

Testimony from NYCHA's Chief Operating Officer Eva Trimble
NYCHA Vacancies and Transfers
Committee on Public Housing
Monday, June 16, 2025 – 10 a.m.
New York City Hall Council Chambers

Chair Chris Banks, members of the Committee on Public Housing, other distinguished members of the City Council, NYCHA residents, community advocates, and members of the public: good morning. I am Eva Trimble, NYCHA's Chief Operating Officer. I am pleased to be joined by Sylvia Aude, Senior Vice President of Public Housing Tenancy Administration, and other members of NYCHA's team. Thank you for this opportunity to discuss vacancies and transfers at the Authority. NYCHA is a vital resource of affordable housing, and we strive to ensure that as many New Yorkers as possible can benefit from safe and decent public housing.

Ensuring Safe, Quality Housing

As part of our efforts to improve residents' quality of life, and in compliance with the HUD agreement, we have been performing extensive – and required – environmental work in every apartment that becomes unoccupied. Considering the massive repair needs across the Authority (nearly \$80 billion) and the average tenure in a NYCHA apartment (25 years), this is a vital opportunity to carry out critical health and safety work.

Lead-based paint testing and abatement is a major element of the work we're doing in vacant apartments. NYCHA's policy is that when an apartment becomes vacant, our Healthy Homes team conducts a lead-based paint inspection if the apartment hasn't already been inspected prior to becoming vacant. If lead-based paint is identified, the apartment is scheduled for abatement. An asbestos investigation is performed at apartments with damaged tiles or textured ceilings.

Since the City instituted a more stringent lead paint standard in December 2021, Healthy Homes has cleared lead-based paint in more than 16,000 apartments at turnover; we are currently clearing vacant apartments for lead-based paint at a rate of 325 apartments per month. For vinyl asbestos floor tiles, we abate around 160 to 200 vacant apartments each month; since December 2021, we have abated asbestos floor tiles in more than 7,500 vacant apartments. On average, it takes four to six months to complete the lead and asbestos testing process, and abatement if necessary, during turnover. It costs approximately \$17,000 to

complete lead testing, abatement, and clearance in each apartment and approximately \$25,000 to complete asbestos testing, abatement, and clearance in each apartment.

While the practice of eliminating lead-based paint adds time to the apartment turnover process, it also means that every resident will move into a new apartment that is free of this environmental hazard. Our work in this area is a transformative accomplishment that addresses a long-entrenched issue and dramatically benefits residents.

Since last June, NYCHA has been turning over approximately 535 apartments per month. Every development is expected to complete a minimum of five moveouts per month. While we are always working to turn over apartments as quickly as possible and to speed up our timelines, we take pride in the significantly increased turnover activity and the fact that residents are moving into safe and rehabilitated homes. We also understand that it's frustrating to wait for a new apartment; to reduce the wait time for families, we now match prospective tenants with apartments when the homes are turnkey ready (rather than once the apartment is vacated, per the previous policy).

Vacancies at NYCHA

NYCHA's vacancy rate is currently 4.46 percent, which is lower than the national public housing vacancy rate of 5.27 percent. Additionally, the total number of move-ins in 2024 (4,052) was 52 percent higher than in 2023 (2,674 move-ins).

NYCHA works with partners at all levels of government to use every available resource to get New Yorkers into our deeply affordable apartments. We are grateful for the City's ongoing support, including via funding for the Vacant Unit Readiness program. In the current fiscal year, the City has made approximately \$76 million available to NYCHA for this program, for rehabilitation work associated with expediting apartment turnover. Additional funding is also available for the following fiscal years.

Improving Our Transfer Policies

I'd like to take a moment to share some exciting updates about our Tenant Selection and Assignment Plan (TSAP). For nearly 30 years, TSAP has guided a fair and neutral process for

filling vacancies with applicants and tenant transfers. We evaluate our transfer policies periodically to ensure we are serving residents and applicants as efficiently and effectively as possible, while adhering to applicable laws, regulations, and requirements.

In line with our vision for transformation, we are considering changing the current TSAP from a four-tier to a three-tier system. Tiers 1 and 2 are allocated to tenant relocations. The third tier encompasses all remaining transfer and applicant selections, which would be divided into seven rotating groups, with certain categories allocated a higher proportion of selections to reflect their priority. The revised rotation model will ensure a more balanced and efficient selection process while addressing the needs of multiple housing priorities, including health and safety matters, domestic violence, reasonable accommodations, and homelessness.

We are currently seeking feedback from stakeholders, including resident leadership and elected officials, on these proposed transfer policy changes, and we have already briefed Chair Banks and Assemblymember Rosenthal, as well as other partners and housing advocates, as part of a robust outreach campaign. The changes are also described in the Draft Fiscal Year 2026 Annual Plan that was released for public review on June 13. Residents and any member of the public can comment on the plan, including the proposed TSAP changes, in person or virtually at a July 30 public hearing; comments can also be submitted via email. The annual plan, as well as details about the public hearing and commenting process, are available on NYCHA's website.

Serving New Yorkers

We aim to provide housing to New Yorkers as quickly as possible, while ensuring that they are moving into safe, decent homes which have been remediated of hazards like lead and asbestos – the strides we are making in carrying out critical work like lead abatement are benefiting residents today as well as the generations to come.

We acknowledge that there is more work to be done, and we are always grateful to collaborate with the Council and other partners on ways we can improve our service to residents and continue making progress as an organization.

Thank you. We are happy to answer any questions you may have.



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON
PUBLIC HOUSING
JUNE 16, 2025**

Greetings,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. Good morning and thank you to Chair Banks and the Committee on Public Housing for holding this hearing.

The CityFHEPS (City Fighting Homelessness and Eviction Prevention Supplement) program was created in April 2019. Since then, most people who exit the shelter system do so with a CityFHEPS Voucher¹ which should be accepted by NYCHA (New York City Housing Authority)². NYCHA has not published data showing the number of new residents using CityFHEPS but there is information stating that they have approximately 5,900 vacant apartments³.

NYCHA saw an increase in vacancies from 490 to 3,300 in a one year period between December 2021 to December 2022, most likely due to different results of COVID-19. Since December 2022 vacancies have continued to steadily increase. As of April 2025, the average turn around time for a new resident to move into a vacant apartment was 362 days or basically an entire year, while in Dec 2021, it was 120 days⁴. The number of unhoused New Yorkers moving into public housing under the Adams administration dropped to the lowest number in a decade, even as the volume of empty NYCHA apartments continued to rise.⁵ Looking forward, NYCHA must assist with the city's unhoused crises. Coalition for the Homeless has stated that more NYCHA apartments should be reserved for the unhoused, because in moving from shelters to NYCHA, data shows people remain housed⁶.

¹ <https://comptroller.nyc.gov/services/for-the-public/charting-homelessness-in-nyc/exits-from-shelters/>

² [https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/DSS-7n-\(E\).pdf](https://www.nyc.gov/assets/hra/downloads/pdf/cityfheps-documents/DSS-7n-(E).pdf)

³ <https://eapps.nycha.info/NychaMetrics/>

⁴ <https://council.nyc.gov/data/nycha-vacancy/>

⁵

<https://gothamist.com/news/fewest-shelter-residents-moving-into-nycha-buildings-in-10-years-while-vacancies-soar>

⁶

<https://gothamist.com/news/fewest-shelter-residents-moving-into-nycha-buildings-in-10-years-while-vacancies-soar>

In NYCHA's executive budget hearing on May 14th of this year, the administration said the excessive vacancies are caused by reserving apartments for transfers⁷. In 2023 at least 19,000 households tried to transfer for various reasons, while by 2024 the average time for an emergency transfer was 797 days⁸, or more than two years. NYCHA has sought assistance with some of these challenges from RAD-PACT (Rental Assistance Demonstration) with private and non-profit development partnerships. Starting April 2025, one can transfer from a PACT apartment to a differently managed PACT apartment if placed on the "inter-PACT transfer waitlist," but only if it is an emergency transfer⁹. In short, even if your apartment is managed by PACT, you can only transfer to a different PACT management if it is an emergency, which limits one's options of transfers.

There has been no signal from the Trump administration that the city will be able to receive any of the \$80 billion dollars of Federal assistance NYCHA needs to make capital repairs to buildings¹⁰. My office supports [Int 0111-2024](#) from CM Aviles to require NYCHA to make publicly available online and submit to the Council an annual report on dwelling units that have been vacant for more than 30 days. NYCHA is not the only factor—but still an important one—in providing affordable housing for residents to move to. The Housing Authority must see this as a crucial time to work with city and state officials on creating better policy measures to protect and care for tenants, especially as more New Yorkers have become more vulnerable from the housing crises, the pandemic, immigration raids, and other economic challenges.

Thank you.

7

<https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1302855&GUID=F039EAFF-4D09-48E9-89E7-11BDF629C80D&Options=infoj&Search=>

8

<https://gothamist.com/news/nyc-public-housing-residents-fleeing-domestic-violence-face-lengthy-waits-report-finds>

9

<https://www.nyc.gov/site/nycha/about/pact/resident-resources.page#:~:text=Inter%20PACT%20Transfer%20Requests,Inter%20PACT%20Transfer%20wait%20list>

¹⁰ <https://www.nyc.gov/site/nycha/about/press/pr-2023/pr-20230712.page>



520 Eighth Avenue
New York, NY 10018
p. 646.386.3100
f. 212.397.0985

Courtney Bryan, Chief Executive Officer

innovatingjustice.org

**Center for Justice Innovation
New York City Council
Committee on Public Housing
June 16, 2025**

Good afternoon Chair Banks and esteemed members of the Committee on Public Housing. Thank you for the opportunity to testify today on behalf of the Center for Justice Innovation (the Center).

The Center for Justice Innovation is a community justice organization that centers safety and racial justice in partnership with communities, courts, and the people most impacted. Addressing the intersection of housing and the criminal legal system is essential for building safer, more equitable communities. Involvement in the criminal legal system can lead to housing instability, while lack of access to stable housing can increase the risk of incarceration. This cyclical relationship disproportionately impacts low-income communities and communities of color, contributing to intergenerational poverty and recidivism. Housing is not only a basic human need—it is a foundational part of justice, dignity, and public safety.

Across the Center, we work to prevent evictions, respond to hazardous repair conditions, and increase financial stability and access to legal services for tenants. By addressing issues early, we help people stay safely housed and avoid legal system involvement that can affect employment, family security, and future access to stable housing. The Center often serves as a bridge between the court system, city agencies, legal service providers, and communities, developing collaborative strategies to advance access to housing and reduce housing insecurity. Our neighborhood-based work supports tenants taking actions on repairs, rent, and lease issues in NYCHA.

Since 2001, the Center has operated two neighborhood-based housing courts, in Harlem and Red Hook, Brooklyn. At these locations, housing resource staff provide court navigation, one-on-one assistance, and direct connections to a variety of resources and legal services for tenants. Our housing resource centers support tenants in documenting and tracking their repair needs, as well as accessing and navigating the court system when needed to hold NYCHA accountable. We also work to achieve systemic reform through advocacy, most recently advocating for open data on NYCHA's housing code violations and for improvements to NYCHA's work order systems.

Over the past 24 years, our staff have conducted over 43,000 intakes for residents in Red Hook and Harlem with housing concerns. In just this past year, our housing resource centers

worked with 2,615 residents to help them remain safely, affordably housed.¹ Building off of this, the Center has expanded our housing work to Mott Haven and Far Rockaway, based out of our Bronx and Queens Community Justice Centers. In partnership with the Office of Court Administration, the Center also operates the Virtual Court Access Network in Harlem and Red Hook, helping tenants respond to housing court notices and file Housing Part Actions for repairs.

Across our sites, we are seeing deeply troubling delays in the NYCHA transfer process. Tenants regularly wait more than two years to be moved from one unit to another—even when they are facing urgent situations, such as the need for ADA-compliant housing, emergency safety concerns, or uninhabitable living conditions.² During this time, residents are often forced to remain in unsafe or unhealthy environments. This is particularly alarming given that just last year, over 5,000 NYCHA units remained vacant.³ With so many empty apartments available, it is unacceptable that residents must endure dangerous living conditions for years.

A major factor worsening these delays is the widespread lack of communication and transparency throughout the transfer process. Clients frequently report receiving little to no updates from NYCHA. In some instances, residents are not even notified in a timely manner when their transfer is approved. Many are left unsure of whom to contact for information or assistance, creating further confusion and distress. We have also seen transfer requests closed automatically when a resident does not respond to the annual canvas letter—often without any meaningful follow-up or outreach.

When transfer requests are denied, the grievance process itself is riddled with barriers that amount to a denial of due process. Alarming, we have seen transfer requests rejected solely because a tenant is involved in housing court—even when the legal matter is directly tied to the unsafe conditions prompting the transfer. These issues highlight a critical need for better communication, more responsive case management, and a clear, accessible point of contact for residents navigating this process.

I want to share a few stories of how the delays and issues with the current transfer process impact residents, their families, and public safety in the community.

Ms. B is a single mother who lives in NYCHA housing with her daughter. Ms. B also works for NYCHA as a Maintenance Worker. Her daughter had fallen ill due to the uninhabitable conditions in their apartment including mold, lead, and an exposed pipe from a work job never completed in the bedroom. Despite being approved for a transfer, NYCHA failed to provide her with a new apartment, leaving her with no choice but to seek refuge with friends and family while she waited for her new apartment to be assigned. During the time that she was not living in her apartment, she stopped paying rent on her uninhabitable old apartment and put down a security deposit for the apartment that was never delivered.

¹ Center for Justice Innovation. (2025). Justice Center Application database. [Data file].

² Chaffers, S. (2025, February 6). Domestic violence survivors endure delays for transfers from NYCHA. <https://amsterdamnews.com/news/2025/02/06/nycha-residents-approved-for-transfers/>

³ Yi, K., & Brand, D. (2024, May 3). *Fewest shelter residents moving into NYCHA buildings in 10 years while vacancies soar*. Gothamist. <https://gothamist.com/news/fewest-shelter-residents-moving-into-nycha-buildings-in-10-years-while-vacancies-soar>

NYCHA eventually brought her to housing court on a non-payment case. It was in court that she learned her already-approved transfer had been canceled because she was in arrears and facing eviction. Ms. B brought an HP Action against NYCHA and worked with our Eviction Diversion Initiative team to advocate for herself. She was ultimately given a rent abatement, her transfer was reinstated, and she was finally given keys to her new apartment where she lives today.

Currently, NYCHA policy states that transfers will not be approved for residents who are in active housing court proceedings or administrative proceedings for failure to occupy the apartment. This policy does not make sense when the very reason tenants are in housing court is related to the reason they are seeking the transfer from their apartment. The reason a household has fallen into arrears or stopped occupying the apartment must be considered.

Ms B. is far from the only client we see suffering with uninhabitable living conditions in NYCHA apartments. Mr. R and his family have been living in NYCHA housing for about ten years. Throughout his time living in the apartment, everything was satisfactory until NYCHA began repairs on the roof of his building. At this time, he began experiencing leaks in his apartment, which resulted in cracks and holes in his walls and ceiling.

He began communicating with NYCHA to find a way to either get the repairs to his apartment done, or move to a new unit. When he became a client at the Queens Community Justice Center, three years had passed since he put in the request for a transfer. We assisted him with bringing NYCHA to housing court for the repairs. However, he is still in housing court and has not been offered another apartment for him and his family to live in. Meanwhile, the mold and mildew have started to become a health hazard.

In many instances, residents take NYCHA to court due to severe repair issues, with the expectation that—after a long wait—the necessary repairs will finally be completed in a timely manner. It is also common for residents to raise concerns about long transfer wait times during their Housing Court HP cases, hoping the transfer can be connected to their legal action. However, NYCHA frequently treats repair issues and transfer requests as unrelated matters, failing to address them as part of the same systemic problem.

Reasonable accommodation transfers are the most common type of transfer we see requested, often directly related to unlivable apartment conditions. These conditions may include, for example, difficulty breathing caused by mold and mildew from excessive leaks throughout the unit. However, we also see transfers requested as a result of dangerous safety issues, which fail to be addressed in a timely manner despite residents' urgent pleas.

In August 2023 at the Red Hook Houses, an armed home invasion occurred at a client's apartment. The NYPD was contacted, which escalated the incident. Armed individuals began entering the building, and gunfire was exchanged, targeting our client. During the incident, our client's father was shot. As a result, a safety transfer request was submitted through the NYCHA Portal in November 2023. Despite the active risk presented to our client, they are still awaiting transfer, well over a year later.

NYCHA residents deserve better. When our clients seek a transfer, it is typically because they are living in conditions that are dangerous, unhealthy, or incompatible with their basic needs. With thousands of vacant units across the system, there is simply no justification for forcing residents to wait years for relief. We are grateful to this Council for your attention to these issues and your ongoing efforts to support the more than 300,000 New Yorkers who call NYCHA home.⁴ Thank you for the opportunity to testify.

⁴ New York City Housing Authority. (2023, April). NYCHA 2023 Fact Sheet. <https://www.nyc.gov/assets/nycha/downloads/pdf/NYCHA-Fact-Sheet-2023.pdf>



520 Eighth Avenue
New York, NY 10018
p. 646.386.3100
f. 212.397.0985

Courtney Bryan, Chief Executive Officer

innovatingjustice.org

**Center for Justice Innovation
New York City Council
Committee on Public Housing
June 16, 2025**

Good afternoon Chair Banks and esteemed members of the Committee on Public Housing. My name is Elizabeth Brantl, and I serve as the Government Relations Coordinator for the Center for Justice Innovation (the Center). Thank you for the opportunity to testify today.

The Center for Justice Innovation is a community justice organization that centers safety and racial justice in partnership with communities, courts, and the people most impacted. Addressing the intersection of housing and the criminal legal system is essential for building safer, more equitable communities. Involvement in the criminal legal system can lead to housing instability, while lack of access to stable housing can increase the risk of incarceration. This cyclical relationship disproportionately impacts low-income communities and communities of color, contributing to intergenerational poverty and recidivism. Housing is not only a basic human need—it is a foundational part of justice, dignity, and public safety.

Across the Center, we work to prevent evictions, respond to hazardous repair conditions, and increase financial stability and access to legal services for tenants. By addressing issues early, we help people stay safely housed and avoid legal system involvement that can affect employment, family security, and future access to stable housing. The Center often serves as a bridge between the court system, city agencies, legal service providers, and communities, developing collaborative strategies to advance access to housing and reduce housing insecurity. Our neighborhood-based work supports tenants taking actions on repairs, rent, and lease issues in NYCHA.

Since 2001, the Center has operated two neighborhood-based housing courts, in Harlem and Red Hook, Brooklyn. At these locations, housing resource staff provide court navigation, one-on-one assistance, and direct connections to a variety of resources and legal services for tenants. Our housing resource centers support tenants in documenting and tracking their repair needs, as well as accessing and navigating the court system when needed to hold NYCHA accountable. We also work to achieve systemic reform through advocacy, most recently advocating for open data on NYCHA's housing code violations and for improvements to NYCHA's work order systems.

Over the past 24 years, our staff have conducted over 43,000 intakes for residents in Red Hook and Harlem with housing concerns. In just this past year, our housing resource centers

worked with 2,615 residents to help them remain safely, affordably housed.¹ Building off of this, the Center has expanded our housing work to Mott Haven and Far Rockaway, based out of our Bronx and Queens Community Justice Centers. In partnership with the Office of Court Administration, the Center also operates the Virtual Court Access Network in Harlem and Red Hook, helping tenants respond to housing court notices and file Housing Part Actions for repairs.

Across our sites, we are seeing deeply troubling delays in the NYCHA transfer process. Tenants regularly wait more than two years to be moved from one unit to another—even when they are facing urgent situations, such as the need for ADA-compliant housing, emergency safety concerns, or uninhabitable living conditions.² During this time, residents are often forced to remain in unsafe or unhealthy environments. This is particularly alarming given that just last year, over 5,000 NYCHA units remained vacant.³ With so many empty apartments available, it is unacceptable that residents must endure dangerous living conditions for years.

A major factor worsening these delays is the widespread lack of communication and transparency throughout the transfer process. Clients frequently report receiving little to no updates from NYCHA. In some instances, residents are not even notified in a timely manner when their transfer is approved. Many are left unsure of whom to contact for information or assistance, creating further confusion and distress. We have also seen transfer requests closed automatically when a resident does not respond to the annual canvas letter—often without any meaningful follow-up or outreach.

When transfer requests are denied, the grievance process itself is riddled with barriers that amount to a denial of due process. Alarming, we have seen transfer requests rejected solely because a tenant is involved in housing court—even when the legal matter is directly tied to the unsafe conditions prompting the transfer. These issues highlight a critical need for better communication, more responsive case management, and a clear, accessible point of contact for residents navigating this process.

I want to share a few stories of how the delays and issues with the current transfer process impact residents, their families, and public safety in the community.

Ms. B is a single mother who lives in NYCHA housing with her daughter. Ms. B also works for NYCHA as a Maintenance Worker. Her daughter had fallen ill due to the uninhabitable conditions in their apartment including mold, lead, and an exposed pipe from a work job never completed in the bedroom. Despite being approved for a transfer, NYCHA failed to provide her with a new apartment, leaving her with no choice but to seek refuge with friends and family while she waited for her new apartment to be assigned. During the time that she was not living in her apartment, she stopped paying rent on her uninhabitable old apartment and put down a security deposit for the apartment that was never delivered.

¹ Center for Justice Innovation. (2025). Justice Center Application database. [Data file].

² Chaffers, S. (2025, February 6). Domestic violence survivors endure delays for transfers from NYCHA. <https://amsterdamnews.com/news/2025/02/06/nycha-residents-approved-for-transfers/>

³ Yi, K., & Brand, D. (2024, May 3). *Fewest shelter residents moving into NYCHA buildings in 10 years while vacancies soar*. Gothamist. <https://gothamist.com/news/fewest-shelter-residents-moving-into-nycha-buildings-in-10-years-while-vacancies-soar>

NYCHA eventually brought her to housing court on a non-payment case. It was in court that she learned her already-approved transfer had been canceled because she was in arrears and facing eviction. Ms. B brought an HP Action against NYCHA and worked with our Eviction Diversion Initiative team to advocate for herself. She was ultimately given a rent abatement, her transfer was reinstated, and she was finally given keys to her new apartment where she lives today.

Currently, NYCHA policy states that transfers will not be approved for residents who are in active housing court proceedings or administrative proceedings for failure to occupy the apartment. This policy does not make sense when the very reason tenants are in housing court is related to the reason they are seeking the transfer from their apartment. The reason a household has fallen into arrears or stopped occupying the apartment must be considered.

Ms B. is far from the only client we see suffering with uninhabitable living conditions in NYCHA apartments. Mr. R and his family have been living in NYCHA housing for about ten years. Throughout his time living in the apartment, everything was satisfactory until NYCHA began repairs on the roof of his building. At this time, he began experiencing leaks in his apartment, which resulted in cracks and holes in his walls and ceiling.

He began communicating with NYCHA to find a way to either get the repairs to his apartment done, or move to a new unit. When he became a client at the Queens Community Justice Center, three years had passed since he put in the request for a transfer. We assisted him with bringing NYCHA to housing court for the repairs. However, he is still in housing court and has not been offered another apartment for him and his family to live in. Meanwhile, the mold and mildew have started to become a health hazard.

In many instances, residents take NYCHA to court due to severe repair issues, with the expectation that—after a long wait—the necessary repairs will finally be completed in a timely manner. It is also common for residents to raise concerns about long transfer wait times during their Housing Court HP cases, hoping the transfer can be connected to their legal action. However, NYCHA frequently treats repair issues and transfer requests as unrelated matters, failing to address them as part of the same systemic problem.

Reasonable accommodation transfers are the most common type of transfer we see requested, often directly related to unlivable apartment conditions. These conditions may include, for example, difficulty breathing caused by mold and mildew from excessive leaks throughout the unit. However, we also see transfers requested as a result of dangerous safety issues, which fail to be addressed in a timely manner despite residents' urgent pleas.

