



Testimony of
Coalition for the Homeless
on
Oversight -- *Housing Our Neighbors: A First Look at the Mayor's Housing Plan*
presented before

New York City Council Committee on Housing and Buildings

by
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July 1, 2022

Thank you for the opportunity to testify on the City’s *Housing Our Neighbors* plan.¹ While the plan includes some laudable goals for addressing many of the problems encountered by homeless New Yorkers, which were developed in collaboration with people with lived experience, more action and investment is needed to actually reduce homelessness. Mayor Adams must dramatically expand the supply of permanent and supportive housing for homeless New Yorkers and extremely low-income households – which takes far bolder housing investments than are included in this plan. The time for incremental change has long since passed.

Far Greater Investments Needed to Address Homelessness

Despite a number of commendable aspects of the housing plan outlined below, the Adams administration must make far bolder investments in order to actually end mass homelessness and housing instability. Mayor Adams’ plan clearly states that homelessness is a housing issue, but disappointingly fails to commit the resources needed for additional production targeted specifically to house homeless and extremely low-income households. To tackle the housing crisis, the City must create at least 6,000 new apartments per year for homeless households and an additional 6,000 new apartments per year for households with extremely low incomes (less than 30 percent AMI).

The Adams administration’s failure to articulate clear housing production goals for homeless and extremely low-income households suggests that the City will merely continue the egregiously inadequate affordable housing production levels of the prior administration – levels that clearly have not made a dent in the crisis. *Housing Our Neighbors* itself points to the inadequacy of New York City’s housing production levels, stating: “Although housing construction picked up in the 2000s, a lot less housing is being built today than during the first three-quarters of the 20th century, adding too few units to keep up with job and population increases. New York City produces significantly fewer new units per capita than many other major cities across the country.”² And yet, inexplicably, the housing plan does not propose increasing housing production beyond current rates.

The situation is indeed bleak: New York City continues to experience near-record homelessness fueled by the affordable housing crisis, with more than 50,000 people sleeping in shelters each night and thousands more sleeping on the streets.³ Hundreds of thousands of additional households – disproportionately Black and Latinx – are on the brink of homelessness as they struggle to pay exorbitant rents. As highlighted in our recent brief, *Housing Affordability: The Dire Housing Crisis for Extremely Low-Income New Yorkers*, the number of apartments renting for under \$1,500 per month (in 2021 dollars) fell from 1.6 million in the early 1990s to just under one million by 2021, while the number renting for \$2,300 per month or more grew during the same period from fewer than 90,000 apartments to more than a half-million, an unsustainable trajectory.⁴

¹ <https://www1.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>

² See page 18: <https://www1.nyc.gov/assets/home/downloads/pdf/office-of-the-mayor/2022/Housing-Blueprint.pdf>

³ <https://www.coalitionforthehomeless.org/facts-about-homelessness/>

⁴ https://www.coalitionforthehomeless.org/wp-content/uploads/2022/05/Housing-Affordability-Brief_June-2022.pdf

