

ANHD is a membership organization of New York City nonprofit neighborhood housing groups engaged in community development and organizing throughout the city. ANHD's mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. Leaders of the city's community development corporations founded ANHD in 1974 to provide a unified voice for grassroots housing groups that focus on the needs of working-class and low-income neighborhoods. Over the past 36 years, our membership has grown from eight founding members to today's 98 groups.

FOREWORD

When the Association for Neighborhood and Housing Development (ANHD), in partnership with a longstanding funders collaborative called the Neighborhood Opportunities Fund, formed the Initiative for Neighborhood and Citywide Organizing (INCO) in 2003, the affordable housing movement in New York City was an energetic yet often fractured effort. Neighborhood-based housing advocacy groups had been fighting the loss of affordable housing through neglect, landlord harassment and gentrification for decades and, within their local neighborhoods, had many successes. However, many of these groups lacked the resources, technical support, and coalition building capacity to pursue city and statewide campaigns to strike at the root causes of the housing crisis.

In the nine years since its formation, INCO has changed this equation. Seeing coordinated community organizing on a citywide scale as the key-missing component in affordable housing campaigns, INCO was formed to leverage community-based groups' local strength on a citywide scale. Now in its second funding cycle, INCO grants are empowering neighborhoodbased organizations to work together, and as part of larger coalitions, to wage citywide campaigns that are redefining the affordable housing landscape in New York City.

To be sure, New York City is in a housing crisis. Nearly half of the city's low-income unsubsidized renters pay more than 50% of their income for a roof over their heads. And all too often their apartments are overcrowded and dangerously dilapidated from landlord neglect and abuse. Moreover, the number of affordable and low-income units has dropped drastically. Between 2000 and 2007, New York City lost over

345,000 apartments affordable to low-income households. ² In the outer boroughs, renters and homeowners alike face eviction due to widespread foreclosures in these areas.

Despite these mounting pressures we have seen significant local and citywide victories in the fight to preserve and expand affordable housing – each won with coordinated strategies in the streets, in the chambers of City Hall and the Capitol. With each grant cycle, INCO and its grantees are aiming higher and reaching farther. The following pages tell the stories behind some of the key victories that INCO grants have made possible. The enclosed timeline provides a complete list of the campaigns assisted by INCO grants since its inception in 2003. With a remarkable and still growing record of success, we have never been more confident that the neighborhoodbased organizing movement in our city, armed with adequate resources and highlyeffective technical support, holds the key to securing safe, decent, affordable housing in the neighborhoods that need it most.

The ANHD staff and INCO-funded groups are deeply grateful to the Neighborhood Opportunities Fund for its vision and support.

Sincerely,

Ericka Stallings

Director

Initiative for Neighborhood and Citywide Organizing

¹ American Community Survey, 2008 2 State of the City's Housing & Neighborhoods, 2010, Furman Center For Real Estate and Urban Policy, New York University

INCO VICTORIES

\$1.3 Billion for Affordable Housing

MEMBER ORGANIZATION CAMPAIGNS

1999_2008

HUD 203(k) Fraud

300 TENANTS / 59 BLDGS

2004-2007

Safe Housing Act

200 BLDGS INSPECTED / YR

2004-2007

Mobilization Against Displacement- MAD/ Wiliiamsburg/Greenpoint Rezoning

2004-2008

Source of Income Discrimination

2007-2008

421A Reform

2004-2009

Hudson Yards / West Side Stadium

3400 AFFORDABLE UNITS

2004-2009

Language Access
Executive Order EO120

1.8M NEW YORKERS PROTECTED

2005-2008

Queens For Affordable Housing: Inclusionary Zoning

2005-2009

Queens For Affordable Housing: Willets Point 1925 AFFORDABLE UNITS

2005

Creation of Community Action for Safe Apartments

2005-2010

Coalition for Asthma Free Homes/Asthma Free Housing Bill

3000 NEW INSPECTIONS / YR

2006-2011

Illegal Hotels Bill

1000 UNITS UNWAREHOUSED

2006-2008

Phony Demolitions

2008-2010

Vantage Settlement

\$1,000,000 SETTLEMENT

2008-2010

Lower East Side Coalition for Accountable Zoning (LESCAZ)

450 AFFORDABLE UNITS

2008 - 2011

Rent Regulation Law of 2011

2009-201

11th Avenue Corridor Rezoning

2009-2011

Multiple Dwelling Registration Act

INCO WIDE CAMPAIGNS

2003 - 2005

Code Enforcement: Targeted Cyclical Enforcment Program (T-CEP)

7200 NEW INSPECTIONS / YR

2004 - 2005

Battery Park City I \$130,000,000

2004-2007

Save Our Homes-Section 8
1110 UNITS PRESEVED

2004-2008

Harassment-Tenant Protection Act

9736 FEWER HARASSMENT CASES

2007

Housing Preservation Initiative \$7,250,000

2007-PRESENT

Long Term Affordability

DOUBLED LENGTH OF AFFORDABILITY

2007-PRESENT

Predatory Equity \$750,000,000

2008-PRESENT

Individual Apartment Improvement Program Reform

2010

Battery Park City II \$400,000,000 "INCO has proven to all of us that collective action and collaborative fundraising together can concretely change communities."

Mike Pratt,President Scherman Foundation andINCO Advisory Committee Chair

writing by Christina Giorgio

INTRODUCTION

If New York is to continue to be a world-class city with a dynamic, innovative economy, it needs affordable, stable housing so that our broad and diverse workforce, neighborhoods and city can all thrive.

We need housing for the new immigrants who keep our city thriving and growing. We need quality homes for the workers with small manufacturing and service jobs. Students who come to this city to study need affordable apartments, and once their education is done, they need attainable rents so they can commit to our city as they put their knowledge to use and start their careers. The moderate-income professionals – police, nurses, teachers, non-profit employees –must be able to find a place within our five boroughs. Even high-income professionals face the pressures of exorbitant housing costs as they measure all the expenses of making a life in our city.

Our city is in a constant state of transformation and change, our neighborhoods must have a resilient civic and social infrastructure so that residents can be part of and guide that change. Affordable housing is essential for building and maintaining strong neighborhoods. When neighborhoods are affordable and stable, its residents can forge alliances to strengthen and reinvent their communities, transforming an entire city.



INITIATIVE FOR NEIGHBORHOOD



AND CITYWIDE ORGANIZING

Early 2007, tenants in Queens and tenants in the Northwest Bronx see a sharp spike in landlord harassment and meritless eviction notices. Tenants in the Upper West Side and the Lower East Side of Manhattan witness landlords turning their apartment buildings into hotels. Communities in Queens and Manhattan see their neighborhoods being rezoned exclusively for luxury uses, further threatening already depleted low-income and affordable housing. Landlords in Queens, Brooklyn and the Bronx evade accountability by hiding behind post office boxes.

