|How NYC Council Legislation Impacts Affordable Housing

Client: New York Housing Conference (NYHC)

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Executive Summary

New York City is in an affordable housing crisis. This report presents the findings of a semester-long research project commissioned by the New York Housing Conference (NYHC) to identify, categorize, and quantify the cumulative cost of thirty years of New York City Council legislation on affordable housing construction and operations.

The analysis draws on four research instruments: a database of all 3,364 NYC Local Laws (LL) enacted between 1998 and 2026, an Affordable Housing Cost Model (AHCM) that translates the highest-impact laws into per-unit cost estimates, eight semi-structured expert interviews across government, nonprofit, and for-profit sectors, and one developer listening session.

The central finding is that NYC Council legislation has added meaningful costs to affordable housing production and operations, concentrated in four categories of legislation: wage and labor mandates (prevailing wage and the Construction Justice Act); energy and climate compliance (the Energy Code cycle and LL97); construction site safety (Site Safety Training and the Site Safety Manager threshold); and recurring building inspections (the Facade Inspection and Safety Program). A longer set of smaller compliance obligations adds to the total. Our cost modeling suggests that costs are in the tens of thousands of dollars per unit on the construction side, and in the low thousands per door per year on the operating side. These estimates are preliminary: many rely on a single literature source or practitioner interview, the cost model has not been validated against project-level financials, and roughly 805 additional housing-relevant laws carry plausible but unquantified cost impacts.

The cost-driving laws identified here pursue legitimate goals: higher wages for construction workers, safer job sites, and lower greenhouse gas emissions. Practitioners argued that the cumulative cost of these mandates has constrained the number of affordable units the city can build. The City Charter requires a Fiscal Impact Statement for every proposed LL, but that FIS estimates impact on the City's budget – not to affordable housing producers. Stakeholders raised reform ideas across four areas: how the Council legislates, administrative and process bottlenecks, right-sizing existing laws, and the biggest individual cost drivers (the state-level Scaffold Law and the Construction Justice Act).

Introduction

The New York Housing Conference commissioned this project to identify, categorize, and quantify the cost that NYC Council legislation has added to affordable housing construction and operations over the past thirty years, and to develop a legislative reform agenda.

Construction costs in New York City exceed those of every other city in the world (Turner & Townsend, 2024), and a growing share of subsidized affordable buildings are running operating deficits. Council legislation is one of several drivers behind these costs. Between 1998 and 2026, the Council passed hundreds of bills aimed at promoting safety, equity, and environmental sustainability in new construction and building operations. Their combined financial effect on affordable housing has never been quantified.

This research draws from both qualitative and quantitative data. We conducted eight semi-structured interviews with city agency staff, affordable housing nonprofits, and academic researchers, as well as one listening session with four affordable housing developers. We also built a database of 3,364 LL's passed in the past 33, screened them for housing relevance, and rated each by cost impact and category using keyword searches, coding, and construction cost research.

This research focuses on local NYC Council legislation. Other cost drivers, including state laws, federal requirements, and market conditions came up in interviews and throughout our literature assessment, and are noted where relevant.

This research has several limitations:

- We did not have access to project-level financial documents, so all cost estimates draw on published secondary sources or numbers shared in housing practitioner interviews.
- The academic literature generally captures legislation only through 2019, so newer mandates including LL154, LL147, and the Construction Justice Act (CJA) were assessed primarily through practitioner interviews.
- This research was conducted over the course of one semester.

Our reform recommendations are grounded in prevailing themes that surfaced consistently across our stakeholder interviews. We sought to develop reform recommendations that are actionable, politically feasible, and impactful.

1. Literature Review

The literature review conducted for this research project was divided into four themes: construction economics, the existing housing advocacy landscape, local legislative forces that may affect housing, and equity. None of the existing literature engages directly with the question this research asks: what is the cumulative cost impact of three decades of NYC Council legislation on affordable housing, and how should that cost be weighed against the goals each law was enacted to accomplish?

1.1. Construction Economics

New York is the most expensive city in the world to build in. A 2005 NYU Furman Center study found that NYC residential construction costs already exceeded the average of 21 peer cities by 33% (Furman Center, 2005). Two decades later, Turner & Townsend (2024) ranked NYC as the global leader at $450–$600 or more per square foot – 30% higher than London, 40% higher than Los Angeles, and more than double the costs in Houston, Toronto, Amsterdam, and Paris (Turner & Townsend, 2024). The RAND Corporation (2023) found that simplifying land use approvals, permits, and environmental reviews could have the largest single impact on housing supply.

Labor cost is NYC's largest single driver of this gap. The NYC Independent Budget Office (2016) estimated that prevailing wage requirements increase construction costs for city-assisted affordable housing by 13 to 23%, or roughly $45,000 per unit at the central estimate. The Economic Policy Institute (Ormiston, Belman, & Hinkel, 2018) critiqued the Independent Budget Office (IBO) findings as overstated, preferring a range closer to six percent.

