



**Testimony to the New York City Council  
Committee on Environmental Protection  
Submitted by the Supportive Housing Network of New York  
November 17, 2021**

INTRODUCTION

Hello Chair Gennaro and members of the Committee on Environmental Protection. My name is Moira McComas and I am a Policy Analyst at the Supportive Housing Network of NY. The Network is a membership organization that represents over 200 nonprofit members who operate and develop supportive housing. In doing so, we also strive to keep the best interests of tenants and staff a priority. Supportive housing is permanent affordable housing with embedded social services for eligible individuals and families, people who are experiencing chronic homelessness and living with disabilities and/or other barriers to maintaining stable housing. The Network also has over 100 corporate members including tax credit syndicators, banks, and other financial institutions.

Thank you for the opportunity to submit testimony regarding Intro 2091.

SUPPORT

The Network supports many of the goals of this legislation and appreciates the attention on the feasibility component of City measures to decarbonize New York City's buildings and achieve climate targets to protect the health and improve the lives of New Yorkers. Ultimately, we understand that the City's emission reducing targets and initiatives aim to provide equitable solutions that benefit the communities suffering the worst impacts of pollution and with the least access to clean energy.

We also want to underscore specific concerns that will affect our supportive housing members and tenants. We hope the feasibility assessments and education plans outlined in this bill will be a solid first step in addressing these concerns.

CONCERNS REGARDING ELECTRIFICATION INITIATIVES

I want to begin with our general concerns regarding electrification initiatives. Electrification and decarbonization efforts will take a massive public investment. Energy efficiency goals are unachievable for nonprofit supportive housing developers and owners if funding will not be scaled up beyond existing resources. There is currently a lack of dedicated and reliable funding to achieve these goals, especially regarding the financial burden inevitably placed on operators and developers of supportive and affordable housing. Any regulations must be paired with programs that ensure we are not diverting limited resources away from the development and preservation of supportive and affordable housing.

It is equally important for the policy goals to match the underwriting realities. New funding mechanisms and incentives must be compatible with term sheets. If term sheets need to be increased to meet climate goals, the City's housing budget must be increased commensurately to ensure that we maintain production.



While formulating these plans and undergoing assessments, the legacy of disinvestment in Black and brown communities that has led to deferred maintenance and disproportionate health hazards in homes needs to be considered every step of the way.

## RECOMMENDATIONS

As previously stated, the Network supports the feasibility assessments outlined in Int. 2091. We hope this legislation will be used to identify any issues related to electrification and decarbonization that would disrupt the supportive housing pipeline, preventing preservation efforts and future development. We cannot allow people experiencing homelessness to suffer as a result of our City and State's climate goals.

The costs of any required rehabilitation or system upgrades needs to be addressed in the assessment for existing affordable and supportive housing residences, and then worked into the parameters of City term sheets. For example, VRF systems for all-electric buildings require monitoring and administrative fees that should be considered in the cost analysis. We hope the feasibility assessments will shed light on these considerations.

There is no mention of a timetable in the legislation for disseminating information to the community and arriving at outcomes of the feasibility assessments. We need to ensure all assessments are completed and ensuing resources are put in place prior to deadlines for energy goals so the pipeline is not impeded.

We would like the Committee to consider adding feasibility studies not just for existing buildings but for new construction. I understand testimony is also being heard today for Int. 2317. For example, including a feasibility study related to the implementation of Int. 2317 would provide clarity on how this legislation will work within the greater context of pushing forward energy goals.

## SUMMARY AND CONCLUSION

We encourage the Council to consider the funding challenges and ask them to thoroughly evaluate the impact of electrification goals and its impact on supportive housing, which houses disenfranchised and marginalized communities already most susceptible to the debilitating, long-term outcomes of climate change.

The Network plans to urge the administration to utilize the cost analysis included in this bill to prioritize and increase investments in the sustainable development and preservation of affordable and supportive housing.

We wholeheartedly support the City's effort to electrify and decarbonize its buildings – the climate goals embedded in Intro 2091. Our testimony to NYC Council to the Committee on Environmental Protection is in support of Int. 2091. Electrification policy goals are important to our organization and we want to ensure they are handled in a way that enables their success.

Sincerely,  
Maira McComas