Prior to INCO, these events might have remained local incidents - and the respective community groups would have worked to resolve them as best they could. With the birth of INCO, however, participating community groups throughout the city started to convene under the INCO umbrella, enabling them to identify abusive patterns and launch local and citywide campaigns to stop them. Big picture vision coupled with growing local capacity brands INCO's efforts. Since its inception in 2003, INCO has coordinated and won more than 10 high-impact citywide campaigns. During that same time, INCO grantees have launched more than 30 effective local campaigns. Many are completed; some are ongoing. With each, INCO and its grantees have taken on the root causes of the affordable housing crisis: the loss of existing affordable housing, lack of new affordable housing and inadequate agency and institutional accountability and transparency.

These problems triangulate to squeeze moderateto low-income families out of the city's housing market – often times pushing them out of their homes and their neighborhoods. In each area, INCO and its grantees have won key regulatory and policy victories that delivered not only immediate relief for thousands of distressed residents, but also pulled community voices from the margins of the city planning and community development debate.

A variety of factors caused this ongoing housing crisis – but the human consequences are universal – a crisis of unsafe, overcrowded apartments, displacement and an increase in homelessness. With the number in need of affordable housing increasing, INCO and its grantees have launched innovative campaigns to keep New Yorkers in their homes and secure meaningful policy changes to empower residents and communities.

INCO engages organizers in citywide policy advocacy to enhance the ability of members and their grassroots constituents to support policy work on a neighborhood and citywide level.

THE INCO MODEL

The Neighborhood Opportunities Fund (NOF) is a consortium of corporate philanthropic organizations and foundations which through collaborating with the Association for Neighborhood and Housing Development to create the INCO program, seeks to advance the practice of community building in New York City.

INCO was born out of the recognition that local affordable housing challenges are best addressed by neighborhood-based organizations. Yet many of these groups struggle to survive due to a lack of funding and technical support needed to sustain vigorous grassroots campaigns. While a handful had maintained strong grassroots organizing capacity, many more had lost the ability to employ this powerful tool as a means to accomplish their neighborhood agendas. INCO founders saw the vital need to reinvigorate neighborhood organizations' ties to their constituents as a means to accomplish social change both at a neighborhood and a citywide level.

INCO was developed as a comprehensive program to help neighborhood-based housing groups develop this strength and effectively coordinate campaigns for neighborhood revitalization and citywide policy change. To do so, INCO has provided pass-

through funding from the Neighborhood Opportunities Fund to 15 to 17 ANHD member groups over a fouryear period to increase their capacity to engage in effective community organizing. Over the course of the two cycles, each participating organization received grants of \$40,000 to \$50,000 for one year. Grants are renewable for up to three additional years based on performance and funding availability. Funds are used to hire new organizing staff as well as for activities to strengthen the organizational infrastructure so essential to community organizing programs.

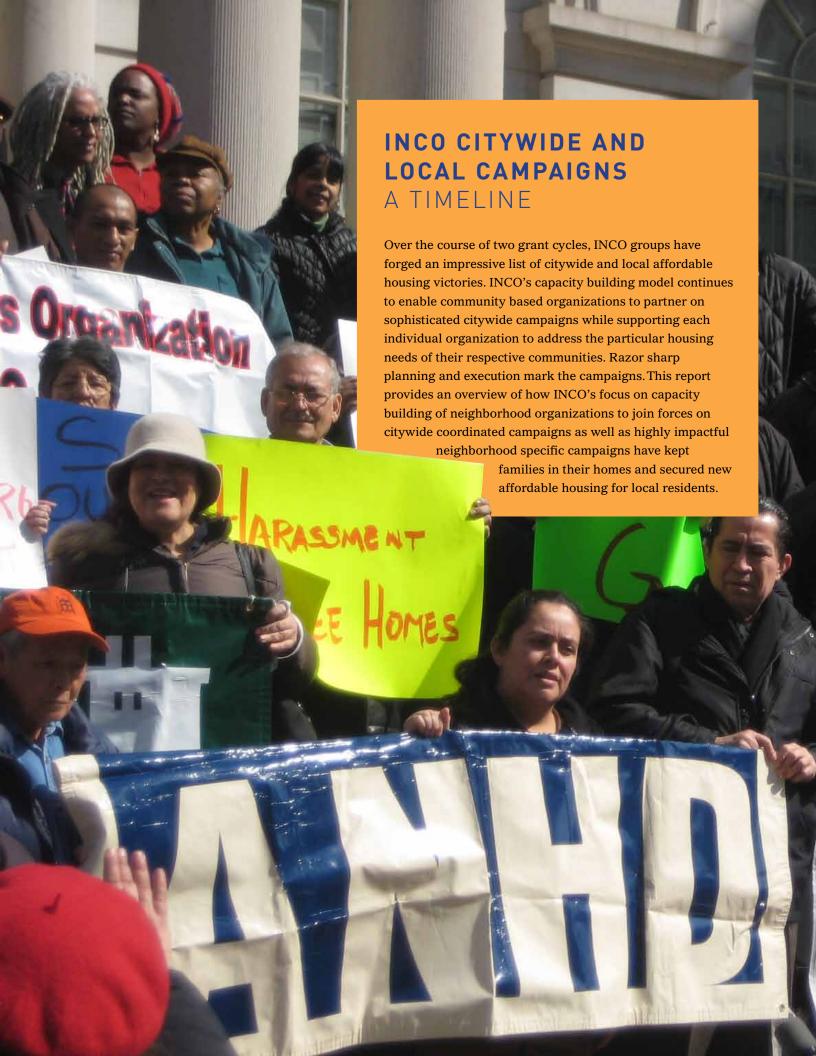
INCO supports the organizers and the organizations that hire them through on-site, peer-to-peer and group training to develop the capacity of the community organizers. INCO also provides management training to agency leadership to support the organizational change needed to accommodate a renewed emphasis on community organizing. This technical assistance is arranged by ANHD for grantees according to their needs.

INCO engages the organizers of participating organizations in citywide policy advocacy to enhance the ability of members and their grassroots constituents to support policy work on a neighborhood and citywide level.

ANHD coordinates the efforts of all 15 INCO groups in campaigns that can set and win important aspects of a progressive citywide housing agenda.

Building the capacity of our groups to win local, neighborhood-level goals have revitalized our communities and brought the developing strength of all the groups in collaboration to advance a citywide affordable housing vision and agenda. Through its financial investment and technical advice, INCO is building grantees' organizing capacity. As grantees organize more effectively, they improve neighborhood housing conditions and citywide housing policy.

