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On the ground - and at the table

NYC Environmental Justice Alliance Public Comment to the Committee on Housing City
Council Budget
March 5th, 2020

Thank you for the opportunity to testify. My name is Priya Mulgaonkar, and I'm the Resiliency Planner at the New York City Environmental Justice Alliance. Founded in 1991, NYC-EJA is a citywide membership network linking 11 grassroots organizations from low-income neighborhoods and communities of color in their fight for environmental justice.

Today, I am here to testify in support of the Climate Works for All coalition demand for the Climate and Community Development Fund, a \$1 Billion allocation for this year's budget to address energy efficiency in low-income, rent-stabilized, and affordable housing. New York has less than 10 years to limit global warming to 1.5 degrees Celsius, which will require rapid and equitable investment in every building in our city – and an unwavering and substantial financial commitment in the City budget.

We commend the City Council for passing Local Law 97, the Climate Mobilization Act, in 2019, which mandates energy efficiency retrofits in most of our large, polluting buildings. With buildings accounting for 67% of all greenhouse gas emissions in New York City, LL97 sets a bold and necessary mandate to help tackle the escalating risks of climate change and adverse public health impacts.

Yet, however ambitious this legislation may be, the fact remains that it only covers about 50,000 of our city's over 1 million buildings. LL97 exempts rent-stabilized affordable housing from mandatory retrofits, and which are instead given only prescriptive measures, since the costs of retrofits could be passed to vulnerable tenants as Major Capital Improvements (MCIs) and lead to displacement. This will leave a significant portion of New York City's housing stock struggling to achieve energy efficiency and reduce energy burdens.

We believe the City Council should fund the CCDF for the following reasons:

- Every single City Council district in New York is home to some form of public, rent-regulated, or government-assisted housing, collectively housing over 3 million people.¹
- Affordable, rent-regulated, and public housing tends to require a higher baseline consumption of energy than their market-rate counterparts.² These buildings tend to be older, inefficient, and in disrepair, thus investing in increased efficiency will be essential to achieve NYC's 80x50 goals. New York City needs a large scale, city-funded energy efficiency program helps improve and preserve affordable and public housing.
- Energy efficiency not only draws down building carbon emissions, but also results in ancillary benefits such as reduced operating and maintenance costs that can be invested for other property improvements, healthier residential environments, lower utility bills, and quality jobs creation.
- Energy efficiency is also key to increasing community resiliency. Tenants in rent-stabilized, affordable and public housing tend to be low-income people of color, residing in areas of high heat vulnerability, made worse due to lack of access to green space. These tenants also pay a much higher proportion of income on energy costs.³ On hot days, when everyone is running their A/C, the most heat vulnerable communities are susceptible to blackouts and brownouts – meaning losing power when it's needed most.
- By providing direct investments, the City will help improve and preserve the affordable housing stock which is essential to maintaining the vibrant diversity of our city.

We urge the City Council to make 2020 the Year of the Climate Budget and invest in preserving and climatizing our valuable affordable housing stock.

Sincerely,
Priya Mulgaonkar
Resiliency Planner, NYC Environmental Justice Alliance

¹ <https://www2.census.gov/programs-surveys/nychvs/tables/2014/s7a-pop-in-household-renter-occupied/series-7a-table-84.xls>

² <https://furmancenter.org/research/publication/low-hanging-fruit-energy-efficiency-and-the-split-incentive-in-subsidized-m>

³ <https://www.tandfonline.com/doi/abs/10.1080/01944363.2019.1647446?journalCode=rjpa20&>