In August 2023 at the Red Hook Houses, an armed home invasion occurred at a client's apartment. The NYPD was contacted, which escalated the incident. Armed individuals began entering the building, and gunfire was exchanged, targeting our client. During the incident, our client's father was shot. As a result, a safety transfer request was submitted through the NYCHA Portal in November 2023. Despite the active risk presented to our client, they are still awaiting transfer, well over a year later.

NYCHA residents deserve better. When our clients seek a transfer, it is typically because they are living in conditions that are dangerous, unhealthy, or incompatible with their basic needs. With thousands of vacant units across the system, there is simply no justification for forcing residents to wait years for relief. We are grateful to this Council for your attention to these issues and your ongoing efforts to support the more than 300,000 New Yorkers who call NYCHA home.⁴ Thank you for the opportunity to testify.

⁴ New York City Housing Authority. (2023, April). NYCHA 2023 Fact Sheet. <https://www.nyc.gov/assets/nycha/downloads/pdf/NYCHA-Fact-Sheet-2023.pdf>



**New York City Council Hearing
June 16th, 2025
Public Housing Committee
Chair, Chris Banks**

**Testimony of the Legal Aid Society
Intro 122-2024**

Jennvine Wong
Supervising Attorney, Cop Accountability Project
Criminal Law Reform
The Legal Aid Society
49 Thomas Street
New York, New York 10013
212-577-3309
jwong@legal-aid.org

Since 1876, The Legal Aid Society (LAS) has provided free legal services to New York City residents who are unable to afford private counsel. Annually, through our criminal, civil and juvenile offices in all five boroughs, our staff handles more than 300,000 cases for low-income families and individuals and is the largest public defense organization in the country. By contract with the City, the Society serves as the primary defender of low-income people prosecuted in the state court system, the overwhelming majority of whom are Black and brown.

The Legal Aid Society is in a unique position to testify about policing in public housing. Legal Aid's Public Housing Unit works to preserve homes, prevent eviction and displacement by providing critical legal services. Through our direct representation and law reform efforts, we promote healthy, stable, affordable housing for our clients and remove the systemic barriers that keep people trapped in cycles of homelessness. Legal Aid's Cop Accountability Project works to improve police accountability and transparency through litigation and advocacy against problematic policing policies.

While Int. 122 appears innocuous in requiring crime reporting quarterly on a subset of complaints for each housing development operated by New York City Housing Authority (NYCHA), it also requires that crime data that the NYPD *already* posts publicly by precinct and patrol borough also be posted for each housing development. But crime data from within NYCHA housing is already posted publicly. Int. 122 would not create a new reporting duty for the NYPD; instead it would compile crime data focusing only on public housing developments. This NYCHA-specific reporting requirement would bring no added benefit, but it would compound negative stereotypes and tropes about public housing. NYCHA residents have long experienced discriminatory and heightened policing in public housing because of negative tropes about public housing developments. Indeed, the NYPD's historical practice of heightened and discriminatory trespass enforcement activity in NYCHA housing is currently under federal monitorship.¹

Moreover, basing police enforcement on the NYPD's crime data rests on a flawed foundation. NYPD crime data is based on policing arrests alone. It is not reflective of arrests that result in the filing of charges and certainly not reflective of case outcomes. We ask you to keep in

¹ The monitorship arose out of three lawsuits that challenged NYPD's stop question and frisk practices and policies, which have now been combined and are part of the monitor effort. *See, Davis, et al. v. City of New York, et al.*, 10-CV-0699 (AT), *Floyd, et al. v. City of New York*, 08-CV-1034 (AT), *Ligon, et al. v. City of New York, et al.*, 12-CV-2274 (AT).

mind the disparity in statistics between who the NYPD arrests and which of these cases city prosecutors ultimately pursue and secure convictions. In 2023, the most recent year with available data,² the New York State Division of Criminal Justice Services reports that NYC prosecutors declined to prosecute 21% of all misdemeanor arrests. An additional 38% of misdemeanor arrests were dismissed by prosecutors and another 18% received deferred dismissals. Together, 77% of misdemeanor arrests in NYC lacked sufficient evidence for prosecutors to initially pursue them or sufficient evidence for prosecutors to secure convictions. These statistics show that NYPD “crime data” are indicative of whether arrests occurred, not whether the arrests were justified.

Any purported benefit from Int. 122 is outweighed by the potential harm to the communities that reside in these housing developments. NYPD data has been used for years to justify targeted policing practices that harm marginalized communities without contributing to public safety.³ The history of data abuse is key context for any attempt to use data for purportedly good aims. An unintended consequence of this bill is the targeting of NYCHA residents, most of whom are Black and brown people. Not only does the data reporting required already exist publicly,⁴ but collecting and posting the same data in this proposed targeted manner will only serve to further entrench stereotypes and prejudice about NYCHA residents. It may also serve to justify oversurveillance of a population that is already overpoliced.⁵ NYPD utilizes data for “precision policing” through various tools and strategies, including CompStat, the Domain Awareness System (DAS) and the Criminal Group Database – better known as the Gang Database. In turn, the dangers of data abuse can result in forming the basis for increased surveillance in furtherance

² See New York State Division of Criminal Justice Services, Dispositions of Adult Arrests, 18 and older 2019-2023, "NYC" available at <https://www.criminaljustice.ny.gov/crimnet/ojsa/dispos/index.htm>

³ See, e.g., Peter Hanink, *Don't Trust The Police: Stop Question Frisk, CompStat, and the High Cost of Statistical Over-Reliance in the NYPD*

⁴ NYPD Borough and Precinct Crime Stats, <https://www.nyc.gov/site/nypd/stats/crime-statistics/borough-and-precinct-crime-stats.page> (last accessed Jun 18, 2025); NYPD Citywide Crime Statistics, <https://www.nyc.gov/site/nypd/stats/crime-statistics/citywide-crime-stats.page> (last accessed Jun 18, 2025). Specific Public Service Area (PSA) data, which covers NYCHA properties, can be found within the CompStat system or by navigating through the precinct-level data.

⁵ See, e.g., Rashida Richardson, Jason Schultz, Kate Crawford, *Dirty Data, Bad Predictions: How Civil Rights Violations Impact Police Data, Predictive Policing Systems, and Justice*, 94 NYU L. Rev. Online 192 (2019); see, also Will Douglas Heaven, “Predictive policing algorithms are racists. They need to be dismantled”, MIT Technology Review (July 17, 2020) <https://www.technologyreview.com/2020/07/17/1005396/predictive-policing-algorithms-racist-dismantled-machine-learning-bias-criminal-justice/>

of “predictive” or “precision” policing, providing a seemingly objective cover for discriminatory policing.⁶

Public safety involves more than crime statistics – it involves creating a community where people and residents alike feel secure and have access to essential resources. It is about addressing the root causes of crime and promoting safety from the economic, social, and environmental conditions that can lead to harm. Public housing developments are home to some of New York’s most vulnerable populations including seniors and families with young people. Yet, public housing developments are regularly without heat and hot water; residents regularly suffer from a lack of working elevators, recurring leaks, infestations, broken lights, and other infrastructure issues. Public housing is a necessary resource that keeps New York City affordable to many. Resources and attention to these long-standing infrastructure issues are desperately required. This city must invest funding for repairs to crumbling NYCHA buildings as safe and habitable homes are key to providing safety for residents.

We respectfully recommend that the City Council reject Int. 122 as redundant and unnecessary. Any of its purported benefits are without support and obscure the serious potential harm it poses to vulnerable and marginalized communities through negative tropes and increased policing.

⁶ See Eleni Manis, Fatima Ladha, Nina Loshkajian, Aidan McKay, Corinne Worthington, Report - *Seeing is Misbelieving: How Surveillance Technology Distorts Crime Statistics*, Surveillance Technology Oversight Project (S.T.O.P.) (June 24, 2025) <https://www.stopspying.org/seeing-is-misbelieving>



Legal Services New York City’s Testimony Before the New York City Council’s Committee on Public Housing on its Oversight Hearing Regarding NYCHA Vacancies and Transfers

Legal Services NYC (“LSNYC”) submits this testimony as part of the oversight hearing held by the Council’s Committee on Public Housing regarding vacancies and transfers at the New York City Housing Authority (“NYCHA”). We also comment on Int. 111-2024 (Avilés), which requires NYCHA to report to the Council and the public on vacant apartments.

LSNYC fights poverty and seeks racial, social, and economic justice for low-income New Yorkers. For over 50 years, LSNYC has challenged systemic injustices that trap people in poverty and helped clients meet basic needs for housing, income and economic security, family and immigration stability, education, and health care.

Our advocates across the five boroughs have assisted thousands of NYCHA families in recent years with myriad legal issues related to their tenancies, including eviction defense, unsafe living conditions, disability accommodations, Violence Against Women Act (“VAWA”) emergency transfers, Rental Assistance Demonstration/Permanent Affordability Commitment Together (“RAD/PACT”) conversions, and Public Housing Preservation Trust voting procedures, among other issues. We have also represented tenants in federal lawsuits seeking to uphold their rights under the Brooke Amendment, the Americans with Disabilities Act (“ADA”), the Fair Housing Act (“FHA”), and VAWA. In addition, we have worked in coalition with numerous public housing tenant groups, community organizers, and service-oriented organizations to advance the rights of NYCHA tenants, including the Citywide Council of Presidents, Good Old Lower Eastside, Justice for All Coalition, CAAAV: Organizing Asian Communities, Save Section 9, New Destiny Housing, and Safe Horizon.

As presented in this testimony, thousands of NYCHA tenants in vulnerable situations wait many years to reach a safe home which, especially in the case of survivors of gender-based violence (“GBV”), pushes them to enter the city’s shelter system.¹ Shockingly, GBV survivors wait close to **800 days** for a transfer and tenants with disabilities wait close to **400 days** for a transfer. This problem is fueled by a number of reasons, but most prominently, NYCHA’s vacant units crisis and broken transfer policies. We thank the Council for the invitation to testify about this important topic affecting half-a-million New Yorkers living in public housing and the many more who aspire to live in the city’s largest and most affordable housing stock.

Demand Justice.

1. Our organization's work to ensure that NYCHA tenants are transferred into safe housing as quickly as possible

For many years, LSNYC has assisted numerous NYCHA tenants with disabilities to secure reasonable accommodation transfers. We have brought litigation in federal court to uphold the rights of our clients under the ADA and FHA to reasonable accommodation transfers as well as undertaken informal advocacy with NYCHA. In one of our cases, NYCHA submitted a declaration indicating that, in 2021, 612 tenants with approved reasonable accommodation transfers waited **388 days** to reach a safe home, despite the fact that NYCHA gives tenants with disabilities one of the highest transfer priorities.² The transfer delays tenants with disabilities face are largely fueled by NYCHA's vacant units crisis, which has worsened since 2021. More on this crisis will be discussed below.

As for the predicament faced by GBV survivors, it is *even worse* than that faced by disabled tenants because, on top of the vacant units crisis, NYCHA gives emergency transfers³ one of the *lowest* priorities. On December 17, 2024, our organization published a report titled *Trapped in Danger: How NYCHA Puts Lives of Gender-Based Violence Survivors at Risk by Delaying Emergency Transfers*.⁴ The culmination of various years of advocacy on behalf of GBV survivors to uphold their rights under VAWA, the report presented the stories of our clients Sarah, Jessica, Frances, and Elizabeth, all who waited upwards of two, even three years for an emergency transfer. In the interim, they continued to experience the threat of violence or suffered actual assaults, in response to which NYCHA did *nothing* to speed up their transfer requests. Indeed, across NYCHA, roughly **2,000** GBV survivors are waiting for their emergency transfers for an average of **797 days**.⁵

Our report presents various causes for the unconscionable delays faced by GBV survivors seeking emergency transfers, but two are particularly relevant to the instant hearing: (1) the exceedingly low priority NYCHA gives emergency transfers; and (2) NYCHA's vacant units crisis.

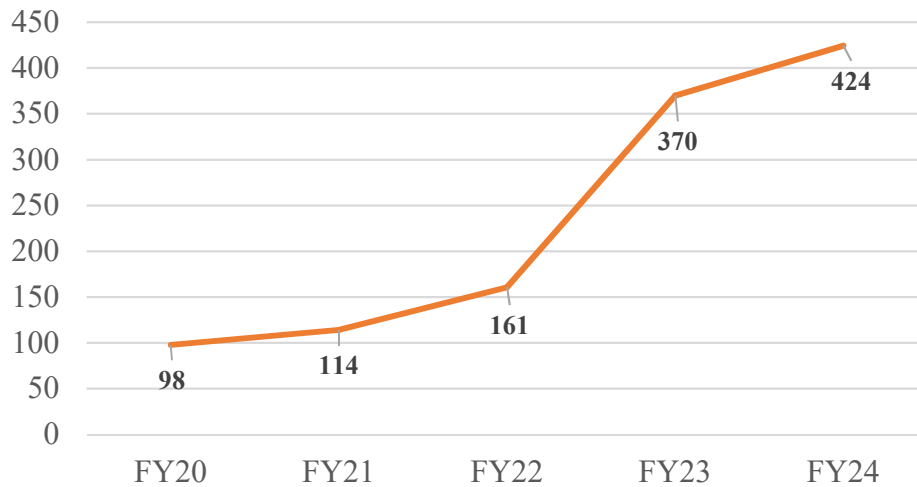
First, as detailed in our report, NYCHA has placed emergency transfers in its *lowest* priority category, above which there are nearly a dozen transfer reasons including reasons that do not involve emergency circumstances (such as transfers because the tenant has empty rooms in their home or because the tenant lives in a seniors' building without being elderly).⁶ Federal regulations require public housing authorities to give emergency transfers as high a priority as other types of transfers in emergency situations, such as those involving physical hazards that make an apartment unlivable or life-threatening medical conditions.⁷ NYCHA is not in compliance with federal regulations in this regard and what it needs to do to fix the problem is clear—give transfer requests by GBV survivor a much higher, if not highest, level of priority.

Second, well known to this Council, NYCHA's vacant units crisis is an enormous problem affecting low-income New Yorkers who rely on safe and habitable public housing to live with dignity. According to public records and information obtained by our organization through a Freedom of Information Law ("FOIL") request, in recent years more than **5,000**

apartments across the system were vacant for upwards of **400 days**, all the while nearly **19,000** New Yorkers were on NYCHA’s waitlists.⁸

Moreover, NYCHA’s vacant units crisis has worsened over the past five years:

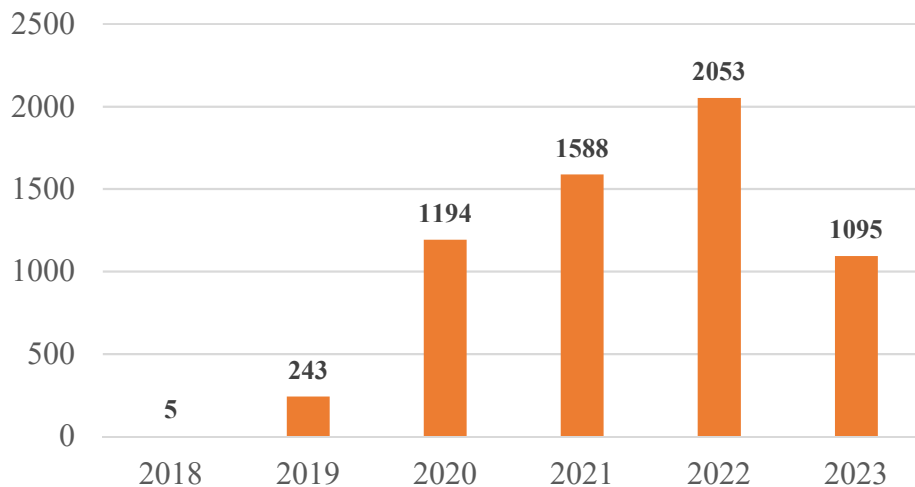
Chart 1: Average vacancy turnover days



NYCHA’s turnover rate—the average number of days it takes NYCHA to complete repairs in a vacant apartment and re-rent it—rose from **98 days** in 2020 to **424 days** in 2024, a **337%** increase.⁹

In a further response to our FOIL request, NYCHA revealed that between 2018 and 2023, it accumulated over **6,000** staff vacancies in its Applications and Tenancy Administration Department (“ATAD”), the division charged with turning over vacant apartments across the system:¹⁰

Chart 2: Apartment Turnover Staff Vacancies



NYCHA's inability to hire and retain ATAD staff, to the tune of **6,178** staff vacancies in recent years is, without a doubt, a major driving force behind its vacant units crisis.

2. Our organization's comments to Int. 111-2024 (Avilés)

For the Council's consideration at this hearing is proposed legislation requiring NYCHA to submit to the Council, and make available to the public, yearly reports detailing the amount of vacant units across the system and the reasons for such vacancies. Specifically, the legislation would require NYCHA to report on every unit that was vacant more than 30 days within the past year, as follows:

- the total number of days such unit was vacant;
- the reasons such unit was vacant; and
- whether during such vacancy the unit was habitable and being offered to prospective occupants.

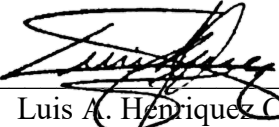
As currently written, this legislation would benefit our organization's clients to the extent that it requires NYCHA to provide information to the public regarding vacant units across the system and the reasons for such vacancies, thereby increasing transparency and accountability. That said, the benefit to our organization's clients and NYCHA tenants as a whole would be larger if the legislation required NYCHA to report on not only the number of vacant units and the reasons for such vacancies, but also what efforts NYCHA undertook during the reporting period to re-rent such vacant units as quickly as possible. For example, if the reason for the vacant units were:

- *understaffing*, NYCHA should report on the steps it took to hire up;
- *operational inefficiencies or redundancies*, NYCHA should report on the steps it took to streamline apartment turnover operations;
- *insufficient funding*, NYCHA should report on petitions it made to this Council, or other levels of government, to secure the necessary funds to run a smooth, efficient, and effective apartment turnover operation.

With this additional information, this Council can make informed decisions on a yearly basis in terms of earmarking additional resources for NYCHA with the goal of ensuring that vacant apartments across the system remain so for the shortest possible time.

We once again thank the Council for the opportunity to testify on this matter. If you have any questions or wish to further discuss our analysis or recommendations, please contact Luis A. Henriquez Carrero, Director of Litigation, Manhattan Legal Services, at lahenriquez@lsnyc.org.

Date: June 16, 2025
New York, NY


Luis A. Henriquez Carrero

¹ New Destiny Housing, *A Crisis Compounded: The Dual Crises of Domestic Violence and Homelessness*, July 2024, available at <https://newdestinyhousing.org/wp-content/uploads/DV-Report-1.pdf>

² June 24, 2022 Declaration of Robert Griffith, *Jane Doe v. New York City Housing Authority et al.*, Civ. No. 22-4460 (LJL) (Dkt. No. 31).

³ Term used by VAWA to describe housing transfer requests by GBV survivors.

⁴ Report available at <https://www.legalservicesnyc.org/wp-content/uploads/2024/12/LSNYCs-Trapped-in-Danger-Report-2024.pdf>.

⁵ New York City Housing Authority, *Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking*, available at <https://www.nyc.gov/site/nycha/residents/vawa-resources.page>; David Brand, *NYC public housing residents fleeing domestic violence face lengthy waits, report finds*, Gothamist, December 17, 2024, available at <https://gothamist.com/news/nyc-public-housing-residents-fleeing-domestic-violence-face-lengthy-waits-report-finds>.

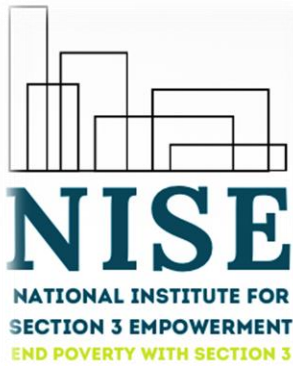
⁶ On June 13, 2025 (one business day prior to the instant public hearing), NYCHA published its draft FY26 Annual Plan in which, among other things, NYCHA is proposing changes to its transfer regulations including bumping up the emergency transfers priority. The draft plan is here: <https://www.nyc.gov/assets/nycha/downloads/pdf/NYCHA-Draft-AnnualPlanFY26-6-13-25.pdf>. Our organization is in the process of reviewing NYCHA's proposed changes and will be submitting comments within the time specified in the public notice.

⁷ 24 C.F.R. § 5.2005(e)(6); United States Government Accountability Office, Report to Congressional Committees, *Rental Housing, Opportunities Exist to Improve Oversight of Assistance to Survivors of Domestic Violence or Sexual Assault*, July 13, 2024, available at <https://www.gao.gov/assets/gao-24-106481.pdf>

⁸ New York City Housing Authority, *Mayor's Management Report, Goal 1c*, available at <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/nycha.pdf>; New York City Housing Authority, *Applications and Tenancy Administration Department - CY 2023 Annual Report*, available at https://drive.google.com/drive/folders/1pQ3B3D9hc9gyfAwWV8_8TLexJaaGP8ba; Greg B. Smith, *NYCHA Has 5,000 Empty Apartments After Bureaucratic Bungle, Monitor Finds*, The City, February 21, 2024, available at <https://www.thecity.nyc/2024/02/21/nycha-5000-empty-apartments/>.

⁹ New York City Housing Authority, *Mayor's Management Report, Goal 1c*, available at <https://www.nyc.gov/assets/operations/downloads/pdf/mmr2024/nycha.pdf>

¹⁰ New York City Housing Authority, *Apartment Turnover Staff Vacancy Data, 2018-2023*, available at https://drive.google.com/drive/folders/1pQ3B3D9hc9gyfAwWV8_8TLexJaaGP8ba.



Testimony of Edna Wells Handy
Founder, National Institute for Section 3 Empowerment (NISE)
Before the New York City Council Committee on Public Housing

RE: Oversight Hearing on NYCHA Vacancies and Transfers
June 16, 2025

Good morning Chair Banks and members of the Committee. My name is Edna Wells Handy, and I am the Founder of the National Institute for Section 3 Empowerment (NISE), a New York State, 501(c)(3) nonprofit organization committed to ensuring that public housing residents and other low-income individuals are prioritized for job opportunities tied to federally funded housing investments.

Thank you for the opportunity to testify on this crucial issue of vacancies and tenant transfers at NYCHA.

The Vacancy Crisis: A Barrier to Equity and Efficiency

Vacant units at NYCHA, many of which remain offline for months or even years, represent missed opportunities to house vulnerable New Yorkers and generate rental income critical to the system's survival. Long-term vacancies also undermine efforts to stabilize communities and erode tenant trust.

Today's proposed bill, requiring NYCHA to publicly report units vacant for more than 30 days, marks a step forward in transparency. While it won't be as detailed or interactive as NYCHA's Capital Projects Tracker, it still holds promise as a tool for oversight and public accountability. But transparency alone is not enough.

We need action.

Solution 1: Train and Employ NYCHA Residents to Rehabilitate Vacant Units

The most immediate and sustainable path to turning units around faster is already authorized under Section 3 of the HUD Act, which requires that low-income residents be hired for jobs generated by HUD-funded projects.

In early 2022, when NYCHA centralized responsibility for vacancy renovation work under the Operational Analysis and Contract Management team, the restructuring was intended to improve efficiency. However, we learned that the shift actually slowed down vacancy turnaround times, created confusion among staff, and contributed to longer delays in unit readiness.

Rather than streamlining the process, that process removed direct accountability from property-level management, and underutilized the existing talent pool within NYCHA developments themselves. That is why **we strongly urge the Council to support the creation of a Resident Repair Corps, a Section 3-compliant workforce initiative that hires and trains public housing residents to help turn over vacant units more rapidly.** This approach would not only reduce vacancies and help address the city's housing crisis, but it would also create good-paying jobs for residents and restore pride and ownership in their communities. A Resident Repair Corps program could certify, and hire public housing residents to

assist with light repairs, painting, plastering, and basic vacancy turnaround work. These are public dollars, let's use them to build public capacity.

This is not a radical idea. It's an idea with precedent and proof.