Since its inception, The Neighborhood Opportunities Fund has granted over \$5.2 million to 23 INCO groups. By the most conservative of estimates, this investment has translated into \$1.3 billion in affordable and low-income housing dividends and has kept countless numbers of New Yorkers in their homes. By any standard, INCO funding is an extraordinary investment in the fight for affordable housing.



(2004 - 2005)

(2003 - 2005)

Targeted Cyclical Enforcement Program

INCO's list of citywide victories starts with the adoption of the Targeted Cyclical Enforcement Program (T-CEP), which has dramatically improved enforcement of housing code violations. Within its first year, INCO took on a broken and ineffective city inspection policy and won the first of several key improvements to help identify slumlords and hold them accountable for building repairs. Prior to T-CEP, member organizations were constantly battling both slumlords and an inefficient Housing and Preservation Department (HPD) inspection process that relied almost exclusively on tenant complaints for inspections.

Seeing the broken enforcement system as a key contributor to the low-income housing crisis, INCO launched a campaign to find a way to fix it. The campaign commenced with ANHD publishing a report that found that code violations were concentrated in five low-income neighborhoods in the South Bronx, Central Brooklyn, and Upper Manhattan, where the percentage of housing units with severe problems ranged from 8.8 percent to 12.8 percent—double to triple the citywide average of 3.1 percent. Having identified such a concentration of code violations, improving inspections in these neighborhoods would go a long way to addressing the most egregious code violations.

The yearlong grassroots campaign secured an agreement between City Council and HPD that created a mechanism for regular, targeted inspections of the city's worst buildings—along with guaranteed enforcement action against owners who refused to make repairs. In all, T-CEP guaranteed repairs to 7,200 apartments per year. T-CEP eventually became the model for several more expansive, proactive enforcement programs such as the Alternate Enforcement Program.

Battery Park City I

When Battery Park City, a massive new housing development project, was conceived in the 1960s utilizing a substantial public investment, affordable housing was integral to its design, specifically the promise that 1/3 of the units would be designated for low-income tenants. Before the project was completed, this 1/3 onsite low-income designation was replaced with the Battery Park City Authority agreeing to add annually \$1 billion toward citywide low-income housing development. But there was a loophole - if the city determined that it needed funds "to maintain fiscal stability... or existing city services," the city could divert Battery Park City revenues to other uses. For over thirty years, NYC mayors used this loophole to divert the Battery Park City revenues to pay for other city programs and projects.

With communities in need of those long-promised resources for affordable housing, INCO and other community partners launched a campaign to force the city to honor the original funding promise. The campaign started with ANHD and citywide partners, including Housing First!, convincing the city's Independent Budget Office to analyze the actual use of Battery Park City funds. The study showed that the city used the \$600 million largely for general budget purposes. With the report's release, ANHD and our partners secured key political support for investing these funds back into affordable housing, while ANHD and INCO mounted continuous media grabbing grassroots actions to pressure local elected officials to make good on the original promise. The pressure resulted in the mayor creating a housing trust fund with the Battery Park City money.

After nearly three decades of false starts, financial misappropriation, and broken promises, the city was finally making good on its guarantee that revenues from Battery Park City, would be used to create affordable housing. Since the conclusion of this campaign, \$130 million has been channeled into an affordable housing trust fund, which the city designated to build or preserve 4,500 units of affordable housing for low-income New Yorkers.



(2004 - 2007)

Section 8

Next, in 2005, ANHD worked with INCO groups to launch the Save Our Homes Campaign as an intensive, multi-year effort to preserve New York City's at-risk Section 8 housing stock. Since the 1970s, project-based Section 8 has been a crucial resource in our city, currently providing over 46,501 stable, affordable apartments to working families. But, many of these units were at risk of failing-out of the program because of owner mismanagement, or opting-out of the program as owners chased higher market rents.

The Save Our Homes campaign focused on targeted highly-effective, building-by-building work to educate tenants and connect local not-for-profit housing groups that have organizing and development capacity with at-risk buildings in their area. The strategy for preservation requires intensive tenant organizing to bring the landlord into compliance with program standards or to pressure the landlord and government agencies to facilitate a transfer of the building to a pres-

ervation-minded developer who will preserve the affordable housing.

ANHD's strength in this campaign came in working closely with the INCO groups to provide training and technical assistance to support local neighborhood groups to do both tenant organizing and development work in Section 8 buildings. Together with our groups, we collected data to monitor the city's Section 8 housing stock, conducted research on potentially at-risk buildings, and prioritized high-risk buildings. We coordinated among the various organizations working on this housing stock, and held rallies attended by over 1,000 tenants. The Save Our Homes Campaign was highly effectively, successfully pushing City policy to shift to a comprehensive preservation strategy for at-risk Section 8 buildings so that City government coordinated all its resources - regulatory and financial - together with local organizers to keep buildings from opting- or failing-out of affordability. During the period of ANHD's Save Our Homes Campaign, INCO group outreach and activism was directly responsible for stopping eleven buildings, containing over 1,100 units of housing, from leaving the affordability program.

INCO groups at Save Our Homes Rally to preserve Section 8 Housing. [2006 - 2008]

Tenant Protection Act

In 2006, INCO organizers began to notice a new and troubling phenomenon in their neighborhoods as illegal tenant harassment spiked to new levels. Harassment of tenants, while not an unknown phenomenon in a city like New York, had generally been an anomaly, a product of a particularly nasty slumlord. This time, however, INCO organizers began to notice harassment that affected the majority of tenants in large swaths of buildings that had recently been bought by new, large-scale landlords. This harassment did not seem to be an anomaly, but rather a systematic business model. This business model later became understood as "predatory equity", but in 2006, organizers just knew that their offices were flooded with tenants talking about harassment.

The type of harassment the tenants were facing was also taking a new form because landlords in these buildings were using New York City Housing Court as the tool of harassment by

repeatedly taking tenants to court with baseless cases. For example, landlords were suing multiple times for rent the tenants did not owe, or filing repeated and unjustified non-primary residence or other eviction cases. INCO organizers surveyed the buildings where large-scale harassment was reported and found that, in many buildings, upwards of 50% of the tenants had faced repeated, baseless legal attacks by a new landlord. INCO organizers also found that this tactic was very effective. The simple fact is that most tenants do not have a lawver to represent them in housing court, and most landlords do. As a result, tenants who are unsure of their legal rights and often unable to speak English well can be intimidated by an aggressive lawyer into signing away their apart-

Speaker Christine Quinn and Mayor Bloomberg at the signing of the Tenant Protection Act.



ment, even if the law would have supported the tenants. INCO surveys found that for every ten tenants sued for specious reasons, four would sign away their legal rights to the apartment.

