

Testimony of Emily Goldstein, Director of Organizing and Advocacy, ANHD
Before the New York City Council Housing and Buildings Committee Regarding Priorities for
the New York City Fiscal Year 2025-2026 Budget

March 25, 2025

Thank you, Chair Sanchez and members of the Committee, for the opportunity to testify today on the Fiscal Year 2026 Executive Budget. My name is Emily Goldstein, and I serve as the Director of Organizing and Advocacy at the Association for Neighborhood & Housing Development (ANHD).

## 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.

## The Community Housing Preservation Strategies (CHPS) Initiative

We are grateful for the Council's longstanding commitment to the Community Housing Preservation Strategies (CHPS) Initiative, which has served as a lifeline for the city's most vulnerable tenants and homeowners for more than fifteen years. Through CHPS, over 45 community-based organizations provide preservation services in neighborhoods most at risk of displacement, particularly among low-income, BIPOC, and immigrant communities. However, despite this essential work, our CHPS partners continue to face two interrelated challenges:



persistent underfunding and unacceptable delays in the City's contracting and payment processes. Every CHPS organization surveyed this year reported delays in registration—some dating back to Fiscal Year 2023—forcing them to front costs for essential services while waiting months or even years to be reimbursed. These delays significantly hinder program operations and staff retention, placing strain on frontline teams and putting tenant protections at risk.

In light of the escalating housing crisis, we call on the City Council to increase CHPS funding to \$4.95 million in FY26. The program's funding has remained flat at \$3.65 million since 2016, despite skyrocketing demand and increasing costs. New investments would enable CHPS groups to scale their services, provide cost-of-living adjustments for staff, and expand their capacity to address evictions, poor housing conditions, and tenant harassment across the city. In tandem, we urge the Council to address the systemic contracting backlog by advancing reforms and ensuring timely contract approvals and payments.

#### **Displacement Alert Project (DAP)**

DAP is a critical resource for affordable housing advocates, helping users to proactively identify and outreach to those at risk of displacement and do in-depth research of individual building histories. The tool has scaled since inception and has the capacity to continue expanding in New York and beyond to support unit, building, and area level strategies that prevent affordable housing displacement. Last year over 1,280+ users (including tenant coalitions, community boards, and elected officials) relied on DAP to track eviction risks and landlord patterns. In addition, ANHD provided 8 specialized trainings conducted to help organizations leverage data tools, build organizing strategies, and advance tenant protections, while providing direct troubleshooting support to CHPS-funded groups responding to housing crises in real time.

We urge the City Council to continue their crucial funding of this work through our application for \$268,907 for ANHD's Displacement Alert Project and our Capacity Building Training and Technical Assistance for the CHPS program. This will allow us to maintain and expand DAP, provide technical assistance and training to CHPS-funded organizations to improve housing stability efforts, and produce research and data tools, including the Housing Risk Chart and AMI Cheat Sheet, to support housing advocacy and policy solutions

#### **KEY OUTCOMES WITH FY26 FUNDING:**

- Sustained operations of the Displacement Alert Project (DAP) and DAP Portal to provide real-time data on displacement risks.
- Expanded training and capacity-building support for CHPS-funded groups, enhancing their ability to protect tenants and preserve affordable housing.
- Development of new housing research tools, including the Housing Risk Chart and AMI Cheat Sheet, for advocacy and policymaking.



 Annual convening with the Department of Housing Preservation and Development (HPD) and CHPS groups to assess program impact and discuss policy solutions.

# **Housing Capital Funding**

Emergency Preservation Funds for Non-Profit Affordable Housing Providers

ANHD commends the \$2 billion capital commitment under the "City of Yes for Housing Opportunity" and "City of Yes for Housing Equity" initiatives, including the critical focus on affordable housing preservation. We are encouraged by the revival of the J-51 tax abatement to support moderate rehabilitation and extend affordability in older housing stock.

That being said, we urge the City Council to ensure that this commitment is codified, and that the promised \$1 billion in capital city resources for preservation comes on top of previously committed resources.

Moreover, targeted action is crucial to ensure that these capital funds reach New York City's nonprofit affordable housing providers, who need them most. These organizations maintain deeply affordable units with rents under \$1,000 and are facing mounting financial challenges from pandemic-era rent arrears, rising operational costs, and dwindling reserves. Unlike for-profit developers, these mission-driven nonprofits operate on narrow margins, prioritizing long-term affordability and tenant stability over profit.

The combined \$2 billion in preservation capital from the City and the State should be directed strategically to support portfolio-level stabilization, particularly for nonprofit developers. These funds can have a transformative impact by covering essential repairs, upgrading building systems, and renovating units to bring them back into service — directly supporting the long-term viability of deeply affordable housing. Preservation is about more than just maintaining physical structures; it's about protecting tenants and ensuring they can live in safe, healthy, and dignified homes.

To fully achieve the objectives of the "City of Yes" initiative, capital dollars must be allocated equitably and strategically to support the sustainability of nonprofit housing portfolios. Without timely investment, many nonprofit-owned buildings could face serious risks of disrepair and tenant displacement within just a few years — ultimately increasing costs for the City and undermining our shared housing goals.

