenant's expense and burdens.
 - ii. On top of that, DHCR continues increasing rent, where not vent "rent rate freezing" should be a consideration but a RENT RATE DECREASE... or even CREDIT BACK to tenants for overpaying with essentially deficient unfulfilled services, and consequential(s) that diminish the thriving of tenants as customers, whose rights, lives and freedoms are held back for landlord's profits.
 - iii. We need to understand – **buildings are being left to degrade and rot, increasing in risks and harm to Life Safety**; while behind the "cosmetic make believe" everything depreciates. We as a society have been endorsing paying more for less, which is against the American Dream and Promise and Way of Life.
 - iv. We've been empowering fraudulent strategies that will

cause great national crisis by the gluttony of the real estate industry and greed, when the rate of building collapses increase moving forward if fundamental aspects are not corrected in how we are handling our own civilization's physical infrastructures.

- e. Contractors and subcontractors, all also for profit, enticed by landlord to provide the cheapest possible "fixes, repairs, remodeling and improvements" for higher retaining of the percentage of tenant paid funds that should be dedicated to each building maintenance.
- f. Then there are the law firms, also seeking profit, and wherever they can extract more from, as serving landlords rather than tenants. As the collective pool of money from tenants go to the landlord for the presumed and alleged services to upkeep the building structure in all its needs and supply the services needed by the tenants. Tenants whom serve other functions in society and empower our economy, without shortchanging others and enabling a functional society. Yet, "prey for the sharks looking to feed", not by hunger need but profit greed.

A tenant facing legal proceedings, is actually facing a lot more than the simplified presumed "legal or court procedures".

All teams directly or indirectly representing the landlord PROFIT FORM EVERY ACTION; all fundamentally funded by the collective of tenants. The tenants are the only ones who pay, pay, pay and often receive more damages than "benefit".

"Benefits" which are not "benefits" and rather UNIVERSAL HUMAN RIGHTS by being born from the Earth and thus with inalienable rights to live, nourish and thrive from and with their own Mother Earth of whom they are part of, not owners of.

The money paid by collectives of tenants simply disappears, while owners and shareholders wealth increases, despite their excuse to

the authorities that “*there isn’t enough income from the rents to upkeep the buildings maintenance*” ... to push for more concessions and benefiting programs for landlords to allegedly “*do good*” by taking care of buildings and developing more, with gifted tax payers money and even public land gifted.

Yet, how many times do officials get to know that tenants have discovered landlord(s) scheme(s) such as owning the very “hardware store(s)” they purchase from?

And the common sense rational question that follows basic intelligence is: how many items in the invoices from hardware stores and contractor services are inflated to take more private hard earned funds from working citizens and families? And how does the same bad habit for greed applies in taking from public funds and resources in the name of helping the economy and society?

Tenant(s) have evidenced landlord(s) producing evidence of their costs to validate their arguments for need of money even before the courts, where in an instance: FOR EACH JOB THE SAME REPEATED TOOLS WERE PURCHASED FOR THE SAME BUILDING EMPLOYEES TO FIX AND ADDRESS THE SAME BASIC PROBLEMS IN DIFFERENT UNITS OR THE SAME UNIT AT EACH PURCHASE OF HARDWARE STORE MATERIALS AND EQUIPMENT TO PROVIDE THE SERVICE.

Does a delivery service or taxi service is allowed to purchase a new vehicle for every delivery fulfilled, and pass the cost to the client? Yet the real estate and derivate branches in that industry are very creative... and seemly untouchable. And the question is who creates and sustains that systemic structure? And why aren’t we correcting when needs to be corrected?

And why isn’t this common knowledge for government officials and the authorities? Because the system requests and commands that tenants need to notify of problems, yet same system silences and suppresses tenants from getting anywhere with any complaint or SOS request HELP to solve the abuses, when things are structured to be

so hard for a citizen to get any kind of just treatment and rights be honored, in The Land of Freedom.

37. In my personal landlord-tenant storyline, during the period between 2013 and 2015, there was also an incident of extraordinary excess building movement where the structure was gaining compounded harmonic resonance movements leading to a fatal collapse. Detecting the source to be external I quickly ran out... reached the demolition occurring almost two blocks away and stopped the action causing the movements transferred through the ground and underground subway structural system, to the foundation and up the structure.

38. That incident in itself depicted the fragility of the building in which I live still, now with a family and our six years old daughter. However, burdened by the legal court proceedings and having to defend myself, and having my health in such deplorable states due to the levels of undue stress to a single human, I moved forward with what I had to address without time to process the further significance of that incident, that was not merely a normal demolition from almost two blocks away... although at the time as I walked back from stopping the particular brute demolition practice, I did asked myself:

a. Why did no one else from any of the closer surrounding buildings even closer ran to stop that?

39. After the 2013 case and surviving the retaliation cases where landlord sought to get rid of the tenant, to not have to fulfill the court order, the landlord decided to apply another temporary cosmetic roofing and touch up the bldg. a little, then sold the building... = further profits while leaving tenants with THE SAME PROBLEMS, "*per secula seculorum*".

40. New owner takes over, starts with convenient management "errors" that are still to be corrected to this date. In addition, regardless of being notified of the history of the building and court order, washes hands saying all that happened before them, and yet to provide the

structural maintenance and solving problems at source seven years later.

41. Tenant reaches another point of end of patience, as the building developed clearer signs of the underlying structural problems that affect his home and family most on a top floor and unit with over 28 years of leaks and mold degrading that part of the building structure. Hence it decides to stop paying rent to require landlord fulfill its obligations.
42. Jumping to present day, tenant is in court for “Non Payment”, caused by landlord itself. However, life is complex when health deteriorates and we also need to take care of elders and health emergencies that consume the saved funds. Now this family that has done no harm to the landlord faces eviction if the judge deliberates in a way that payment can not occur within the five days once the judge orders, at the conclusion of the current trial.
43. There is a lot more to this story than the race to complete this draft to send before the 72 hours end for submitting this rough draft as testimony. Yet the question remains: Is all this “justice”? Does a citizen, his family and only living ancestor prone to endure this entire circus just for landlord’s “Negligence for Profit”?
44. Is this the journey a citizen who also has served this city’s own infrastructures in projects such as WTC, JFK, LGA, EWR, SCA schools, MTA subway stations, Federal Detention Center, labs, medical facilities, university buildings, etc. who has given the very best for everyone’s thriving and progress of our civilization and economy deserves to NOT EVEN HAVE A FUNDAMENTAL HABITABLE CONDITIONS AT HIS HOME WHERE HIS BELOVED AND PRECIOUS DAUGHTER ENTRUST OUR VERY CODES, SYSTEMS AND AUTHORITIES TO ENSURE THE DELIVERY OF LIFE SAFETY IN OUR OWN HOMELAND?

Here is a copy paste of public post recently made by myself for tenant’s communities seeking permanent solutions to the housing crises. These are

just some aspects of my personal and/or family experience, for a peak at the cost of bad housing industry fraudulent behaviors when allowed:

SIGNS OF STRUCTURAL COLLAPSE:

- Floors have **sunk 6 inches** in the center of our apartment
- **Ceilings are sloping**, signaling ongoing collapse
- Interior **walls are sinking** from the ceiling and floor
- Nails are **popping up** from the floor and door frames
- **Cracks** are spreading **rapidly**, especially along the **exterior bedroom wall facing Broadway**
- The entire unit **north wall leaks** severely and has mold throughout
- Our **bedroom doors, pantry and front door jam shut**, trapping us inside
- The apartment has **abnormal structural movements** daily
- We are now experiencing **90% more floor squeaking** than in the prior 28 years
- All rooms are affected with **sloped and shifting floors and walls**, creating life-threatening instability

This is not just "*disrepair*." This is **life-endangering structural failure**.

THE PERSONAL COST:

- I sleep **less than 3.5 hours a night** (with few exceptions), often with clenched fists and jaw
- I work **143+ hours/week** learning how to legally self-represent in court and more
- I've developed **asthma** from long-term **mold exposure**
- I've lost **over 25 pounds** from burnout exhaustion
- I now suffer **chronic stress syndrome**, confirmed by medical specialists
- My **vision has deteriorated** from long screen hours on the case
- My Beloved "*had it*" and wants to move away from "*civilization*"
- My daughter cries, saying: "*you don't play with me anymore...*"

THIS IS JUST THE BEGINNING...

This case is the **start of a broader mission**:

- I will **advocate for updated building codes** to prevent future collapses
- I will push for **mandatory certified professional roofers** to address leaks and damage properly
- I will demand **Lead Abatement reform** — ending deceptive practices like "**encapsulation**," which **hides structural problems and put lives at risk**

- If necessary, I will bring these issues to **lawmakers** — because **no child should grow up in a collapsing home**, and no family should fear for their lives inside their own sanctuary
- There is **no law that mandates structural inspections** for buildings 6 stories and under, or over a certain age, even if **over 100 years old** (like ours); and we need to change that.