Solution 2: Build on What's Worked—Models from Chicago, Philly, and Beyond

- ❖ Chicago has leveraged Section 3 hiring and small contractor programs to create resident job pipelines for maintenance and rehab work, reducing unit turnaround time while building skills locally.
- ❖ Philadelphia's "Resident Maintenance Trainee" program brought in residents for apprenticeship-style training and permanent civil service jobs, creating long-term economic mobility.
- ❖ In Australia, a model promoted by New York's own Rosanne Haggerty and others trained public housing residents to perform repairs in their own buildings, an approach rooted in dignity, ownership, and cost-effectiveness. When Ms. Haggerty brought these ideas to NYCHA leadership over a decade ago, there was interest, but not enough momentum to make it happen. Now is the time.

These models show us that it's not just possible, it's legal, fiscally sound, and transformative to involve residents directly in repairing and maintaining their homes.

Solution 3: Align the Law with the Moment

The authority to do this work already exists.

- ❖ Section 3 regulations allow public housing authorities to prioritize residents for training, jobs, and contracts on projects funded with HUD dollars.
- ❖ City Council support can ensure these mandates are funded and enforced—especially for workforce development programs tied to NYCHA's capital and vacancy prep work.

With the right partners—including local workforce boards, unions, and CUNY, NYCHA can move from a culture of outsourcing to a culture of capacity building.

Next Steps and Why This Matters

NISE is ready to support this vision. We can help NYCHA identify Section 3 opportunities, structure resident training programs, and monitor local hiring goals. But we need your partnership.

Chair Banks, you have long been a champion for transparency and equity in public housing. With your leadership and this Committee's oversight, we can push NYCHA beyond the status quo.

Let's use this vacancy reporting bill not just to gather data—but to spark action.

Let's stop waiting on vendors—and start investing in people.

Let's make public housing a platform for public good.

Thank you for your time. I welcome any questions.

June 16, 2025
New York City Council
Hearing Before the Committee on Public Housing
Re: Int. 111 and Int. 122
Testimony of the New York Legal Assistance Group

Greetings Chair Banks and members of the New York City Council Committee on Public Housing. Thank you for the opportunity to testify today on these important measures that will provide a much-needed increase in transparency for the NYCHA community. My name is Anna Luft and I am the Public Housing Justice Project Director in the Tenants' Rights Unit at NYLAG. PHJP is the first team of legal advocates solely dedicated to directly representing public housing residents in New York City.

We offer this testimony today because, as legal services providers dedicated to NYCHA residents, I can tell you that both Intro 111 and Intro 122 speak to frequent issues we encounter in our practice and outreach that are fundamental to public housing residents' rights as tenants.

First, I'd like to speak about vacancies. Addressing NYCHA's vacancy rate is about the stability of both NYCHA households and the housing authority itself. 19% of NYCHA's budget is from its rental revenue, and yet since 2020, vacancy rates have more than doubled from close to 0% to 2%. As the future of federal funding for NYCHA is called into greater uncertainty and NYCHA calls residents into housing court for Covid-era arrears, it is unacceptable that so many units remain vacant and NYCHA willingly forgoes the potential income from these units. Indeed, each time we appear in Housing Court on a nonpay, or at the NYCHA Office of Impartial Hearings on a termination of tenancy based on chronic rent delinquency, the NYCHA L&T attorneys act like the missed rental income from that single unit will be the undoing of the Housing Authority. Meanwhile, NYCHA is sitting on thousands of unoccupied units that could be a part of the rent roll, but are not.

But more importantly to our clients, NYCHA's failure to move vacant units promptly results in due process violations, exacerbating existing inequities and destabilizing families and communities in the process. NYCHA residents seeking transfers based on overcrowding, reasonable accommodations, or even safety issues will have to wait months, if not years, for a unit to open up all the while living in unsafe conditions, whether it be environmental or social. Meanwhile, these same residents see empty units as they walk around their developments. This disconnect fosters the feeling of distrust between residents, their advocates, and NYCHA.

As you can imagine, long wait times for transfers can have cascading effects for our clients. By way of an example:

1. We represented Mr. S. in a termination of tenancy based on allegations that he was failing to occupy his apartment. However, the only reason he was not in his apartment

was because he was wheelchair-bound in a nursing home and the facility would not discharge him until he was transferred to an accessible unit. While his tenancy was ultimately not terminated, Mr. S. died in the nursing home, waiting for his transfer.

2. Ms. W. lived in a one-bedroom apartment with her husband and five children. That's seven people in a one-bedroom apartment. In addition to the severe overcrowding, she also had been assaulted in the development and requested an emergency safety transfer on that basis. Finally, the physical condition of Ms. W.'s apartment was so deteriorated that ACS opened an investigation for her family and made a referral directly to NYCHA, stating that the apartment conditions and overcrowding were unsafe for children and they needed a transfer. Despite all of this, Ms. W. had been waiting for a transfer for two years before meeting my team.
3. We are representing Ms. V. in a termination of tenancy based on allegations that she is not occupying her apartment. However, Ms. V. has been waiting for five years for a safety transfer after she was assaulted in the development and her daughter was groped in the development. For five years, Ms. V. and her daughter have been kept away from their home for their own safety due to NYCHA's failure to timely process their transfer.

These are just some examples of how NYCHA's protracted transfer wait times impact residents' lives beyond an inconvenience or arbitrary desire to move, while apartments remain unoccupied.

We urge the City Council to adopt Intro. 111 requiring NYCHA to publish its annual vacancy rates. A stable future for public housing requires a true partnership between NYCHA and its residents, and that is not possible without greater transparency from NYCHA so that both parties have access to the same information. Publishing vacancy rates will empower tenants with information they can use to organize around apartment availability or advocate for expedited transfers. Finally, this intro will provide clarity as to whether NYCHA is currently fulfilling its mandate to provide safe and affordable housing and working in good faith to build its revenue base without destabilizing communities. When all parties have access to the same information, we can work together to build long-term solutions for the future of public housing in New York City.

Now I'd like to turn my attention to Intro. 112 which would require the publication of crime statistics by development. NYCHA developments are disproportionately subjected to NYPD surveillance and NYCHA residents disproportionately bear the burden of the collateral consequences of contact with the criminal justice system. A 2022 study published in Proceedings of the National Academy of Sciences (Concentrated incarceration and the public-housing-to-prison pipeline in New York City neighborhoods) found that incarceration in NYCHA tracts are 4.6 times higher than non-NYCHA and 94% of NYCHA tracts have incarceration rates above the median level of non-NYCHA tracts. Most concerning, 17% of New York State's incarcerated population originated from just 372 NYCHA tracts. While these statistics are deeply troubling, they are not surprising given NYCHA and the NYPD's close relationship.

In addition to disproportionately facing the punitive impact of the criminal legal system, NYCHA residents also must grapple with greater collateral consequences and housing security based on contact with the NYPD. NYCHA's bases for terminations of tenancy are rooted in the antiquated,

paternalistic origins of public housing, when housing authorities were empowered to ensure that tenants were morally worthy of public housing. Today, we represent clients in termination of tenancy proceedings at OIH based on arrests or criminal allegations that have nothing to do with their ability to be good tenants and sometimes have nothing to do with them or their household at all. As examples:

1. We are representing a client named Ms. J in a nondesirability case based on a fight she was involved in over six years ago. This is the only arrest on Ms. J's record and she has since enrolled in therapy and completed multiple therapeutic programs, including anger management. There are no allegations of ongoing nuisance. In private housing, this is a case that a landlord would likely never have heard about. Yet here, Ms. J. and her two young children face the threat of eviction and loss of their deeply affordable housing.
2. A former client, Ms. M. faced termination of tenancy based on the arrest of her sister. Her sister did not live in the apartment, was not arrested in the apartment, and there were no allegations involving Ms. M.'s apartment. However, her sister was arrested in another NYCHA unit that Ms. M. had no connection to.
3. Another client faced termination of tenancy because her son was arrested for possession of a ziploc bag full of miscellaneous bullets and a broken starter pistol. Although the criminal case did not result in any criminal disposition, NYCHA still brought the termination case.
4. Still another client faced the loss of her son as her caretaker, and therefore her ability to age in place, due to an arrest that took place outside of the home.

These are just a small handful of examples of how NYCHA's special relationship with the NYPD puts our clients at heightened risk of displacement.

In light of our clients' lived experience and the heavy hand with which the NYPD deals with their communities, we welcome any examination of the overpolicing that NYCHA communities experience. However, we urge the Council to pass this measure with protections ensuring that any steps to address these issues are resident-led solutions focused on bringing greater stability to NYCHA communities and keeping public housing families together and housed, instead of more paternalistic hoops and greater surveillance.

Thank you again for the opportunity to testify today and for your attention to these important matters.

Save Section 9 Written Testimony

To: Committee on Public Housing

Date: June 16th, 2025

Hearing: Oversight – NYCHA Vacancies and Transfers

Chair Banks, Deputy Speaker Ayala and members of the Committee on Public Housing,

We submit this testimony on behalf of our members, and neighbors, in response to the hearing held on June 16th, 2025.

New York City's public housing tenants continue to suffer due to NYCHA's inability to invest in the skilled staff necessary to ensure vacant units become turnkey ready in a timely manner. Empty apartments increase squatting, crime and blight. These negatively impact our vibrant communities and put our most vulnerable neighbors, seniors, in danger. This danger is truly felt in senior buildings where empty units erode safety. Utilizing Section 3 as a solution to this problem is an innovative and economically sound solution. We believe that NYCHA's vacancy problem is a self-inflicted injury. One that allows NYCHA to claim that units are uninhabitable and should therefore be removed from the Section 9 rolls, further weakening public housing and justifying privatization.

NYCHA's claim is that they need \$79B to operate and address repair backlogs. But we'd like to remind you that they actually need much less. The \$79B is based on a 20-year physical need forecast. Historically NYCHA has used a five year forecast system. The 5-year physical need in 2023 is actually \$60.3 billion. However, over 30% of the 2023 Physical Needs Assessment amount (\$18.9 billion) is attributed to 'market price escalation'. Since this is not concerned with physical needs, removing it brings the 2023 physical needs to \$41.4B. This number makes sense when we consider how many units NYCHA is shedding via RAD/ PACT conversions. Allowing NYCHA to claim a deficit of \$79B is problematic. The way NYCHA handles transfer requests is equally harmful.

NYCHA ignores [HUD's transfer regulations](#). NYCHA regularly fails to honor transfer requests from tenants in unsafe or inhumane conditions. But the skirting of policy worsens when a development is being considered for conversion. NYCHA, RAD/PACT partners, and property managers throw out the rule book and stop honoring transfer requests before tenants are made aware of the change in financing for their development. NYCHA should be offering every household the option to transfer in order to remain a Section 9. Tenants are not being informed of this option and are instead bullied into converting to a project based voucher.

While NYCHA wants to claim that they are not responsible once a new management company takes charge, the truth is that the housing authority is an oversight agent post conversion. NYCHA opted to remain involved in the recertification and project based voucher administrative process. Ensuring that transfer policies are honored IS their responsibility.

We call on city council to:

1. Demand NYCHA uphold HUD's transfer regulation for developments in the process of converting out of Section 9 through RAD/PACT by providing tenants the option to transfer in writing, in multiple languages;
2. Demand NYCHA provide publicly accessible statistics on how many tenants end up requesting a transfer ahead of RAD/PACT conversion, and how many transfer requests are honored;
3. Demand that NYCHA and RAD/PACT partners publish a comprehensive timeline for conversions so that tenants know at which point transfers are available to them and when that window closes;
4. Demand that RAD/PACT partners create a transfer tracking system for tenants allowing them to transfer request status in real-time;
5. Hold RAD/PACT partners accountable, and demand that they mirror NYCHA's management staffing guidelines thereby ensuring that every tenant is served by a housing administrator that can respond to tenant's questions and requests regarding transfers and daily needs.

Tenants whose developments are under consideration for privatization and whose developments are in the midst of RAD/PACT conversion are experiencing violations of their rights, and extensive discrepancies and violations of HUD regulations regarding transfers.

Tenants are experiencing these discrepancies via:

- Transfers being frozen for extended periods during PACT conversion, regardless of need, including urgent health effects from construction at their developments;

- Lack of clarity regarding how long transfers are frozen while conversion is occurring and discrepancies in [HUD policy](#) and RAD/PACT partner enforcement of conversion period;
- Poorly managed and executed construction at RAD/PACT developments delaying the possibility for transfer and furthering dire health effects on tenants;
- Transfers not being offered by NYCHA **before** conversion is approved and during conversion assessment with tenants, as per HUD policy and therefore losing their section 9 status with no choice or option for recourse;
- Complete lack of communication and transparency by NYCHA and RAD/PACT partners regarding tenant's transfer status, regardless of communication method;
- Renovated units in PACT developments being held vacant while there is a waitlist of transfers and tenants who are in distress and being exposed to harmful materials during construction, repairs, asbestos abatement, etc.

Additionally,

1. We ask the City Council to immediately issue a moratorium on all NYCHA RAD/ PACT conversions, pending the completion of a robust impact study inclusive of all properties currently being served by Project Based Section 8.
2. We ask the City Council to host a joint hearing with its Albany counterparts on RAD/PACT. During this hearing, NYCHA and HUD's office of Public and Indian Housing should be asked to:
 1. Provide insight on the success of the program nationally, success should be defined on improved quality of life for previous Section 9 tenants living in a specific property.
 2. An explanation of the timeline for RAD/PACT conversions highlighting when tenants have an opportunity to oppose these.
 3. Expand on how said opposition is weighed in the larger application for RAD/PACT or Section 18.

We urge you to recognize that in spite of abandonment, we continue to thrive. Public housing supports strong communities, diminishes gentrification, and supports tenants at every stage of life. An investment in public housing will ensure more families have stability, and the social infrastructure necessary to be bold enough to head to Harvard, become urban farmers, start businesses and be part of the solution. Collectively we can work towards our [national solutions](#) and the adoption of the [Green New Deal for Public Housing](#). The latter is now cosponsored by [57 members of congress](#).

We are available for further conversations regarding our proposals and national solutions for public housing. We will follow up with your office to schedule meetings.

Save Section 9 Members

Testimony by The Legal Aid Society
For the New York City Council Public Housing Committee
NYCHA Vacancies and Transfers

Introduction

The Legal Aid Society (“the Society”), the nation’s oldest and largest not-for-profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,000 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, the Society provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel. The Society’s legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by the Society’s Pro Bono program. With its annual caseload of more than 300,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States and brings a depth and breadth of perspective that is unmatched in the legal profession. The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 300,000 individual cases and legal matters, the Society’s law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Society is class counsel on numerous class-action cases concerning the rights of public housing residents. Additionally, staff in the Society’s housing law units represent individual New York City Housing Authority (“NYCHA”) residents throughout the five boroughs in proceedings in New York City Housing Court and in termination of tenancy administrative proceedings at NYCHA. We also maintain a helpline that is available to PACT and public housing tenants throughout the city that provides advice and access to advocacy services. This helpline is an important resource to support tenants and provides invaluable insight into and information on the experiences of tenants, especially in the areas of temporary relocation, conditions and repairs, subsidy administration and transfers.

We thank Chairperson Banks and members of the Public Housing Committee of the New York City Council for the opportunity to testify about the issue of vacancies within NYCHA's public housing portfolio.

NYCHA's Preservation Programs and Vacancies

NYCHA has a number of different preservation strategies for making long-standing, critically needed repairs to its public housing stock. Historically, NYCHA planned for repair work to be done with tenants remaining "in place" in their apartments, however, now many planned preservation projects require residents to temporarily relocate from their homes for repair work to be completed more comprehensively and safely. To prepare for temporary relocation of residents in anticipation of renovation projects and demolition, NYCHA has been keeping an increasingly large number of units vacant both portfolio-wide and concentrated at specific developments. While keeping units vacant to make available units for temporary relocations is necessary, it means that there are fewer units available for new applicants and transferees to move into, thereby taking fewer households off the long public housing wait list and preventing those in need from transferring to safe, habitable, accessible units. The detrimental toll ballooning vacancies is having on an already limited stock of available units for transfers and new tenancies cannot be ignored.

In addition to issues raised by the massive volume of vacant units NYCHA is holding in abeyance, the relocation process itself can be excessively burdensome to tenants. NYCHA has stated that the goal is to relocate within the development when it comes to relocation for rehabilitation and PACT conversions, but at certain sites that goal cannot be achieved and in these cases some residents may be relocated to a hotel or other privately owned site; NYCHA also looks to using vacant units outside the developments in its portfolio to house tenants while work is done in their permanent homes. Tenants forced to temporarily relocate outside of the immediate vicinity of their development or neighborhood have reported experiencing significant disruption in carrying out daily tasks and activities like taking kids to school, going to work, caring for loved ones and going to medical appointments. It is critical that the ability of tenants to carry out the essential tasks of their day-to-day lives be as minimally impacted as possible where temporary relocation is necessary. This requires attention to the individual needs of each resident, especially when accommodations are required.

NYCHA's PACT Program

Several of the initial conversion transactions under NYCHA's PACT program planned for preservation work to be performed with tenants "in place." The first few bundles of developments were chosen exactly because work could be done in place. Recently, work at the new conversion bundles is requiring temporary relocation of residents to other available units because work cannot be done safely or effectively with tenants remaining in their homes. In order to prepare for the eventuality of temporary relocation in the lead-up to the closing of the

PACT conversion, NYCHA keeps a number of units at the development vacant and “off-line,” and after conversion PACT developers do the same. These units are usually referred to as “hospitality suites.” Sometimes there are not enough available vacant units within a particular development to accommodate the number of those needing temporary relocation and, in those cases, we’ve seen some residents being moved to other developments that are part of the same bundle. The distance between these developments can be significant and raises the same concerns around the extent of disruption of the lives of PACT tenants, especially where their jobs, access to childcare and ability to attend medical appointments and other health related tasks are impacted.

Again, we reiterate our concerns about the amount of time before and after conversions NYCHA units are held vacant. As the number of PACT conversions grows, including projects that seek total demolition of housing suitable for rehabilitation requiring long term relocation, the number of units taken offline grows and the harm caused to eligible transferees and new admissions increases. Each vacant unit that sits empty is a unit that is unavailable to a parent fleeing domestic violence, a senior that needs an accessible apartment, and a family that is living in an excessively overcrowded or inhabitable apartment.

NYCHA’s Comprehensive Modernization Program

NYCHA has another preservation program known as the Comprehensive Modernization Program (“Comp Mod”). Preservation work at these developments often requires the temporary relocation of residents to other apartments within the development or to other units within NYCHA’s public housing portfolio. The NYCHA Comp Mod program is currently working on two developments: St. Nicholas Houses in Harlem and Todt Hill Houses on Staten Island. NYCHA states that tenants will not have to be relocated for more than nine months and that not every household will be relocated within their development. We reiterate concerns already raised around forcing relocation that is excessively disruptive to and potentially harmful to the health of tenants.

We Recommend:

- In order to make the process of planning for preservation work more transparent, we ask NYCHA to publish data consistently about the number of vacancies that it is holding at particular developments for use as temporary units for preservation work.
- The data should include the number of days/months that the unit has been vacant and how long the unit is expected to be offline.
- Updates on any work that is being done in the vacant apartment to “ready it” for occupancy.
- The data should cover both those developments that are in the PACT pipeline pre-conversion and those that are being held empty for other preservation work under NYCHA’s other programs.

Apartment “Readiness” Delays

As part of its new Healthy Homes Initiative/Protocol, NYCHA is committed to completing both lead and asbestos abatement each time a unit becomes vacant. While we appreciate the need for NYCHA to undertake this necessary work, our clients have been experiencing lengthy delays in gaining access to homes to which they intend to move and for which they have paid a security deposit and first month’s rent. We understand that there have been supply chain issues as a result of the COVID-19 Pandemic, however, in many cases these delays in making an apartment ready for occupancy are extraordinarily long and often not the result of supply chain issues or the required lead and asbestos abatement work, but because of a lack of competence or sense of urgency at the property development staff level in scheduling the repairs. Additionally, we routinely see a real lack of communication from NYCHA when it comes to keeping a family updated about the status of the work in the apartment, and many times families are given conflicting information about the progress of the work. We have also heard from clients who have been moved into apartments that are not ready and require serious work, this is particularly devastating when a tenant is transferring because of conditions in their apartment. The lack of communication and transparency causes huge stress to families waiting to move into their new home, often from a homeless shelter or while living in dangerous conditions. We understand it takes up to six months to complete abatement, but every effort should be made to eliminate any inefficiencies to reduce this timeline.

We Recommend:

- NYCHA should not be issuing ARD letters that it knows are not realistic. There needs to be better communication between the staff within a development about the status of the work and expected occupancy readiness date.
- NYCHA needs to get better at actively communicating to residents about the status of the work in the apartment. Many of the clients we speak with express how stressful they find the waiting-most are in temporary, unstable and often dangerous living conditions and having information about the wait time could help reduce that stress.
- The City and the State should help fund NYCHA to ensure that they have the money necessary to hire an adequate work force to do apartment readiness to make the apartment turnover time shorter.

Impact of Vacancies on Transfers

We must especially highlight the severe impact these practices have on tenants awaiting transfers - particularly those with urgent needs. While we also advocate on behalf of applicants long awaiting affordable housing with few to no other options, we consistently hear from clients and helpline callers that desperately need

transfers that are waiting in seeming perpetuity to be offered units. The situation is markedly different than prior to when NYCHA began holding thousands of units vacant. NYCHA's decision to hold units vacant in anticipation of PACT conversions and other preservation work has significantly reduced the availability of apartments for tenants on the waitlist for a transfer. This includes individuals and families who have been approved for emergency transfers due to domestic violence, medical necessity, or hazardous living conditions.

We have seen cases where even emergency transfers take well over a year to be fulfilled. This delay is not only unacceptable - it is dangerous. Tenants fleeing violence or requiring accessible housing for health reasons are left in limbo, often in unsafe or unsuitable conditions, because units that could house them are being held vacant for vast amounts of time for future use. These delays undermine the very purpose of the emergency transfer process and place vulnerable residents at continued risk.

The practice of warehousing units for future PACT conversions, sometimes even years in advance, must be re-evaluated. While we understand the logistical need to prepare for temporary relocations, this cannot come at the expense of tenants in immediate need. NYCHA must strike a better balance between planning for future preservation work and addressing the urgent housing needs of current residents.

Conclusion

We urge NYCHA to prioritize transparency and equity in its vacancy management. This includes publishing data on how many units are being held for PACT conversions, how long they have been vacant, and how many transfer requests, especially emergency transfers, households living in unsafe conditions, and tenants requiring accommodations, remain unfulfilled due to lack of available units. The Legal Aid Society also supports Councilmember Alexa Avilés' proposed legislation (Int 0111-2024) that would require NYCHA to publish an annual report detailing all public housing units that have remained vacant for more than 30 consecutive days. This report would be made publicly available online and submitted to the City Council. Publishing more data on this issue would enhance transparency and promote accountability within NYCHA around ensuring vacant units are returned to habitable condition and made available to those in need as swiftly as possible. Thank you for the opportunity to submit testimony on this important issue.

Respectfully Submitted:

Lucy Newman, Supervising Attorney
Public Housing Unit
The Legal Aid Society
49 Thomas Street
New York, New York 10038
lnewman@legal-aid.org

FOR THE RECORD

Good morning Public housing committee
My name is Crystal Glover & I
want justice.

6-16-2005

Almost 2 years ago, Adaline Carrion, former Resident Council pres. of Washington houses had me falsely arrested. Washington houses didn't have running water! Management allowed the RC to give the water out, but they shouldn't have. When I went to reach for the water, Adaline said, "I'm sick of her." She jumped on my back. That evening I called the police to report the incident. They came. While I got into the Ambulance Adaline was walking by. I told the officer "there she go right there." ^{2 Cops} went over 2 her. They took a long time. The ambulance took me to the neighborhood hospital & while the nurse tryogod (took my vitals) a bunch of cops from the 23rd & P.S.A. precinct ~~surround~~ ^{surround} me. I asked them "What's going on?" A female cop said, "She said you scratched her and she's getting a Lawyer." I pleaded with the cop, "No, you got it wrong." They Shackled me. They handcuffed me. I sat there for 2 hours waiting to see a doctor about my back. An when the doc was done, the cops took me to the precinct, took my picture, then put me in a bullpen.

