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Gale A. Brewer, Borough President

Testimony of Gale A. Brewer, Manhattan Borough President On Proposed Rule Change LINC III Rental Assistance Program

Good morning. Thank you, Commissioner Banks and Commissioner Taylor for the opportunity to offer comments on the proposed amendments to the rules for the LINC III Program.

Late last year I had the opportunity to offer my support for the LINC I, LINC II and LINC III proposals and would like to begin with a re-affirmation of my support for these programs. Although more work is needed, the LINC Rental Assistance Programs are a solid tool to address the problem of homelessness.

The first proposed change to the program would allow survivors of domestic violence to continue to receive assistance if they secure employment and become ineligible for Public Assistance, or if their household no longer includes a child. This change will give HRA the discretion to make reasonable and necessary decisions to keep survivors of domestic violence from re-entering the shelter system. I whole-heartedly support this change.

The second change would allow members of LINC III households who are not on Public Assistance to contribute a portion of their income to rents higher than those currently allowed by the program. HRA asserts that this flexibility will “allow more families to be able to relocate from shelter to permanent housing.”

But any conversation about programs to address homelessness must also take into account the ongoing affordability crisis facing New York City. As you both are well aware, in

the last decade we have lost more than 100,000 stabilized apartments in Manhattan alone. Most of the loss is a result of the rent being increased during a vacancy to a level sufficient to remove it from regulation. We know that in many cases, these increases are not completely proper and should be challenged. But this challenge must be made by the tenant within four years, or the right to do so is lost forever. Since the tremendous loss of affordable housing stock is intrinsically linked to the problem of homelessness, I am compelled to raise my concerns once again: the rent charged for any apartment accepted into the LINC programs should be scrutinized to determine its legitimacy. Absent such checks, we run the risk of causing harm in two ways; first, wasting the City's precious funds by paying illegally high rents; and second, by saddling the former shelter residents, years down the line when their time in the program expires, with an illegally high and unchallengeable rent.

So, while I welcome the program modification in LINC III, I reiterate my concern that safeguards be created to protect both the City's funds, and the future affordability of the apartments. Increasing the rent level that an owner may charge for a unit accepted into the program may create an incentive to increase the rent charged – rent which may or may not be fully legitimate. We all want this program to succeed in helping families leave the shelter system and stabilizing them in a safe, affordable apartment. By closely examining the legality of the rents paid by the program, and ensuring that the apartments are safe and affordable while the tenants are part of the LINC program, we increase the likelihood that residents will thrive when out of the program. Therefore, I urge once again that program participants be provided with access to free legal advice and assistance to ensure that their apartments are fully in compliance with rent regulations and housing codes along with all of our health and safety codes.

I would also like to, very briefly, comment on the LINC program implementation so far, based on feedback from constituents who have sought assistance from our office. First,

constituents have trouble getting basic information about the program once they receive LINC approval notices. They need to know where they can find apartments that qualify for the program, and how rent increases will be handled before and after the five-year program timeline. Clear, specific guidelines on rent increases and lists of eligible apartments would help ensure that this great program will help as many New Yorkers as possible.

Thank you for the opportunity to speak about this program and I look forward to continuing to work with both of your agencies on this issue.