



OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007
(212) 669-8300 p (212) 669-4306 f
163 West 125th Street, 5th floor, New York, NY 10027
(212) 531-1609 p (212) 531-4615 f
www.manhattanbp.nyc.gov

Gale A. Brewer, Borough President

Testimony of Gale A. Brewer, Manhattan Borough President On The Emergency Rules Establishing the LINC Rental Assistance Programs November 24, 2014

My name is Gale A. Brewer and I am the Manhattan Borough President. Thank you to Commissioner Banks and Commissioner Taylor for the opportunity to offer comments on the proposed rules for the LINC Rental Assistance Programs.

New York City today faces a terrible dilemma in our burgeoning population of homeless. The loss of a home is an inestimable life trauma, and as we know, can be deeply harmful to children. The longer the condition of homelessness persists, the deeper the trauma and the more life disruptions occur.

For that reason, I wholeheartedly applaud and support these three programs, LINC I, LINC II and LINC III. Obviously, the number of families involved is small – much smaller than we would like, and only a fraction of what will be needed to truly address the problem. But it represents a good start and a program that can, if successful, point the way to a solution for a larger portion of the homeless problem. While I can see that the LINC I and II Programs can only provide housing for a small fraction of the current homeless population, it appears that the LINC III program, for families currently in HRA domestic violence shelters, will provide significant relief.

As you know, I have been, for many years, deeply committed to finding solutions to both our homeless problem and our lack of housing that is affordable to low income and working New Yorkers. There is no doubt that the two problems are inextricably connected.

If we keep losing affordable housing at the rate we have been in recent years, no program, no matter the size, will really address the problem of homelessness. So most importantly, while we develop programs to move our current homeless population out of the shelter and into permanent housing, we must be sure that any such program – at a minimum -- does not exacerbate the ongoing housing loss.

So while I applaud and encourage these programs to alleviate the ongoing trauma of homelessness and shelter confinement for those families that will be fortunate enough to receive the benefit, I would urge the Administration to look at the problem through a bigger lens. It is essential that this effort to house these families not itself contribute to the continuing loss of affordable, regulated housing.

While I am sympathetic to the need to induce landlords to provide the units for these programs, we must make sure that these units are safe, legal housing. This is important for the families, who we hope, through these programs, will be able within five years, to assume the rent and lease responsibilities for these apartments. As we all know, the law currently provides that a rent unchallenged for four years, becomes basically unassailable as the legal regulated rent. So if a rent paid under this program is improperly high, and is not contested during the five-year program period, the family will likely be stuck with that improper, unaffordable rent.

In the last decade, the City has lost more than 100,000 affordable stabilized units – mostly through high rent deregulation. This loss continues unabated, and certainly must be acknowledged as a contributing factor in the growth of our homeless population. Any homeless policy must take this into consideration.

Affordable housing is lost through improper rent increases as well as neglect and deterioration of conditions. Therefore, in addition to building in provisions in these programs to

insure that the rents paid by the City are not improper rents, we should make certain that the families have real opportunities to enforce their rights under the City's housing codes. While I understand the Rules contain a current provision for an initial inspection of the units, there is no provision for regular annual inspection, or enforcement.

I urge you to include in this program access to legal advice and representation for the families involved. The laudable goal of the LINC programs as I read the Rules is to help these families move to housing independence. We must take steps to see that they are as fully empowered as possible to exercise their rights as tenants, on their way to true independence. Good legal assistance does more than solve immediate problems, it can serve to educate, empower and create an understanding of a client's entitlement dignity and the full protections of the law. The LINC Programs are promising efforts to find a way out of our homeless problem. Making sure that free, competent legal services are available to these families will go a long way toward fulfillment of that goal.

Thank you again for the opportunity to voice my position. I look forward to continuing to work with you on this important issue.