CONCLUDING:

I am available to discuss the housing crisis with City Council and any agency interested to see it from perspectives that may have not conceived, and to share any and all ideas coming through and piling up for me to pursue when I have enough peace and security for my family and recuperate with some healthy sleep which, a right that has been taken away from me, and affecting my health for years now.

I hereby expressly volunteer to further serve the City of New York, my city, the State of New York and this country of ours to invest every effort I can harness to resolve the man-made created problems on Housing... SO THAT NO OTHER CITIZEN, FAMILY, CHILD, ELDER, HEALTHY OR DISABLED, AMERICAN OR VISITOR IN OUR HOMELAND EXPERIENCES THE LEVELS OF DISGRACED MISFORTUNES THAT ARE IN OCCURRENCE WITHIN OUR SOCIETY AT THIS LEVEL OF EVOLUTION AND TECHNOLOGIES, for landlords to persuade others that building problems are a matter of 1960's Rocket Science or modern Quantum Physics riddles.

If we allow the circus to keep playing the same tricks on “We The People” then we shall not deserve the country all our ancestors so dedicatedly built to be what was known as “American Made” by the quality of everything this country has been known worldwide.

BUILDING COLLAPSES IN AMERICA ARE NOT A NORM FOUNDED IN BUILDING'S OLD AGE. THEY ARE THE DIRECT REFLECTION OF WHAT HAS BEEN OCCURRING UNDER THE TABLE FOR DECADES, UNTIL BUILDINGS REACH A STATE OF DEGRADE THAT FATAL COLLAPSES BEGIN TO LOOK NORMAL UNDER THE REAL ESTATE, LANDLORDS, PROPERTY MANAGEMENT AND DEVELOPERS NARRATIVE TO WHOM EVEN THAT IS PROFITABLE.

I am available to meet with City Council officials and other agencies to discuss the issues in depth. What tenants of increasing lower income in relation to how the real estate, landlords, etc. drive have skyrocket rents which in turn increases all products costs, including groceries, and rather harvest an economy impossible for all who work and upkeep this country while the least are comfortable in their air-conditioned offices betting of our American buildings and on housing as asserts for gambling... while tenants are further pushed to need “low income housing” as if it were a beggar’s Disney Land and something to be happy and grateful for.

A series of crises of sorts in existence have been created by the real estate industry itself. Let’s stop endorsing our economy and country’s collapse.

Tenants are also “We The People”, whom have been undergoing more than officials can summon up to understand... Yet among these citizens, there is much talents, wisdom, desire to work for a better future for all... WE NEED TO STOP CRUCIFYING THOSE WHO ARE TRYING TO UPHOLD OUR VERY OWN NATION TO UPLIFT IT.

I’m looking forwards to discussing an initiative that has been simmering in my mind about how to unify and establish a system that can track buildings health status over time and regardless of who occupies it, to eradicate the decay of our civilization’s structures and build forward rather than having to rebuild what we forgot to treasure and value enough, built by the blood and sweat of all ancestors.

If put in place, the system, once fulfilled, will aid all agencies, including Housing Court and judges to understand the real Health Status of each building and unit, to take out the guessing work. We are living in times that we need to learn to use technologies to our advantage, nor to our detriment. Let’s evolve forward.

At your service,

Jorge R. Paula-Molina
(646) 280-6930
600 W. 140 St. #6C, New York, NY 10031

Electronically signed by Jorge Paula on June 6th of the years 2025.

PS: My apologies for the nature of the “draft” as a final, without a single review nor consolidation of ideas in lesser words. It is however, what flowed from Heart and Experience. Best regards, and looking forward to collaborating in some capacity for a better future for all, and specially for the world we will inherit to our children and generations to come. It si our duty to be at our best and leave the best legacy we can all collectively pass on to Life itself through our own human species descendants.

I am Joyce Bialik, a member of WE ACT for Environmental Justice. I live in District 7, and I surveyed most of my district for WE Act's land survey. We identified vacant lots and vacant buildings for development. I'm also a social work and social policy educator who has advocated for housing that is affordable for all – because when we are adequately housed our mental and physical health benefits as well as our ability to earn a decent living.

I support all parts of the Community Land Act, but will be talking here about Public Land for Public Good, intro 78. It's a bill that requires the city government when awarding its properties for the purpose of developing affordable housing to give priority to non-profit developers and community land trusts over those organizations that are for-profit. Studies have found that not-for-profit organizations allocate more units for the most low income residents than do for profits; specifically 38% by not-for-profits vs. 21.6 percent by for profits. As you may know, we define the most low income as 0-30 percent of the area median income, which in NYC is between 0-\$38,130 for a family of three. If not-for-profits are more likely to develop for the most needy then we want more of such organizations developing properties, which should happen when the city prioritizes awarding its properties to such organizations.

I'd like to suggest your introducing another bill, namely that any development that is obtained from city property or that receives tax credits be required to allocate at least 40% of its units for residents at the most low income level.

Testimony: Marnie Brady, PhD, Brooklyn, New York, D-35
New York City Council Hearing on Social Housing:
Committee on Housing & Buildings
Tuesday June 3, 2025

Good afternoon Council Member Sanchez, my name is Marnie Brady, I'm an Associate Professor of Sociology at Marymount Manhattan College and a member of the statewide House the Future campaign. As a concerned scholar, New Yorker, and proud parent of a CUNY Hunter college student and a NYC public high schooler I thank you and my Council Member Crystal Hudson and so many others for signing onto [Resolution 0777](#) in support of the NYS Social Housing Development Authority; and [Resolution 0374-2024](#) in support of NYS Tenant Opportunity to Purchase TOPA (S221/A3353) sponsored by NYS Assembly Member Marcela Mitaynes (D51) to ensure tenants have the first right of refusal to make an offer to purchase and control their homes.

I call on the entire Council to fully support and implement Intro [78](#) "Public Land for Public Good" to prioritize CLTs and affordable housing non-profit developers ideally within a transparent land bank system, along with Intro [902](#) "Community Opportunity to Purchase Act" (COPA). These are legislative pillars of the NYC **Community Land Act** and measures that— alongside the state social housing and TOPA bills— are mutually reinforcing. We need both a statewide public authority and well-supported non-profit affordable housing developers so all of our young people who the city invests in every day in their schools can envision a future as adults in their city.

I've lived in BK for the last twenty years, but previously lived in DC where I learned first hand TOPA works. I organized with neighbors who in an area of encroaching development were informed at the time of sale of their building of their right to Tenant Opportunity to Purchase (TOPA) and received direct technical support from community partners and the city. Rather than face another overleveraged landlord, rising rent, and potential displacement, they ultimately formed their own coop and in the process mitigated mold and rats, which they had been fighting against for years. This is just one example among the more than 16,000 units of affordable housing preservation due to TOPA in the District of Columbia. The state of Maryland along with the local jurisdictions of Baltimore, Prince George's County, and Montgomery County recently implemented their own tenant and/or community opportunity to purchase or right to refusal programs based on the success of TOPA in Washington, D.C., as has Philadelphia, San Francisco, San Diego, and a pilot program in Chicago (see March 2025 map of where opportunity to purchase is gaining traction: <https://www.policylink.org/topa-copa-map>).

We already know that affordable housing preservation with maintenance subsidy keep people healthier and safer; in one statistical modelling, NYC maintenance violations decreased three-fold in properties sold to a community partner compared to a market purchaser (see research on potential of TOPA and COPA at <https://www.lisc.org/our-resources/resource/tenant-community-opportunity-purchase-policies/>).

As a parent leader in my own community as part of the PTA and with my local Community Education Council (CEC) for District 15 we've held tenant rights workshops where community-minded, involved, empowered parents have shown up to with the goal of staying put in the communities they've built; TOPA and COPA have been sorely missing in the tenant rights and preservation toolbox.

This has been at an opportunity cost of strengthening families, our neighborhoods, and school communities, and has exacerbated stress and housing injustice within an already lopsided relationship between tenants and real estate. TOPA and COPA would advance preservation and resident control.

Earlier today we heard from HPD about the potential of COPA. I would encourage you to take insight from all the many opportunity to purchase initiatives gaining traction across the country, including COPA in San Francisco where in its first three years the program has been responsible for more than a quarter of all affordable housing preservation that occurred in the prior decade in that city (see <https://www.lisc.org/our-resources/resource/stable-homes-and-resident-empowerment/>).