New York's Scaffold Law (Labor Law 240/241) – a state law, not a City Council LL further affects this cost environment: HR&A Advisors and the Building Trades Employers' Association (2025) found that construction insurance related to scaffolding in NYC accounts for eight to ten percent of total development costs, compared to two to four percent in comparable states.

1.2. The Existing Housing Advocacy Landscape

Analyses by the Association for Neighborhood and Housing Development (ANHD), Enterprise Community Partners, and the National Equity Fund (NEF) identify three causes of the operating-cost crisis: unpredictable cost surges against strict rent caps; rent collection that has not recovered to pre-pandemic levels, dropping from 95% to as low as 70% in some cases (ANHD); and administrative delays that keep finished apartments empty. A 2025 Enterprise/NEF analysis found that over 63,700 homes in New York City are financially distressed, with the cost of replacing these units estimated at $26.8 billion, making preservation of existing nonprofit-owned stock the only financially viable path forward. Total operating expenses have surged approximately 40% since 2017, driven heavily by a 110% increase in insurance premiums (Enterprise/NEF, 2025). The NYC Rent Guidelines Board found that operating costs have increased 28.1% over the past five years, consuming 62.9 cents of every dollar of rental income for rent-stabilized buildings.

Nonprofit operators often lack the financial capital to absorb large, infrequent compliance obligations. Brendan Mitchell, Director of Real Estate and Finance at UNHP, described routinely lending from UNHP's own lending arm to cover Facade Inspection and Safety Program (FISP) costs for buildings in its portfolio that had no other capital source which was a workaround that underscores how the compliance architecture was designed without regard for the financial capacity of the operators it governs.

1.3. Local Legislation in New York City

If laws such as the state prevailing wage law, LL212 or city scaffolding LL's, LL11, aforementioned are amended or repealed, the legislative process around reforming laws must be considered. LL reformation in New York City Council is done the exact same way as new laws are introduced, which is through its five-step legislative process: a bill is introduced, public hearings are held, the appropriate committee then council votes, the mayor makes a decision, and then the bill becomes law (New York City Council). Bills can only formally be introduced by council members, but can be suggested by anyone in the city. The Scaffold Law has already been reformed multiple times through new bill introductions. A recent example of this is a 2025 bill, which had passed, to strengthen safety and efficiency of sidewalk shed management, sponsored by several council members (New York City Council, 2025). In order to introduce a bill such as this one, it is imperative to obtain council member support for bill introduction through strong evidence around benefits of reforming previous laws.

1.4. Equity Considerations in Housing Legislation

In urban planning and policy, equity refers to fair and just inclusion in all aspects of society by acknowledging the different types of resources and support different ethnic, racial, socioeconomic, gender, and immigration status groups may need to prosper (Yuen & Nguyen, 2020). Affordability and access to safe, stable housing are inherent in minimizing racial, gender, socioeconomic, environmental, and other intersecting disparities. Many LL, including prevailing wage requirements, minority and women-owned business enterprises (MWBE) participation rules, LL97's emissions caps, and site safety mandates, were passed with explicit equity goals. However, there is a gap in grey literature and research pertaining to the cost or timeline impact of equity-focused LL's on affordable housing development in NYC.

Fair compensation for labor and economic mobility fit under the "inclusion" and "support" concepts in Yuen and Nguyen's *equity* definition. Prevailing wage laws were passed to protect the wages of local construction contractors and prevent the public procurement process from reducing just compensation for laborers (*Prevailing Wage Laws - NABTU*, 2025). At this time, there is no consensus in the studies on the impact of prevailing wage requirements on affordable housing construction costs. As per a 2016 report from the IBO, a cost model estimated that prevailing wage requirements would increase labor costs by 80% and overall construction costs by 25% in NYC (*Background on Prevailing Wages…*, 2016). These findings suggest that prevailing wage laws prevent affordable housing projects from being built– thereby undermining another desired equity outcome. However, the quality and methodology behind IBO's data analysis were critiqued by research contemporaries, such as the The Economic Policy Institute and Fiscal Policy Institute (LaBarbera, 2016).

A report by the Pratt Institute's Center for Community Development discusses how required Racial Equity Reports (LL78) are *not* overly-restrictive "apartment killers" (as per Engquist, 2025), and that they do not delay nor block rezonings whatsoever (Duvivier & Baron, 2025). Besides this instance in research, the cost and bureaucratic delays of equity-focused LLs are not well-documented within the landscape. Policy recommendations in existing literature generally fail to address cost and bureaucratic delay reductions.