Thank God my family were there waiting for me to be released.

I had to go to criminal court. The first time I went, the Lawyer told me, "plead guilty. We can do the paper work & it will be over." I said I will never plead guilty to something I did not do. After 90 days, the court sealed the case.

I had to go through the legal department of NYCHA. I testified, told the truth, and the case was dismissed! Because of the hate of Adaline Carrion, I could have loss my lease. Adaline & I never had any negative encounter, we just live in the same development. Just as sure as there's a God, I gave this women no reason to hate me.

I want NYCHA to reprimand Adaline. She should not be allow to get away with this. This whole incident has cost me much stress psychologically and physically.

As for vacant apartments, I wouldn't recommend anybody trying to move into NYCHA. The resident Council is suppose to be "the voice" for tenants, legally, and in accordance with 964 HUD regulations. Washington houses hasn't had a tenant meeting in 8 months.

Falsely

Since my getting arrested on NYCHA grounds and the case being dismissed, we have had 3 managers.

The management office is not safe. There is severe contract work going on. The manager is suppose to meet with the RC monthly for monthly meetings. Not happening. In my building, Elevator A car has been broken/working for 2 years. I've been stuck in it 3 times. The authorities is going to wait until someone dies in it before they terminate it altogether. NYCHA is Unethical, and immoral. I've spoken to the Vice-president for PTD, Manhattan Property management, EVP for Resident Services, Partnerships & Initiatives office of the EVP, Vice Pres. of Resident Services/Community Engagement & Partnerships about the safety & security at Washington houses. None of them have followed through, and like I said "If anything happens to me or my family, NYCHA is to blame!!"

Thank you for listening 2 me.

Date: June 18th, 2025
Committee on Public Housing
RE Hearing: Oversight – NYCHA Vacancies and Transfers

Dear Chair Banks, Deputy Speaker Ayala and members of the Committee on Public Housing,

I submit this testimony on behalf of neighbors and public housing tenants, in response to the hearing held on June 16th, 2025.

New York City's public housing tenants continue to suffer due to NYCHA's inability to invest in the skilled staff necessary to ensure vacant units become turnkey ready in a timely manner. Empty apartments increase squatting, crime and blight. These negatively impact our vibrant communities and put our most vulnerable neighbors, seniors, in danger. This danger is truly felt in senior buildings where empty units erode safety. Utilizing Section 3 as a solution to this problem is an innovative and economically sound solution. We believe that NYCHA's vacancy problem is a self-inflicted injury. One that allows NYCHA to claim that units are uninhabitable and should therefore be removed from the Section 9 rolls, further weakening public housing and justifying privatization.

NYCHA's claim is that they need \$79B to operate and address repair backlogs. But we'd like to remind you that they actually need much less. The \$79B is based on a 20-year physical need forecast. Historically NYCHA has used a five year forecast system. The 5-year physical need in 2023 is actually \$60.3 billion. However, over 30% of the 2023 Physical Needs Assessment amount (\$18.9 billion) is attributed to 'market price escalation'. Since this is not concerned with physical needs, removing it brings the 2023 physical needs to \$41.4B. This number makes sense when we consider how many units NYCHA is shedding via RAD/ PACT conversions. Allowing NYCHA to claim a deficit of \$79B is problematic. The way NYCHA handles transfer requests is equally harmful.

NYCHA ignores HUD's transfer regulations. NYCHA regularly fails to honor transfer requests from tenants in unsafe or inhumane conditions. But the skirting of policy worsens when a development is being considered for conversion. NYCHA, RAD/PACT partners, and property managers throw out the rule book and stop honoring transfer requests before tenants are made aware of the change in financing for their development. NYCHA should be offering every household the option to transfer in order to remain a Section 9. Tenants are not being informed of this option and are instead bullied into converting to a project based voucher.

While NYCHA wants to claim that they are not responsible once a new management company takes charge, the truth is that the housing authority is an oversight agent post conversion. NYCHA opted to remain involved in the recertification and project based voucher administrative process. Ensuring that transfer policies are honored IS their responsibility.

I call on city council to:

- Demand NYCHA uphold HUD's transfer regulation for developments in the process of converting out of Section 9 through RAD/PACT by providing tenants the option to transfer in writing, in multiple languages;
- Demand NYCHA provide publicly accessible statistics on how many tenants end up requesting a transfer ahead of RAD/PACT conversion, and how many transfer requests are honored;
- Demand that NYCHA and RAD/PACT partners publish a comprehensive timeline for conversions so that tenants know at which point transfers are available to them and when that window closes;
- Demand that RAD/PACT partners create a transfer tracking system for tenants allowing them to transfer request status in real-time;
- Hold RAD/PACT partners accountable, and demand that they mirror NYCHA's management staffing guidelines thereby ensuring that every tenant is served by a housing administrator that can respond to tenant's questions and requests regarding transfers and daily needs.

Tenants whose developments are under consideration for privatization and whose developments are in the midst of RAD/PACT conversion are experiencing violations of their rights, and extensive discrepancies and violations of HUD regulations regarding transfers. Tenants are experiencing these discrepancies via:

- Transfers being frozen for extended periods during PACT conversion, regardless of need, including urgent health effects from construction at their developments;
- Lack of clarity regarding how long transfers are frozen while conversion is occurring and discrepancies in HUD policy and RAD/PACT partner enforcement of conversion period;
- Poorly managed and executed construction at RAD/PACT developments delaying the possibility for transfer and furthering dire health effects on tenants;
- Transfers not being offered by NYCHA before conversion is approved and during conversion assessment with tenants, as per HUD policy and therefore losing their section 9 status with no choice or option for recourse;
- Complete lack of communication and transparency by NYCHA and RAD/PACT partners regarding tenant's transfer status, regardless of communication method;

- Renovated units in PACT developments being held vacant while there is a waitlist of transfers and tenants who are in distress and being exposed to harmful materials during construction, repairs, asbestos abatement, etc.

Additionally, I ask the City Council to immediately issue a moratorium on all NYCHA RAD/ PACT conversions, pending the completion of a robust impact study inclusive of all properties currently being served by Project Based Section 8.

I ask the City Council to host a joint hearing with its Albany counterparts on RAD/PACT. During this hearing, NYCHA and HUD's office of Public and Indian Housing should be asked to:

- Provide insight on the success of the program nationally, success should be defined on improved quality of life for previous Section 9 tenants living in a specific property.
- An explanation of the timeline for RAD/PACT conversions highlighting when tenants have an opportunity to oppose these.
- Expand on how said opposition is weighed in the larger application for RAD/PACT or Section 18.

I urge you to recognize that in spite of abandonment, we continue to thrive. Public housing supports strong communities, diminishes gentrification, and supports tenants at every stage of life. An investment in public housing will ensure more families have stability, and the social infrastructure necessary to be bold enough to head to Harvard, become urban farmers, start businesses and be part of the solution. Collectively we can work towards our national solutions and the adoption of the Green New Deal for Public Housing. The latter is now cosponsored by 57 members of congress.

Thank you for considering my written testimony on behalf of neighbors and tenants of public housing.

With Gratitude,
Jamilah Elder



Metin Sarci
[REDACTED]
New York, NY 10031

June 16, 2025

The Honorable Chris Banks Chair, Committee on Public Housing
New York City Council
City Hall New York, NY 10007

RE: Committee on Public Housing Testimony: Intro 0111-2024, Intro 0122-2024, and NYCHA Oversight

My name is Metin Sarci. The opinions I share today are based on my own experience and do not necessarily represent the views of the Housing Authority as an employee.

I am here to discuss the effectiveness of NYCHA's current operational strategies, particularly concerning apartment vacancies and repairs.

Regarding Intro 111, if the intention is to improve transparency on vacancy data, I believe it may be superficial. Citywide statistics for occupied, renovated, vacant units, or those selected for move-in are already publicly available on the NYCHA website under "NYCHA Metrics," "Public Housing Tab," and then "Vacancies". You can even filter this data by borough or individual development.

My primary concern, and one echoed in federal monitor reports, is that NYCHA's "Neighborhood Model" has not genuinely shifted resources and decision-making away from central offices as intended. Instead, leadership frequently makes budgetary decisions in response to immediate pressures like emergency repairs, negative press, or demands from elected officials and non-profit organizations. While these issues are important, this reactive approach consistently disrupts property-level operations.

There is a critical failure in communication between NYCHA's Operational and Capital teams, preventing comprehensive solutions to systemic issues. This lack of internal coordination means residents are often left uninformed about how resources are being diverted to the loudest voices, sometimes at the expense of less organized communities. This programmatic breakdown has forced residents to project-manage their own repairs. Neighborhood Planners, for example, are tasked with managing a repair portfolio of approximately 5,000 units each, a number that increases when positions are vacant.

When existing repair tickets are combined with new ones from multiple inspection teams, it creates the significant backlog we see today. Each apartment requires individual attention to centralize work scope plans on Maximo that effectively address repairs at the individual level. This persistent problem has also been highlighted in the Federal Monitor's reports.

Finally, I fully support Intro 122. There is a clear need for more accessible crime data at the Police Service Area level, similar to what is currently provided from Precincts.

Thank you.

To: Committee on Public Housing

Date: June 16th, 2025

Hearing: Oversight – NYCHA Vacancies and Transfers

Chair Banks, Deputy Speaker Ayala and members of the Committee on Public Housing,

We submit this testimony on behalf of our members, and neighbors, in response to the hearing held on June 16th, 2025.

New York City's public housing tenants continue to suffer due to NYCHA's inability to invest in the skilled staff necessary to ensure vacant units become turnkey ready in a timely manner. Empty apartments increase squatting, crime and blight. These negatively impact our vibrant communities and put our most vulnerable neighbors, seniors, in danger. This danger is truly felt in senior buildings where empty units erode safety. Utilizing Section 3 as a solution to this problem is an innovative and economically sound solution. We believe that NYCHA's vacancy problem is a self-inflicted injury. One that allows NYCHA to claim that units are uninhabitable and should therefore be removed from the Section 9 rolls, further weakening public housing and justifying privatization.

NYCHA's claim is that they need \$79B to operate and address repair backlogs. But we'd like to remind you that they actually need much less. The \$79B is based on a 20-year physical need forecast. Historically NYCHA has used a five year forecast system. The 5-year physical need in 2023 is actually \$60.3 billion. However, over 30% of the 2023 Physical Needs Assessment amount (\$18.9 billion) is attributed to 'market price escalation'. Since this is not concerned with physical needs, removing it brings the 2023 physical needs to \$41.4B. This number makes sense when we consider how many units NYCHA is shedding via RAD/ PACT conversions. Allowing NYCHA to claim a deficit of \$79B is problematic. The way NYCHA handles transfer requests is equally harmful.

NYCHA ignores [HUD's transfer regulations](#). NYCHA regularly fails to honor transfer requests from tenants in unsafe or inhumane conditions. But the skirting of policy worsens when a development is being considered for conversion. NYCHA, RAD/PACT partners, and property managers throw out the rule book and stop honoring transfer requests before tenants are made aware of the change in financing for their development. NYCHA should be offering every

household the option to transfer in order to remain a Section 9. Tenants are not being informed of this option and are instead bullied into converting to a project based voucher.

While NYCHA wants to claim that they are not responsible once a new management company takes charge, the truth is that the housing authority is an oversight agent post conversion. NYCHA opted to remain involved in the recertification and project based voucher administrative process. Ensuring that transfer policies are honored IS their responsibility.

We call on city council to:

1. Demand NYCHA uphold HUD's transfer regulation for developments in the process of converting out of Section 9 through RAD/PACT by providing tenants the option to transfer in writing, in multiple languages;
2. Demand NYCHA provide publicly accessible statistics on how many tenants end up requesting a transfer ahead of RAD/PACT conversion, and how many transfer requests are honored;
3. Demand that NYCHA and RAD/PACT partners publish a comprehensive timeline for conversions so that tenants know at which point transfers are available to them and when that window closes;
4. Demand that RAD/PACT partners create a transfer tracking system for tenants allowing them to transfer request status in real-time;
5. Hold RAD/PACT partners accountable, and demand that they mirror NYCHA's management staffing guidelines thereby ensuring that every tenant is served by a housing administrator that can respond to tenant's questions and requests regarding transfers and daily needs;

Tenants whose developments are under consideration for privatization and whose developments are in the midst of RAD/PACT conversion are experiencing violations of their rights, and extensive discrepancies and violations of HUD regulations regarding transfers.

Tenants are experiencing these discrepancies via:

- Transfers being frozen for extended periods during PACT conversion, regardless of need, including urgent health effects from construction at their developments;
- Lack of clarity regarding how long transfers are frozen while conversion is occurring and discrepancies in [HUD policy](#) and RAD/PACT partner enforcement of conversion period;
- Poorly managed and executed construction at RAD/PACT developments delaying the possibility for transfer and furthering dire health effects on tenants;

- Transfers not being offered by NYCHA **before** conversion is approved and during conversion assessment with tenants, as per HUD policy and therefore losing their section 9 status with no choice or option for recourse;
- Complete lack of communication and transparency by NYCHA and RAD/PACT partners regarding tenant's transfer status, regardless of communication method;
- Renovated units in PACT developments being held vacant while there is a waitlist of transfers and tenants who are in distress and being exposed to harmful materials during construction, repairs, asbestos abatement, etc.

Additionally,

1. We ask the City Council to immediately issue a moratorium on all NYCHA RAD/ PACT conversions, pending the completion of a robust impact study inclusive of all properties currently being served by Project Based Section 8.
2. We ask the City Council to host a joint hearing with its Albany counterparts on RAD/PACT. During this hearing, NYCHA and HUD's office of Public and Indian Housing should be asked to:
 1. Provide insight on the success of the program nationally, success should be defined on improved quality of life for previous Section 9 tenants living in a specific property.
 2. An explanation of the timeline for RAD/PACT conversions highlighting when tenants have an opportunity to oppose these.
 3. Expand on how said opposition is weighed in the larger application for RAD/PACT or Section 18.

We urge you to recognize that in spite of abandonment, we continue to thrive. Public housing supports strong communities, diminishes gentrification, and supports tenants at every stage of life. An investment in public housing will ensure more families have stability, and the social infrastructure necessary to be bold enough to head to Harvard, become urban farmers, start businesses and be part of the solution. Collectively we can work towards our [national solutions](#) and the adoption of the [Green New Deal for Public Housing](#). The latter is now cosponsored by [57 member of congress](#).

We are available for further conversations regarding our proposals and national solutions for public housing. We will follow up with your office to schedule meetings.

Save Section 9 Members

Save Section 9 Solutions and References

1. Place an immediate moratorium on all RAD and RAD-Section 18 blends in New York City, until a comprehensive, third party impact assessment study of all Project-based Section 8 conversions in New York City

To date, there have been no New York City-wide impact assessments of the RAD/PACT program on tenants. In this absence, two studies by [Human Rights Watch](#) and [Neighbours Helping Neighbours](#) document the detrimental impacts of RAD - nationwide and at Ocean Bay Houses respectively, along with data gathered by City Limits and the Anti-Eviction Mapping Network and evidence gathered by media articles:

a. Evictions

- i. The Human Rights Watch report documents significant increases in evictions in two RAD developments. The report states: “ On paper, aside from the NYCHA-specific protections discussed above, tenants in RAD housing nationally have essentially the same rights as those in public housing. But in practice, property managers have significant discretion over evictions and other decisions that may have far-reaching impacts on tenants’ lives. Many tenants worry that PACT managers will be more likely to evict them if they fall behind on rent, which could lead to homelessness or a loss of adequate housing.”
- ii. City Limits and Anti-Eviction Mapping Project gathered data at Ocean Bay Houses indicating there were 80 evictions between January 2017 and February 2019, more than two times higher than evictions at any other NYCHA development
- iii. The Rockaways Neighbors Helping Neighbors report supplements this data via tenant surveys at Oceans Bay finding that 19% of tenants said new management tried to evict them and 18% said they knew a neighbor was threatened with eviction.
- iv. Further eviction evidence:
<https://www.thecity.nyc/2024/03/14/eviction-private-nycha-managers-rad/>

b. Rent increases and Double Landlords

- i. 61% of tenants at Ocean Bay Houses indicated their rent had increased, 35% said they were recertified more than once a year and 64% said they had to recertify with both NYCHA and the private manager.

c. Poor Living Conditions

- i. The Human Rights Watch report details countless evidence of continued poor living conditions, faulty repairs, poor construction during renovations,

hard to reach management, and more. A tenant that was interviewed said: “Monopoly is being played with our lives.... “That’s what the fight is, to protect us from investors who don’t give an ‘F’ about us.” Some tenants describe how repairs were carried out in a manner that places tenants at risk including exposure to lead paint or asbestos. Other tenants worry that their homes will fall into disrepair again, noting that the private managers are frugal with their repairs.

- ii. At Ocean Bay Houses, 40% of tenants said conditions have gotten worse or much worse after conversion, 21% said it is harder to get repairs and 35% said there is not an easy-to-use system for submitting repair requests.

2. Call on Congress to:

a. Uphold the RAD Sunset date of September 30th 2024

A sunset on the RAD program was due on September 30th 2024 and RAD. City Council should call on Congress to sunset RAD on the originally planned date.

- i. The claimed reason to extend RAD until September 2029 was to “provide PHAs more time to carry out the necessary and important resident engagement activities prior to applying for RAD and allow PHAs pursuing large scale, multi-year development of public housing properties to keep their commitments to their communities”
 1. Thus far, tenant engagement by NYCHA and PACT partners has been poor and many tenants do not know their development is being converted or what this means for their tenancy. An example of this was the tenant engagement at Fulton Elliot Chelsea which included a survey process that was falsely communicated as a vote:
 - a. 969 of 3388 participated in the survey. That is 16% meaning 84% did not take part.
 - b. Simon Kawitzky, Vice President Portfolio Planning stated the packets were given out in the languages spoken in the development. English, Spanish , Chinese
 - c. Unable/unwilling to explain how we went from No Demolition to Demolition.
 - d. Have taken the attitude that they are doing everyone a courtesy by meeting with CB4 to explain the proposal.
 - e. Lack of transparency: NYCHA speaks with Resident Leaders And CB4 but not the thousands of other tenants.
 - f. Related is now trying to put up a casino in the Western Rail Yards [West Side Rail Yards/Hudson Yards Rezoning -](#)

[Manhattan Community Board 4 \(nyc.gov\)](https://www.nyc.gov/manhattan-community-board-4) violating this agreement.

- ii. As of NYCHA's 2024 Annual Plan, there are 81 developments under consideration for RAD conversions (Bronx: 36; Brooklyn: 21; Manhattan: 22; Staten Island: 2), a huge increase since the program was first introduced. This will impact 22,282 NYCHA units. Without a comprehensive impact assessment and proper framework of accountability for NYCHA and RAD partners being established by City Council & HUD, extending the RAD sunset deadline puts tens of thousands of tenants at risk

b. Invest in Section 9 Public Housing and submit a letter of support for the Green New Deal for Public Housing (GND4PH).

- i. Congress has steadily divested from public housing while increasing funding for housing programs that rely on the private sector. ([HRW](#)). Of note is the consistent disinvestment in Section 9 while increasing investment in the RAD Program:
 1. In 2021, the overall budget of the US Department of Housing and Urban Development (HUD) was \$69.3 billion, of which \$2.9 billion was allocated for major repairs to public housing. Adjusted for inflation, this amount is around 35 percent lower than the capital funding allocation in 2000, which in 2021 dollars would be worth \$4.5 billion ([HRW](#)).
 2. The 2021 President's Budget requests \$100 million for the RAD program, which is \$100 million more than the 2020 enacted level. These funds would be used to support the costs of conversion for public housing properties that are unable to convert using only the funds currently provided through public housing appropriations. ([President's Budget RAD](#)).

Funding has also been increasing for the Section 8 vouchers which bring valuable support to tenants in private market housing. However this increase also facilitates RAD conversions.

Direct investment is needed in Section 9 Public Housing. Funds should be divested from the RAD program and the associated funding of the Section 8 program to preserve public housing.

- ii. Another critical funding source that was just introduced is the GND4PH. NYC gets 50% of the investments allocated within the GND4PH.

c. Convene a joint hearing between multiple levels of government to hold accountable NYCHA and PACT partners during RAD, Section 18, and RAD-Section 18 blend conversions

- i. While RAD is a federal program, its implementation is a multi-governmental effort and all levels, including City Council, NY State and HUD are accountable to its impacts. RAD conversions are increasingly using a blend of Section 8 and 18 vouchers (also used by the NY State established Public Housing Preservation Trust). Section 8 and 18 blends provide PACT teams access to Tenant Protection Vouchers which are a higher revenue stream but are distributed on the condition that units meet 'obsolescence' criteria - placing huge risks on tenants as poor living conditions draw in higher vouchers.
- ii. City Council is accountable to work jointly with NY State and HUD to have close oversight on NYCHA and PACT partners' actions during conversions. [Since NYCHA is controlled and funded by the Mayor and City Council](#), and its board and leadership appointment is overseen by these entities, City Council has a responsibility to track NYCHA's actions. Furthermore, City Council directly funds NYCHA, and \$265.1 million dollars were provided for NYCHA's operating budget in 2024. NYCHA has a history of misusing this funding (see next point), but these practices are connected to a broader mismanagement that embroils NY State and HUD.
- iii. Before his replacement, Federal Monitor Bart Schwartz challenged NYCHA's default position of blaming money woes for its troubles, arguing that many of its problems are self-inflicted due to incompetence and an inability to efficiently use existing resources. He is quoted as saying "Funding is not the worst of NYCHA's problems. It is the lack of effective governance, ethics and accountability that prevents NYCHA from achieving comprehensive, sustainable improvements within its current financial restraints." The Federal Monitor's warnings need to be taken seriously by City Council as it points to a systemic issue in NYCHA's practices that can only be addressed by a coordinated efforts between multiple levels of government.

3. Develop the following accountability processes:

a. Track NYCHA's spending and claimed capital repair needs, with joint oversight from City Council and HUD

- i. In light of the recent federal bribery charges against 70 NYCHA employees, City Council must develop stringent oversight on NYCHA's spending practices ([US Attorney's office](#)). These bribery charges arrive

on the backs of decades of general money mismanagement, as tenants have watched NYCHA use the repair process take place with no accountability and many tenants describe how money is wasted in these processes with repeat visits, poor work quality, and no oversight from NYCHA over work that is contracted out to third parties.

- ii. In a [hearing on NYCHA's Spending of Capital Funds on November 18th 2021](#), **City Council highlighted that NYCHA only spends 6.5% of its allocated City capital funds**. Since City capital funds do not have an expiry date, the report points to a history of NYCHA not spending allocated city capital funding. This is compared to a spending rate by other agencies of at least 60-61%. **This is clear evidence of NYCHA's long track record of wasting and mismanaging funds**. Along with this broader issues, tenant testimonies highlighted a range of related issues that take place when NYCHA mismanages its spending including:
 1. Section 964 regulations not being followed by NYCHA, and tenants not being involved in decision making on how capital repairs get addressed
 2. Continued issues with no heat, hot water and broken elevators despite NYCHA having access to City funds to address these
 3. No by-laws in how tenant associations and resident councils are elected and many tenants having no access to NYCHA's claimed 'tenant engagement'
 4. Section 3 regulations not being abided by, and public housing tenants not having access to labor opportunities that can be provided during capital repair efforts
 5. NYCHA abandoning units and critical repair needs that place tenants' lives at risk just so the units can qualify as 'obsolete' and receive Tenant Protection Vouchers PACT/The Public Housing Preservation Trust
- iii. In 2023, NYCHA released an updated Physical Needs Assessment which claimed the Authority needed an astounding \$78.34 billion dollars, increased from \$31.8 billion in 2017. There are a range of issues with how the 2023 PNA was carried out, however the key point to make is that NYCHA parading the alarming number of \$80 billion deeply stigmatizes public housing and contributes to the narrative of its failure. The 2023 PNA is meant to be about tenant needs, however is being used by NYCHA to justify its plans to forward RAD/PACT and the Public Housing Preservation Trust as the only options moving forward, instead of scrutinizing its own mismanagement of funds. The 2023 PNA does not accurately reflect capital needs and must be understood with the following details:
 1. Compared to the 2017 PNA which comprehensively examined the whole NYCHA portfolio, the 2023 PNA only examined

10-15% of apartments in 30 selected developments. Only 18% of NYCHA apartments were actually inspected.