Whether we're reinforcing the potential of HPD to create and preserve meaningful affordability or we're prioritizing or collaborating with a Community Land Trust, or once we've enacted the NYS SHDA tenants need both COPA & TOPA as well as public land for public good to make a more rational & publicly accountable & transparent system of acquisition & preservation to stop the massive losses of existing affordable units, in addition to building tenfold more.

Thank you for your time.

Dear Council Member Sanchez, and Members of the Housing and Building Committee,

My name is Nicholas Latimer, and I've lived in the same apartment in Hell's Kitchen for more than forty years. When I first moved to New York as a young graduate from the University of Alabama, a splashy advertising campaign was attempting to boost tourism to a then-beleaguered city. Its catchy tune "I...love New York" could be heard from every television and radio station across the city, and its related pop-art graphic, "I 'heart' New York," was being plastered on t-shirts, postcards, and souvenirs in Times Square and beyond.

I came to the city to work in book publishing, because New York is the book publishing capital of the world. And when I landed a job as a lowly publicist at one of the industry's most prestigious publishers, I knew I had arrived. A few months later, I was manning our company's booth at "New York Is Book Country," the popular street fair that ran up and down Fifth Avenue each fall. But working in the glamorous world of books is a notoriously low-wage job. For the first few years, to make ends meet, I also worked on weekends as a sales clerk at Bloomingdale's, selling designer handbags to tourists and wealthy Upper Eastsiders. So, it is no exaggeration when I say that the only reason I was able to achieve my dream of living and working in New York was because I was lucky enough to find a tiny apartment, with relatively low rent, in walking distance from my office.

But today, luck is not enough! We need to pass COPA, Public Land for Public Good, and the resolution supporting TOPA, so that young people coming to the city are able to realize their own dreams and find an affordable place to live. We all love New York. But it's time for New York to show a little love to its tenants.

Thank you.

Rita Moyo

Written Testimonial

Dear Members of the city council and legislators.

I say this message as a resident of New York City and an Urban Studies student at City College. Nothing defines the urban experience quite like housing. Housing is inarguably the most important aspect of living in a city, and it drastically impacts the quality of one's life, and unfortunately, it has become incentivized to be viewed as a vehicle for profit instead of a right. This is all to say that merely having a place to stay is sometimes not enough. People face obstacles affecting their living situation daily, and most of those obstacles are caused by neglectful or greedy landlords. As part of a Community-based research class, we have facilitated a lot of research and had many conversations with people who are advocating for the Tenant Opportunity to Purchase Act. Most of those people are spurred into advocacy because they are facing less-than-ideal circumstances regarding their housing and are fearing displacement. There have been reports of tenants who, despite living in a certain apartment for years, are forced to uproot their whole lives and find new homes in a short amount of time, or tenants forced to live in deteriorating, squalid conditions and still being forced from their homes. This phenomenon has become increasingly ubiquitous, with landlords taking advantage of speculative financial incentives that land their tenants in precarious situations. Many residents are displaced from the places they call home, grew up in, or worked hard to secure, and this practice is entirely unfair and sets a horrible precedent for future New Yorkers. To combat this would mean passing the Tenant Opportunity to Purchase Act. This initiative is widely supported by New York City renters and would help them purchase their buildings from neglectful landlords. Many working groups have already been established with multiple tenants taking the initiative to fix their own housing situation, because nobody else will. The passing of TOPA would bring about a lot of hope for people who feel as

though there is no way out of a speculative financial economy that is wholly incompatible with the working class of New York City. Workers are needed daily, and yet their material conditions are constantly neglected in favor of profit, and many workers are getting pushed out of the city they have made beautiful. Legislators, is your job not made easy if a problem is identified and given a working solution? Such is the case with TOPA; 82% of New Yorkers fully support this, and many think it would drastically improve their lives if their immediate needs were met. So I implore you once again, as a renter myself and a student of Urban studies, to pass TOPA and give New Yorkers their agency back.

Dear Council Member Sanchez, and Members of the Housing and Buildings Committee,

My name is Simon Kapler, a healthcare worker and resident of Kips Bay, submitting testimony in favor of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78) and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374), three urgently needed bills that provide pathways to take property off the speculative market, combat displacement of Black and brown New Yorkers, and ensure community-led development.

I have seen the direct negative impact of lack of community land control on my patients, as well as my neighbors. Patients who are displaced by rising rents due to landlord profiteering cannot continue their medical care without interruptions; patients who remain in place despite this are often unable to afford their medications or sufficient food, and have to make the impossible decision of deciding which to prioritize. This leads to shorter lives filled with more suffering, and more expenses for the city and state when they foot the bill for publicly insured patients with poorly controlled health conditions since these problems have straightforward solutions.

We the community demand the opportunity to decide how land in our community is used - whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the community.

So for that reason, I strongly urge the New York City Council to enact Intro 902, Intro 78, and Resolution 374. Thank you for your time.

Simon Kapler

June 3, 2025, Comments to New York City Council Committee on Housing and Buildings

Local Law Intros: 0078-2024, 0350-2024, 0570-2024, 0571-2024, 0902-2024, 1006-2024, 1007-2024, 1034-2024, 1281-2025, 1296-2025 and Resos: 0374-2024, 0777-2025

Regarding “Community Land Act” suite of Intros. 0078-2024, 0902-2024 and Reso. 0374-2024:

HPD needs to upgrade its complaint system to include an ombudsperson type of service for clients, to resolve grievances within the administration of its programs which require substantive supervising and enforcement obligations. Currently there isn’t a procedure for this dire need. Relying on the courts, the DA, the AG, the DOI, is not efficient and unduly burdens victims.

[.https://www.nyc.gov/site/hpd/services-and-information/report-a-housing-complaint.page](https://www.nyc.gov/site/hpd/services-and-information/report-a-housing-complaint.page)

No property and buildings should be allocated to any so-called nonprofit until there is a viable and verifiable system with accountability and transparency accessible via a web portal.

Why should anyone be required to FOIL or FOIA for LIHTC information?

Non profit and for profit developers must be required to disclose to all stakeholders information that is relevant to public interest such as partnerships, contracts, and beneficial rights agreements. This egregious loophole in the COPA and TOPA allows perpetual fraud and abuse by developers.

The criteria for a list of “qualified” entities must also be reformed to include penalties, such as sanctions for non-compliance. Currently this list includes deviant developers with impunity.

<https://www.nyc.gov/site/hpd/services-and-information/qualified-preservation-buyers.page>

Since my previous Comments, I was forced to leave the Relocation Apartment because UHAB and their partners, BFC and BandN, owed the landlord back rent. Under duress, I accepted a payment of 10% of my apartment’s financial value. UHAB and their partners, BFC and BandN, refused to honor me with a just and equitable outcome.

Sincerely Annie Wilson Co-Founder 544 E 13 St TA/HDFC

Comments and documents posted on pages 106-159 on the Council website at 7. [Hearing Testimony 11/12/24](#)

<https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6566026&GUID=B40D2431-39E4-445D-8E80-39D0BD7B7125&Options=&Search=>

November 12, 2024, Comments to Council Committee on Housing and Buildings

Local Law Intros: 0621, 0622, 0623, 0993, 0994, 1037 and Resolutions: 0119, 0246

These legal initiatives, if passed and sufficiently enforced, will certainly improve housing conditions and rights for many people living in New York City apartments.

<https://www.amny.com/news/she-just-loves-her-lovi-dovi/>

However, all tenants and lawful occupants will not be protected. Excerpted from my ongoing distressing experience, the attached documents illustrate how predatory developers can coerce, displace, harass, misuse the court process, and evict people like me. I am now a senior citizen without sufficient finances to buy adequate legal representation to defend and protect myself. I will be evicted from my Temporary Relocation Apartment on January 31, 2025, and homeless.

While under HPD supervision, assigned sponsor developer UHAB promoted substantive safety and housing code violations while refusing to process corrective actions made by the tenants towards removing a DOB vacate order for half of the apartments.