Now is the time to act: preserve what we've already built and protect the communities that depend on it.

Prioritizing Deeper Affordability



The FY26 Preliminary Budget reflects a record high level of housing capital investment thanks to the City of Yes/City for All agreements. However, record investments must be matched with deeper affordability and targeted implementation. In 2024, only 16% of housing completions and 21% of housing starts served extremely low-income (ELI) households—despite ELI households representing 35% of all NYC renters, 58% of rent-burdened households, and the vast majority of those experiencing homelessness. To address this disparity, the City must dramatically increase the proportion of capital dollars dedicated to projects that serve the lowest-income New Yorkers. This includes prioritizing financing tools that make deeply affordable housing feasible and sustainable, and using capital creatively in conjunction with operating support to enable our members and the broader affordable housing field to develop more of the affordable housing homeless and housing insecure New Yorkers need.

Lastly, we are deeply concerned that while the FY26 allocation for HPD is \$3.3 billion, funding declines sharply in the outyears, dropping to \$1.9 billion in FY27 and less than \$500 million in subsequent years (NYHC, 2025). Similarly, NYCHA's capital funding is set to fall from \$1.1 billion in FY26 to roughly \$200 million in the following years (NYHC, 2025). If we are to make real, sustained progress in solving New York City's housing crisis, both the Council and the Administration must commit to maintaining and increasing housing capital funding beyond FY26. Long-term investment is critical to ensuring that both new development and preservation efforts receive the funding they need to support affordable housing for generations to come.

#### Right to Counsel

ANHD calls for full funding for the Right to Counsel program - we have a proven, effective tool to prevent evictions, and far too many eligible New Yorkers are being denied access due to lack of resources. In 2024, less than half of tenants with eviction cases in housing court were represented by an attorney (Right to Counsel NYC). Full funding for Right to Counsel will have an immediate impact to reduce eviction rates and stop even more vulnerable New Yorkers from becoming homeless.

## **CityFHEPS**

In the midst of an unprecedented homelessness crisis in New York City, the agencies responsible for safely sheltering unhoused New Yorkers and helping them to transition into permanent housing urgently need additional funding. One of the most effective solutions to alleviate overcrowding in the shelter system is expanding access to permanent, subsidized housing—while also preventing more families from entering homelessness in the first place.

The package of CityFHEPS laws passed in summer of 2023 are a critical part of making these solutions a reality. Now that the CityFHEPS expansion bills are law, we must have them fully



implemented and funded. CityFHEPS is one of the key programs that helps those in shelters access permanent housing, which in turn helps alleviate overcrowding in the shelter system itself (CSS, 2023). The program's expansion will also allow more New Yorkers to use vouchers to avoid eviction and stabilize their housing before reaching crisis levels. We know that housing stability yields wide-reaching benefits—supporting higher wages, lower healthcare costs, and improved educational and workforce outcomes.

While the Administration has cited logistical, staffing, and budget constraints as barriers to implementation, the FY26 Executive Budget must reflect the resources necessary to fulfill the mandate of these new laws. We also urge increased baseline funding to ensure more CityFHEPS vouchers can be distributed and used effectively. While expanding the program to cover families facing eviction is projected to cost the city approximately \$8 billion dollars, it is also expected to save \$5 billion from reduced shelter and rehousing costs—resulting in a net cost of about \$3 billion over five years (CSS, 2023).

## **Homeownership**

While the "City of Yes" initiative includes a significant commitment to expanding homeownership, the Administration's proposed FY26 budget does not appear to fully reflect that promise. Based on the City Council's homeownership tracker, several key programs fall short of the 10-year investment goals outlined in the Council's proposal.

For example, HomeFix—which should be funded at \$27.7 million—is currently projected to receive only \$18 million over 10 years, based on this year's allocation. HomeFirst is funded at \$3 million annually, totaling just \$30 million instead of the \$41 million target. HelpDesk is allocated \$20 million over 10 years, falling short of the recommended \$25.6 million.

The Tenant Legal Services (TLS) program appears to receive only \$200,000 next year, far below the \$2.2 million annual target (or \$22 million over a decade), though this may reflect HPD staffing allocations. Funding for the Accessory Dwelling Unit (ADU) Technical Assistance program is also lower than expected—roughly \$3.3 million (\$2.4 million + \$907,000) instead of the proposed \$4 million.

We urge the Administration to fully fund these homeownership programs in alignment with the Council's proposed investment levels and ensure these resources are accessible to low- and moderate-income New Yorkers seeking to build wealth and stability through homeownership.

#### **Agency Staffing**

The Preliminary FY26 expense budget includes additional funding from the "City of Yes" and "City for All" agreements to support increased staffing at HPD, Department of Buildings (DOB),



and the Department of City Planning (DCP). According to NYHC analysis, the budget adds 153 new positions across these agencies: 77 at HPD, 66 at DOB, and 10 at DCP (2025). ANHD supports increased staffing, as it is critical to the operations of our members citywide.

We urge the administration to ensure that additional staff at HPD and DOB is directed towards two areas where our members are experiencing negative impacts due to insufficient agency capacity.