One of the troubling aspects of using housing court as a venue for harassment is that tenants could not readily defend themselves by claiming that they were being harassed because harassment did not exist as a legal "cause of action" in housing court. INCO organizers set about to change this by crafting the Tenant Protection Act, which would provide tenants, for the first time, with a meaningful defense against harassment. INCO organizers mounted an energetic and highly-effective media campaign, holding numer-

ous media-friendly rallies and demonstrations at buildings that were the site of the worst harassment, raising the profile of tenant harassment as a problem that had to be solved. At the same time, ANHD and INCO worked to draft model legislation, eventually winning enough support from the leadership of the New York City Council to negotiate a strong bill that was passed by the Council and signed into law by Mayor Bloomberg in 2008. The Tenant Protection Act has proven very effective, giving tenants an accessible tool to fight back against harassment, and has helped to slow the loss of affordable apartments in many neighborhoods around the city.

(2007 - PRESENT)

Winning Long-Term Affordability

Almost every neighborhood in the city has lost affordable housing due to expiring affordability restrictions. Over the past decade, many INCO groups have led campaigns to preserve buildings—mostly Mitchell-Lama and Project Based Section 8—that were at-risk of becoming market rate. Whether it was putting political pressure on landlords or encouraging them to extend restrictions in exchange for additional public subsidy, neighborhood-based groups led the fight to protect these important affordable housing resources. However, for every building that was saved, it is likely that at least another left the program.

Recognizing that this expiring affordability crisis was being re-created in Mayor Bloomberg's New Housing Marketplace plan, ANHD and INCO launched a permanent affordability campaign. Working neighborhood by neighborhood and citywide, the campaign's ultimate goal is both to secure permanence on individual projects as well as a comprehensive shift in the city's affordable housing policy, toward one that requires permanence on all city-owned land or when substantial city subsidy is invested in a project. By releasing three major research reports, leading dozens of neighborhood strategy sessions, holding several roundtable discussions, and hosting a national policy convening with participants from seven cities, the campaign has begun to bear fruit.

Over the past two years, the city has committed to permanent affordability for over 3,100 units of affordable housing-more than half of the new units created. Most of these projects are in neighborhoods such as Hells Kitchen, Williamsburg, Gowanus, and Long Island City where there has been a vocal community presence calling for permanence. Additionally, both New York State and City have extended the initial affordability term from 30 years to 55 and 60 years respectively in the competitive scoring portion of the Low Income Housing Tax Credit application. Most recently, in February 2012, New York City Council Speaker Christine Quinn announced that she and the City were moving towards an agreement to double the required affordability term - from 30 years to 60 years - for developers using public subsidy or land. This alone would be a major change in City policy, but Speaker Quinn also announced her support for a breakthrough policy shift to create an "automatically renewable tax abatement" that will give the city a major new regulatory tool to achieve permanent affordability in new publicly-subsidized developments. These are important steps toward permanent affordability and a major victory in ensuring working class communities across the city receive a greater share of the public benefit when the city invests in affordable housing.

(2007-PRESENT)

Predatory Equity

In working to pass the Tenant Protection Act, ANHD and INCO identified the growing use of tenant harassment as part of a larger scheme of displacement – something more systematic and calculated than what they had seen before. In spotting this pattern throughout the five boroughs, INCO pieced together that the harassment was embedded in the new phenomenon of preda-

In 2007, INCO launched its most sophisticated and ambitious campaign to date – the campaign to expose and halt predatory equity displacement in the neighborhoods most vulnerable to the practice.

tory equity. Responding to the housing boom in 2004, real estate companies – backed by a pool of investors looking for excessive returns - purchased extensive rent regulated building portfolios in New York City, intending to illegally displace existing tenants and replace them with market rate payers.

The business model and community impact was laid out in ANHD's 2008 white paper Predatory Equity and 2009 report Predatory Equity: Evolution of a Crisis, both of which garnered major press attention, including front-page reports in the New York Times and tens of follow-up articles from numerous media outlets, and effectively introduced the concept of

"predatory equity" as a new and significant threat to affordable housing in our city.

Between 2003 and 2007, predatory equity exploded in boroughs ripe for gentrification - often immigrant rich parts of the city. By the time predatory equity arrived in New York, however, INCO and community groups from every corner of the city had been convening for over three years to discuss housing trends in their neighborhoods and designing unified strategies to address them.

In 2007, INCO launched its most sophisticated and ambitious campaign to date – the campaign to expose and halt predatory equity displacement in the neighborhoods most vulnerable to the practice. With a campaign that challenged predatory

equity at every level of its configuration – from the investors, the banks, the city agencies and legal loopholes - INCO helped deliver a low-income housing victory once thought impossible.

From the start, INCO knew it needed data - citywide numbers to convert a hunch into proof of the predatory equity "buy and displace" practice. INCO's model made the data collection goals possible with INCO groups knocking on thousands of doors to talk to tenants in buildings likely to be victim to the predatory equity scheme. Over the course of two years, INCO mapped out geographic concentrations and analyzed the individual mortgage histories of the suspect buildings. The research revealed not only a clear pattern, but also a previously unseen investment model based on harassment and displacement. ANHD's number crunching found that private equity-backed developers, from 2003 to 2007, purchased an estimated 100,000 units of affordable, rent-regulated housing - nearly 10 percent of New York City's rent-regulated housing stock.

With the mystery decoded, it was time to mobilize to stop it. From their research, ANHD produced a comprehensive report exposing the practice and secured widespread media coverage to take the information public. INCO also engaged in a highly successful outreach program to educate tenants on the Tenant Protection Act. With more and more tenants taking advantage of the new law, landlords had a harder time turning over apartments. And although this was empowering for the tenants, it created its own instability problem, as landlords were increasingly unable to pay the mortgages, given how heavily leveraged their loans were and dependant on converting apartments into market rate units. At the same time, ANHD analysis suggested that much of the loan underwriting was so speculative and badly overleveraged that even aggressive tenant turnover could not have supported the mortgage debt the owners incurred.

This investment strategy created a growing danger of default and posed a crisis for NewYork City apartment buildings. As of June 2009, 10 out of 10 predatory equity loans that ANHD tracked were on a finance industry watchlist for being in danger of default. These loans were far more likely to be on the default watchlist then non-predatory equity loans in the same mortgage-backed security pools, and placed up to 100,000 apartments at risk.

With predatory equity exposed and INCO grantees' capacity strengthened by four years of increasingly effective local organizing, INCO grantees mobilized to take on the predatory investors in their neighborhoods. The success of each campaign demonstrates the power and effectiveness of the INCO model. Below is a snapshot of one of the hardest fought local predatory equity victories.