13.05.30 Vacate Order posted on my apartment door 5C, 544 E 13 St, New York, NY 10009

14.04.10 email to UHAB with Parapet Repair Documents needed to remove DOB violation

15.07.22 UHAB "Graveyard Trust" ultimatum memo, under false pretenses forcing a Temporary Relocation Apartment partnership with for profit developers BFC Partners and B&N Housing

15.09.04 Temporary Apartment Relocation Agreement - UHAB blocked my return to my apartment 5C and secretly gave it to wealthy actress Rosario Dawson's uncle Nicholas Scott, while he was residing as owner of a house at 5923 Southville Street, Houston, TX 77033-1836

20.02.10 Affidavit to Mayor's Office to contradict UHAB false claims against me

21.05.03 email to B&N Housing - Underwood Decision v UHAB - Housing Options

23.11.01 Comments to New York City Council Committee on Oversight and Investigations Meeting regarding the "Oversight - Mayor's Management Report: Agency Performance in Delivering Housing and Services - HPD". Comments with documents are also posted on the Council website at 2. [Hearing Testimony](#)

<https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6379859&GUID=2AF2C863-1483-4E45-B52D-1507FA5F24BB&Options=&Search=>

19.05.16 Contract of Sale, aka Nominee Agreement, Exhibit A, Index No. 161908/2019

The proposed COPA and TOPA bills need transparency requirements to strengthen certain resident protections. Non profit and for profit developers must be required to disclose all information that is relevant to the public interest to all stakeholders. For TOPA loophole example, see top of page 9. <https://www.nysenate.gov/legislation/bills/2021/S3157>

Sincerely Annie Wilson Co-Founder 544 E 13 St TA/HDFC

September 30, 2024, Comments to Council Committee on Housing and Buildings

Local Law Intro: 1063

Comments posted pages 160-162 on the Council website at 6. [Hearing Transcript 9/30/24](https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6865150&GUID=E2212DBF-08CE-44F5-A9A8-9DCE8E13EB8E&Options=&Search=)
<https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6865150&GUID=E2212DBF-08CE-44F5-A9A8-9DCE8E13EB8E&Options=&Search=>

or

<https://citymeetings.nyc/city-council/2024-09-30-0100-pm-committee-on-housing-and-buildings/chapter/testimony-by-annie-wilson-cofounder-of-544-east-13th-street-hdfc>

Annie Wilson, cofounder of 544 East 13th Street HDFC, shared her challenging experience with the HDFC conversion process and subsequent issues that prevented her from returning to her home. She described a situation involving mismanagement, forced relocation, and potential fraud by developers and property managers.

- Wilson helped structure her building towards HDFC status in 2002, but encountered numerous obstacles including disrepair, unauthorized loans, and a dramatic increase in renovation costs from \$260,000 to \$6 million.
- She was relocated from her apartment and has been unable to return, facing eviction from her temporary housing and struggling to find legal representation.
- Wilson expressed willingness to cooperate with any investigation into her situation and requested assistance as a senior citizen trying to return to her home.

Supplement to my November 1, 2023, Comments to New York City Council Committee on Oversight and Investigations Meeting regarding the “Oversight - Mayor’s Management Report: Agency Performance in Delivering Housing and Services - HPD”.

Below is a transcript of my spoken Comments with detailed footnotes for attached documents.

“Hello. Thank you for this opportunity to speak. I am Annie Wilson, and I am here to report that I have also been in a HDFC scenario, as cofounder in 1984, and eventually forced out by the

developers. This building was a building transferred to the non-profit in 2002¹, to be completed in 2004, and I have to say that there had been a fire, they kept the fire insurance money. They forced us out by claiming a foreclosure² need of \$179,000, and an agreement that they had made with a for-profit developer³, and they had not disclosed to us or revealed that they had taken a mortgage⁴ out on us a couple years prior for \$850,000. So based on this scheme, we were forced out of our apartments and given relocation apartment contracts. I was not allowed to return to my apt 5C and went in negotiation for alternatives. They took me to court, I believe, as reprisal for speaking out in this body in 2018⁵ and 2019⁶, detailing the issues that we had, and particularly financial issues, and if you look up the record I testified on July 22, 2019, if you go to pages 261 to 268, and I had testified April 26, 2018, pages 174 to 177. I know I have to wrap up now but I would like to add that I'm still in the relocation apartment, overstayed five years, facing eviction from there, and I would like to work and meet with you and help with any kind of investigation needed because the situation is dire right now for me and others.”

HPD refused their responsibility to administer oversight and compliance. Sincerely Annie Wilson

¹ See [Attachment A - Land Disposition Agreement \(LDA\) between City of New York, Housing Preservation and Development \(HPD\), Urban Homesteading Assistance Board \(UHAB\), August 19, 2002](#)

² See [Attachment B - Supreme Court of New York, County of New York, Index No. 650336/2014, SUMMONS in TAX LIEN FORECLOSURE and COMPLAINT, NYCTL 2013-A TRUST, and THE BANK OF NEW YORK MELLON as Collateral Agent and Custodian for the NYCTL 2013-A Trust against UHAB HOUSING DEVELOPMENT FUND CORPORATION et alia, January 27, 2014](#)

³ BFC Partners / B&N Housing Inc.

⁴ See [Attachment C - Department of Finance, City of New York, MORTGAGE, ID: 2009020400607001, January 30, 2009](#)

⁵ See [Attachment D - City Council, City of New York, Transcript of the Minutes of the Committee on Housing and Buildings, April 26, 2018, pages 1, 174 to 177](#)

⁶ See [Attachment E - City Council, City of New York, Transcript of the Minutes of the Committee on Housing and Buildings jointly with Committee on Oversight and Investigations, July 22, 2019, pages 1, 261 to 268](#)

Dear Council Member Sanchez, and Members of the Housing and Buildings Committee,

My name is Evan, a resident of Morris Park in the Bronx and a member of NYCASH. I'm also a healthcare provider who serves patients in the Bronx. I am submitting testimony in strong support of the Community Opportunity to Purchase Act (Intro 902), Public Land for Public Good (Intro 78), and the resolution supporting the Tenant Opportunity to Purchase Act (Res 374). These are urgently needed bills that would help take land off the speculative market, combat the displacement of Black and brown New Yorkers, and support community-led development that truly addresses the needs of residents.

My neighbors and I do not often have a say in what is built in our neighborhood. We've seen rents rise steadily while wages remain stagnant. Many tenants live with mold, leaks, or lack of heat, and fear retaliation if they speak up. Entire blocks have been redeveloped with luxury housing while long-time residents are priced out. There's a lack of green space and essential services, especially for families and elders.

We the community demand the opportunity to decide how land in our community is used — whether that be for affordable housing, public recreational spaces, community gardens, resiliency features, or locally supported businesses that add positively to the community.

As a healthcare provider, I witness the consequences of housing instability and displacement every day. One of my patients, a mother of three, came to my clinic repeatedly with worsening asthma symptoms. Her housing had mold and poor ventilation, but her landlord refused to address it. She applied for other housing, but there were few affordable options nearby. Eventually, her family had to move far from their school and support system — disrupting her care and making it harder to manage her children's health. If community groups had the ability to acquire and manage properties, as proposed in Intro 902, this family might have had the chance to stay in safe, stable housing. Public land, instead of being sold to for-profit developers, could have been used to meet the actual needs of families like hers.

So for that reason, I strongly urge the New York City Council to enact Intro 902, Intro 78, and Resolution 374. Thank you for your time and consideration.

Thomas Winston

New York, New York 10032

3rd June 2025

To: City of New York Council Members of the Committee on Housing and Buildings
Oversight: Social Housing

Thank you for holding this hearing to address the affordability in housing crisis in the City of New York on bills re **Social Housing**: Int no. 78, Int no.350, Int no. 570, Int no. 571, Int no. 902 (tenant opportunity to purchase), proposed Int no 1006-A and proposed Int no. 1007-A, Int no. 1034, Int no. 1281, Int no. 1296 and Res no. 374 and Res no. 777 calling on the New York State legislature to pass ...

The Committee on Housing and Buildings does not yet address the financing measures inherent in the New York State Private Housing Finance Law (and HPD as the supervising agency in the City of New York) that it depends upon to enact these bills re **Social Housing**.

I remain hopeful that you will see the necessity for Transparency and Accountability in these Participatory Loan (Advance Payments) measures to prevent the irreparable harm my wife and I have experienced, from happening to any other resident of the City of New York.

I submitted prior Testimony to the Housing and Buildings Committee re the Third Party Transfer Program on the 26th April 2018, 22nd July 2019 and 30th September 2024.

City of New York Council Hearings held by the Housing and Buildings Committee on the Third Party Transfer Program, 26th April 2018 (Committee Report, 7p; Testimony, 275p; Transcript, 209p): <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3465116&GUID=1BC54EFF-A8C0-4A4A-B278-E939E85D17A8&Options=&Search=>

22nd July 2019 (Committee Report, 15p; TPT Hearing Slides, 34p; TPT. Hearing Testimony, 266p; TPT Hearing Testimony (Con't), 1p; TPT Hearing Transcript, 271p); <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=>

Below is Testimony from 30th September 2024 and 22nd July 2019.

Respectfully submitted.