2. The 2023 PNA focuses on the 20-year need while the 2017 PNA focused the 5-year need. This in itself is not of issue, however the 20-year need is a higher number (\$78.3 billion instead of \$60 billion) and adds to the sensationalizing of repair needs without proper explanation of its meaning.
3. Over 30% of the 2023 PNA amount (18.9 million) is attributed to 'market price escalation', which is the impact of inflation and market prices for construction. This is relevant, but has nothing to do with the physical condition of apartments. Furthermore, this was calculated during surges resulting from the pandemic and do not take into account savings that can occur through mass material ordering and coordinated construction practices across the portfolio.

The 2023 PNA is an excellent example of how NYCHA continues to twist its financial needs to serve its agenda of forwarding RAD/PACT and the Public Housing Preservation Trust. A thorough assessment of the validity of this PNA is required. For more detailed analysis, please see [CSS and Legal Aid's testimony on the PNA](#).

b. Dedicated oversight on the PACT team's (NYCHA + Private Management) tenant communications during conversion including: information sharing, tenant 'voting' processes, and what NYCHA claims as tenant 'engagement'.

Communication from NYCHA and private management during RAD/PACT conversions has included misinformation, confusion, alterations of the truth.

- i. It is also centered on communication *through* the tenant association and not directly to tenants - many tenants do not know their tenant association representatives. Not having a public listing of the publicly elected representatives that compose tenant associations is a barrier to tenant participation. Therefore tenant association contacts should be made public by NYCHA and made available to any tenant at their management office and online. The bylaws that oversee the tenant association should be standardized, including clear instructions on the recall process, and election cycle. NYCHA must be reminded that tenants have a right to request a copy of their bylaws. Each one should be publicly available at the management office and online.

- ii. The PACT teams claim to conduct robust ‘tenant engagement’ and often cite the Chelsea Working Group as an example. However, NYCHA’s plans to demolish Fulton Elliot and Chelsea Houses completely negates the demands of the Working Group. As articulated by the Community Service Society: “During the Chelsea Working Group, residents spent month after month scrutinizing the technical issues facing their developments and the priorities they agreed on when it came to addressing them. The plan proposed by NYCHA in the Draft Significant Amendment reflects none of this work” ([Joint statement by CSS and Legal Aid on FEC](#)). Also noted in this statement is that despite tenants receiving a right to return, historically relocations of this scale and construction timelines of this length mean **demolition will lead to the displacement of tenants**.
- iii. At Fulton Elliot Chelsea, NYCHA and private partners Related Companies and Essence Development claimed that most tenants wanted demolition as indicated by a voting process. **This was actually a survey with poor outreach and little accessibility falsely paraded as a vote and should not hold any legitimacy:**
 - 1. Only 969 of 3388 participated in the survey. This is only 16% of those eligible. ([Fulton Elliott-Chelsea Environmental Review \(nyc.gov\)](#)). 84% did not vote and compose the countless that do not want demolition.
 - 2. Again, Tenant Association representatives were the only pathway for ‘engagement’. A significant number of tenants at Fulton Elliot and Chelsea do not have clear information on what the plan ahead means for their leases, for their homes, and for their rent.
 - 3. Flyers about the survey were in English, Spanish, Chinese, simplified Chinese at the Chelsea Land Use meeting when the survey was under discussion. There are more languages than those spoken in the development. The annual review asks tenants the languages they are comfortable reading and speaking. There are more languages spoken in the development than those. Language justice wasn’t observed in this process.
 - 4. Even though Fulton Elliot Chelsea is still NYCHA and under Section 9, tenants are already confused about who the management company is. For example, Related has already established their security personnel on site, without properly informing tenants of this change. Related has hired tenants that live in the development to patrol it. While this seems benevolent - providing employment to tenants - this presents a conflict of interest and an unbalanced power dynamic. Tenants who are hired by Related are more likely to want their plan despite not being educated on it.

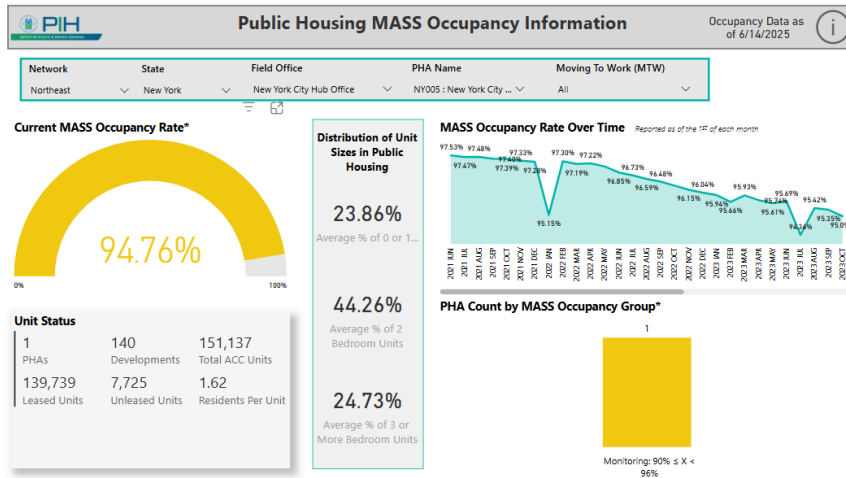
- [“The Tenant Never Wins”: Private Takeover of Public Housing Puts Rights at Risk in New York City | HRW](#)
- [Ahead of Public Hearing, Legal Aid and Community Service Society Raise Serious Concerns About NYCHA](#)
- [2023 Pre-Qualified PACT Partner List | NYC.gov](#)
- [An Advocate’s Guide to Public Housing Conversions Under Component 1 of the Rental Assistance Demonstration](#)
- [Congress Approves Changes to the RAD Statute, Managing Multifamily Properties and More! PMCS, INC..](#)
- [DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Office of Housing Rental Assistance Demonstration PROGRAM PURPOSE BUDGET OVERVIEW JU](#)
- [HUD Highlights Congressional Changes to RAD Statute, Implementation Guidance Forthcoming -NH&RA](#)
- [Monitor’s Final Report Card Slams NYCHA’s Culture Of Mismanagement | THE CITY — NYC News](#)
- [National Low Income Housing Coalition. Letter to Senate Committee on Appropriations Subcommittee on Transportation, Housing and Urban Development. April 21, 2023.](#)
- [New York City Housing Authority 2023 Physical Needs Assessment Final Report.](#)
- [NYCHA Residents Join NYC Comptroller to Announce Audits of Repair Processes and Eviction Rates at the Housing Authority](#)
- [Private company running Brooklyn public housing complex fired for repeated failures - Gothamist](#)
- [RAD Case Study: New Jersey Development Team Learns Early Lessons | Novogradac](#)
- [Rental Assistance Demonstration](#)
- [Rockiness in the Rockaways:Five Years of RAD at Ocean Bay Houses](#)
- [Tenants’ Rights at Risk in NYCHA Conversions, Warns Human Rights Group | THE CITY — NYC News](#)
- [The Nefarious Nature of the Private Partners Selected for RAD Conversions – NYCHA Rising](#)

Testimony of Renee Keitt

Resident and Resident Association President, Elliott-Chelsea Houses

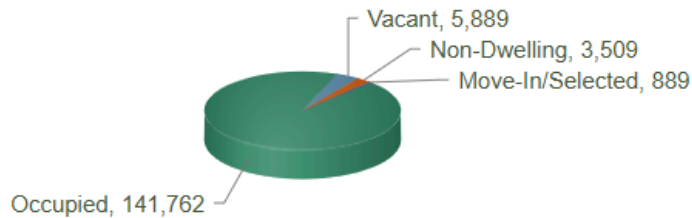
Thank you, Chair Banks, and members of the committee.

My name is Renee Keitt, and I am both a resident of the Elliott-Chelsea Houses and the President of the Resident Association. Thank you for having this hearing concerning vacancies in NYCHA. On the [Public Housing Data Dashboard](#) as of June 16th



When you look at NYCHA Metrics this is what you see

Occupied and Vacant Apartments



This chart shows how many NYCHA apartments are occupied or available to move into. It also indicates “non-dwelling” units that may be under renovation or not for residential use.

I’m here to raise serious concerns about what’s happening in our community under the guise of “choice” and “improvement.” Once a decision has been made *for us*, not by us, that our development is being pushed into PACT, it’s as if we no longer count. Our homes and families are treated as liabilities on a spreadsheet, not as communities with history, stability, and rights.

If you look at the NYCHA Metrics Dashboard, it shows only 4 vacancies between the Fulton and Elliott-Chelsea Houses. But when you examine the “non-dwelling units,” there are 199 listed. This is how they’re masking true vacancy numbers, reclassifying livable apartments as non-dwelling. It artificially lowers the vacancy rate and creates the illusion that our buildings are obsolete, when in reality, they are being warehoused.

To make matters worse, two of our apartments in Fulton and Elliott Chelsea are currently being used by Housing Opportunities Unlimited (HOU) a relocation contractor known for their involvement in previous RAD conversions, including Linden Houses. These are apartments that could and should be used to house NYCHA residents, particularly those on transfer lists within the development or in unsafe units, but instead, they’re being handed over to outside consultants who are there to facilitate the PACT process and ultimately, the demolition of our homes.

At Fulton, 11 households have been selected to move in, but instead of being welcomed into a stable home, they’re being drawn into a misleading process, one that pushes them to self-evict by dangling a supposed lottery and urging them to act quickly to secure their spot in an undefined future.

This is not the resident's choice. This is managed displacement. What is happening at Fulton and Elliott-Chelsea is not revitalization—it is erasure. Residents are being strategically sidelined while their homes are left to decay. Transfers are delayed. Repairs are denied. And then, NYCHA and developers point to these same conditions as justification for demolition. This is not a policy failure; it is policy *by design*.

The Crisis Is Not Housing Supply. The Crisis Is Vacancy.

Let's be clear: we do not have a housing crisis—we have a vacancy crisis. City Council Intro 0111-2024 is a step forward. It would require NYCHA to report publicly on units vacant longer than 30 days. But let's be honest: a transparency law is only as strong as the data it demands—and NYCHA has mastered the art of manipulating the numbers: Units are reclassified as “non-rentable” or “under repair” indefinitely. Apartments are kept off the books during RAD/PACT transitions or pre-demolition staging. Meanwhile, families languish on waitlists and transfers are stalled on purpose.

I strongly agree with Ms. Hall: weekly reporting, not annual, is essential. We need a real-time database of all units vacant more than 180 days, including reasons for the delay and current work status. And we need independent oversight not NYCHA grading its own homework.

Policy Impacts Go Beyond NYCHA

When a public agency warehouses homes, the private market takes note. NYCHA sets the tone. When it signals that vacancy is acceptable, or even desirable, private landlords follow suit. These are not isolated errors. This is an institutional playbook that clears land for developers like Related and Essence to step in under the guise of revitalization.

This is a 21st-century land grab—a public-to-private handoff, dressed up in “resident choice” language that disappears anyone who doesn't choose demolition.

Solutions and Demands

We are not against improvement. We are against being erased. Here is what real, just, and democratic redevelopment looks like:

1. Weekly Vacancy Data Reporting

- Public dashboard, updated weekly, showing vacancies by development, unit size, and reason.

- Independent auditor to verify all data.
- Required Council oversight hearings every quarter.

2. Support the NYCHA INVEST Act (A.6925/S.6114)

This bill, introduced in 2025, is what real action looks like. It would:

- Establish a state-administered vacant-unit rehab program,
- Allocate \$275–\$300 million from the state general fund,
- Add Section 14-a to the Public Housing Law, requiring NYCHA to turn over truly vacant apartments for expedited renovation and re-occupancy.
- Pass the state bill and secure general fund allocations for in-place rehab of vacant units.
- Prioritize deep repair, not displacement.

City Council must join with its state partners to champion this bill. This is what preservation looks like: public funding for public housing, without demolition, privatization, or displacement.

3. Impose a Moratorium on PACT

Thank you for your time.

Junio 11 del 2025

Testimonio de Roberto Olivares

Mi nombre es Roberto Olivares. Vivo con mi esposa y nuestro hijo menor de edad en un estudio de renta estabilizada ubicado en el Lower East Side de Manhattan. Actualmente vivimos en el quinto piso de un edificio sin ascensor y sin ninguna adaptación razonable para personas con discapacidades o problemas de movilidad. Mi familia y yo necesitamos urgentemente un apartamento accesible debido a mis condiciones de salud deteriorándose.

Tengo una solicitud pendiente con NYCHA desde el año 2022. En abril de 2025 actualice mi aplicación y notifique a NYCHA sobre la gravedad de mi situación médica. Mi caso fue categorizado como N4, W3 por su nivel de urgencia. Sin embargo, hasta la fecha, no he recibido una respuesta ni ninguna oferta de vivienda.

Estoy en una situación médica crítica. En marzo de 2025 fui hospitalizado de urgencia por más de dos semanas, donde, después de numerosos exámenes, se me diagnosticó leucemia en etapa temprana, hígado graso y artritis, entre otras condiciones que afectan seriamente mi sistema inmune y movilidad. Actualmente recibo cinco sesiones de quimioterapia al mes como tratamiento para estabilizar mi sistema inmunológico y prepararme para un trasplante de médula ósea. Este proceso incluye una serie de exámenes exhaustivos ordenados por el oncólogo para asegurarse que mis órganos están en condiciones de recibir el trasplante.

Debido a mi condición, solicito apoyo urgente con el fin de poder acceder a un apartamento de vivienda pública accesible y asequible **en cuanto sea posible**. Después de discutir mi situación de vivienda y plan de cuidado a largo plazo con el doctor en repetidas ocasiones, el médico no emitirá la autorización para seguir adelante con mi tratamiento hasta que con mi familia estemos viviendo en un espacio adecuado antes del trasplante, y al regresar a casa, pueda recibir los cuidados intensivos que requeriré las 24 horas del día.

En este momento, me toma al menos 30 minutos subir los seis pisos de escaleras hasta nuestro apartamento, y no puedo hacerlo sin la ayuda de otras personas. Hemos intentado buscar opciones dentro y fuera del edificio donde vivimos, pero no hay unidades accesibles y asequibles disponibles. Nuestra situación económica también se ha visto gravemente afectada: actualmente recibo ingresos por discapacidad (SSDI), y mi esposa solo puede trabajar medio tiempo porque debe encargarse del cuidado de nuestro hijo, de la casa, y de acompañarme a todas mis citas médicas.

Le pido respetuosamente a NYCHA y a los líderes de la ciudad a reconocer que mantener las viviendas públicas disponibles, especialmente las que ya están vacías, perjudica directamente a las familias con necesidades médicas y económicas urgentes. La falta de una colocación oportuna no solo es incómoda; para familias como la mía, es una amenaza de vida.

Agradecería cualquier ayuda, información e intervención que puedan brindar para agilizar el procesamiento de mi solicitud de vivienda pública. Para más detalles, pueden comunicarse con mi administradora de casos, María Ortiz, de University Settlement—Project Home, al teléfono 332-213-9497 o por correo electrónico a Mortiz@universitysettlement.org.

Atentamente,

Roberto Olivares

Via Electronic Mail

June 11, 2025

Roberto Olivares' Testimony (translated version)

My name is Roberto Olivares. I live with my wife and minor son in a rent stabilized studio apartment located on the Lower East Side of Manhattan. We currently reside on the fifth floor of a walk-up building with no elevator and no reasonable accommodation for individuals with disabilities or limited mobility. My family and I are in dire need of an accessible apartment due to my deteriorating health conditions.

I have had an active application with NYCHA since 2022. In April 2025, I updated my application and reported the severity of my medical condition to NYCHA. As a result, my case was classified as N4, W3, which indicates a high level of urgency. Yet, to this day, I have not received any follow-up or housing offer.

I am in a serious medical crisis. In March 2025, I was hospitalized for over two weeks. After extensive testing, I was diagnosed with early-stage leukemia, fatty liver disease, and arthritis—conditions that severely impact both my immune system and mobility. At the moment, I receive five chemotherapy sessions each month to help stabilize my immune system in preparation for a bone marrow transplant. This process also includes frequent and rigorous testing to ensure my organs can handle the transplant.

Because of my condition, I am urgently requesting assistance in securing a safe, accessible, and affordable public housing unit **as soon as possible**. After discussions with the doctor about my current living situation and long-term care plan, the doctor will not issue a clearance to move forward with my treatment until my family and I are placed in an adequate space prior to the transplant, so I can safely return home and receive the intensive care I will require 24 hours a day.

Right now, it takes me over 30 minutes to climb the six flights of stairs to reach our apartment—and I can't do it without help. We have explored every possible housing option both within and outside of our current building, but there are no accessible or affordable units available. Our financial situation has also deteriorated. I rely solely on SSDI income, and my wife can only work part-time as she is responsible for caring for our son, maintaining the household, and accompanying me to all my medical appointments.

I respectfully urge NYCHA and city leadership to recognize that withholding available public housing units—especially those already vacant—directly harms families in urgent medical and economic need. The lack of timely placement is not just inconvenient; for families like mine, it is life-threatening.

I would greatly appreciate any support, information, or advocacy you can provide to help expedite the processing of my public housing application. For more information, you may contact my case manager, María Ortiz, at University Settlement—Project Home, by phone at (332) 213-9497 or by email at Mortiz@universitysettlement.org.

Sincerely,

Roberto Olivares

New York City Council
250 Broadway
New York, NY 10007

June 16, 2025

Written Testimony to the Committee on Public Housing
RE: NYCHA Vacancies and Transfers

Dear Mr. Banks and other esteemed members of the Committee:

My name is Shaquaisa Spears. I am a long-time resident of NYCHA and native New Yorker – born and raised in Gun Hill Houses. I am also a member of Save Section 9, a grassroots organization and tenant led coalition that works to educate and activate public housing tenants. The testimony I am about to provide was also forwarded to your district offices via email on 5/23/2025 and 5/27/2025. I pray that my direct appeal today will garner an immediate response.

I am seeking assistance with an issue related to being transferred into a right sized unit with a reasonable accommodation request at the recently RAD/PACT converted Boston Secor Houses, which is being managed by Wavecrest Management in the Bronx, NY, and is now subsidized through Project Based Section 8 as of 10/1/2024.

My teenaged son and I have been waiting to be transferred into a 2-bedroom apartment for over a decade, with the most recent transfer approval being issued in 2019. In August 2024, I received a letter from NYCHA's Leased Housing Department stating my intra-developmental transfer was closed due to Boston Secor's privatization under RAD/PACT. I was advised to contact Wavecrest Management to initiate a new transfer request. My historic transfer requests were erased in the NYCHA portal upon conversion.

An initial phone conversation with Leased Housing Department's Director Robert Tesoriero on 9/24/2025 noted that to be considered for a transfer I would need to sign the new RAD/PACT lease to obtain a Tenant based Section 8 voucher. I obtained legal representation to advocate for me to receive the voucher in advance of the 10-month conversion rule. The lawyer advised me that the issuance of a voucher was the ONLY remedy to resolve my transfer request, although I asked to be placed in another Section 9 funded NYCHA apartment.

Residing on the top floor of a building with constant elevator outages and living with a permanent partial disability has been hard. As a recent brain surgery survivor, concerns of exposure to construction dust, lead and asbestos contaminated debris presented themselves, and it was important to minimize my exposure to environmental toxins. I was told by NYCHA staff over Summer 2024 that transfers to other NYCHA developments and within Boston Secor were frozen. My right to be transferred out of my apartment was taken away from me due to RAD/PACT, which I never wished to be a part of.

I later found out that I was expecting my second child, who was born in March 2025. This made the need for a right sized apartment more urgent. Unfortunately, throughout my entire pregnancy, I was subjected to the toxic conditions I tried to avoid which resulted in headaches, nausea, nosebleeds, and high blood pressure. My newborn is now being exposed to the same toxic environment, with active demolition work being conducted as I speak to you all.

Although I received the portable voucher in November 2024 and have vigorously sought housing in NYC, I have not been able to find an apartment. I am unable to port my voucher out to another NY county through the NYCHA portal. A phone call to NYCHA's customer contact center on 6/10/2025 confirmed that my transfer voucher was closed on 5/25/2025, although Mr. Tesoriero stated in an email on April 25 that he personally extended it to 7/24/2025.

Wavecrest Management's property manager Benjamin DeLeon has told me that there are no vacancies within Boston Secor. However, on 4/25/2025, I was relocated into a fully renovated 2-bedroom apartment within my same building as my 1-bedroom apartment was renovated. I have inquired about leasing the apartment, and was told by lead housing assistant Carmen Alvarez that transfers are not being done at Boston Secor until the conversion is complete, which will be no earlier than year 2027. I am essentially being forced to return to an inadequately sized unit relative to my household size of three. Being in a wrong sized apartment will create hoarder like conditions for my household. As a person with a disability, my reasonable accommodation request is being ignored.

Wavecrest Management is holding vacant units as "hospitality suites", which is unfair to tenants like me who were approved for a transfer under a reasonable accommodation request before this contract between NYCHA and real estate entities was signed. I am now being threatened and retaliated against by Wavecrest Management with holdover proceedings, which is contributing to my postpartum anxiety and depression.

I would appreciate an opportunity to discuss my issues further and to obtain assistance or advocacy in helping me remain in the 2-bedroom apartment that I am entitled to reside in according to NYCHA guidelines. This would entail

being given a new lease and having a project-based Section 8 voucher assigned to the vacant unit that Wavecrest and Preservation Logistics moved my family and me into in April 2025.

I sincerely thank you for the opportunity to share my concerns, as I represent many tenants who are being subjected to similar unethical and potentially illegal practices. Your attention to this urgent matter, as I try to obtain adequate housing for my son and daughter, is greatly appreciated.

Respectfully Submitted,



Shaquaisa Spears

sspears.peacs@gmail.com

Attachments:

- NYCHA Portal - Historical Transfer Requests from years 2014-2019
- NYCHA Transfer Request Determination 4/12/2023
- NYCHA Notice of Cancellation of Emergency Transfer 8/15/2024
- NYCHA Portal - Transfer Application - Dead 8/22/2024
- NYCHA PACT Conversion Approval and Conversion Date 9/12/2024

Case Number

Lessee

SHAQUAISA SPEARS

My Transfer Service Requests

1 - 5 of 5+

Service Reque	Type	Status	Sub-Status	Resolution	Resolution De	Status Date
1-482051585	Transfer	In Progress	Development Manager Revi...			4/17/2019 07:14:10 PM
1-473979136	Transfer	Closed	Expired			4/3/2019 11:00:44 PM
1-126358041	Transfer	Closed	Expired			7/21/2018 11:00:38 PM
1-7250771881	Transfer	Closed	Completed	Approved		7/20/2017 08:03:17 AM
1-3510555461	Transfer	Closed	Completed	Approved		10/31/2014 08:04:58 AM

NEW YORK CITY HOUSING AUTHORITY

Boston Sector

7186712050

04/12/2023



A. Case #:



B. TRANSFER REQUEST DETERMINATION

C. Dear Tenant:

In accordance with New York City Housing Authority procedures, your Transfer Request has been



1. Approved

(Approval is subject to confirmation of eligible immigration status, family composition and income. You will be contacted by property management when an apartment becomes available. You may check your status on NYCHA's Self-Service Portal (<https://selfserve.nycha.info>))

a. Development:

Boston Sector

3570 Bivona Street

b. Borough:

c. Bedroom Size: 2



d. Your transfer included a request for Reasonable Accommodation

e.



Your transfer included a request for Section 504 Apartment (a modified apartment that is fully accessible for a person with a mobility impairment) in a building with an Accessible Entrance.