[2008 - 2010]

Queens Vantage Tenant Council

Vantage Properties, with almost 10,000 apartments in their portfolio, was among the most aggressive practitioners of the predatory equity business model, and became a target of organizer and government action after Vantage was highlighted in the media as a result of ANHD's high-profile Predatory Equity reports. Intent on cashing in on the predatory equity scheme, between 2006 and 2008, Vantage Properties purchased over 50 buildings in Queens and West Harlem with plans to evict the tenants – mostly low-income immigrants - and replace them with market rate payers. But Vantage's business model of overleveraging and harassment did not go as planned.

Under the banner of the Queens Vantage Tenant Council, INCO groups, Centro Hispano Cuzcatlan, Chhaya CDC and Make the Road New York, in coalition with the Catholic Migration Office - Immigrant Tenant Advocacy Project and the Queens Community House, brought unprecedented public attention to the illegal harassment tactics of private equity backed corporate landlords seeking to systematically remove lowincome tenants from rent regulated housing in gentrifying neighborhoods of NYC.

Launched in January 2008, the grassroots campaign secured multiple face-to-face meetings between the private equity investors, the property

ownership/management company and tenant leaders to redress rampant tenant harassment and building violations. The Queens Vantage Tenant Council earned high-profile media coverage, staging several demonstrations with more than 300 tenants and ultimately compelled the New York State Attorney General's Office to investigate Vantage Property. The campaign concluded in May 2010 with an unprecedented agreement providing compensation and heightened protections to tens of thousands of tenants living in buildings owned and managed by Vantage Properties.

(2009 - 2012)

Housing Preservation Initiative - Increasing Funding for Effective Grassroots Work

Although the Neighborhood Opportunities Fund was providing much-needed resources for community groups to address local affordable housing threats, more resources were still badly needed. In 2007, INCO groups led a campaign to expand City funding for grassroots work, calling on the New York City Council to create a new Council-funded "Housing Preservation Initiative" that would allocate funding to a group in each of the 25 neighborhoods that were most at-risk of losing affordable housing. The program design proposed by the INCO groups allowed each community to design a bottom-up, strategic approach that tailored grassroots activism and education to address the specific threat to affordable housing in that community. INCO groups led by ANHD made a convincing case to the City Council and, in the spring of 2007, won a commitment of \$1.5 million for the Housing Preservation Initiative, allocating \$60,000 to each of the 25 most at-risk neighborhoods around the city. The Housing Preservation Initiative has, with continued support and advocacy by ANHD and INCO groups, been refunded each year since 2007, bringing a total of \$7.25 million in much-needed resources for communities to date.



[2006-2008]

Statewide Rent Reform Campaign

Expanding its efforts to address predatory equity harassment, INCO turned its sights to a different, yet equally notorious, landlord practice of converting rent regulated apartments into market rate units through fraudulent Individual Apartment Improvement increases - more commonly known as "1/40th increases". Under this state law, a landlord is allowed to raise the monthly rent on a vacant apartment by 1/40th of the total cost of any improvement made to that apartment. We defined the issue in our 2009 \$20,000 Stove Report, finding that, as a consequence of a lack of government oversight, 1/40th fraud is rampant. The rule's formula is also excessively generous: instead of providing a reasonable incentive for owners to invest and make improvements, the loophole offers owners a quick and cheap path to removing a rent regulated unit from the city's affordable housing stock.

Seeing 1/40th fraud as part of the overall problem of inadequate tenant protections and a major contributor to the loss of rent-regulated units, INCO joined the Real Rent Reform campaign. In the summer 2011 legislative session the campaign won legislation to tighten the 1/40th increase mechanism, along with other pro-tenant provisions to preserve rent regulation laws. The new law reduces by 1/3rd the amount that a landlord can pass on to the tenant in many apartments. It is difficult to estimate the city-wide impact of this important change, but the data does show that approximately 40,000 affordable rent regulated apartments become unaffordable every year because of loopholes in the rent laws, the most important of which is individual apartment improvements. Reducing the rent pass-along to tenants will help keep many of these apartments affordable.

For nearly 20 years, Albany lawmakers have chipped away at the rent stabilization protections afforded New York tenants. Thanks to the coordinated efforts of the statewide housing coalition, with INCO as central participants, in June 2011 state lawmakers for the first time in nearly two decades passed rental regulation laws that provided new protections for tenants. Although the protections won were modest, they marked the reversal of a twenty-year legislative run in favor of landlords and deregulation.

[2009 - 2012]

Preservation Transfers to Keep Overleveraged Buildings Decent and Affordable

With more and more multifamily buildings bought by predatory equity developers falling into financial distress, the risk that these units would also fall into greater physical distress increased. This could potentially trigger a vicious cycle of depressing property values in the surrounding buildings, setting the stage for "vulture investors" to purchase huge swaths of neighborhoods, resulting in increased tenant harassment and displacement, pursuant to the predatory equity model. To reverse this trend, INCO devised and advocated for establishing a public and privately funded preservation transfer program to incentivize mortgage-holding lenders to write down loans and transfer ownership to preservation minded owners.

The campaign was waged on both the citywide and local level with widespread attention being brought to the destructive cycle of predatory equity. Political and community organizing pressure was applied on the limited number of banks and financial institutions that held defaulting predatory equity loans, bringing them to the table before the building had been transferred to vulture investors or the loan inadequately restructured with the current owner. These and numerous other community-led anti-predatory equity campaigns not only preserved thousands of rent-regulated apartments, they also showed that local communities, with strategic grassroots organizing, can hold agencies and financial institutions accountable.

ANHD and INCO made remarkable progress when, in late 2009, Mayor Bloomberg responded to these high profile local grassroots campaigns by publicly committing \$750,000,000 of city funds to a preservation transfer program to incentivize banks to move away from the speculative model and reduce the sale price of the asset to its true income-based value.

In 2011, INCO groups won two high profile preservation transfer victories. Through their organizing work with tenants, New Settlement Apartments (NSA) and

Northwest Bronx Community & Clergy Coalition (NWBCCC) learned of escalating harassment tactics in 50 buildings newly owned by SG2 and in 10 buildings owned by Milbank Real Estate. NSA and NWBCCC mounted highly successful grassroots campaigns to stop the harassment, engage lenders and hold the management companies accountable. After consistent and targeted pressure from tenants SG2's deed was transferred to a landlord with a healthier record; some rent increases were halted; and the holder of Milbank's mortgages was ordered to pay \$2.5 million for repairs.

In 2012, INCO groups with ANHD forged a new approach to address the fallout of the predatory equity crisis by de-leveraging properties in default and facilitating their transition to developers to preserve affordability. As a result, New York Community Bank agreed to sell a portfolio of four highly-distressed overleveraged buildings to the non-profit developer, Mutual Housing Association of New York. This served as a particularly important model because, for the first time, the non-profit developer purchased the distressed note directly from the bank, and not the foreclosed property. It was also an unusual step for a non-profit because of the increased risk, requiring goodfaith from all sides. In a similar success, Ridgewood Savings Bank worked with Banana Kelly CDC to facilitate the note-sale transfer of five distressed overleveraged buildings on Kelly Street.