[REDACTED] --10//2024-- 1:55 PM

Testimony of Thomas Winston--Third Party Transfer Program--30th September 2024

[REDACTED]
[REDACTED]
[REDACTED]

Thomas Winston

[REDACTED] New York, New York 10032
[REDACTED]

30th September 2024

To: City of New York Council Members of the Committee on Housing and Buildings
Oversight: Third Party Transfer Program (TPT)

Thank you for having this hearing (Int 1063) to repeal sections 11-425, 11-426 and 11-427 relating to the Third Party Transfer Program agreements for payment of delinquent taxes and charges in installments.

The Third Party Transfer Program is a public private partnership administered by the Department of Housing Preservation and Development (HPD.)

The text consistently states “the commissioner of finance may also exclude or thereafter remove from such list any parcels which are owned by a company organized pursuant to Article XI of the private housing finance law with the consent and approval of the department of housing preservation and development” ...

“the commissioner of finance with assistance from the department of housing preservation and development may exclude or thereafter remove from such list any property that is a distressed property but where all of the hazardous or immediately hazardous violations of record of the of the housing maintenance code ...”

HPD pursuant to Article XI of the New York State Private Housing Finance has fiduciary responsibility to oversee its Participation Loans under transfer to a “third party” that supposedly develops housing development fund corporations (HDFCs) for ownership by resident tenants. The HDFCs become “distressed” when the “third party” takes out loans/mortgages without any input from resident tenants. The resident tenants are then responsible for mortgages that they did not approve and cannot afford. Furthermore, the “third party” does not invest the loans in the buildings to the benefit of the resident tenants.

My wife and I thus far have lived in conditions of disrepair for twenty (20) years that was caused by a ‘third party’ a nonprofit (SHUHAB) that was allowed to take a building that needed some repair to leave the building in mortgage debt with great disrepair, in conditions harmful to the health and safety of the resident tenants. A “third party” solution in our opinion would be to have an “ombudsman” that works directly with the resident tenants to enhance the building from the inside. First focusing on the building infrastructure (heating, plumbing, wiring, common areas) then individual apartment repair if necessary. The Participation Loan would be utilized appropriately in partnership with the “ombudsman” and the resident tenants.

The department of finance and HPD transferred our building to Neighborhood Restore and SHUHAB for \$1.00 with no fiduciary oversight. This corruption and malfeasance has ended with a \$6 million dollar mortgage and great disrepair and suffering. Where did the money go?

I submitted prior Testimony to the Housing and Buildings Committee re the Third Party Transfer Program on the 26th April 2018 and the 22nd July 2019.

City of New York Council Hearings held by the Housing and Buildings Committee on the Third Party Transfer Program, 26th April 2018 (Committee Report, 7p; Testimony, 275p; Transcript, 209p): <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3465116&GUID=1BC54EFF-A8C0-4A4A-B278-E939E85D17A8&Options=&Search=>

22nd July 2019 (Committee Report, 15p; TPT Hearing Slides, 34p; TPT. Hearing Testimony, 266p; TPT Hearing Testimony (Con’t), 1p; TPT Hearing Transcript, 271p); <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=>

Below is Testimony from 22nd July 2019.

Thomas Winston

[REDACTED] New York, New York 10032

22nd July 2019

To: City of New York Council Members of the Committee on Housing and Buildings and the Committee on Oversight and Investigations: Third Party Transfer Program (TPT)

**Affordable Housing: Sponsor Enrichment!! Resident /Foreclosure/Poverty!!
Re: The misuse of public funds (including the HOME program) by housing
development fund corporations in the creation of affordable housing programs under
the auspices of the New York State Private Housing Finance Law (PHFL.)**

I, Thomas Winston and my wife, M.E. Greene-Cohen are the "First Shareholders."
Residing at [REDACTED] New York, NY 10032

On May 1, 2000, I signed the lease for [REDACTED].
We entered into an Agreement/Contract with the then 7A Administrator of 938 St.
Nicholas Avenue to lease [REDACTED] which had been vacant for over ten (10) years.
The 7A Administrator did not have the funds to renovate and prepare the apartment for
rental. The agreement between the parties entailed rent credits against the stated
monthly lease while I conducted and paid for the renovation.

We entered into this agreement because it was an affordable investment that would
allow us to consolidate our two households and cease to live separately. The building
was slated to become a cooperative and we thought that our money, time and sweat
equity investment would be rewarded over time.

In May 2001, the City of New York Commissioner of Finance conveyed 936-938 St.
Nicholas Avenue ('The Building') to Neighborhood Restore in exchange for the sum of
\$1.00. In December 2002, Neighborhood Restore conveyed the Building to SHUHAB
HDFC in exchange for the sum of \$1.00. In July 2002, SHUHAB HDFC entered into an
agreement with contractor Dellwood Construction to perform work at the Building.
Dellwood was given a deposit of \$3,912,000.00 without Scope of Work compliance.

During this period, I served as Sergeant at Arms of the 936-938 St. Nicholas Avenue
Tenants Association. After receiving many complaints from tenants regarding shoddy
work, we formed a Construction Committee that I chaired, to monitor the work
progress.

I and my wife did live happily in Apartment 31 until May 2004, when forced by a
Relocation Agreement to vacate the premises for renovation/refurbishing by SHUHAB
HDFC for a period of two to three months. Unfortunately, we were out of [REDACTED]
for a total of thirteen (13) months due to SHUHAB HDFC's non-compliance with its
own Relocation Agreement to hold its contractor responsible for shoddy and
incomplete repairs as outlined in its TPT Scope of Work and to demand that its

contractor perform according to City of New York building/housing codes. We began written complaints of disrepair on 1st September 2004.

In August 2005 we were informed by City of New York Department of Housing Preservation and Development (HPD) that a rent increase based on the costs of renovation/mortgage would become effective. We informed HPD that the renovation was shoddy and incomplete and not deserving of a rent increase. We also informed public officials about our concerns regarding the misuse of public funds.

In April 2006, the Tenant Association engaged an engineer, Mr. John J. Flynn, P.E. to inspect the premises and prepare a survey. Some of the deficiencies highlighted in Mr. Flynn's survey: "Structural damage—"rambling cracks on the facades of the northeast and southeast corners of the building"; The necessity of reconnecting the detaching corners by means of structural shear connections and the reconstruction of several of the window soffits ...; Inadequate heating systems in three cellar apartments; Failure to remove all wiring and conduit not being used from the building walls; Failure to repair concrete stairs and install proper handrails; The roofing contractor's complete ignorance of the required roof and roof parapet work; Failure to place firestopping materials for opening in floors, walls between apartments and public spaces; Failure to properly install heating in the community room (the pipes are not in the wall, but rather run along the floor, creating a fire hazard); Demolition of the abandoned incinerator chimney; Inadequate installation of a boiler smaller than originally specified; Concern that should the Sponsor transfer ownership of the building to the Tenant Committee without first completing the items indicated above ... the obligation to correct the deficiencies will fall to the owner of record".

Also in April 2006, Precision Combustion Consultants, Inc. prepared a Preliminary Field Survey Report to confirm the proper installation of the new boiler system in accordance with the contract specification and to evaluate the boiler system's performance. This Report made several notable findings: "The current electrical wiring works is in violation of the DOB code requirements; There was asbestos hanging/falling off accessible areas of the basement, which could lead to contamination throughout the building because of a "plunger effect" of the up and down movements of the elevators in the elevator shaft. A continuation of the current sump pump operations may over a period of time create structural problems in the building. The fuel oil storage tank had never been cleaned, before or after the boiler installation. The boiler is not surrounded with sufficient fireproofing materials, in violation of DOB code, leaving open a risk that a fire could cause structural damage to the columns and steel I-beams. The report

concludes that the heating plant installation “is not installed in full accordance” with the Contract and “and applicable NYC and NY code requirements”

SHUHAB HDFC, the Owner, did not make necessary repairs and included a clause stating “Accept the apartment [building] in the condition it is in at the closing date”.

I and my wife remained as renters because we could not accept the eventual costs of repair to contractors’ shoddy work that would be required of cooperators. This Scope of Work was at a cost of \$5 million dollars. Little of this amount was spent in [REDACTED]. The contractor did compromise our Renovation to make [REDACTED] habitable. It has been estimated that it will require at least \$15 million dollars to correct this disrepair to the Building and apartments therein.

In September 2006, we filed decreased services, lack of lease and rent overcharge forms with the DHCR. The DHCR only recognized the request for a lease and denied our repair and rent overcharge requests because “HPD had certified the renovation and issued rent increases” Also in September 2006, I hired Professional Home Inspection Corp., Consulting Engineers to inspect Apartment 31.

In July 2008, we appealed to the Supreme Court by an Article 78 Proceeding in our quest for repairs in [REDACTED] and the proper use of public funds pursuant to Article 15 of the New York State Private Housing Finance Law (SEE Verified Petition: **Index No. 109389/2008**) —No Certificate of Occupancy.