2. Methodology

This research draws on both qualitative and quantitative data. We use three instruments, described below, to answer a single question: how much does NYC Council legislation passed over the past thirty years contribute to the cost of producing and operating affordable housing?

2.1. Legislative Database

We built a database of every NYC LL enacted between 1998 and 2026, 3,364 laws from the Council's Legistar system. We scored each law twice: once for construction cost impact, once for operating cost impact. The two scores often diverge because the same law affects construction and operations differently: a sidewalk-shed law matters during construction but less during operations, while an annual energy-reporting law is the opposite. Each law received a cost-impact tier (High, Medium, Low, Unknown, or No Impact) for both construction and operations.

We scored laws in four steps.

1. **Housing relevance.** We scan each law text against two keyword lists – one for construction-costs ("construction code," "scaffold," "prevailing wage") and one for operating-costs ("benchmarking," "annual inspection," "HMC"). About 75% of laws don't hit either list and receive No Impact for both construction and operating cost. The remaining 844 (25%) are deemed housing-relevant.

2. **Category assignment.** Each housing-relevant law is assigned to one of 21 themes, grouped into eight broader groups: Construction Codes & Safety Standards, Energy & Climate, Environmental Health & Hazardous Materials, Labor / Equity / Workforce, Land Use & Zoning, Operating-Phase Mandates, Tax Policy & Development Incentives, and Other. We assign these by matching each law's text to theme-specific keyword patterns.

3. **Tier assignment.** Each theme is mapped to a construction and operating cost tier. For 19 of the 21 themes, the theme determines the cost tier directly. Three sub-themes: Fire & Life Safety, Building Code Updates, and Energy & Climate Compliance, carry multiple tiers because laws inside them differ meaningfully in costs (e.g. sprinkler retrofit vs. smoke-detector swap).

4. **Evidence override.** Laws that come up in three or more interviews are tagged High regardless of their theme. About 31 construction laws and 15 operating laws that practitioners discussed at length fall into this category, including LL97 and LL11/FISP.

Of the 844 housing-relevant laws, 39 are rated High on the construction side, 270 Medium, 280 Low, and forty Unknown. On the operating side, 17 are High, 165 Medium, 156 Low, and 33 Unknown. Every law scored High on the operating side also scored High on construction.

Table 1 shows the full theme to tier mapping. Each row represents a claim ("a sidewalk-shed law has a medium impact on construction costs") that any reviewer can read and question. Sub-themes marked with a * are the three that carry multiple tiers; the row shows the dominant tier and the rationale column flags the split.

Table 1

Themes and their cost-impact tiers + rationales

Theme	Construction Cost Impact	Operating Cost Impact	Example law	Rationale

Construction Codes & Safety Standards				
Building & Construction Code Updates*	Med	–	LL33/2026 (Existing Building Code)	This law replaced the 1968 Building Code. It changed what counts as a major alteration, added new occupant protection requirements during construction, and updated accessibility and fire safety rules (New York City Department of Buildings, n.d.). Less relevant to operating-phase.
Fire & Life Safety*	Low	Low	LL71/2022 (self-closing doors)	Devices like smoke detectors and self-closing doors are inexpensive to install and require only periodic functional tests. Sprinkler retrofits within this group are scored as Medium.
Flood Resilience	Med	Low	LL124/2024 (flood risk area map)	Flood-resilience requirements add capital cost on new construction in covered flood zones, plus modest ongoing monitoring once the building is in use.
Energy & Climate				
Energy & Climate Compliance*	High	High	LL97/2019 (building emissions limits)	Laws like LL97 require mandatory retrofits and create a risk of penalty costs for buildings that exceed emissions caps. Green-roof and solar-roof laws within this group are scored as Medium.
Building Systems & Mechanical	Med	Low	LL142/2025 (gas piping inspections)	These laws require equipment installation in relevant buildings (gas piping, EV charging, boiler upgrades), with minor ongoing maintenance once installed.
Energy Disclosure & Benchmarking	Low	Med	LL84/2009 (benchmarking)	These laws require a one-time sub-meter install during construction and recurring consultant and reporting costs each year afterward.
Environmental Health & Hazardous Materials				
Lead-based Paint	Med	Med	LL31/2020 (Lead Package)	Lead-paint laws require abatement work during alterations and ongoing inspection and remediation obligations under the Housing Maintenance Code.
Asbestos	Med	—	LL37/2009 (asbestos abatement)	Asbestos rules require compliance work during alterations and demolition.