The successful transfers to non-profit developers in 2012 marked a significant victory for ANHD as two major multifamily lenders agreed to a standard protocol to offer distressed buildings for preservation financing through a procedure created by HPD and ANHD. Because the current crop of distressed debt across the city is often handled through note sale, we are optimistic that this new model will help preserve decent, affordable housing in the coming years.

"Our citywide united voice has made all the difference in winning critical victories. Communities see that we are organizing to make change happen"

> Deacon Ingrid Compton, Leader, Brooklyn Congregations United

[2009 - 2010]

Battery Park City II

ANHD and INCO thought we had won the fight to use the Battery Park City surplus for affordable housing, as had been promised, when, in 2005, we won the creation of a \$130 million Housing Trust Fund. But, in 2009 we were forced to take up the issue again when Governor Paterson proposed, for the first time ever, to dramatically breach the spirit of the Battery Park City agreement by having the state take \$20 million annually from the operating surplus to fill gaps in the state budget.

Once again, ANHD and our citywide partners quickly rebuilt some of the consensus and momentum we had won in 2005 and came out strongly against the Governor's unprecedented proposal, calling instead for the money to be used for affordable housing in the city, as originally promised. In February 2010, a deal pushed by ANHD and other partners was reached. The new plan, an addendum to the original Battery Park City Memorandum of Understanding, will use the ongoing Battery Park City surplus to bring an additional \$400 million in funding for affordable housing through 2017. The funds will be housed at HDC in the designated 421a Affordable Housing Fund.





(2004 - 2007)

Safe Housing Act-**Alternate Enforcement** Program

New York City tenants have long struggled with owner neglect. Landlords frequently allowed buildings to decay into intolerable living conditions, refusing to make crucial repairs and ignoring health and safety violations. When this campaign began, 43% of "immediately hazardous" housing violations (called "C" violations) went unaddressed for an average of one year, even though the housing code requires that repairs be made within 24 hours of notification. In 2002, there were more than 300,000 housing violations in NYC, including 61,500 class C violations. Clearly the City's inspection and violation system was failing New York families.

To combat this problem, INCO groups Make the Road New York, Fifth Avenue Committee and Pratt Area Community Council in partnership with New York Immigration Coalition, Urban Justice Center, Housing Here and Now and VO-CAL (formerly the NYC Aids Housing Network), launched the Safe Housing Act campaign. Understanding how landlords evade their legal obligation to provide habitable units, these groups drafted legislation to target landlords with the highest number of violations and to get repairs made with or without the landlord's cooperation.

After an intensive three-year community organizing campaign, City Council passed the Act in 2007. Under the law, every year the city identifies 200 buildings with the most housing code violations and targets them for aggressive inspection, follow-up, and comprehensive repairs. If the landlord does not make the repairs in four months, the Department of Housing Preservation and Development (HPD) makes the repairs and bills the landlord for the costs. The impact of the Safe Housing Act has not only been in the law itself, but in the pressure it placed on the City to move much of its housing code enforcement apparatus to a more proactive approach, which has resulted in further reforms within the housing agency, including the recently created Proactive Enforcement Program.

[2005 - 2011]

Returning Rent Regulated Units to the Market - Illegal Hotels

While communities in Queens, the Bronx and West Harlem saw existing affordable housing threatened by predatory equity, Manhattan neighbors of the Upper West Side and the Lower East Side witnessed low-income renters losing units to tourists, as landlords turned rent stabilized apartments into hotel rooms. Such unlawful use presented an urgent public policy issue, as it not only resulted in deteriorating living conditions for permanent residents, but effectively warehoused rent stabilized units, thereby depleting an already limited affordable housing supply.

To return these units to the regulated rent system, INCO groups Housing Conservation Coordinators in partnership with Goddard Riverside/Westside SRO Law Project, mounted a four-year campaign to pass the Illegal Hotels Law. During the height of the campaign in 2009, Albany devolved to a state of near chaos as control of the State Senate changed hands from party-to-party in an unprecedented period of political instability. Undaunted by the slim chance of passing pro-tenant legislation, Housing Conservation Coordinators steadily educated community members and elected offices about the problem. Their working groups established productive relationships with the Office of Special Enforcement and other city agencies responsible for code enforcement, and with representatives of the Hotel Trades Council. In July 2010, after years of organizing and advocacy, complete with a number of legal setbacks, Governor David Paterson signed into law the Illegal Hotels Bill which requires that Class A multiple dwelling units be rented for no less than 30 days.

While there remain challenges, including passing new legislation to increase fines for illegal use, coordinating with the Office of Special Enforcement to ensure enforcement of the new law and overseeing the transition of units currently warehoused back to rent regulation at legal rent levels, the law provides badly needed protection against the loss of affordable apartments to illegal hotels.



[2006 - 2011]

Asthma Free Housing

Building on the success of the Safe Housing Act campaign, INCO groups Fifth Avenue Committee and Make the Road New York, along with the American Lung Association of the City of New York, Congregation B'nai Jeshurun, New York Immigration Coalition, Northern Manhattan Improvement Corporation, Urban Justice Center, and WEACT for Environmental Justice formed the Coalition for Asthma Free Homes with the goal of creating enforceable regulations for indoor asthma triggers. With skilled and coordinated advocacy and grassroots organizing and education, the Coalition succeeded in passing the Asthma Free Housing Act in September 2010. The law, which went into effect in January 2011, strengthens and expands the Safe Housing Act, requiring building-wide remediation of asthmatriggering housing code violations in thousands of the most hazardous housing units throughout the city.

Make the Road New York members rallying to demand greater enforcement of asthma triggering housing violations.

The campaign required grassroots organizing to document the problem and show borough-wide support for taking on the city's worst landlords. Surveys gathered by the Coalition documented how city regulations failed to hold landlords accountable for repairs, which in many cases, exposed residents to toxic indoor environments known to be health hazards, such as rodents and mold. This campaign showed that it is not just poor air quality making New Yorkers sick, but also unsafe living conditions in their apartments. The law strengthened and expanded the city's innovative Alternative Enforcement Program, designed to fix the city's 200 worst buildings each year, by more than doubling the number of housing units repaired to 3,000 annually.



[2003-PRESENT]

Inclusionary Zoning

In June 2003, the Bloomberg administration announced plans to rezone over twenty New York communities in one of the most ambitious development plans since the days of Robert Moses. By converting manufacturing areas into residential use, increasing density by allowing taller residential and commercial buildings, and promoting mixed-use business districts, the administration's plan promised to unleash the power of the private market to generate over 50,000 units of new housing. Yet most of the proposed housing was slated as market-rate—units that would sell or rent to people earning over \$100,000 per year. The plan failed to address the shortage of affordable housing for low- and moderate-income families.