The Supreme Court only recognized our request for a lease and denied our repair and rent overcharge requests because “HPD had certified the renovation and issued rent increases.” We filed A Reply Affidavit to DHCR’s request for dismissal, an appeal to the Appellate Division, per Brief for Petitioners, Reply Brief for Petitioners, Motion for Reargument re “Ahmed”, or Alternatively, Leave to Appeal to the Court of Appeals. We filed our Motion to the Court of Appeals on 4th November. Our Motion for Leave to appeal to the Court of Appeals was denied.

In July 2009, my wife, M.E. Greene-Cohen was denied lease renewal of her 33 year residency in Apt. 14A located at 121 West 72nd Street: “schedule: only visits the building to pick up her mail, uses the apartment as storage, believed to be residing with Thomas Winston at [REDACTED]”.

In November 2009, Walber 72nd Street Associates/Walter & Samuels filed a Non-Primary Residence Holdover Proceeding against my wife’s 33 year residency at 121

West 72nd Street (**Index No. 92576/2009.**) Their prima facie evidence was the Verified Petition, **Index No. 109389/2008.**

In April 2013, the court denied all my wife's Affirmative Defenses in the Non-Primary Residence Holdover Proceeding and issued a Warrant of Eviction. She filed an appeal.

In May 2013, Flabbergasted that my wife could be evicted from her premises based upon an appeal to a governmental agency, I began to write "To Whom It May Concern" Affordable Housing: Sponsor Enrichment!! Resident/Foreclosure/Poverty!! Re: The misuse of public funds (including the HOME program) by housing development fund corporations in the creation of affordable housing programs under the auspices of the New York State Private Housing Finance Law (PHFL) (SEE Thomas Winston ... To Whom It May Concern: Dated 5th May 2013, Updated 26th June 2015)

In November 2014, I filed an Article 78 proceeding regarding rent overcharges and requested that DHCR provide a forensic financial, structural, and architectural accounting of renovations in [REDACTED] and the Building. (SEE Verified Petition **Index No. 101294/2014**) The proceeding was dismissed May 1, 2015.

An appeal to a governmental agency is protected from retaliation pursuant to Real Property Law §223b.

In March 2016, to understand the various respiratory and health problems we are experiencing, I hired Microecologies, Inc. to perform an environmental inspection.

Since Fall of 2004, The Residents of 936-938 St, Nicholas Avenue have suffered the perpetuation of a fraudulent refurbishing/renovation that has resulted in a "sick" building that needs to be made whole. Renovation was not performed per the Scope of Work. Inferior [poisonous] building material was used. The shoddy work has resulted in creating environmental and structural conditions that effect residents' health, morbidity and mortality. The building is mold infested, seen and unseen. Respiratory, cardiovascular, pulmonary illness and broken hearts abound.

For example, in this fifty-one (51) unit building, ten (10) residents have died from initial symptoms that include respiratory distresses and memory loss. The contractor was given a deposit of \$3,912,000.00 without scope of work compliance.

Residents have recently learned that the building's lack of a Certificate for Occupancy is a violation of the City of New York Multiple Dwellings Law §301. How/Why was a mortgage granted without a Certificate of Occupancy?

The **Job No. 103324653** which was/is the permit for the 2002-2004 construction work in 938 St. Nicholas Avenue, Block 2107, Lot 20 is still **Open at the City of New York Department of Buildings (DOB)**. The Work remains Incomplete. The Contractor willfully misfiled the Job so that it did not reflect the true cost of the Scope of Work and compliance with the Multiple Dwellings Law. There was No Certificate of Occupancy in 2006. There is NO Certificate of Occupancy NOW. How/Why was a mortgage granted without a Certificate of Occupancy? An ALT 1 should have been filed with the DOB. The mortgage amounts of approximately \$6 million dollars require an ALT 1 filing and a Certificate of Occupancy.

Please note the document file for the foreclosure action that commenced in 2013 under the auspices of Judge Joan Madden and dismissed dated July 31, 2018: "Ordered that plaintiff's foreclosure action is dismissed in its entirety without prejudice; and it is further Ordered that the temporary receivership of Daniel R. Milstein is terminated and Mr. Milstein shall be fully discharged as Receiver upon court approval of his final accounting":

850011 – 2013--

<https://iapps.courts.state.ny.us/nyscef/DocumentList?docketId=P7AHkVkJAJoalJnTcmWwrEA==&display=all&courtType=New%20York%20County%20Supreme%20Court&resultsPageNum=1>

Unfortunately, the mortgage note was transferred to a new lender for the third time during the dismissed foreclosure action. The new lender served the building and shareholders with a new foreclosure action on Wednesday, 5th September. It is assigned **Index No. 850233-2018--** New York County Supreme Court

Short Caption: 938 ST. NICHOLAS AVENUE LENDER LLC, - v. - 936-938
CLIFFCREST HOUSING DEVELOPMENT FUND CORPORATION et al

Case Type: Real Property - Mortgage Foreclosure - Commercial

Case Status: Pre-RJI;

<https://iapps.courts.state.ny.us/nyscef/DocumentList?docketId=YjmbXxmT0PYGZOFID8uTig==&display=all&courtType=New%20York%20County%20Supreme%20Court&resultsPageNum=1>.

The Managing Member of 938 ST. NICHOLAS AVENUE LENDER LLC, Mr. David Aviram, is also the Principal and Director of Acquisitions for Maverick Real Estate

Partners (www.maverickrep.com), “a private equity fund manager that acquires loans, mechanic’s liens and judgments secured by real estate”

We ask that you take direct action to help end the rampant abuse of the American legal system and the unjust application of the law, whether de jure or de facto in the City and State of New York. People are evicted, harassed and abused by those who use resources to manipulate the Courts. The Courts have failed in supervising themselves and the attorneys who capitalize on these unfortunate circumstances. Whether it is the lawyer that uses the legal system to throw families out of their homes or the judge that endorses them, things cannot continue like this. I ask that you take direct action to order an outside independent agency to investigate how tax payer dollars are being coopted.

The affordable housing programs in the City of New York are corrupted by the fraudulent use of federal HOME funds and other public monies in “economically targeted investments.”

Particularly egregious in facilitating the fraudulent use of public monies is the Tenant Interim Lease Program (TIL), the Third Party Transfer (TPT) Program and the Affordable Neighborhood Cooperative Program (ANCP) created and administered by the Department of Housing Preservation and Development (HPD) and its Participation Loan Program, under the auspices of Article 11 and Article 15 of the New York State Private Housing Finance Law.

HPD arranges sponsor/developer access to public monies ostensibly to provide affordable housing to residents. In fact, sponsors and developers are enriched and residents are left with damaged property and unmanageable debt. The predatory lending scheme threatens the retirements of workers vested in City of New York pension funds that are guaranteeing these programs i.e. “economically targeted investments”.

Furthermore, residents are subjected to “breaches of law” that include deprivation of rights under the 5th Amendment to the U.S. Constitution, mortgage fraud, inverse condemnation, regulatory taking (ultra vires, unjust enrichment) and violations of Truth in Lending Laws.

For example, in the City of New York, 644 Riverside Drive is saddled with a \$46 million dollar mortgage, 540-550 West 144th Street saddled with a \$14 million mortgage, 50 West 112th Street, 86 West 119th Street, 477 West 142nd Street and other buildings are at risk and at the mercy of predatory lenders.

Respectfully submitted.

Thomas Winston

[REDACTED]

New York, NY 10032

[REDACTED]

Brief testimony regarding public land for public good proposal:

I think this is a classic example of the city ceding responsibility and outsourcing any potential issues to others. I have experience in construction working for both for-profit and not-for-profit developers. The best way to ensure that public land is used for what the city thinks is best is for the city to develop the land themselves. The NYCHA housing stock is very weak, and no significant additions to public housing have been made in decades. Public land should be used to quickly build public-owned housing. This is also an opportunity to meet city sustainability goals.

Is there any reason why the city cannot get thousands of units of zero net energy, publicly owned housing into production instead of giving the land over to others and hoping for the best?