Note: Not all Section 504 apartments may be able to accommodate larger motorized wheelchairs.

f.



Your transfer included a request for a Non-504 Apartment (an apartment that is not fully accessible for a person with a mobility impairment) in a building with an Accessible Building Entrance.



2. Disapproved. Reasons for Disapproval:



NEW YORK CITY HOUSING AUTHORITY
Applications and Tenancy Administration Department
90 Church Street, 9th Floor
New York, NY 10007

August 15, 2024

Dear Resident,

This is an update on your pending or previously approved emergency transfer request with NYCHA's public housing program. As you are aware, later this year Boston Secor will convert from Section 9 public housing to Project-Based Section 8 through New York City's Permanent Affordability Commitment Together (PACT) program. PACT allows us to complete comprehensive repairs at your development and enhance on-site community programming and services, while also ensuring that your home remains permanently affordable and residents have the same basic rights as they possess in the public housing program. Your development is scheduled to convert later this year.

Since your development is converting through PACT, your NYCHA public housing transfer request can no longer be processed. Please disregard any prior notices, whether approved or disapproved, related to your public housing transfer request.

At this time, if you would still like to transfer, the following options are available to you:

1. If you wish to transfer to another apartment within Boston Secor you should follow up with the new management company about transferring after the PACT conversion. **Wavecrest Management Group, LLC** can be reached at **347-331-1074**, or bbm@twml.net. The website is <https://nychapactbbm.com>.
2. If you wish to leave Boston Secor and you qualify for an emergency transfer, you may request a Section 8 transfer request form after your development converts by either calling NYCHA's Customer Contact Center at 718-707-7771 or logging on to the NYCHA Self-Service Portal (<https://selfserve.nycha.info>). Your completed request will be reviewed, and if you qualify for an emergency transfer voucher, a Tenant-Based Housing Choice Voucher will be issued to you that you can use to lease a new unit in or outside of New York City.
3. If you do not qualify for an emergency transfer, one year after the PACT conversion, you have the right to submit a transfer request for a Tenant-Based Section 8 Choice Mobility Voucher. If funding is available and you meet income eligibility, NYCHA will issue you a Tenant-Based voucher that you can use to lease a new unit in or outside of New York City. For additional information on the Section 8 transfer process visit the 'Tenants' section of NYCHA's Section 8 website. This page outlines the process available to you once you are a PACT Section 8 tenant.

We encourage all residents to confirm information about their household prior to the conversion, regardless of your transfer request status. You can always check your information about your household in NYCHA's Self-Service Portal.

Thank you for your cooperation.

Sincerely,
Applications and Tenancy Administration Department

A translation of this document is available in Customer Contact Center. NYCHA is providing the translation for your information only. Please fill out the English language version of the document.
La traducción de este documento está disponible en los Centros de Atención al Cliente. NYCHA proporciona la traducción solo para su información. Por favor, llene la versión en inglés del documento.
客戶服務中心備有文件譯本可供索取。紐約市房屋局所提供的文件譯本僅供參考。請填寫文件的英文版本。
客戶服務中心備有文件譯本可供索取。紐約市房屋局所提供的文件譯本僅供參考。請填寫文件的英文版本。
Перевод этого документа находится в Центре обслуживания клиентов. NYCHA предоставляет перевод только для вашей информации. Пожалуйста, заполните английский вариант документа.

 **Menu**



 **Transfer Information**

Transfer Request status

Dead

Transfer Request status Description

Transfer Status Date

8/21/2024



[\(/app/eservice/enu?](#)

[SWECmd=GotoView&SWEView=NYCHA+OUI+Home+Page+View\)](#)

HOME



HELP

TRANSLATE



MENU



NEW YORK CITY HOUSING AUTHORITY
OFFICE OF THE EVP FOR REAL ESTATE DEVELOPMENT
90 CHURCH STREET • NEW YORK, NY 10007
TEL: (212) 306-3000 • nyc.gov/nycha

September 12, 2024

Re: PACT CONVERSION APPROVAL and CONVERSION DATE

Dear Resident:

As you know, Boston Secor, Boston Road Plaza, and Middletown Plaza have been included in the *Permanent Affordability Commitment Together* (PACT) program, which will unlock funding to bring comprehensive repairs and enhanced property management and social services to your development, while preserving your rights and protections and ensuring that your home remains permanently affordable. Through PACT, your development will be included in the U.S. Department of Housing and Urban Development (HUD) Rental Assistance Demonstration (RAD), which converts the source of funding for your development to a more stable HUD program called Project-Based Section 8.

This notice is to let you know that HUD has issued its approval for the conversion of your property to Project-Based Section 8, and **September 27, 2024** will be the first day that Wavecrest Management Group, LLC will act as the new property manager for your development. The rehabilitation of Boston Secor, Boston Road Plaza, and Middletown Plaza is targeted to begin in the fall of 2024 and will take approximately three years to complete. Rehabilitation of your building will occur sometime during the overall construction period.

Your **PACT Property Manager** and **NYCHA's Leased Housing Department**, which administers the PACT Section 8 program, will send you a **PACT Project-Based Section 8 Welcome Packet** with information about who to contact for repairs, how to pay your rent bill, and how to get answers to any questions you may have about the PACT conversion.

As has been shared previously, HUD requires that residents sign a new lease in connection with a PACT conversion. The PACT Section 8 Lease also includes House Rules that are specific to your development and that were developed in collaboration with your tenant association. You can request a copy of your signed lease and house rules from Wavecrest Management Group, LLC.

- If you have already signed a PACT Section 8 Lease with NYCHA's PACT Partner, you do not need to do anything further.
- If you have not yet signed a PACT Section 8 Lease with NYCHA's PACT Partner, reach out to Wavecrest Management Group, LLC at (347) 331-1074 or email them at bbm@twmt.net.

Your new PACT Section 8 Lease will be effective as of the date of the Housing Assistance Payment (HAP) Contract for the Section 8 Project-Based program. Many of the rights and protections guaranteed through the PACT program are included in the PACT Section 8 Lease, so it is important that you sign the new lease as soon as possible. The PACT Section 8 Lease was developed by NYCHA and has been informed by residents, advocates, and stakeholders from across the city. It has also been reviewed by Legal Aid Society, an independent legal services organization. The PACT Section 8 Lease cannot be

changed without NYCHA's approval. By signing your new PACT Lease, you ensure that your apartment will remain affordable and that your authorized relatives will have succession rights to the apartment.

You may be required to temporarily move to a hospitality suite if any construction work may impact your household's health and safety. You have the right to return to your original apartment once it is deemed safe to re-occupy your unit, typically within 4 to 8 weeks. The temporary moves will ensure that residents are not exposed to hazardous materials and not subject to service disruptions of heat and water. The temporary move will be at no cost to residents. Wavecrest Management Group, LLC will reach out to each household directly with more information about the possible need for a temporary on-site move. If you need a reasonable accommodation for a household member with a disability or an appropriately sized unit for your household, please let Wavecrest Management Group, LLC know as soon as possible.

PACT residents are eligible to apply for a tenant-based voucher (TBV) starting 10 months after a PACT conversion and, subject to availability, may receive a tenant-based voucher starting one year after PACT conversion. If granted, residents can use TBVs to move out of the PACT development to a private property that accepts TBVs, if they wish. If you are interested in a TBV, please reach out to NYCHA's Leased Housing Department by calling the NYCHA Customer Contact Center (CCC) at 718-707-7771 or making the request through NYCHA's Self-Service Portal (<https://selfserve.nycha.info/>).

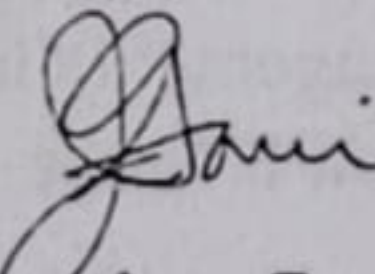
If you have any questions about PACT, please use the following resources to learn more:

- Call the PACT hotline at (212) 306-4036 or email PACT@nycha.nyc.gov with any questions or concerns.
- Call Wavecrest Management Group, LLC at (347) 331-1074 or email bbm@twmt.net.
- Call the free legal services hotline provided by the Legal Aid Society (212-298-3450). This line is dedicated to residents participating in the NYCHA PACT program.

We thank you for your continued partnership in helping to shape the future of your development.

NEW YORK CITY HOUSING AUTHORITY

By:



Jonathan Gouveia

Executive Vice President, Real Estate Development

A translation may be provided to you to help you understand your rights and obligations. The English language version of this document is the official, legal, controlling document. The translation is not an official document.

From: [Sweet Siide](#)
To: [Testimony; Ramona Ferreyra@RPPH & Save section 9](#)
Subject: [EXTERNAL] Concerns Regarding Transfers and Apartment Vacancies Issues Impacting NYCHA Residents
Date: Wednesday, June 18, 2025 4:48:01 PM

Dear Chairman Banks,

I hope this letter finds you well. I am writing to express concerns about the ongoing challenges related to resident transfers and vacancies within the New York City Housing Authority (NYCHA) and the significant impact these issues are having on residents.

Firstly, the low rate of feasible transfers disrupts the continuity of services. Residents often rely on familiar, experienced personnel who understand the unique needs of their community. Residents need a better quality of life upon return to their homes, not upheaval. Constant personnel changes lead to delays in addressing maintenance requests, tenant inquiries, and community issues. Leads to constant mistrust, accountability, transparency and miscommunication from executives down to ground caretakers. There needs to be an environmental impact study and monitorship by residents as a third-party but treated as a first priority!!! HUD 964 is Our Tenant Bill of Right and should be treated and protected as such if not then residents should seek legal alternatives.

Secondly, prolonged vacancies in critical positions (the lack of available / habitable apartments) hinder efficient operations. Maintenance backlogs increase, urgent repairs are delayed, and communication gaps widen, affecting residents' quality of life. Essential services like building upkeep, safety measures, and administrative support suffer from inadequate staffing. We need more apartments available during this real affordable housing crisis, not more RAD PACT Projects on the table!!!

Moreover, these apartment transfer vacancies staffing issues contribute to decreased morale among both staff and residents. Employees face heavier workloads, leading to burnout and reduced efficiency, while residents experience frustration due to unmet needs and unreliable service delivery. This is a Budget and a Housing Crisis Pre and Post Covid years

Addressing these concerns requires strategic workforce planning, improved retention efforts,

and a streamlined hiring process to ensure that NYCHA can maintain stable, responsive support for its communities.

Thank you for your attention to this critical matter. I look forward to your leadership in implementing solutions to enhance the living conditions for NYCHA residents.

Warm regards,

Siide Gil-Frederick



“If you fail to plan, you are planning to fail!”

– **Benjamin Franklin**

CONFIDENTIAL COMMUNICATION: This email message and any attachment may contain privileged and confidential information intended only for the use of the individual or entity to which the email is addressed. If the reader of this message is not the intended recipient or the employee or agent responsible to deliver it to the intended recipient, that person is hereby notified that any dissemination, distribution or copying of this communication is prohibited. If you have received this communication in error, please notify us as soon as possible by telephone (collect calls will be accepted). Thank you for your cooperation and assistance.

Testimony in Support of the Bill Requiring NYCHA to Report Vacant Public Housing Units

My name is Tamika Mapp, and I am a proud resident of New York City, District Leader 68th AD, Part D, a community advocate, and a member of the East Harlem Committee for Good Government Democratic Club. I am writing today in strong support of the proposed legislation that would require the New York City Housing Authority (NYCHA) to publish an annual report on public housing units that have been vacant for more than 30 continuous days.

For too long, families in desperate need of safe, affordable housing have been left waiting—often for years—while thousands of NYCHA apartments sit empty. This bill brings long-overdue transparency and accountability to a system that has kept both the public and elected officials in the dark.

Vacant units are not just statistics; they represent missed opportunities for New Yorkers—working families, seniors, and those experiencing homelessness—who deserve a place to call home. When units are left empty due to bureaucratic delays, lack of repairs, or poor management, it not only wastes public resources, it deepens our housing crisis.

By requiring NYCHA to report the number, location, and reason for each long-term vacancy, this bill would empower the Council and the public to identify patterns, push for solutions, and ensure follow-through. Transparency is the first step toward restoring trust and delivering the housing justice our communities deserve.

This legislation is a common-sense measure to promote efficiency, accountability, and most importantly—dignity for all New Yorkers seeking affordable housing.

I urge the Council to pass this bill without delay. Thank you for your leadership and commitment to housing equity.

Sincerely,

Tamika Mapp

District Leader, 68th AD, Part D

From: [Teresa Scott](#)
To: [NYC Council Hearings](#); [Save Section 9](#); rad@hud.gov; gsptherealone@gmail.com; [HUD Public Engagement](#); [District31](#)
Subject: [EXTERNAL] Public Housing Hearing June 16, 2025
Date: Thursday, June 19, 2025 11:29:38 AM

To: Committee on Public Housing
Date: June 16th, 2025
Hearing: Oversight – NYCHA Vacancies and Transfers

Chair Banks, Deputy Speaker Ayala and members of the Committee on Public Housing,

We submit this testimony on behalf of our members, and neighbors, in response to the hearing held on June 16th, 2025.

New York City's public housing tenants continue to suffer due to NYCHA's inability to invest in the skilled staff necessary to ensure vacant units become turnkey ready in a timely manner. Empty apartments increase squatting, crime and blight. These negatively impact our vibrant communities and put our most vulnerable neighbors, seniors, in danger. This danger is truly felt in senior buildings where empty units erode safety. Utilizing Section 3 as a solution to this problem is an innovative and economically sound solution. We believe that NYCHA's vacancy problem is a self-inflicted injury. One that allows NYCHA to claim that units are uninhabitable and should therefore be removed from the Section 9 rolls, further weakening public housing and justifying privatization.

NYCHA's claim is that they need \$79B to operate and address repair backlogs. But we'd like to remind you that they actually need much less. The \$79B is based on a 20-year physical need forecast. Historically NYCHA has used a five year forecast system. The 5-year physical need in 2023 is actually \$60.3 billion. However, over 30% of the 2023 Physical Needs Assessment amount (\$18.9 billion) is attributed to 'market price escalation'.

Since this is not concerned with physical needs, removing it brings the 2023 physical needs to \$41.4B. This number makes sense when we consider how many units NYCHA is shedding via RAD/ PACT conversions. Allowing NYCHA to claim a deficit of \$79B is problematic. The way NYCHA handles transfer requests is equally harmful.

NYCHA ignores [HUD's transfer regulations](#). NYCHA regularly fails to honor transfer requests from tenants in unsafe or inhumane conditions. But the skirting of policy worsens when a development is being considered for conversion. NYCHA, RAD/PACT partners, and property managers throw out the rule book and stop honoring transfer requests before tenants are made aware of the change in financing for their development. NYCHA should be offering every household the option to transfer in order to remain a Section 9. Tenants are not being informed of this option and are instead bullied into converting to a project based voucher.

While NYCHA wants to claim that they are not responsible once a new management company takes charge, the truth is that the housing authority is an oversight agent post conversion. NYCHA opted to remain involved in the recertification and project based voucher administrative process. Ensuring that transfer policies are honored IS their responsibility.

We call on city council to:

1. Demand NYCHA uphold HUD's transfer regulation for developments in the process of converting out of Section 9 through RAD/PACT by providing tenants the option to transfer in writing, in multiple languages;
2. Demand NYCHA provide publicly accessible statistics on how many tenants end up requesting a transfer ahead of RAD/PACT conversion, and how many transfer requests are honored;
3. Demand that NYCHA and RAD/PACT partners publish a comprehensive timeline for conversions so that tenants know at which point transfers are available to them and when that window closes;
4. Demand that RAD/PACT partners create a transfer tracking system for tenants allowing them to transfer request status in real-time;

5.

Hold RAD/PACT partners accountable, and demand that they mirror NYCHA's management staffing guidelines thereby ensuring that every tenant is served by a housing administrator that can respond to tenant's questions and requests regarding transfers and daily needs.

Tenants whose developments are under consideration for privatization and whose developments are in the midst of RAD/PACT conversion are experiencing violations of their rights, and extensive discrepancies and violations of HUD regulations regarding transfers.

Tenants are experiencing these discrepancies via:

- Transfers being frozen for extended periods during PACT conversion, regardless of need, including urgent health effects from construction at their developments;
- Lack of clarity regarding how long transfers are frozen while conversion is occurring and discrepancies in [HUD policy](#) and RAD/PACT partner enforcement of conversion period;
- Poorly managed and executed construction at RAD/PACT developments delaying the possibility for transfer and furthering dire health effects on tenants;
- Transfers not being offered by NYCHA **before** conversion is approved and during conversion assessment with tenants, as per HUD policy and therefore losing their section 9 status with no choice or option for recourse;
- Complete lack of communication and transparency by NYCHA and RAD/PACT partners regarding tenant's transfer status, regardless of communication method;
- Renovated units in PACT developments being held vacant while there is a waitlist of transfers and tenants who are in distress and being exposed to harmful materials during construction, repairs, asbestos abatement, etc.

Additionally,

1.

We ask the City Council to immediately issue a moratorium on all NYCHA RAD/PACT conversions, pending the completion of a robust impact study inclusive of all

properties currently being served by Project Based Section 8.

2.

We ask the City Council to host a joint hearing with its Albany counterparts on RAD/PACT. During this hearing, NYCHA and HUD's office of Public and Indian Housing should be asked to:

1.

Provide insight on the success of the program nationally, success should be defined on improved quality of life for previous Section 9 tenants living in a specific property.

2.

An explanation of the timeline for RAD/PACT CC on how said opposition is weighed in the larger application for RAD/PACT or Section 18.

We urge you to recognize that in spite of abandonment, we continue to thrive. Public housing supports strong communities, diminishes gentrification, and supports tenants at every stage of life. An investment in public housing will ensure more families have stability, and the social infrastructure necessary to be bold enough to head to Harvard, become urban farmers, start businesses and be part of the solution. Collectively we can work towards our [national solutions](#) and the adoption of the [Green New Deal for Public Housing](#). The latter is now cosponsored by [57 member of congress](#).

We are available for further conversations regarding our proposals and national solutions for public housing. We will follow up with your office to schedule meetings.

Save Section 9 Members

Save Section 9 Solutions and References

1.

Place an immediate moratorium on all RAD and RAD-Section 18 blends in New York City, until a comprehensive, third party impact assessment study of all Project-based Section 8 conversions in New York City

To date, there have been no New York City-wide impact assessments of the RAD/PACT program on tenants. In this absence, two studies by [Human Rights](#)

[Watch](#) and [Neighbours Helping Neighbours](#) document the detrimental impacts of RAD - nationwide and at Ocean Bay Houses respectively, along with data gathered by City Limits and the Anti-Eviction Mapping Network and evidence gathered by media articles:

a.
Evictions

2.

i.
The Human Rights Watch report documents significant increases in evictions in two RAD developments. The report states: “ On paper, aside from the NYCHA-specific protections discussed above, tenants in RAD housing nationally have essentially the same rights as those in public housing. But in practice, property managers have significant discretion over evictions and other decisions that may have far-reaching impacts on tenants’ lives. Many tenants worry that PACT managers will be more likely to evict them if they fall behind on rent, which could lead to homelessness or a loss of adequate housing.”

ii.
City Limits and Anti-Eviction Mapping Project gathered data at Ocean Bay Houses indicating there were 80 evictions between January 2017 and February 2019, more than two times higher than evictions at any other NYCHA development

iii.
The Rockaways Neighbors Helping Neighbors report supplements this data via tenant surveys at Oceans Bay finding that 19% of tenants said new management tried to evict them and 18% said they knew a neighbor was threatened with eviction.

iv.
Further eviction evidence: <https://www.thecity.nyc/2024/03/14/eviction-private-nycha-managers-rad/>

c.
Rent increases and Double Landlords

4.

i.
61% of tenants at Ocean Bay Houses indicated their rent had increased, 35% said they were recertified more than once a year and 64% said they had to recertify with both NYCHA and the private manager.

e.

Poor Living Conditions

6.
 - i. The Human Rights Watch report details countless evidence of continued poor living conditions, faulty repairs, poor construction during renovations, hard to reach management, and more. A tenant that was interviewed said: “Monopoly is being played with our lives.... “That’s what the fight is, to protect us from investors who don’t give an ‘F’ about us.” Some tenants describe how repairs were carried out in a manner that places tenants at risk including exposure to lead paint or asbestos. Other tenants worry that their homes will fall into disrepair again, noting that the private managers are frugal with their repairs.
 - ii. At Ocean Bay Houses, 40% of tenants said conditions have gotten worse or much worse after conversion, 21% said it is harder to get repairs and 35% said there is not an easy-to-use system for submitting repair requests.

2.

Call on Congress to:

3.

a.

Uphold the RAD Sunset date of September 30th 2024

A sunset on the RAD program was due on September 30th 2024 and RAD. City Council should call on Congress to sunset RAD on the originally planned date.

i.

The claimed reason to extend RAD until September 2029 was to “provide PHAs more time to carry out the necessary and important resident engagement activities prior to applying for RAD and allow PHAs pursuing large scale, multi-year development of public housing properties to keep their commitments to their communities”

2.

1.

Thus far, tenant engagement by NYCHA and PACT partners has been poor and many tenants do not know their development is being converted or what this means for their tenancy. An example of this was the tenant engagement at Fulton Elliot Chelsea which included a survey process that was falsely communicated as a vote:

2.

- a. 969 of 3388 participated in the survey. That is 16% meaning 84% did not take part.
- b. Simon Kawitzky, Vice President Portfolio Planning stated the packets were given out in the languages spoken in the development. English, Spanish , Chinese
- c. Unable/unwilling to explain how we went from No Demolition to Demolition.
- d. Have taken the attitude that they are doing everyone a courtesy by meeting with CB4 to explain the proposal.
- e. Lack of transparency: NYCHA speaks with Resident Leaders And CB4 but not the thousands of other tenants.
- f. Related is now trying to put up a casino in the Western Rail Yards [West Side Rail Yards/Hudson Yards Rezoning - Manhattan Community Board 4 \(nyc.gov\)](#) violating this agreement.

ii.

As of NYCHA's 2024 Annual Plan, there are 81 developments under consideration for RAD conversions (Bronx: 36; Brooklyn: 21; Manhattan: 22; Staten Island: 2), a huge increase since the program was first introduced. This will impact 22,282 NYCHA units. Without a comprehensive impact assessment and proper framework of accountability for NYCHA and RAD partners being established by City Council & HUD, extending the RAD sunset deadline puts tens of thousands of tenants at risk

b.

Invest in Section 9 Public Housing and submit a letter of support for the Green New Deal for Public Housing (GND4PH).

3.

i.

Congress has steadily divested from public housing while increasing

funding for housing programs that rely on the private sector. ([HRW](#)). Of note is the consistent disinvestment in Section 9 while increasing investment in the RAD Program:

2.

1.

In 2021, the overall budget of the US Department of Housing and Urban Development (HUD) was \$69.3 billion, of which \$2.9 billion was allocated for major repairs to public housing. Adjusted for inflation, this amount is around 35 percent lower than the capital funding allocation in 2000, which in 2021 dollars would be worth \$4.5 billion ([HRW](#)).

2.

The 2021 President's Budget requests \$100 million for the RAD program, which is \$100 million more than the 2020 enacted level. These funds would be used to support the costs of conversion for public housing properties that are unable to convert using only the funds currently provided through public housing appropriations. ([President's Budget RAD](#)).

Funding has also been increasing for the Section 8 vouchers which bring valuable support to tenants in private market housing. However this increase also facilitates RAD conversions.

Direct investment is needed in Section 9 Public Housing. Funds should be divested from the RAD program and the associated funding of the Section 8 program to preserve public housing.

ii.

Another critical funding source that was just introduced is the GND4PH. NYC gets 50% of the investments allocated within the GND4PH.

c.

Convene a joint hearing between multiple levels of government to hold accountable NYCHA and PACT partners during RAD, Section 18, and RAD-Section 18 blend conversions

4.

i.