Housing activists across the city – led by the strategy and policy research expertly provided by the Pratt Center for Community Development – planned a campaign to harness the power of these rezonings and market transformation to produce affordable housing. But to be successful, the effort would need to engage community activism and mobilize communities.

[2004 - 2009]

Hudson Yards and Williamsburg/ Greenpoint

The following year, the city announced plans to rezone two neighborhoods long prized by developers for their potential to draw top-dollar. The original proposal for the Hudson Yards neighborhood on Manhattan's Far West Side targeted 59 city blocks between West 28th and 43rd streets and Seventh and Eighth avenues to the Hudson River. It proposed an expansion of the Javitz

Convention Center, an extension of the Number 7 subway line, a new stadium for the Jets, and higher density commercial and market-rate residential development. An even more ambitious plan was proposed for the Williamsburg/Greenpoint neighborhoods in North Brooklyn, which called for opening up a nearly two-mile stretch of industrial properties to development of luxury high-rises. Further inland, the city would rezone the neighborhood's quirky mixed-used blend of warehouses, row houses, and manufacturing to permit residential buildings ranging in height from six-to twelve-stories.

Gentrification had been growing in both neighborhoods over the past decade, and many residents felt rezoning would push out the remaining low- and moderate-income residents. With the city proposing to use its zoning authority to unleash the market, tenants and housing advocates decided to use that same model to ensure rezoning resulted in new affordable housing in the rezoned districts.

Led by the INCO groups St. Nicks Alliance and Los Sures in Williamsburg, Brooklyn and Housing Conservation Coordinators in Hudson Yards, Manhattan, over the next two years, "inclusionary zoning" became the rallying cry for a coalition of neighborhood residents, churches, community development organizations, policy experts, and housing organizers as they waged a successful citywide campaign to persuade city officials to create affordable-housing set-asides for neighborhood rezoning plans. The final plans included a strong package of building bonuses and tax incentives for private developers who set aside a certain percentage of units for affordable housing, with the city committing public land and financing for affordable housing as well. All told, 28% of the units in Hudson Yards, and 33% of the units in North Brooklyn, are slated for low- and moderate-income households. New provisions also protect existing residents against displacement as developers assemble sites. But equally important are the precedents the campaigns set and the constituency that now exists to ensure that future rezoning plans meet the housing needs of all New Yorkers.

INCO member group Queens Congregations United for Action with Allies in the Queens for Affordable Housing Coalition demanding the inclusion of affordable housing at Willets Point.

"With our Willets Point campaign, we were everywhere. Mets opening day, press conferences, city planning hearings, city council meetings - we used every opportunity to have our voices heard. And heard, we were - our win of 35% affordable housing confirmed the power we have when we come together."

> Kathleen Smith Leader, QCUA Elmhurst, Queens

[2005 - 2008]

Willets Point

When Mayor Bloomberg announced his plans to dislocate 260 businesses in the Willet Point area of Queens and build office, retail and entertainment spaces, a convention center, a hotel and a school, residents who made less than \$35,750 nearly 40% of that area's population - were left out of the plans completely. Throughout Queens, residents have been facing escalating rents, dedicating ever-larger portions of their income for housing. Willets Point presented a unique opportunity for Queens to contribute to the city's affordable housing stock. The plan proposed creating up to 5,500 units, yet not one was guaranteed to low- and moderate- income families (less than \$45,000 per year for a family of four), effectively excluding half of the population in Queens from living in Willets Point.

Finding the plan unacceptable, INCO groups Asian Americans for Equality, Queens Congregations United for Action, Centro Hispano "Cuzcatlan," and Queens Community House, with Catholic Charities Brooklyn & Queens, Habitat for Humanity, New York Communities for Change (NYCC) (formerly ACORN), and the New York Immigration Coalition formed a coalition coordinated and lead by the Pratt Center for Community Development, and mounted a comprehensive grassroots campaign to bring true affordable housing to Willets Point.

And they succeeded. The Queens For Affordable Housing Coalition lost no time - holding press conferences, marches and days of action before the Uniform Land Use Review Procedure (ULURP) began. Once ULURP was underway, community members were fully engaged by speaking and submitting testimony at hearings and holding press conferences and actions around each vote. The coalition partnered with key elected officials to ensure that local community members were present or represented during negotiations.

By the end of the campaign, the affordable housing coalition had won an unprecedented commitment to create 1,925 (35%) units of affordable housing with housing set aside for very low-, low-, moderate-, and middle-income families. This was the deepest level of affordability committed for a major redevelopment project. Willets Point shows the success community voices can achieve when they have the resources necessary to take a proactive role early in the planning process. The campaign could not have been won without INCO funding.

[2006 - 2008]

Lower East Side Rezoning

In May of 2008, the National Trust for Historic Preservation unveiled its 2008 list of America's 11 Most Endangered Historic Places. Making the list was the Lower East Side of New York City, which the Trust characterized as "the neighborhood that embodies the history of immigration in America that is steadily and irrevocably being erased by inappropriate development." At that time, the city had not evaluated the zoning restrictions for the Lower East Side in many decades. The neighborhood, where approximately 60% of the residents are of color and many live on fixed incomes, had seen a drastic loss of affordable housing due to rampant gentrification, with longstanding lowrise tenements being leveled and replaced with massive luxury apartments and condos.

Determined to stop the escalating displacement, as well as preserve its cultural heritage, community based groups in the Lower East Side proactively proposed their own rezoning plan for the Lower East Side/East Village. Having already formed the Lower East Side Coalition for Accountable Zoning (LESCAZ), INCO group Good Old Lower East Side (GOLES), along with numerous neighborhood-based organizations, worked with Community Board 3 to develop a rezoning plan to restrict construction heights, protect rent regulated tenants and provide more affordable housing.

With a two-year rezoning campaign, LESCAZ showcased that community groups need not wait for the city to propose rezoning plans. LESCAZ took the lead, developed the plan and mapped out the protections needed for their neighborhood. Key among its victories was inclusionary zoning distributed throughout the avenues, rather than concentrated in the already established affordable housing district along Avenue D. The inclusionary zoning bonus requires developers to make 20% of the units built affordable. They also defeated developers' plans to erect high-rises by winning height restrictions consistent with the neighborhoods historic character.

In May 2012, as part of the effort to ensure inclusion of affordable housing in the Seward Park Urban Renewal Area (SPURA), GOLES and its Lower East Side allies secured commitments for 450 new permanently affordable onsite units as part of the first stage of the land use review process. The campaign proved that by taking the lead and initiating rezoning, communities can chart their neighborhood's future, while preserving their homes and their histories.