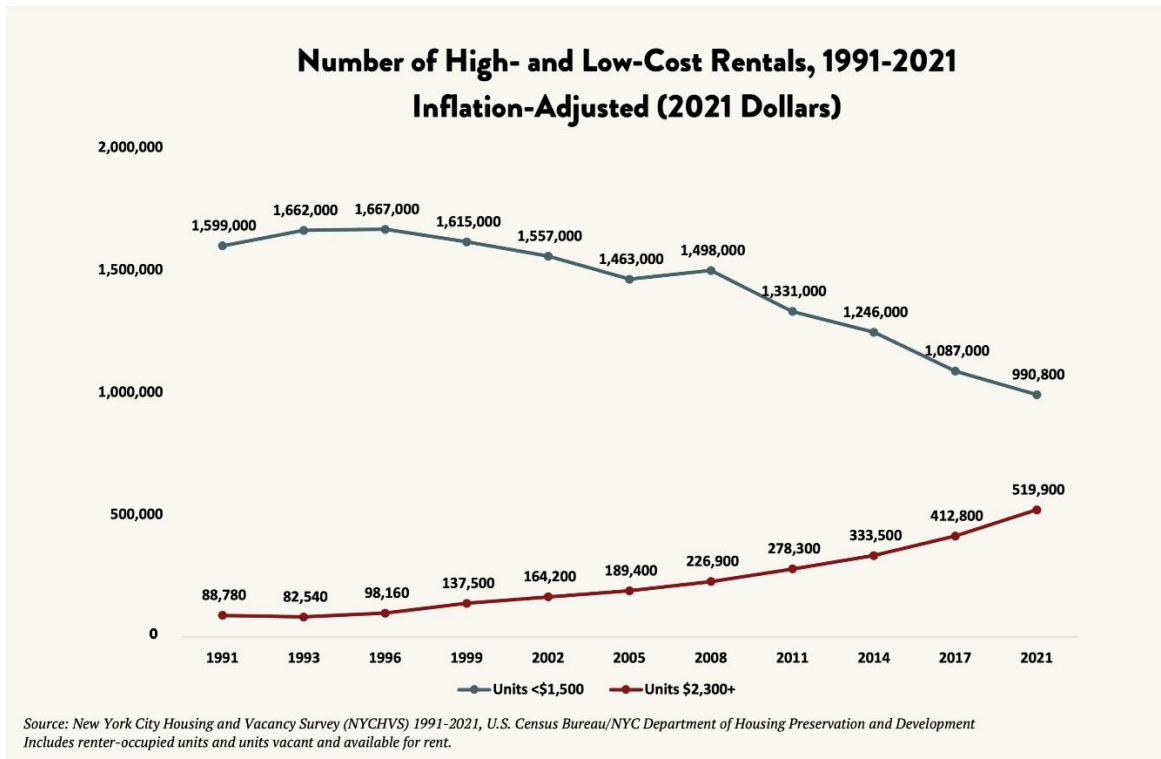


Image Description: A graph labeled “Number of High- and Low-Cost Rentals, 1991-2021 Inflation-Adjusted (2021 Dollars).” The vertical axis lists numbers 0 to 2,000,000 in increments of 500,000. The horizontal axis lists each year the New York City Housing and Vacancy Survey findings were published between 1991 and 2021. A gray line shows the number of low-cost rental units for under \$1,500, and a dark red line shows the number of high-cost rental units for more than \$2,300. The number of low-cost units shows a decrease over time, with a value of 990,800 in 2021, and the number of high-cost units shows a steady increase, with a value of 519,900 in 2021.

The brief summarizes alarming data from the 2021 Housing and Vacancy Survey⁵:

As a result of these disparities in the rental market, a disturbingly large number of NYC tenants are shouldering unsustainable rent burdens – too often, just one missed paycheck or unexpected expense away from homelessness. In 2021, more than half of NYC renters (53 percent, or just under 1 million households) were rent burdened, meaning they paid more than 30 percent of their incomes toward rent, and one-third (32 percent, or just under 600,000 households) were severely rent burdened, paying more than half of their incomes for rent. Of these severely rent-burdened households, nearly 400,000 were individuals and families with incomes below \$25,000 per year, 343,000 were single individuals, 233,400 were foreign-born, 186,000 included an older person, 132,000 included a person with a disability, and 115,000 included a child. Unsurprisingly, rent burdens were almost universal for those with the lowest incomes: Among those with household incomes of less than \$25,000 per year who did not live in public housing or report having a housing voucher, 85 percent were severely rent burdened, and an additional 7 percent were moderately rent burdened. Further, among those who were severely rent burdened, 17 percent reported missing one or more rent payments in the past year, and two of every five such households were still behind on their rent when they were surveyed.

⁵ <https://www1.nyc.gov/assets/hpd/downloads/pdfs/services/2021-nychvs-selected-initial-findings.pdf>

This is a matter of racial justice, with 36 percent of all households headed by a Black or Hispanic New Yorker having been severely rent burdened in 2021, compared with 28 percent of those headed by a White New Yorker and 29 percent of those headed by an Asian New Yorker. Without robust investments in truly affordable housing, these racial disparities will deepen as many renters of color grapple with housing precarity and the very real risk of becoming homeless. These data starkly show that inadequate policies and a failure to target housing resources toward the lowest-income New Yorkers have worsened the affordability crisis for the most vulnerable renters.

Number of Severely Rent-Burdened Households

Household Income

< \$24,999	393,600
\$25,000-\$49,999	154,700
\$50,000-\$99,999	44,090

Race/Ethnicity

Asian Non-Hispanic	82,870
Black Non-Hispanic	130,700
Hispanic	190,100
White Non-Hispanic	187,100

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Foreign-Born	233,400
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Household Characteristics

Single Person	343,000
1+ Older Adult	185,800
1+ Person with a Disability	132,300
1+ Child	114,800

Citywide	598,600
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*Source: New York City Housing and Vacancy Survey (NYCHVS) 2021,
U.S. Census Bureau/NYC Department of Housing Preservation and Development*

Given the scale of the affordable housing crisis, the City must radically transform its housing policies rather than continuing to tinker around the edges. To start, Mayor Adams must mobilize City agencies to create at least 6,000 new apartments per year for homeless households and an additional 6,000 new apartments per year for households with extremely low incomes. This would be an ambitious but necessary increase above current production levels, particularly if the administration follows through on its plan to expand eligibility for homeless set-aside apartments beyond people sleeping in Department of Homeless Services shelters. For context, throughout the eight years of the de Blasio administration, the City financed only about 2,100 units per year on average for homeless households and just 4,100 units per year for extremely low-income households, consisting primarily of preservation units rather than

newly constructed units.⁶ The prior administration's stubborn refusal to align their housing plan with the reality of mass homelessness meant that near-record numbers of New Yorkers languished in shelters and on the streets at the same time Mayor de Blasio touted the record production of allegedly affordable housing. Mayor Adams must learn from the mistakes of the prior administration by significantly ramping up the production of housing for homeless and extremely low-income New Yorkers.