I work in pediatric cancer care, and too many of my patients have been impacted by housing instability. There is extensive research demonstrating that poverty and housing instability are independent predictors of increased mortality amongst children with cancer. I saw this play out all too clearly with one of my patients, a beautiful young girl who was diagnosed with cancer, ultimately requiring her to use a wheelchair. Fortunately, her family lived in a ground-floor apartment, enabling them to easily get in and out of her apartment to come to the clinic for chemo, go to physical therapy, go to the grocery store with her parents since she was too young to stay at home alone, or - on days when she felt well - to find joy in going outside to the park. Shortly after her diagnosis, their landlord gave notice that their building would be sold, raising questions of housing security on top of the unimaginable stress of having a child with cancer. As their lease was nearing renewal, they learned their rent would be increased under the new owners. Despite assistance from social workers, her parent was ultimately unable to afford the increased rent on their apartment, and they were faced with notice of eviction. I cannot imagine the stress of being a parent whose child has cancer being evicted from an apartment and forced to search for a new place to live while your child is fighting for her life. The logistical and emotional stress of it are sickening. Her parent managed to find a new apartment, but what they could afford was a 6th floor walk-up. Since moving into this apartment, my patient can only leave her apartment on days when medical transport comes and carries her down the stairs. She has begun to struggle with depression, and her single parent struggles to access basic necessities since she can't leave her daughter alone in the apartment. Can you imagine being a child and only leaving your apartment to go to the hospital for chemotherapy? The logistical and emotional stress this family has experienced is sickening and is grounded in a lack of access to affordable housing.

While their experience is heartbreaking, it is all too common. My patient and her parent were one of the 227,000 families in NYS who were evicted from their home last year. Our state has an affordable housing emergency. Over half of New Yorkers spend more than 30% of their incomes on rent. In NYC, 60% of families earning \$30,000 or less spend at least half of their income on rent, placing many like my patient at risk of eviction as they live paycheck to paycheck. Any event - a medical emergency, job loss, unexpected expense - can result in these families losing their homes. Without a safe, stable place to live, it becomes nearly impossible to maintain a job, send children to school, access basic needs, and maintain mental and physical health as has been all too horribly the case for my patient.

Sadly, the problem is only getting worse. NYS lacks an estimated 655,000 units for extremely low-income earners alone, tenants remain vulnerable, and affordable housing stock is not keeping pace. More than 60% of units built with the 421-a tax break

between 2017-2020 were unaffordable to low- and even middle-income New Yorkers. Clearly the current solutions aren't working, so how do we address this massive and heartbreaking problem?

These bills would give NYS tenants the right to make the first offer on their building if the landlord decides to sell it, making it easier for tenants in NYS to buy the housing they live in and keep affordable housing units. Tenants would have 1-4 months to secure financing for the purchase. \$250 million a year for four years would support an acquisition fund and technical assistance for tenants going through the TOPA process, resulting in an estimated more than 6,800 units of permanently affordable units. This has been successfully done in Washington D.C., Minneapolis, and San Francisco. Boston, Berkeley, and Oakland are all experimenting with TOPA strategies. Let's be the next to ensure housing is a human right for all New Yorkers.

LL 157 Amendment Comments

As a former SVP of Gas Operations at Con Edison, I am a strong advocate for LL 157's mandate to install natural gas alarms in buildings with natural gas service, as they provide a proven effective additional layer of safety beyond odorization of natural gas alone. Natural gas alarms are as essential to public safety as smoke and carbon monoxide alarms. Incident data available from the U.S. Department of Transportation (DOT) Pipeline Hazardous Material and Safety Administration (PHMSA) and the National Fire Protection Association (NFPA) reinforces the public safety value of natural gas alarms. Gas leaks from utility infrastructure, and much more commonly, leaks from household gas appliances lead to on average more than 70 gas explosions and thousands of gas fed fires every year. The latest PHMSA Significant 3-year average Incident data shows there is an average of 54 significant utility infrastructure related natural gas incidents each year, causing 10 fatalities, 25 serious injuries and \$28 million in property damage. NFPA research data published in 2024 showed that from 2018 – 2022 there was an annual average of more than 4,500 home structure fires per year started with the ignition of natural gas. On an annual basis those fires lead to 32 fatalities, 129 serious injuries and \$88 million in property damage. In the state of NY, there have been 28 gas explosions in the past five years and nationally there is an average of one gas explosion every five days.

Given these statistics, compounded by tragic incidents such as the 2014 East Harlem natural gas explosion that killed eight and the 2015 East Village explosion that killed two, the additional layer of protection and the public safety value of natural gas alarms is clear. Significantly, in the 2014 East Harlem incident, neighborhood residents had been smelling gas odors for more than 20 hours but unfortunately did not report it until it was too late to prevent the explosion. It is my strong belief that a natural gas alarm with an alarm threshold of 10% of the lower explosion limit (LEL), prompts action to evacuate and report a leak to the fire department or local gas utility, where the presence of an odor alone may not. Natural gas alarms that comply with UL-1484 "Residential Fuel Gas Alarms" sound an 85-decibel alarm. Some models include voice alerts in English and Spanish telling occupants to evacuate and call 911.

LL157 was designed to prevent catastrophic events from occurring, save lives and protect property. The National Transportation Safety Board (NTSB) recently completed their investigation into a 2023 catastrophic gas explosion in West Reading, PA that caused seven fatalities. One of their recommendations is for every State to require the installation of natural gas alarms that meet the specifications of NFPA 715 "Standard for the Installation of Fuel Gases Detection and Warning Equipment" in businesses, residences and other buildings where people congregate that could be affected by a natural gas leak.

The testimony of June 3, 2025, referenced the fact that inspections required by LL152 reduces the risk of a gas explosion. LL152 certainly is a benefit, however the scope of these inspections only includes exposed building piping, typically in the basement between the gas service point-of-entry to the riser piping that lead to individual apartments. The scope of LL 152 inspections

DOES NOT include inspection of the piping and appliance connections in individual apartments, therefore leaks on gas stove flex hoses, etc., would not be covered by a LL 152 gas piping inspection. As the NFPA research data demonstrates, thousands of gas fed fires occur each year that are associated with in-home appliances – 80% associated with cooking or heating equipment. In addition, as with any inspection, it's a point-in-time inspection that only occurs once every four years, which while beneficial, does not compare to an alarm that is continuously monitoring for gas leaks 24X7.

During the committee hearing, there was a recommendation to delay the compliance date of LL157, due to the limited availability and number of products on the market. The committee may not be aware that there are already several natural gas alarms available in the market today (Battery Powered, Plug-In, and hardwire). Brands such as Kidde, First Alert, DeNova Detect, and USI Electric. Some product costs are higher than others because they include a 10-year battery that never needs to be replaced. There is no electricity cost, and many plug-in alarms have back up batteries that have to be replaced every 6 months.

However, if it is determined that the current commercial availability of natural gas alarms is impeding building owner compliance with LL 157, I agree with the proposal to extend the May 1, 2025, compliance date until satisfactory supplies of UL-1484 compliant alarms are available. However, given the significant public safety value of natural gas alarms, I urge the NYC Department of Buildings (DOB) to make the extension of May 1, 2025, compliance date as short as reasonably possible. Current gas alarm supply chain challenges could be resolved in the near term that would enable a compliance due date prior to January 1, 2027. Therefore, I recommend that the NYC DOB should continue to monitor the commercial availability of UL-1484 compliant natural gas alarms and assess product availability on a quarterly instead of annually, so that LL 157's compliance date is not unnecessarily extended.

Thank you for the opportunity to provide comments and I appreciate the Committee's commitment to keep NYC residents safe from potential gas explosions.

Dear Council Members,

I'm writing to you asking that you pass the Community Land Act bills. As a young person who is proudly a 6th generation New Yorker, with deep ties to community organizations in New York, and committed to the growth of this city, I can't imagine living anywhere else. However, I'm seeing the writing on the wall that this city is not making plans to allow me to stay. I see everyday my peers, many who work in nonprofits serving this city, being forced out of their old shoe box apartment into a new shoe in the next newly gentrifying neighborhood. We all know the real estate speculation is beyond out of control. We clearly need to innovate ways to improve and expand our housing stock in ways that are not reliant on speculation. We are so fortunate that community organizations have been innovating and have come up with proven solutions they are prepared to implement to do just that. I am so excited by the competence and vision I see in the many community land trusts across our city. We need to pass the laws that can allow more people to benefit from their work. I am so thrilled by the energy our communities have for Copa and Topa and so relieved that we finally have real opportunities for public land and lien sales to actually benefit our communities instead of developers' bottom lines.