[2004-2008]

421a Abatement

421a is a tax abatement designed to incentivize development in New York City by abating the property value on new multifamily developments to the considerably lower pre-development value of the property. The tax abatement, which lasts between 10-25 years, disproportionately values wealthy households, since the abatement applies to tax assessments based on property values that are far higher for sprawling luxury properties than for more modest and low-income units in working class neighborhoods. The generous abatement applies to all developments, including luxury developments, with the exception of those taking place within a special zone called a Geographic Exclusion Area. Only developments within an exclusionary zone are required to include affordable housing (20%) in order to take advantage of the 421a tax incentive. Although developers and the real estate industry treat 421a as a sacred cash cow, it is widely believed to be an inefficient producer of affordable housing and a drain on city tax revenues.

Much of the citywide strategy and policy research was expertly provided by the Pratt Center for Community Development. But to be successful, the effort would need to engage community activism and mobilize communities. Seeing a challenge worth tackling, INCO groups St. Nicks Alliance, Queens Congregations United for Action, Asian Americans for Equity, Centro Hispano Cuzcatlan and Housing Conservation Coordinators, with NYCC and Housing Here and Now devised a citywide campaign to require affordable housing be included in construction projects benefiting from a 421a abatement beyond the narrow strip of Manhattan already included in 421a (the aforementioned exclusionary zone). Waging a four-year campaign, INCO groups in Brooklyn, Queens, and Manhattan turned a wonkish tax code rule into a rallying cry for affordable housing. The campaign succeeded in pressuring Mayor Bloomberg to appoint a taskforce that, after examining the program, resulted in an expansion of the exclusionary zone, increasing the area requiring the inclusion of affordable housing; capping the benefits that the buildings outside of that zone can receive and eliminating the inefficient off-site negotiable certificates program.

[2009 - 2011]

Multiple Dwellings Registration – Brick and Mortar Addresses

Prior to 2011, New York City Law did not prevent landlords from listing post office boxes and mailing centers as their addresses. This practice routinely stymied tenants' efforts to address repair, service and payment concerns. In 2010, INCO groups led by Make the Road NY, whose attorneys drafted the adopted legislation, worked to close this legal loophole and secured the passage of Local Law 44, which requires all corporate owners of multiple dwellings to register the names of individuals with at least 25% ownership of the corporation, and requires them to register an actual brick-and-mortar address with the city. Previously, community-based organizations, legal services providers and tenants were often un-

able to determine who actually owned buildings in their communities. Too often actual ownership was obscured by a corporation, usually a limited liability corporation. The lack of an actual ad-

dress coupled with unclear ownership often made it difficult, if not impossible, to reach or influence anyone with decision-making authority over the property. The lack of transparency hampered the efforts of tenants and their advocates to resolve problems outside of litigation and for the city to track problematic property owners.

With the Multiple Dwelling Registration Act and the Tenant Harassment Protection Act, which created a private right of action for harassment, tenants are better able to assert their rights, protect their homes and hold landlords accountable.

CONCLUSION

With each INCO four-year grant cycle, the affordable housing movement grows in strength and reach. INCO campaigns have added nearly 11,000 units of truly affordable housing to neighborhoods in Queens, Manhattan, the Bronx and Brooklyn. Time and time again, INCO groups together and in partnership with other community-based organizations, secure the support to pass legislation to protect tenants and preserve rent-stabilized apartments throughout the city. The predatory equity and illegal hotels campaigns together saved thousands of threatened affordable homes. With support from the Neighborhood Opportunities Fund, INCO's work continues to make these homes safer

 bringing attention to numerous indoor hazards that have for too long diminished the health of countless New Yorkers.

Grassroots community organizing brings real solutions to local problems – it shapes the discussion around the reality of those living in the affected communities. It turns victims into leaders, recipients into delegators. Lacking financial clout, communities in need of affordable housing have but one way to achieve that end and that is through solidarity in organizing. With INCO's support, community-based groups are organizing on unprecedented scales – waging campaigns that challenge the root

causes of New York City's affordable housing crisis. The need to preserve and create affordable housing has never been greater. New York City's future depends on its ability to house the many new residents destined to make the city their home in the coming decades. Undoubtedly many more affordable housing campaigns will be waged to see that this need is met. Yet with nine years of solid policy, planning and program victories, INCO has helped ignite and unify a burgeoning community-based affordable housing movement that is reshaping the city's housing landscape - one campaign at a time.

INCO GROUPS 2003-2012

ABYSSINIAN DEVELOPMENT CORPORATION

ASIAN AMERICANS FOR EQUALITY

BROOKLYN CONGREGATIONS UNITED

CENTRO HISPANO CUZCATLÁN

CHHAYA COMMUNITY DEVELOPMENT CORPORATION

CYPRESS HILLS LOCAL DEVELOPMENT CORPORATION

ERASMUS NEIGHBORHOOD FEDERATION

FIFTH AVENUE COMMITTEE

QUEENS COMMUNITY HOUSE

GODDARD-RIVERSIDE COMMUNITY CENTER (HARLEM OPERATION TAKE-BACK)

GOOD OLD LOWER EAST SIDE

HOUSING CONSERVATION COORDINATORS

LOS SURES/SOUTHSIDE UNITED HOUSING

MAKE THE ROAD NEW YORK

MIRABAL SISTERS CULTURAL AND COMMUNITY CENTER

MOTHERS ON THE MOVE

NEW SETTLEMENT APARTMENTS

NORTHWEST BRONX COMMUNITY AND CLERGY COALITION

ST. NICKS ALLIANCE

PRATT AREA COMMUNITY COUNCIL

QUEENS CONGREGATIONS UNITED FOR ACTION

NEIGHBORHOOD OPPORTUNITIES FUND & INCO SUPPORTERS

(2003 TO PRESENT)

ALTMAN FOUNDATION

ASSOCIATION FOR NEIGHBORHOOD & HOUSING DEVELOPMENT

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BANK OF NEW YORK MELLON

THE BANK OF TOKYO-MITSUBISHI UFJ, LTD.

CAPITAL ONE

CITIGROUP COMMUNITY DEVELOPMENT

DEUTSCHE BANK AMERICAS FOUNDATION

ENTERPRISE COMMUNITY PARTNERS, INC.

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HSBC BANK USA

LOCAL INITIATIVES SUPPORT CORPORATION

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NEW YORK COMMUNITY TRUST

NEW YORK FOUNDATION

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PREVIOUS FUNDERS

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INDEPENDENCE COMMUNITY FOUNDATION

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MERRILL LYNCH COMMUNITY DEVELOPMENT

COMPANY LLC

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ROBERT STERLING CLARK FOUNDATION

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