While RAD is a federal program, its implementation is a multi-governmental effort and all levels, including City Council, NY State and HUD are accountable to its impacts. RAD conversions are increasingly

using a blend of Section 8 and 18 vouchers (also used by the NY State established Public Housing Preservation Trust). Section 8 and 18 blends provide PACT teams access to Tenant Protection Vouchers which are a higher revenue stream but are distributed on the condition that units meet 'obsolescence' criteria - placing huge risks on tenants as poor living conditions draw in higher vouchers.

ii.

City Council is accountable to work jointly with NY State and HUD to have close oversight on NYCHA and PACT partners' actions during conversions. [Since NYCHA is controlled and funded by the Mayor and City Council](#), and its board and leadership appointment is overseen by these entities, City Council has a responsibility to track NYCHA's actions. Furthermore, City Council directly funds NYCHA, and \$265.1 million dollars were provided for NYCHA's operating budget in 2024. NYCHA has a history of misusing this funding (see next point), but these practices are connected to a broader mismanagement that embroils NY State and HUD.

iii.

Before his replacement, Federal Monitor Bart Schwartz challenged NYCHA's default position of blaming money woes for its troubles, arguing that many of its problems are self-inflicted due to incompetence and an inability to efficiently use existing resources. He is quoted as saying "Funding is not the worst of NYCHA's problems. It is the lack of effective governance, ethics and accountability that prevents NYCHA from achieving comprehensive, sustainable improvements within its current financial restraints." The Federal Monitor's warnings need to be taken seriously by City Council as it points to a systemic issue in NYCHA's practices that can only be addressed by a coordinated efforts between multiple levels of government.

3.

Develop the following accountability processes:

4.

a.

Track NYCHA's spending and claimed capital repair needs, with joint oversight from City Council and HUD

2.

i.

In light of the recent federal bribery charges against 70 NYCHA employees, City Council must develop stringent oversight on NYCHA's

spending practices ([US Attorney's office](#)). These bribery charges arrive on the backs of decades of general money mismanagement, as tenants have watched NYCHA use the repair process take place with no accountability and many tenants describe how money is wasted in these processes with repeat visits, poor work quality, and no oversight from NYCHA over work that is contracted out to third parties.

ii.

In a [hearing on NYCHA's Spending of Capital Funds on November 18th 2021](#), **City Council highlighted that NYCHA only spends 6.5% of its allocated City capital funds**. Since City capital funds do not have an expiry date, the report points to a history of NYCHA not spending allocated city capital funding. This is compared to a spending rate by other agencies of at least 60-61%. **This is clear evidence of NYCHA's long track record of wasting and mismanaging funds**. Along with this broader issues, tenant testimonies highlighted a range of related issues that take place when NYCHA mismanages its spending including:

3.

1.

Section 964 regulations not being followed by NYCHA, and tenants not being involved in decision making on how capital repairs get addressed

2.

Continued issues with no heat, hot water and broken elevators despite NYCHA having access to City funds to address these

3.

No by-laws in how tenant associations and resident councils are elected and many tenants having no access to NYCHA's claimed 'tenant engagement'

4.

Section 3 regulations not being abided by, and public housing tenants not having access to labor opportunities that can be provided during capital repair efforts

5.

NYCHA abandoning units and critical repair needs that place tenants' lives at risk just so the units can qualify as 'obsolete' and receive Tenant Protection Vouchers PACT/The Public Housing Preservation Trust

iv.

In 2023, NYCHA released an updated Physical Needs Assessment which claimed the Authority needed an astounding \$78.34 billion

dollars, increased from \$31.8 billion in 2017. There are a range of issues with how the 2023 PNA was carried out, however the key point to make is that NYCHA parading the alarming number of \$80 billion deeply stigmatizes public housing and contributes to the narrative of its failure. The 2023 PNA is meant to be about tenant needs, however is being used by NYCHA to justify its plans to forward RAD/PACT and the Public Housing Preservation Trust as the only options moving forward, instead of scrutinizing its own mismanagement of funds. The 2023 PNA does not accurately reflect capital needs and must be understood with the following details:

5.

1.

Compared to the 2017 PNA which comprehensively examined the whole NYCHA portfolio, the 2023 PNA only examined 10-15% of apartments in 30 selected developments. Only 18% of NYCHA apartments were actually inspected.

2.

The 2023 PNA focuses on the 20-year need while the 2017 PNA focused the 5-year need. This in itself is not of issue, however the 20-year need is a higher number (\$78.3 billion instead of \$60 billion) and adds to the sensationalizing of repair needs without proper explanation of its meaning.

3.

Over 30% of the 2023 PNA amount (18.9 million) is attributed to 'market price escalation', which is the impact of inflation and market prices for construction. This is relevant, but has nothing to do with the physical condition of apartments. Furthermore, this was calculated during surges resulting from the pandemic and do not take into account savings that can occur through mass material ordering and coordinated construction practices across the portfolio.

The 2023 PNA is an excellent example of how NYCHA continues to twist its financial needs to serve its agenda of forwarding RAD/PACT and the Public Housing Preservation Trust. A thorough assessment of the validity of this PNA is required. For more detailed analysis, please see [CSS and Legal Aid's testimony on the PNA](#).

b.

Dedicated oversight on the PACT team's (NYCHA + Private Management) tenant communications

during conversion including: information sharing, tenant 'voting' processes, and what NYCHA claims as tenant 'engagement'.

Communication from NYCHA and private management during RAD/PACT conversions has included misinformation, confusion, alterations of the truth.

i.

It is also centered on communication *through* the tenant association and not directly to tenants - many tenants do not know their tenant association representatives. Not having a public listing of the publicly elected representatives that compose tenant associations is a barrier to tenant participation. Therefore tenant association contacts should be made public by NYCHA and made available to any tenant at their management office and online. The bylaws that oversee the tenant association should be standardized, including clear instructions on the recall process, and election cycle. NYCHA must be reminded that tenants have a right to request a copy of their bylaws. Each one should be publicly available at the management office and online.

ii.

The PACT teams claim to conduct robust 'tenant engagement' and often cite the Chelsea Working Group as an example. However, NYCHA's plans to demolish Fulton Elliot and Chelsea Houses completely negates the demands of the Working Group. As articulated by the Community Service Society: "During the Chelsea Working Group, residents spent month after month scrutinizing the technical issues facing their developments and the priorities they agreed on when it came to addressing them. The plan proposed by NYCHA in the Draft Significant Amendment reflects none of this work" ([Joint statement by CSS and Legal Aid on FEC](#)). Also noted in this statement is that despite tenants receiving a right to return, historically relocations of this scale and construction timelines of this length mean **demolition will lead to the displacement of tenants.**

iii.

At Fulton Elliot Chelsea, NYCHA and private partners Related Companies and Essence Development claimed that most tenants wanted demolition as indicated by a voting process. **This was actually a survey with poor outreach and little accessibility falsely paraded as a vote and should not hold any legitimacy:**

4.

1.

Only 969 of 3388 participated in the survey. This is only 16% of those eligible. ([Fulton Elliott-Chelsea Environmental Review](#)

[nyc.gov](https://www.nyc.gov)). 84% did not vote and compose the countless that do not want demolition.

2. Again, Tenant Association representatives were the only pathway for 'engagement'. A significant number of tenants at Fulton Elliot and Chelsea do not have clear information on what the plan ahead means for their leases, for their homes, and for their rent.
3. Flyers about the survey were in English, Spanish, Chinese, simplified Chinese at the Chelsea Land Use meeting when the survey was under discussion. There are more languages than those spoken in the development. The annual review asks tenants the languages they are comfortable reading and speaking. There are more languages spoken in the development than those. Language justice wasn't observed in this process.
4. Even though Fulton Elliot Chelsea is still NYCHA and under Section 9, tenants are already confused about who the management company is. For example, Related has already established their security personnel on site, without properly informing tenants of this change. Related has hired tenants that live in the development to patrol it. While this seems benevolent - providing employment to tenants - this presents a conflict of interest and an unbalanced power dynamic. Tenants who are hired by Related are more likely to want their plan despite not being educated on it.

References

- [“The Tenant Never Wins”: Private Takeover of Public Housing Puts Rights at Risk in New York City | HRW](#)
- [Ahead of Public Hearing, Legal Aid and Community Service Society Raise Serious Concerns About NYCHA](#)
- [2023 Pre-Qualified PACT Partner List | NYC.gov](#)
- [An Advocate’s Guide to Public Housing Conversions Under Component 1 of the Rental Assistance Demonstration](#)
- [Congress Approves Changes to the RAD Statute, Managing Multifamily Properties and More! PMCS, INC..](#)
- [DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT Office of Housing Rental Assistance Demonstration PROGRAM PURPOSE BUDGET OVERVIEW JU](#)
- [HUD Highlights Congressional Changes to RAD Statute, Implementation Guidance](#)

Forthcoming -NH&RA

- [Monitor's Final Report Card Slams NYCHA's Culture Of Mismanagement | THE CITY — NYC News](#)
- [National Low Income Housing Coalition. Letter to Senate Committee on Appropriations Subcommittee on Transportation, Housing and Urban Development. April 21, 2023.](#)
- [New York City Housing Authority 2023 Physical Needs Assessment Final Report.](#)
- [NYCHA Residents Join NYC Comptroller to Announce Audits of Repair Processes and Eviction Rates at the Housing Authority](#)
- [Private company running Brooklyn public housing complex fired for repeated failures - Gothamist](#)
- [RAD Case Study: New Jersey Development Team Learns Early Lessons | Novogradac](#)
- [Rental Assistance Demonstration](#)
- [Rockiness in the Rockaways: Five Years of RAD at Ocean Bay Houses](#)
- [Tenants' Rights at Risk in NYCHA Conversions, Warns Human Rights Group | THE CITY — NYC News](#)
- [The Nefarious Nature of the Private Partners Selected for RAD Conversions – NYCHA Rising](#)

Teresa L Scott



From: [Simone-Lisa](#)
To: [Testimony; District42](#)
Subject: [EXTERNAL] Testimony on NYCHA Vacancies and Transfers Hearing
Date: Wednesday, June 18, 2025 7:11:51 PM
Attachments:



Submitted, are written testimony with attachments provided for NY City Council's Hearing on June 16, 2025 at 10:00 a.m.; NYCHA Vacancies and Transfers.

Respectfully submitted,

Simone and Lisa Hall
Email: projectsecor@gmail.com

June 16, 2025

New York City Council
250 Broadway New York, NY 10007

Written Testimony to the Committee on Public Housing

SUBJECT: T2025-3593 Oversight - NYCHA Vacancies and Transfers

Reporting on vacant public housing dwelling units.

Introduction: This bill would require the New York City Housing Authority to make publicly available online and submit to the Council an annual report on public housing dwelling units that have been vacant for more than 30 continuous days.

Testimony: NYCHA Vacancies And Transfers

Comments of:

Simone and Lisa Hall – Boston Secor Houses, Bronx, NY 10475

submitted to

The New York City Council Committee on Public Housing

Monday, June 16, 2025

[Time - 2:44:50 through 2:49:10]

To Councilmembers Chris Banks, Diana I. Ayala, and Alexa Aviles, Chiefs of Staff, and additional Public Housing Committee Staff,

NYCHA is being directed to make publicly available an annual report on public dwelling units that have been vacant for more than 30 continuous days.

An Annual Report provides outdated information. NYCHA should publish an updated report every 30 days in real time to help families find housing sooner. A monthly report would aid in addressing the homeless crisis, especially when apartments are repaired and have a Certificate of Occupancy.

No one should wait a year for published information to secure housing. This delay could force people into prolonged stays in shelters, doubling up with others, living in cars, riding subways, or sleeping in staircases, as is currently happening.

The Real Estate industry immediately knows which housing is available.

NYCHA has incorporated a real estate operation into its business model to transition away from managing its buildings. This action has allowed NYCHA to turnover its daily management operation to private management companies under the RAD/PACT program.

However, NYCHA buildings cannot be privatized under Section 9 without tenant knowledge and participation. Buildings have been reclassified to a Project-Based Section 8 status.

NYCHA does whatever it wants to do regarding its properties including the sale of properties, in example, the sale of Boston Secor Houses in the Bronx to Wavecrest Management Group, and BRC Master Tenant LLC located in Boston, Massachusetts without informing the tenants.

At Boston Secor Houses, resident engagement was overlooked, as there was no formal tenant association established after the death of the Tenant Association President Emma Miller in December 2022. Additionally, there was neither an election nor a voting process conducted for the approval of the RAD/PACT program prior to the sale of the buildings. These events occurred during a nationwide pandemic and violated **HUD Regulation 964, THE TENANT PARTICIPATION AND TENANT OPPORTUNITIES IN PUBLIC HOUSING RULE** which ensures tenants' rights and responsibilities in the decision-making process.

HUD Regulation 964 mandates that tenants have a say in managing and maintaining housing developments while protecting their tenancy rights like the Right to Safe Housing, Maintenance and Repairs, Protection Against Discrimination, Privacy Rights, Clear and Understandable Lease terms and conditions, and follow Legal Eviction procedures without harassment and threats.

Private ownership, Wavecrest Management Group ignored HUD Regulation 964, starting with:

Adding unexplained arrears on monthly rent statements for tenants who signed the PACT lease and tenants who did not sign the PACT lease.

1. Pressuring tenants to first sign a lease WITHOUT the opportunity to read the PACT lease, usually 50 pages long.
2. Not having a system in place along with non-working phone numbers to report needed repairs.
3. Submitting rent payments to various rent processing companies; Bank of America, Wells Fargo, JPMorgan Chase, PAYMENTUS, Wavecrest MGMT Group, BRC MASTER TENANT LLC.
4. NYCHA and the Wavecrest Management Group ignores apartment transfer requests.
5. Tenants must sign leases prior to the submission of an application by the PACT program to the SAC Special Applications Center and the subsequent HUD approval for the conversion to private Section 8.
6. Tenants are exposed to unclear situations that can lead to unjust evictions. This causes an environment of uncertainty and fear, where tenants feel they are pawns in a larger game between the housing authority and private partners.
7. Apartments left vacant only worsens the homeless situation.

CONCLUSION

- A monthly report could display the available inventory of apartments and review compliance by housing authorities and private partnerships with the laws of Section 9 and HUD Regulation 964, ensuring accountability to tenants' needs.
- Section 9, as mandated by Congress, ensures that housing remains accessible regardless of market changes. Section 8 private ownership does not provide assurances.
- Section 9 should fulfill its original intent to provide safe, affordable housing for those in need. It would highlight instances of success or failure in meeting program goals.
- Some tenants have thirty thousand dollars (\$30,000.00) in arrears since the program was implemented at their development.

- Regular reports would create a sense of stability, security, and trustworthiness for tenants. Public Housing Authorities nationwide tend to view New York City's NYCHA as a model of success to replicate. We will submit the rest of our 4-page testimony to the City Council.

Thank you for your time.

Respectfully,

Simone and Lisa Hall

Residents

Boston Secor Houses

Email: projectsecor@gmail.com

Attachments: -HUD Regulation Part 964- Tenant Participation in Public Housing Code of Federal Regulations
-Letters to HUD NY and AG Letitia James Wavecrest MGMT Termination of Tenancy/Subsidy
-Unexplained Wavecrest MGMT Rent Statement Increase Nov. 6, 2024-4pgs.
-Emails: Unexplained Rent Increase and Rent Statement by Wavecrest MGMT Parts 1 and 2
-Property Owner Registration Information-BRC MASTER TENANT and Wavecrest MGMT Team
-BBM Tenants Portal Not Safe – Screenshot 12-02-2024
-HPD Online Violations 2175 Reeds Mill Lane 11F, Jan 03 thru Jan 07, 2025 – 5pgs.



WAVECREST MANAGEMENT GROUP
87-14 116TH ST., RICHMOND HILL, NY 11418

STATEMENT **November 2024**
Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$272.00
MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

Bill To:

SIMONE HALL
[REDACTED]
BRONX, NY 10475-1431

WebReg#: A1924F

ARREARS WILL BE INCLUDED ON THE NOVEMBER RENT BILL



This statement includes payments received as of 10/21/2024

REGISTRATION PIN: A1924F

DESCRIPTION	AMOUNT
BASE CHG	\$3205.00
SECTION '8'	\$-2933.00
TOTAL AMOUNT DUE:	\$272.00

RESIDENT REMINDERS:

As a friendly reminder to all current residents, Wavecrest Management has made several changes to improve the quality of customer service. Please take a few moments to review the below:

- If you are unable to pay rent due to financial hardship, we encourage you to contact the Legal Team at Wavecrest Management immediately. We can work with you to arrange a payment plan and/or connect you with the appropriate resources to help you and your family during this time. Please email: legal@twmt.net or call (718)463-1200; extension: 7998.
- In an effort to improve resident services, we have added DocuSign to help our residents legally & securely sign lease renewals and other paperwork related to occupancy electronically. The introduction of e-signatures has been a proven success thus far, saving many residents time and energy. Contact us today to update the email address on file for your household by emailing info@twmt.net or calling (718)463-1200 and speaking to the receptionist.
- Annual Lead Paint Notices have been sent to each household. New York City law requires that all tenants living in building with rental units complete this form and return to management before February 15th, 2024. We appreciate your cooperation in completing this form in a timely manner.
 - Wavecrest Management is open Monday to Friday from 9:00AM to 5:00PM. If any resident faces a maintenance / repair emergency during non-business hours, such as: lack of heat, hot water, etc. Please call our after-hours hotline immediately: (718)692-7178.
- We are always interested in hearing our resident feedback to aid in improving our operations. If you had an unsatisfactory with our team and/or services, we kindly ask that you email help@twmt.net This way we can look into any issues you may be facing and work with you to find a solution.
- Please continue to look out for more updates & reminders from management. Thank you for your tenancy!

Please detach and return coupon with your payment.

1465

WAVECREST
WAVECREST MANAGEMENT GROUP
87-14 116TH STREET
RICHMOND HILL, NEW YORK 11418

Return Service Requested

SIMONE HALL
[REDACTED]
BRONX, NY 10475

PAID
11/2/24
\$272.00
#569

REMITTANCE SECTION
Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$272.00
MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

WAVECREST MGMT GROUP-770
87-14 116TH ST
RICHMOND HILL, NY 11418



WAVECREST MANAGEMENT GROUP
87-14 116TH ST., RICHMOND HILL, NY 11418

Bill To:

SIMONE HALL
[REDACTED]
BRONX, NY 10475

STATEMENT

November 2024

Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$6138.00

MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

WebReg#: [REDACTED]

ARREARS WILL BE INCLUDED ON THE NOVEMBER RENT BILL

This statement includes payments received as of 10/31/2024

REGISTRATION PIN: A1924F

DESCRIPTION	AMOUNT
BASE CHG	\$3205.00
BASE CHG AR	\$2933.00
TOTAL AMOUNT DUE:	\$6138.00

RESIDENT REMINDERS:

As a friendly reminder to all current residents, Wavecrest Management has made several changes to improve the quality of customer service. Please take a few moments to review the below:

- If you are unable to pay rent due to financial hardship, we encourage you to contact the Legal Team at Wavecrest Management immediately. We can work with you to arrange a payment plan and/or connect you with the appropriate resources to help you and your family during this time. Please email: legal@twmt.net or call (718)463-1200; extension: 7998.
- In an effort to improve resident services, we have added DocuSign to help our residents legally & securely sign lease renewals and other paperwork related to occupancy electronically. The introduction of e-signatures has been a proven success thus far, saving many residents time and energy. Contact us today to update the email address on file for your household by emailing info@twmt.net or calling (718)463-1200 and speaking to the receptionist.
- Annual Lead Paint Notices have been sent to each household. New York City law requires that all tenants living in building with rental units complete this form and return to management before February 15th, 2024. We appreciate your cooperation in completing this form in a timely manner.
 - Wavecrest Management is open Monday to Friday from 9:00AM to 5:00PM. **If any resident faces a maintenance / repair emergency during non-business hours, such as: lack of heat, hot water, etc. Please call our after-hours hotline immediately: (718)692-7178.**
- We are always interested in hearing our resident feedback to aid in improving our operations. If you had an unsatisfactory with our team and/or services, we kindly ask that you email help@twmt.net This way we can look into any issues you may be facing and work with you to find a solution.
- Please continue to look out for more updates & reminders from management. Thank you for your tenancy!

Please detach and return coupon with your payment.

613



WAVECREST MANAGEMENT GROUP
87-14 116TH STREET
RICHMOND HILL, NEW YORK 11418

Return Service Requested

SIMONE HALL
[REDACTED]
BRONX, NY 10475

REMITTANCE SECTION

Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$6138.00

MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

WAVECREST MGMT GROUP-770
87-14 116TH ST
RICHMOND HILL, NY 11418



The Wavecrest Management Team Ltd.
Wavecrest Management Group LLC

October 25, 2024

Dear Resident,

Please be advise that you are receiving a second rent bill for November. Please note if arrears showed on your previous November rent bill they were listed in error. Any arrears listed on this revised November rent bill are correct.

We apologize for this inconvenience and any trouble it may have caused.

If you have any questions, please reach out to you site office or email us at Charges@twmt.net

Sincerely,

Account Receivable Department
Wavecrest Management Group LLC
87-14 116th Street
Richmond Hill, NY 11418
Charges@twmt.net
718-463-1200

Log in to OLRP

No Account? [Register.](#)

Please be advised that we are currently experiencing phone issues and are diligently working to rectify this as soon as possible. We apologize for the inconvenience and thank you for your patience and understanding during this time.

Email

Password

Remember Me

[Terms and Conditions](#)

[Log In](#)

[Forgot Password?](#)

From: [Lisa-Simone](#)
To: [Turcios, Andy](#); [Lisa-Simone](#)
Subject: A. Unexplained Rent Increase and Rent Statement by Wavecrest Management

Tuesday, November 12, 2024

Hello Andy,

This is Simone Hall and Lisa Hall of Boston-Secor Houses. I hope this email finds you well.

As per our first phone conversation with you on Monday 10-28-2024 and follow-up call on Friday 11-08-2024, we have made persistent efforts to follow the established process for reporting and resolving the following issues,

- 10-05-2024 – The start date of our apartment’s cold water only / limited availability of hot water / hot water made available at 169-degree temperatures.
- 10-31-2024 – Our inability to access our NYCHA tenant account through the PAYMENTUS Corporation with PAYMENTUS call center assistance (1-800-420-1663) to pay our monthly rent.
- 10-31-2024 – Inability for ‘311’ NYC services to record our rent payment issue due to our apartment address not registered in their computer system.
- 10-31-2024 – Inability of NYCHA’s Call Center (718-707-7771) to record and provide a confirmation number to report cold/hot water accessibility issues due to our development and address not registered in their computer system. (Boston-Secor House, Bronx, NY)
- 10-31-2024 - Inability to report our pending rent payment to Wavecrest’s customer service number due to our address and Tenant Account not registered on Wavecrest’s computer system. Wavecrest’s tenant portal is inaccessible for tenants’ use.
- 11-02-2024 - We paid our correct rent amount established by NYCHA to “BCR MASTER TENANT LLC”.

We are including Wavecrest Management Group’s additional Rent Statement mailed to us on 11-06-2024.

- a) We are now in arrears in the amount of **\$6,138.00 for November 2024, a 2156.62% increase.**
- b) Where are the rent statement figures detailing how this amount was determined?
- c) Are tenants under public and private management required to pay more than 30% of their income at any time?
- d) Will my new rent of \$6, 138.00 begin to compound monthly going forward?
- e) What month will the process of eviction begin as threatened by Wavecrest Management?

We need answers as soon as possible from your office as Wavecrest Management outreach is inaccessible to date.