I know you are up against the very powerful forces of the real estate lobby but I ask that this be a moment you take a stand, so that one day you will not wake up to govern a city emptied out of the people you hope to help.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 6-3-2020

(PLEASE PRINT)

Name: Albert Scott

Address: 59 Penn Ave

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 48 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Clint Okayama

Address: 2737 27th St Apt 1F

I represent: Western Queens Community Land Trust

Address: _____

**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: Romela Herrera

Address: e

I represent: Western Queens Cit

Address: e

Please complete this card and return to the Sergeant-at-Arms

**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: 06/03/2025

(PLEASE PRINT)

Name: Anna Ditucci

Address: 515 W 184th Street

I represent: TOPA/COPA

Address: _____

**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: 6/3/25

(PLEASE PRINT)

Name: Valerio Orsetti

Address: 16 2nd Ave NYC 10007

I represent: This Land Is Ours CLT

Address: 61 E 4 St NYC 10007

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0902,0070 Res. No. _____

in favor in opposition

Date: 6/3/2025

(PLEASE PRINT)

Name: DAVID LANDER

Address: 440 W. 45th Apt #1W

I represent: TENANTS of 440 W 45th Street

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0902-0078 Res. No. 0374

in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Jack Hsia

Address: 749 Nostrand Ave Apt 3F Brooklyn NY 11216

I represent: Chinatown C.I.T.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 6902 Res. No. 0078

in favor in opposition

Date: 06/03/2025

(PLEASE PRINT)

Name: Melanie Reyes

Address: 583 Fox Street Bronx NY

I represent: Ne. B. Tomas

Address: 754 Melrose Ave Bronx NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. #78+907 Res. No. #777

in favor in opposition

Date: JUNE 3 2025

(PLEASE PRINT)

Name: MARME GRADY

Address: 4/20 CLASSON AVE # BK NY 11238

I represent: myself

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 0902

in favor in opposition

Date: 6/3/2025

(PLEASE PRINT)

Name: JOHN KRINSKI

Address: 309 W. 104th St #4D

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 79 Res. No. 374

in favor in opposition

Date: 6/2/25

(PLEASE PRINT)

Name: Pia Talamino

Address: 386 Harman St

I represent: East New York coalition for community

Address: 276 Chestnut St

**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: 6/3/25

(PLEASE PRINT)

Name: Escalante

Address: 222 Bedford Park Blvd 6B 10458

I represent: North West Bronx Community Coalition

Address: 103 E 176th St Bronx NY 10468

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 1281 Res. No. _____

in favor in opposition

Date: 6/3/2025

(PLEASE PRINT)

Name: REBECCA POOLE

Address: 3850 HUDSON MANOR TER

I represent: COUNCIL OF NY COOPS + CONDOS

Address: 870 7th AVENUE, 10019

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 90C Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: DANIELA MIRONOVICH

Address: 633 3rd Ave

I represent: CSSNY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 902 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: SYLVIA MORSE

Address: 200 WILLOUGHBY BKLYN NY 11205

I represent: PRAET CENTER / NYCCL

Address: _____



Please complete this card and return to the Sergeant-at-Arms



**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: Paula Seagl

Address: _____

I represent: Take Root Justice / Abolish the tax lien sale condition

Address: _____

**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: Renelle Brantly

Address: 2754 Pitkin

I represent: DSA SOCIAL HOUSING

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. COA Res. No. _____
 in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Avielle Hersh

Address: _____

I represent: UHAB

Address: 120 Wall St, 20th Fl, 10005

THE COUNCIL
THE CITY OF NEW YORK

Social
Housing

Appearance Card

[]

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

Date: 6/3/25

(PLEASE PRINT)

Name: SIMON BANKOFF

Address: _____

I represent: CAMPAIGN FOR A LIVABLE CITY

Address: _____

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: WILL DEPOD

Address: 50 BROAD ST.

I represent: AIVHD

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Social
Housing

Appearance Card

[]

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

Date: 6/3/25

(PLEASE PRINT)

Name: ROBERTA GRATE

Address: _____

I represent: CAMPAIGN FOR A LIVABLE CITY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1281 Res. No. _____

in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Robert Holub

Address: _____

I represent: Dept. of Buildings

Address: 280 Broadway NY NY 10007

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 0817

in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Anabel Ruggiero

Address: 311 Lincoln Pl #9A

I represent: Transsexual Menace NYC

Address: N/A

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. 0141

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Int 1258 - in favor

Address: Int 0691 - in favor

I represent: _____

Address: _____

**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: Jake Capozzino

Address: _____

I represent: Department of Finance

Address: _____

**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: Stephen Erdman

Address: _____

I represent: HPD

Address: _____

**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: Lucy Joffe

Address: _____

I represent: HPD

Address: _____

**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: Robert Holub

Address: _____

I represent: DOB

Address: _____

**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: 6/3/25

(PLEASE PRINT)

Name: Adam Blazej

Address: 70 Park Terrace East #6L

I represent: Upper Manhattan Tenants Union

Address: _____

**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: JUNE 3, 2025

(PLEASE PRINT)

Name: JORGIE R. PAULA

Address: 600 W. 140 ST. #6C NYC 10031

I represent: UMTU

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**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: Roberto Gratz

Address: 25 CPW

I represent: Campaign for Accountability

Address: Some

**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: 6-3-25

(PLEASE PRINT)

Name: Sharon Benjamin

Address: 515 W 174th St

I represent: Funding for Foundation

Address: 105 W 135th St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 902 Res. No. _____

in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Will Spisak

Address: 254-08 75th AVE, Queens

I represent: New Economy Project

Address: 121 W 27th St



Please complete this card and return to the Sergeant-at-Arms



**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 796 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ha Young Jeong

Address: _____

I represent: East New York Community

Address: Land Trust

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 78, 902 Res. No. 374

in favor in opposition

Date: 06/03/25

(PLEASE PRINT)

Name: Rachel Coyle

Address: 312 W 116th St Apt 3A NY 10026

I represent: WEACT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 78/902 Res. No. 374

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Raunag Zamal

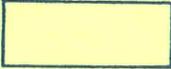
Address: 3528 99th St Queens NY 11368

I represent: Chhaya Community Development Corporation

Address: 37-43 77th St #2 Jackson Heights NY

**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: Debra Ack

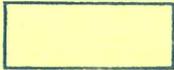
Address: _____

I represent: ENYCLT

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 78/902 Res. No. 374

in favor in opposition

Date: 06/03/2025

(PLEASE PRINT)

Name: CAMERON CLARKE

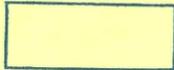
Address: 295 W 145TH ST

I represent: WE ACT

Address: 1852 AMSTERDAM

**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: ABOU FARMAW

Address: 427 W 146

I represent: Haslem

Address: _____



Please complete this card and return to the Sergeant-at-Arms



**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: 6/3/25

(PLEASE PRINT)

Name: JAKOB SCHWIDEN

Address: 246 77th St, BK 11209

I represent: EAST NEW YORK CLT

Address: 2966 FULTON, BK 11208

**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: Hannah Anousheh

Address: 2966 FULTON ST, BK 11208

I represent: EAST NEW YORK CLT

Address: 2966 FULTON ST, BK 11208

**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: Shantana Dew

Address: 2966 Fulton Street, Brooklyn NY 11208

I represent: East New York Community Land Trust

Address: 2966 Fulton Street, Brooklyn, NY 11208

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0072, 10th Res. No. _____

in favor in opposition

Date: 6/03/25

(PLEASE PRINT)

Name: Mark Natanson

Address: 1076 Broadway Brooklyn, 11221

I represent: _____

Address: _____

**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: 6.3.25

(PLEASE PRINT)

Name: WILLIAM LATIMER

Address: 440 W. 45TH ST.

I represent: TENANT / MYSELF

Address: 440 W. 45TH ST.

**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: Jessica Balgobin

Address: 135-19 120th Street, South Ozone Park

I represent: Chhaya CDC

Address: 37-43 77th St., Jackson Heights

Please complete this card and return to the Sergeant-at-Arms

**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: 6-3-2025

(PLEASE PRINT)

Name: Elizabeth W. Thompson

Address: 2757 CLAFIN Ave 4T

I represent: me in Being a resident

Address: 2757 CLAFIN Ave 4T

**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: 06/03/2025

(PLEASE PRINT)

Name: Matthew Shore

Address: 127 Lincoln Ave 2nd Floor

I represent: Matt Haren - Port Morris Community and Stewards

Address: St. Johns Bronx NY 10467

**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: Alexis Foster

Address: Edgemere

I represent: Founder of The REAL

Address: Edgemere CLT

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 902+78 Res. No. _____

in favor in opposition

Date: 6/3/25

(PLEASE PRINT)

Name: Rachel Brown

Address: 2647 30th St. Astoria

I represent: WQCLT

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 902 Res. No. 78

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: John Leyva

Address: 63 Tiffany Pl #602

I represent: Brooklyn NY

Address: SAVE 63 Tiffany.com

Please complete this card and return to the Sergeant-at-Arms

**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: 10-3-25

(PLEASE PRINT)

Name: Shreya Benjamin

Address: 515 W 174th St

I represent: Guiding Star Covenant Foundation

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**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: JUNE 3RD 2025

(PLEASE PRINT)

Name: GILDA D Gillim

Address: 1845 7th Avenue # 2B

I represent: TULINISE

Address: SAME AS ABOVE

Please complete this card and return to the Sergeant-at-Arms