However, rather than committing to bolder housing production goals, *Housing Our Neighbors* lacks any specific metrics or production targets. Mayor Adams has rightfully noted that the prior administration was overly focused on hitting topline production and preservation goals, but he has misrepresented advocates' criticism of his predecessor by refusing to articulate any metrics by which the success of this new housing plan can be measured. To be clear, the Coalition for the Homeless and the other advocates who collaborated on our multiyear House Our Future NY campaign were critical of the de Blasio administration for focusing on overall "affordable" housing production targets that did not reflect the actual needs of the poorest New Yorkers.⁷ We never suggested that the City should eliminate all production targets, but rather that it should focus its production on housing for people who are homeless or extremely low-income.

This omission of production targets for people with the lowest incomes is particularly troubling given the inadequate capital budget for housing passed a day prior to the release of the housing plan. As a mayoral candidate, Adams had committed to at least \$4 billion annually for housing capital, which is the minimum necessary to achieve deeper levels of affordability to help the lowest-income New Yorkers. The adopted budget, however, falls short of this promised amount, leaving those most in need of housing assistance treading water while both rents and the costs of production skyrocket. Touting an increase over past budgets is not enough when those budgets were woefully inadequate. New York City needs to commit at least \$2.5 billion annually for the next five years to create 6,000 apartments for homeless households and 6,000 apartments for extremely low-income households per year to meaningfully reduce homelessness and housing insecurity. Similarly, the rest of the Fiscal Year 2023 adopted budget does not include the major investments in housing and homelessness necessary for the administration to follow through on many of the reforms proposed in *Housing Our Neighbors*. This disconnect between the housing plan and the budget suggests that the administration will not fully or quickly implement these housing reforms.

Beyond the lack of housing production targets, *Housing Our Neighbors* is also light on details regarding homelessness prevention efforts, such as how the City will handle the crisis playing out in housing court following the end of the eviction moratorium. The Coalition for the Homeless and many other advocates fought hard for New York City's first-in-the-nation right to counsel in housing court, but legal services providers are struggling to keep up with the volume of cases. The City must use every available resource to ensure that tenants have access to legal representation in housing court and make additional investments in upstream prevention, such as expanding access to CityFHEPS for more people at risk of homelessness. We hope the administration will detail a more in-depth homelessness prevention plan soon.

Furthermore, the Adams administration's continued criminalization of unsheltered homeless New Yorkers, while not highlighted in *Housing Our Neighbors*, is not only inhumane, it is contrary to the

⁶ <https://www1.nyc.gov/site/hpd/about/the-housing-plan.page>

⁷ <https://www.coalitionforthehomeless.org/event/house-our-future-ny/#About>

plan's stated goals of reducing homelessness. As we testified in May, the aggressive encampment sweeps push homeless New Yorkers further from services and housing by dislocating people and breaking the trust that trained outreach teams work hard to build.⁸ People on the streets should instead be offered immediate placement in permanent housing, and in the interim they should be connected to safe, low-barrier shelters with single rooms. We call on Mayor Adams to recognize the dignity and humanity of those who will continue to feel safer sleeping on the streets until they can obtain permanent housing by ceasing the cruel and counterproductive sweeps that merely criminalize the most vulnerable among us.

Housing Our Neighbors Includes Several Promising Reforms

Even with these shortcomings, it is important to acknowledge that the Mayor's plan includes several important reforms that will help reduce administrative burdens and connect people to stable housing more quickly. The administration deserves credit for giving people with lived experience of homelessness a seat at the table during the development of the housing plan, and for incorporating many of their suggestions into the final blueprint. Too often, the people who are most directly impacted by policies are not included in the creation of those policies, and their valuable contributions and ideas are ignored. We hope the administration continues to offer meaningful opportunities for directly impacted people to contribute and that those opportunities are accessible to as wide a swath of homeless New Yorkers as possible, including homeless people with disabilities and those who do not speak English.

Housing Our Neighbors is also notable in that it presents a unified plan for homelessness and housing, including public housing. These issues have historically been siloed by prior administrations, with separate plans and inadequate coordination across City agencies. These disjointed plans led to unambitious initiatives that did little to reduce mass homelessness in New York City, and that failed to align housing resources with the goal of helping New Yorkers move out of shelters and off the streets. By recognizing that homelessness is a housing issue, the Adams administration is signaling an intent to have better coordination across agencies and a commitment to target housing resources toward the goal of reducing homelessness. Similarly, incorporating NYCHA into the housing plan shows that the vital resource of public housing will not be treated as an afterthought, but rather as an essential source of affordable housing. The release of a unified housing and homelessness plan is an important first step, and we will closely monitor whether the administration follows through on its promise of interagency coordination and targeting its housing resources to New Yorkers with the greatest needs.