Building Details

STATUS	REG#	RANGE	BIN	BLOCK	LOT	CENSUS TRACT
Active	229055	2175-2185	2093877	5263	70	462
STORIES	A UNITS	B UNITS	CD	CLASS	OWNERSHIP	BUILDING ID
14	123	0	12	E	PVT	806885

Property Owner Registration Information

Registration Expiry Date 09/01/2025 Last Registration Date 10/21/2024

OWNER	ORGANIZATION	NAME	ADDRESS
Head Officer	-	Dara Kovel	2 Center Plz suite 700, Boston, 02108
Corporation	BRC MASTER TENANT LLC	-	2 Center Plz suite 700, Boston, 02108
Managing Agent	WAVECREST MGMT TEAM	CHRISTINA PIMENTEL	87-14 116 STREET null, Richmond Hill, 11418

Open Violations (29) A=8, B=13, C=8, I=0

VIOLATION ID	CLASS	ORDER #	APT #	STORY #	REPORTED DATE	NOV ISSUED DATE
NOV ID	NOV TYPE	CORRECTION BY DATE	CERTIFICATION BY DATE	VIOLATION STATUS	VIOLATION STATUS DATE	ACTUAL CERT. DATE
VIOLATION DESCRIPTION						
17699861	A	556	██████	11	02/12/2025	02/14/2025
9628472	ORIGINAL	05/20/2025	06/03/2025	NOV SENT	02/14/2025	-
§ 27-2013 adm code paint with light colored paint to the satisfaction of this department at south wall in the ██████████						
17699852	B	688	██████	11	02/12/2025	02/14/2025
9628473	ORIGINAL	03/21/2025	04/04/2025	NOV SENT	02/14/2025	-
§ 27-2037, 2038 hmc: provide a safe and adequate supply of electric service to the fixtures at ceiling in the foyer located at ██████████						
17699854	A	583	██████	11	02/12/2025	02/14/2025
9628472	ORIGINAL	05/20/2025	06/03/2025	NOV SENT	02/14/2025	-
§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the bathroom located at ██████████						
17699863	A	508	██████	11	02/12/2025	02/14/2025
9628472	ORIGINAL	05/20/2025	06/03/2025	NOV SENT	02/14/2025	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the ██████████ from east at south located at apt ██████████						

VIOLATION ID	CLASS	ORDER #	APT #	STORY #	REPORTED DATE	NOV ISSUED DATE
NOV ID	NOV TYPE	CORRECTION BY DATE	CERTIFICATION BY DATE	VIOLATION STATUS	VIOLATION STATUS DATE	ACTUAL CERT. DATE
VIOLATION DESCRIPTION						
17699855	B	508	██████	11	02/12/2025	02/14/2025
9628473	ORIGINAL	03/21/2025	04/04/2025	NOV SENT	02/14/2025	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the bathroom located at ██████████						
17699853	B	508	██████	11	02/12/2025	02/14/2025
9628473	ORIGINAL	03/21/2025	04/04/2025	NOV SENT	02/14/2025	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at north wall in the foyer located at apt ██████████						
17699862	A	554	██████	11	02/12/2025	02/14/2025
9628472	ORIGINAL	05/20/2025	06/03/2025	NOV SENT	02/14/2025	-
§ 27-2005 adm code paint metal in accordance with dept. regulation at riser in the ██████████						
17699859	B	509	██████	11	02/12/2025	02/14/2025
9628473	ORIGINAL	03/21/2025	04/04/2025	NOV SENT	02/14/2025	-
§ 27-2005 adm code properly secure the loose steel grab bar at bathtub in the bathroom located at apt ██████████						
17623567	C	672	-	Basement	01/15/2025	01/16/2025
9583374	ORIGINAL	01/22/2025	01/29/2025	NOV CERT	01/27/2025	01/27/2025
§ 27-2033 adm code provide ready access to buildings heating system door locked at boiler room						
17581021	B	702	██████	7	12/27/2024	12/30/2024
9557528	ORIGINAL	02/03/2025	02/17/2025	CIV14 MAILED	02/13/2025	02/12/2025
§ 27-2045 adm code repair or replace the smoke detector defective in the entire apartment located at ██████████						
17581020	B	1503	██████	7	12/27/2024	12/30/2024
9557528	ORIGINAL	02/03/2025	02/17/2025	CIV14 MAILED	02/13/2025	02/12/2025
§ 27-2046.1 hmc: repair or replace the carbon monoxide detecting device(s). defective in the entire apartment located at ██████████						
17581019	B	598	██████	7	12/27/2024	12/30/2024
9557528	ORIGINAL	02/03/2025	02/17/2025	CIV14 MAILED	02/13/2025	02/12/2025
§ 27-2026 adm code repair the broken or defective connection wasteline at washbasin in the bathroom located at ██████████						

VIOLATION ID	CLASS	ORDER #	APT #	STORY #	REPORTED DATE	NOV ISSUED DATE
NOV ID	NOV TYPE	CORRECTION BY DATE	CERTIFICATION BY DATE	VIOLATION STATUS	VIOLATION STATUS DATE	ACTUAL CERT. DATE
VIOLATION DESCRIPTION						
17549870	C	577*	██████	12	12/12/2024	12/13/2024
9535248	ORIGINAL	12/19/2024	12/26/2024	CIV14 MAILED	12/27/2024	12/26/2024
§ 27-2024 adm code provide adequate supply of hot water for the fixtures .. in the entire apartment located at apt ██████████						
17549871	C	568	██████	12	12/12/2024	12/13/2024
9535249	ORIGINAL	01/08/2025	01/13/2025	CIV14 MAILED	01/09/2025	01/08/2025
hmc adm code: § 27-2017.4 abate the infestation consisting of roaches in the entire apartment located at ██████████						
17549872	C	569	██████	12	12/12/2024	12/13/2024
9535249	ORIGINAL	01/08/2025	01/13/2025	CIV14 MAILED	01/09/2025	01/08/2025
hmc adm code: § 27-2017.4 abate the infestation consisting of mice in the entire apartment located at apt ██████████						
17549869	C	576*	██████	12	12/12/2024	12/13/2024
9535248	ORIGINAL	12/19/2024	12/26/2024	CIV14 MAILED	12/27/2024	12/26/2024
§ 27-2024 adm code provide adequate supply of cold water for the fixtures .. in the entire apartment located at ██████████						
17510626	C	672	-	Basement	12/04/2024	12/05/2024
9516074	ORIGINAL	12/11/2024	12/18/2024	NOV CERT	12/10/2024	12/10/2024
§ 27-2033 adm code provide ready access to buildings heating system door locked at boiler room						
17510628	B	508	██████	13	12/04/2024	12/05/2024
9516073	ORIGINAL	01/09/2025	01/23/2025	CIV14 MAILED	01/22/2025	01/21/2025
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color at ceiling in the kitchen located at ██████████						
17510627	B	583	██████	13	12/04/2024	12/05/2024
9516073	ORIGINAL	01/09/2025	01/23/2025	CIV14 MAILED	01/22/2025	01/21/2025
§ 27-2026, 2027 hmc: properly repair the source and abate the evidence of a water leak at ceiling in the kitchen located at apt ██████████						
17510624	C	666*	██████	13	12/04/2024	12/05/2024
9514377	ORIGINAL	12/05/2024	12/17/2024	CIV14 MAILED	12/11/2024	12/10/2024
§ 27-2029 adm code provide an adequate supply of heat for the apartment in the entire apartment located at ██████████						


VIOLATION ID	CLASS	ORDER #	APT #	STORY #	REPORTED DATE	NOV ISSUED DATE
NOV ID	NOV TYPE	CORRECTION BY DATE	CERTIFICATION BY DATE	VIOLATION STATUS	VIOLATION STATUS DATE	ACTUAL CERT. DATE
VIOLATION DESCRIPTION						
17510625	C	670*	█	13	12/04/2024	12/05/2024
9514377	ORIGINAL	12/05/2024	12/17/2024	CIV14 MAILED	12/11/2024	12/10/2024
§ 27-2031 adm code provide hot water at all hot water fixtures in the entire apartment located at apt █						
9082668	A	501	-	1	08/26/2011	08/30/2011
4241706	ORIGINAL	12/03/2011	12/17/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code properly repair the broken or defective bell buzzer return system at lobby, 1st story						
9082651	A	508	█	11	08/26/2011	08/30/2011
4241706	ORIGINAL	12/03/2011	12/17/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the north wall in the foyer located at apt █						
9082653	A	508	█	11	08/26/2011	08/30/2011
4241706	ORIGINAL	12/03/2011	12/17/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the east wall in the █						
9082659	A	554	█	11	08/26/2011	08/30/2011
4241706	ORIGINAL	12/03/2011	12/17/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code paint metal in accordance with dept. regulation the riser in the █						
9082644	B	508	█	11	08/26/2011	08/30/2011
4241707	ORIGINAL	10/04/2011	10/18/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the west wall in the kitchen located at █						
9082665	B	508	█	11	08/26/2011	08/30/2011
4241707	ORIGINAL	10/04/2011	10/18/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code repair the broken or defective plastered surfaces and paint in a uniform color the ceiling and south wall in the bathroom located at █						
9082650	B	501	█	11	08/26/2011	08/30/2011
4241707	ORIGINAL	10/04/2011	10/18/2011	NOV SENT	08/30/2011	-
§ 27-2005 adm code properly repair the broken or defective electric outlet at north wall in the █						

VIOLATION ID	CLASS	ORDER #	APT #	STORY #	REPORTED DATE	NOV ISSUED DATE
NOV ID	NOV TYPE	CORRECTION BY DATE	CERTIFICATION BY DATE	VIOLATION STATUS	VIOLATION STATUS DATE	ACTUAL CERT. DATE
VIOLATION DESCRIPTION						

9082649	B	505	██████	11	08/26/2011	08/30/2011
---------	---	-----	--------	----	------------	------------

4241707	ORIGINAL	10/04/2011	10/18/2011	NOV SENT	08/30/2011	-
---------	----------	------------	------------	----------	------------	---

§ 27-2005 adm code replace with new the broken or defective broken glass at lower sash window in the ██████████
 ██████████

From: [Lisa-Simone](#)
To: [Turcios, Andy](#); [Lisa-Simone](#)
Subject: A. Unexplained Rent Increase and Rent Statement by Wavecrest Management- Part II
Attachments: 

Tuesday, November 12, 2024

Hello Andy,

Please find attached, additional information as an addendum to support our concerns listed in our initial email:

1. Wavecrest Management Rent Statement showing NYCHA rent amount paid on 11-02-24.
2. Wavecrest Management Rent Statement second rent bill on November 6, 2024, for \$6,138.00 total due, a 2,156.62% increase. These figures are listed as Base Charge Arrears.
3. The Wavecrest Management cover letter included with the second rent bill verifying arrears is listed as correct.
4. A screenshot showing the Wavecrest Management Tenant Portal as inaccessible.

The unaddressed issues and our inability to advance forward in NYCHA, New York City services and Wavecrest Management systems have caused significant inconveniences and added unexplained financial obligations and an adverse status as tenants in good standing.

We kindly request your assistance in addressing this matter.

Sincerely,

Lisa Hall and Simone Hall
Boston-Secor Houses
Email: projectsecor@gmail.com



WAVECREST MANAGEMENT GROUP
87-14 116TH ST., RICHMOND HILL, NY 11418

STATEMENT **November 2024**
Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$272.00
**MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC**

Bill To:

SIMONE HALL
[REDACTED]
BRONX, NY 10475-1431

WebReg#: A1924F

ARREARS WILL BE INCLUDED ON THE NOVEMBER RENT BILL



This statement includes payments received as of 10/21/2024

REGISTRATION PIN: A1924F

DESCRIPTION	AMOUNT
BASE CHG	\$3205.00
SECTION '8'	\$-2933.00
TOTAL AMOUNT DUE:	\$272.00

RESIDENT REMINDERS:

As a friendly reminder to all current residents, Wavecrest Management has made several changes to improve the quality of customer service. Please take a few moments to review the below:

- If you are unable to pay rent due to financial hardship, we encourage you to contact the Legal Team at Wavecrest Management immediately. We can work with you to arrange a payment plan and/or connect you with the appropriate resources to help you and your family during this time. Please email: legal@twmt.net or call (718)463-1200; extension: 7998.
- In an effort to improve resident services, we have added DocuSign to help our residents legally & securely sign lease renewals and other paperwork related to occupancy electronically. The introduction of e-signatures has been a proven success thus far, saving many residents time and energy. Contact us today to update the email address on file for your household by emailing info@twmt.net or calling (718)463-1200 and speaking to the receptionist.
- Annual Lead Paint Notices have been sent to each household. New York City law requires that all tenants living in building with rental units complete this form and return to management before February 15th, 2024. We appreciate your cooperation in completing this form in a timely manner.
 - Wavecrest Management is open Monday to Friday from 9:00AM to 5:00PM. If any resident faces a maintenance / repair emergency during non-business hours, such as: lack of heat, hot water, etc. Please call our after-hours hotline immediately: (718)692-7178.
- We are always interested in hearing our resident feedback to aid in improving our operations. If you had an unsatisfactory with our team and/or services, we kindly ask that you email help@twmt.net This way we can look into any issues you may be facing and work with you to find a solution.
- Please continue to look out for more updates & reminders from management. Thank you for your tenancy!

Please detach and return coupon with your payment.

1465

WAVECREST
WAVECREST MANAGEMENT GROUP
87-14 116TH STREET
RICHMOND HILL, NEW YORK 11418

Return Service Requested

SIMONE HALL
[REDACTED]
BRONX, NY 10475

#569

REMITTANCE SECTION
Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$272.00
**MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC**

WAVECREST MGMT GROUP-770
87-14 116TH ST
RICHMOND HILL, NY 11418



WAVECREST MANAGEMENT GROUP
87-14 116TH ST., RICHMOND HILL, NY 11418

Bill To:

SIMONE HALL
[REDACTED]
BRONX, NY 10475

STATEMENT

November 2024

Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$6138.00

MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

WebReg#: A1924F

ARREARS WILL BE INCLUDED ON THE NOVEMBER RENT BILL

This statement includes payments received as of 10/31/2024

REGISTRATION PIN: A1924F

DESCRIPTION	AMOUNT
BASE CHG	\$3205.00
BASE CHG AR	\$2933.00
TOTAL AMOUNT DUE:	\$6138.00

RESIDENT REMINDERS:

As a friendly reminder to all current residents, Wavecrest Management has made several changes to improve the quality of customer service. Please take a few moments to review the below:

- If you are unable to pay rent due to financial hardship, we encourage you to contact the Legal Team at Wavecrest Management immediately. We can work with you to arrange a payment plan and/or connect you with the appropriate resources to help you and your family during this time. Please email: legal@twmt.net or call (718)463-1200; extension: 7998.
- In an effort to improve resident services, we have added DocuSign to help our residents legally & securely sign lease renewals and other paperwork related to occupancy electronically. The introduction of e-signatures has been a proven success thus far, saving many residents time and energy. Contact us today to update the email address on file for your household by emailing info@twmt.net or calling (718)463-1200 and speaking to the receptionist.
- Annual Lead Paint Notices have been sent to each household. New York City law requires that all tenants living in building with rental units complete this form and return to management before February 15th, 2024. We appreciate your cooperation in completing this form in a timely manner.
 - Wavecrest Management is open Monday to Friday from 9:00AM to 5:00PM. **If any resident faces a maintenance / repair emergency during non-business hours, such as: lack of heat, hot water, etc. Please call our after-hours hotline immediately: (718)692-7178.**
- We are always interested in hearing our resident feedback to aid in improving our operations. If you had an unsatisfactory with our team and/or services, we kindly ask that you email help@twmt.net This way we can look into any issues you may be facing and work with you to find a solution.
- Please continue to look out for more updates & reminders from management. Thank you for your tenancy!

Please detach and return coupon with your payment.

613



WAVECREST MANAGEMENT GROUP
87-14 116TH STREET
RICHMOND HILL, NEW YORK 11418

Return Service Requested

SIMONE HALL
[REDACTED]
BRONX, NY 10475

REMITTANCE SECTION

Due Date: 11/01/2024
Account Number: [REDACTED]
Unit: [REDACTED]
Amount Due: \$6138.00

MAKE CHECKS PAYABLE TO:
BRC MASTER TENANT LLC

WAVECREST MGMT GROUP-770
87-14 116TH ST
RICHMOND HILL, NY 11418



The Wavecrest Management Team Ltd.
Wavecrest Management Group LLC

October 25, 2024

Dear Resident,

Please be advise that you are receiving a second rent bill for November. Please note if arrears showed on your previous November rent bill they were listed in error. Any arrears listed on this revised November rent bill are correct.

We apologize for this inconvenience and any trouble it may have caused.

If you have any questions, please reach out to you site office or email us at Charges@twmt.net

Sincerely,

Account Receivable Department
Wavecrest Management Group LLC
87-14 116th Street
Richmond Hill, NY 11418
Charges@twmt.net
718-463-1200

Log in to OLRP

No Account? [Register.](#)

Please be advised that we are currently experiencing phone issues and are diligently working to rectify this as soon as possible. We apologize for the inconvenience and thank you for your patience and understanding during this time.

Email

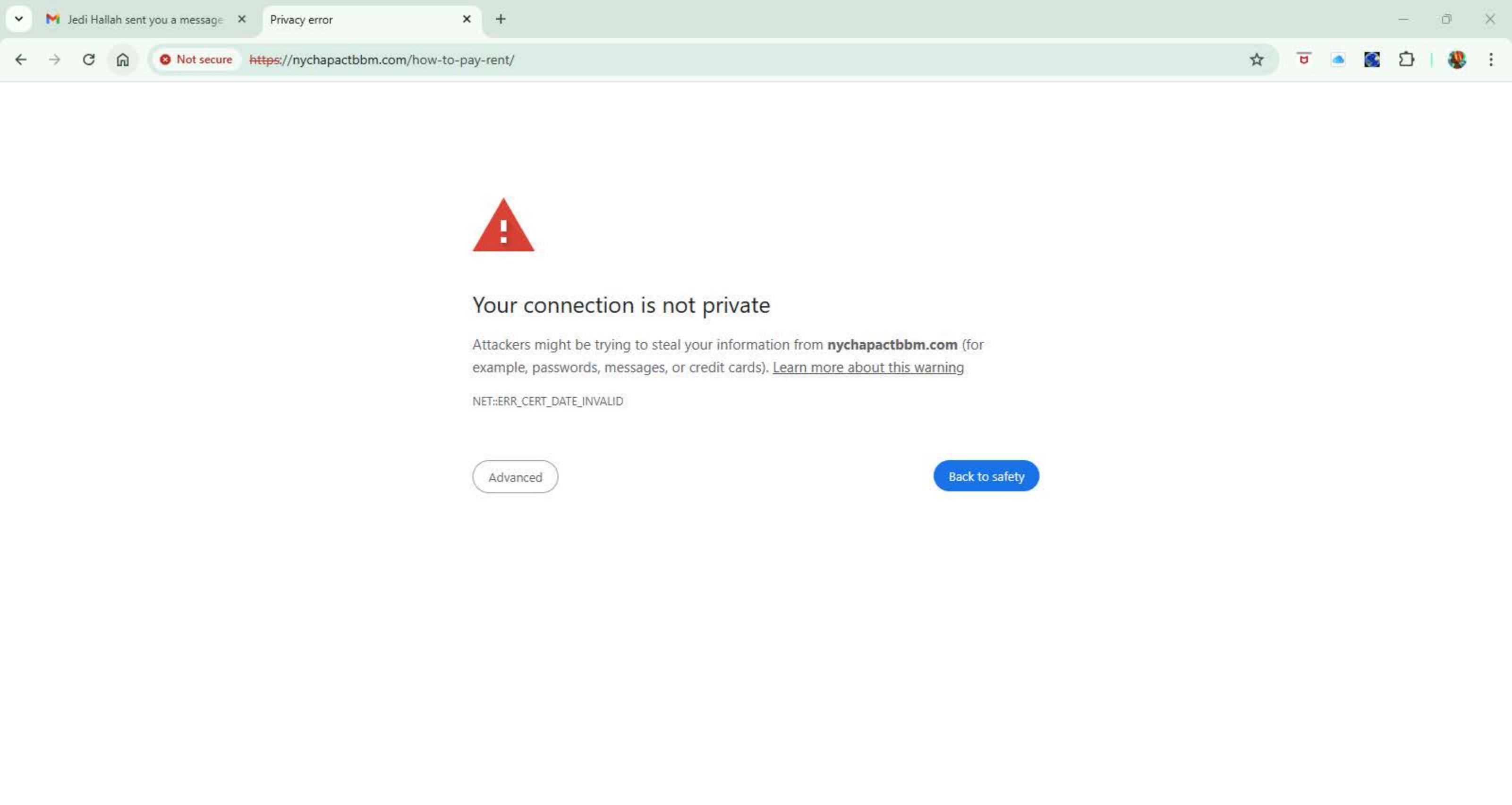
Password

Remember Me

[Terms and Conditions](#)

[Log In](#)

[Forgot Password?](#)



Your connection is not private

Attackers might be trying to steal your information from **nychapactbbm.com** (for example, passwords, messages, or credit cards). [Learn more about this warning](#)

NET::ERR_CERT_DATE_INVALID

Advanced

Back to safety

Property Owner Registration Information

Last Registration Date - 10/21/24 Registration Expiration Date - 09/01/25

+ Expand All

OWNER
Head Officer

ORGANIZATION
-

NAME
Dara Kovel

ADDRESS
2 Center Plz, suite 700, Boston,
02108

OWNER
Corporation

ORGANIZATION
BRC MASTER TENANT LLC

NAME
-

ADDRESS
2 Center Plz, suite 700, Boston,
02108

OWNER
Managing Agent

ORGANIZATION
WAVECREST MGMT TEAM

NAME
CHRISTINA PIMENTEL

ADDRESS
87-14 116 Street, Richmond Hill,
11418

[Click here to find out more information about property registration and how to register if you are a property owner or agent](#)

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 172 Res. No. _____

in favor in opposition

Date: 6/16/25

(PLEASE PRINT)

Name: Director of Leg. Affairs Josh

Address: Levin

I represent: NYPD 1 Police Plaza

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 172 Res. No. _____

in favor in opposition

Date: 6/16/25

(PLEASE PRINT)

Name: Inspector Howard G. Herman

Address: 1 Police Plaza

I represent: NYPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 172 Res. No. _____

in favor in opposition

Date: 6/16/25

(PLEASE PRINT)

Name: Chief of Navy Charles McEvoy

Address: _____

I represent: NYPD 1 Police Plaza

Address: _____



Please complete this card and return to the Sergeant-at-Arms



**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 111/122 Res. No. _____

in favor in opposition

Date: 6/16/75

(PLEASE PRINT)

Name: Anna Loft, NYLAG

Address: 100 Pearl St, 19th Fl, NY, NY 10007

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: LAYLA LAW GISIKO

Address: _____

I represent: DISTRICT LEADER 75/A

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sylvia Anderson

Address: Senior Vice President

I represent: Public Housing Tenancy

Address: Administration, NYCHA

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Eva Trimble, Chief Operating Officer

Address: NYCHA

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Manny Martinez

Address: _____

I represent: South Jam. H.Ses. Res. Comm. & Qws South

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: June 16, 2025

(PLEASE PRINT)

Name: Tanisha Grant

Address: 448 W 163rd St

I represent: Parents Supporting Parent W/ RPPH

Address: - Same

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Zulay Velazquez

Address: _____

I represent: Jacob Riis Houses - Myself

Address: _____ Resident

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Elizabeth Rodriguez

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: LAYLA LAW GISIKO

Address: _____

I represent: DISTRICT LEADER AD 75/A

Address: _____

PRE-PANEL

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 111/125 Res. No. _____

in favor in opposition

Date: 6/16/25

(PLEASE PRINT)

Name: Martin Sarr

Address: [Redacted] Riverside Drive

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/16/2025

(PLEASE PRINT)

Name: Edna Wells Handy

Address: 333 Schermerhorn Street

I represent: National Institute for Section 3

Address: EMPOWERMENT (NISE)

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 2024 Res. No. _____

in favor in opposition

Date: 6/16/2025

(PLEASE PRINT)

Name: Luis Henriquez

Address: Legal Services NYC, 40 Worth

I represent: LSNYC

Address: 40 Worth

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Elizabeth Brant

Address: [Redacted] Bklyn NY 11222

I represent: Center for Justice Innovation

Address: 520 8th Ave NY NY 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 6/16/21

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: [Redacted]

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: C. Glover

Address: [Redacted] 99 St

I represent: _____

Address: _____