First, HPD's code enforcement and litigation units must improve their capacity to not only respond to tenant complaints and conduct routine inspections, but to take proactive measures targeting buildings with consistent patterns of severe violations. This requires more capacity for activities like roof to cellar inspections, as well as increased capacity to forcefully pursue penalties in court.

Second, HPD and DOB must increase their capacity to support nonprofit developers — especially in preservation and operations. Persistent delays in approvals, processing, and inspections create major cash flow challenges for nonprofit housing providers, impacting their ability to sustain and reinvest in affordable housing. Backlogs in addressing building code violations and operational approvals not only stall preservation efforts, but also directly affect residents' quality of life.

On the development side, HPD plays a central role in nearly all affordable housing production in New York City. Recent staffing shortages have significantly slowed down this pipeline. In 2022, 12,000 fewer apartments were built compared to pre-pandemic numbers, according to the Comptroller's office (Gothamist, 2024). The staff shortages have caused delays for nonprofit developers, who are forced to carry expensive pre-development and construction loans longer while awaiting closings and permanent financings. Although HPD has made great efforts to alleviate the shortages, the loss of institutional knowledge and experience cannot be diminished. There is still a significant backlog of affordable housing projects from the past couple years requiring us to give HPD all the resources we can to ensure that we recuperate from the loss in production (Comptroller, 2024).

Additionally, we urge the council and administration to increase funding to the Commission on Civil and Human Rights to ensure that we continue to protect New Yorkers from discrimination in the housing market. Especially at a time when the federal government is rolling back its commitment to fair housing, New York City must step up. Despite being outlawed since 2008, Source of Income (SOI) discrimination remains pervasive, and presents a significant barrier to New Yorkers seeking to leave shelters for permanent housing. CityFHEPS and other housing voucher programs have proven to be effective in allowing tenants to remain in their homes and prevent future evictions/homelessness. However, even after tenants jump through multiple hoops to obtain a voucher, they are rejected by landlords who choose to discriminate against them. The CCHR needs more funding to fully staff its offices to have increased enforcement of



discriminatory laws. It is a step in ensuring we prevent further discrimination and homelessness. At minimum, capacity should be increased to 2018 staffing levels, which would be an estimated cost of \$3 million in new funding for the Commission's Law Enforcement Bureau in FY25.

Finally, the Department of Social Services (DSS) budget must reflect an accurate assessment of the cost to house asylum seekers, without relying on inhumane measures like shelter time limits. It must also include funding for case management, helping asylum seekers access work authorization and other supports needed to stabilize and thrive.

# **Delayed Contracts and Stalled Projects**

ANHD commends NYC Council Speaker Adrienne Adams for her leadership in reducing delayed payments to nonprofits, a critical step toward strengthening the organizations that serve our communities. We strongly support advancing legislation to transition to a grant-based model, which would streamline funding and improve cash flow for nonprofits (State of the City. 2025). Additionally, we urge the restoration of \$16 million to the Mayor's Office of Contracts to ensure adequate staffing and capacity to prevent further delays and administrative breakdowns (State of the City, 2025). ANHD members working in low- and moderate-income (LMI) communities across the city that depend on timely City contracts to sustain their operations. This includes nonprofit housing developers, who need reliable funding to preserve and build affordable housing. When contract approvals are delayed, projects stall, forcing nonprofits to absorb financial losses they cannot afford. To prevent further harm, the City must restore this funding and implement reforms that ensure nonprofits can continue their essential work without unnecessary financial strain. Investing in a strong, efficient contract system is not just about fiscal responsibility—it is about safeguarding the stability of the communities we serve.

#### Prevailing Wage/Wage floor

ANHD is dedicated to ensuring fair wages and equitable treatment for workers and understands the spirit and intent of City Council proposed bills to ensure fair wages and workers' rights. We have serious concerns on the proposed bills' potential reduction in affordable housing units and the adverse effects on non-profit developers. Due to uncertainty in housing and construction costs from federal tariffs and significant federal cuts to HUD, we believe it is not the appropriate time to impose additional funding requirements on non-profit affordable housing developers. Without significant sustainable added capital, city agency staffing capacity and capacity by our non-profit developers we believe these proposals will result in a significant loss of affordable housing units and a reduction in affordability for the lowest-income New Yorkers.

If the parameters of Intros 1156-2024 and 910-2024 fall upon non-profit developers, the cost of building affordable housing units will increase drastically on a citywide scale. These parameters



include: providing prevailing wages and ensuring that 30% of hours worked are done by residents of a certain zip code where 15% of the population is below the federal poverty level.

Intros 1156-2024 and 910-2024 do not stipulate the definitions of "certain economic developers" or "housing developers of certain housing development projects." Affordable housing developments rarely cost less than \$1 million. Non-profit developers do not have the capital capacity or cash reserves to bear the burden of the above requirements without the properties they are developing losing their affordability.

Thank you again for the opportunity to testify. If you have any questions or for more information, please contact Emily Goldstein: <a href="mailto:emily.g@anhd.org">emily.g@anhd.org</a>.