The housing plan includes several reforms that we look forward to exploring further with the administration. Crucially, the blueprint suggests eliminating administrative burdens that keep people homeless longer. Although we await further details regarding how these changes will be implemented, it is an encouraging sign that the administration is committed to cutting red tape and burdensome paperwork that frustrate homeless New Yorkers and deprive them of ready access to housing opportunities. Likewise, the announcement of a working group to address barriers to housing for undocumented New Yorkers is long overdue.

The administration also acknowledges that commonly cited shelter census figures mask the full scale of homelessness by excluding runaway and homeless youth, some survivors of domestic violence, people with HIV, and people sleeping in shelters under the Department of Housing Preservation and

⁸ https://www.coalitionforthehomeless.org/wp-content/uploads/2022/05/CFTH_LAS_Testimony_Unsheltered_Homelessness_5-3-22.pdf

Development. We support legislation that would require more transparent, comprehensive reporting on the shelter census across various agencies. We further support opening up housing resources to all homeless New Yorkers, provided that the administration simultaneously invests more to expand the universe of available housing resources so that homeless people are not competing with each other for a limited pool of permanent housing, as discussed above. The housing plan also proposes to invest in high-quality shelters, which should help improve many of the poor shelter conditions described in *New York at a Crossroads*, our *State of the Homeless 2022* report.⁹

We are also grateful that the administration has committed to streamlining supportive housing placements and accelerating the NYC 15/15 supportive housing pipeline by completing the 15,000 pledged units by 2028, two years ahead of schedule. However, given the scale of the need, we urge the City to make even greater investments to complete the program by 2025 and to ensure that supportive housing is adequately funded to provide the robust services needed by many who qualify for this type of housing.

Finally, we are pleased to see the administration's commitment to addressing the prison-to-shelter pipeline, specifically through stronger anti-discrimination protections. Landlords and brokers are currently able to reject prospective tenants on the basis of an arrest or conviction history, and due to systemic racism in the criminal legal system, this is often used as a proxy for racial discrimination. Denying people access to housing on this basis prolongs homelessness and makes reentry that much more challenging because people need housing stability in order to get back on their feet. Until New York City passes a bill fully banning discrimination based on arrest or criminal history for housing applicants, thousands of New Yorkers – especially Black and Latinx New Yorkers – will face perpetual punishment and struggle to secure the stable housing they need. We thank the administration for supporting anti-discrimination protections, and we look forward to working with the Council and the administration on the swift passage of strong Fair Chance for Housing legislation.

We thank the Council for the opportunity to testify today, and for your steadfast commitment to ending homelessness and housing insecurity.

About Coalition for the Homeless

Coalition for the Homeless: Coalition for the Homeless, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless and at-risk New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to address the crisis of modern homelessness, which is now in its fifth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, the right to reasonable accommodations for those with disabilities, and life-saving housing and services for homeless people living with mental illnesses and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term, scalable solutions and include: Permanent housing for formerly homeless families and individuals living with HIV/AIDS; job-

⁹ <https://www.coalitionforthehomeless.org/state-of-the-homeless-2022/>

training for homeless and low-income women; and permanent housing for formerly homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen, which usually distributes 800 to 1,000 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx, had to increase our meal production and distribution by as much as 40 percent and has distributed PPE and emergency supplies during the COVID-19 pandemic. Finally, our Crisis Services Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries. In response to the pandemic, we are operating a special Crisis Hotline (1-888-358-2384) for homeless individuals who need immediate help finding shelter or meeting other critical needs.

The Coalition was founded in concert with landmark right-to-shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981, the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless single adults. Pursuant to the decree, the Coalition serves as court-appointed monitor of municipal shelters for homeless single adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families. In 2017, the Coalition, fellow institutional plaintiff Center for Independence of the Disabled – New York, and homeless New Yorkers with disabilities were represented by The Legal Aid Society and pro-bono counsel White & Case in the settlement of *Butler v. City of New York*, which is designed to ensure that the right to shelter includes accessible accommodations for those with disabilities, consistent with Federal, State, and local laws. During the pandemic, the Coalition has worked with The Legal Aid Society to support homeless New Yorkers, including through the *E.G. v. City of New York* Federal class action litigation initiated to ensure WiFi access for students in DHS and HRA shelters, as well as *Fisher v. City of New York*, a lawsuit filed in New York State Supreme Court to ensure homeless single adults gain access to private hotel rooms instead of congregate shelters during the pandemic.