Mold & Indoor Allergens	Med	Med	LL61/2018	Mold laws require capital remediation during alterations and ongoing landlord obligations under the Housing Maintenance Code.
Cooling Tower & Water Quality	Low	Med	LL78/2019	These laws require a small one-time install during construction and periodic inspections and certifications once operating.
Labor, Equity & Workforce				
Wage Mandates	Med	—	LL212/2019 (prevailing wage for service employees)	Prevailing-wage laws raise labor costs on city-assisted construction projects.
Site Safety & Training	Med	No Impact	LL196/2017 (SST)	Site-safety laws require training and on-site supervision costs during construction. These obligations end once the building is operating.
Equity & Hiring	—	Low	LL21/2026 (community hiring)	Laws in this category create reporting obligations once a building is operating but don't add direct construction cost.
Land Use & Zoning				
Inclusionary Zoning	Low	—	LL212/2017 (MIH fund)	Inclusionary zoning shapes what gets built through density bonuses and affordable-unit requirements, rather than adding direct construction cost.
Operating-Phase Mandates				
Recurring Inspections	Med	Med	LL11/1998 (FISP); LL49/2025	Periodic-inspection laws like FISP require engineering and capital spending on existing buildings each inspection cycle. Sidewalk-shed laws within this group are scored Med on construction and Low on operations.
Tenant Protection & Anti-Harassment	Med	Med	LL47/2024 (rent stabilization continuation)	Tenant Protection Plan amendments add procedural cost during alteration work. Rent-stabilization and tenant-harassment laws create recurring landlord and administrative compliance once the building is operating.
Waste, Recycling & Env. Compliance	Low	Med	LL36/2025 (waste containers)	Waste and composting laws add a small storage-room cost during construction and recurring landlord compliance once the building is operating.

Recurring Reporting	—	Low	LL18/2022 (short-term rental registration)	These laws create administrative reporting obligations only.
Tax Policy & Development Incentives				
Tax Incentives	Med	Med	LL122/2024 (J-51 alterations)	Tax-incentive programs like J-51 change the financial structure of new development and impose recurring compliance during the years the abatement is in effect.
Personal Property Tax Relief	Low	Med	LL109/2023 (SCHE / DHE)	These programs give tax relief directly to tenants, so they don't significantly change development cost. They do require ongoing tenant recertification.

Each housing-relevant law was also coded on legislative necessity – whether the law required Council action or could have been accomplished through agency rulemaking or industry self-regulation. We assigned each law one of four labels:

- **Required**. Council was the only legal venue. This covers any law that creates a tax abatement, establishes a right enforceable in court, or amends the Housing Maintenance Code – amendments to the Administrative Code require Council enactment under NYC Charter Section 28 (The New York City Charter Section 28, n.d.).
    - Example: LL122/2024 amended the J-51 tax abatement program at NYC Administrative Code Section 11-243. Only the Council can amend the Admin Code, and no agency has been delegated authority to create or modify tax abatements.

- **Likely administrative**. A relevant agency had pre-existing rulemaking authority and could have issued the rule itself.
    - Example: LL11, which established a five-year facade inspection cycle for buildings six stories or taller. FISP is codified at NYC Administrative Code Section 28-302, in the Construction Code. But the inspection cycle and procedural details could have been adopted via DOB rulemaking under NYC Charter Section 643 (The New York City Charter Section 643, n.d.).

- **Likely industry**. An industry standard covers similar content. Example: LL196, which created a NYC-specific Site Safety Training credential. The Occupational Safety and Health Administration's Occupational Safety and Health Administration (OSHA)-30 training program predated this law, but Council made participation mandatory (New York City Department of Buildings, 2023). All 15 laws in this category fall in the Site Safety & Training theme.

- **Unknown**. It is unclear whether Council action was necessary. Example: LL154, the fossil-fuel ban for new construction, which might have required Council action or might have been achievable directly by the Department of Buildings (DOB).

This analysis identified where alternative legal paths may have been available, but does not suggest that the Council was wrong to legislate. We surface this dimension because a meaningful share of cost-impactful laws may have legally been accomplished through administrative channels, which suggests a possible angle for future reform efforts.

Table 2
Themes and their legislative necessity labels

Theme	Legislative Necessity	Example law
Construction Codes & Safety Standards		

Building & Construction Code Updates	Unknown	LL33/2026 (Existing Building Code)
Fire & Life Safety	Unknown	LL71/2022 (Self-closing doors)
Flood Resilience	Unknown	LL124/2024 (Flood risk area map)
Energy & Climate		
Energy & Climate Compliance	Unknown	LL97/2019 (Building emissions limits)
Building Systems & Mechanical	Likely Admin	LL142/2025 (Gas piping inspections)
Energy Disclosure & Benchmarking	Likely Admin	LL84/2009 (Annual energy benchmarking)
Environmental Health & Hazardous Materials		
Lead-based Paint	Required	LL30/2020 (Lead Package)
Asbestos	Likely Admin	LL37/2009 (Asbestos abatement)
Mold & Indoor Allergens	Required	LL61/2018 (Housing Maintenance Code obligations)
Cooling Tower & Water Quality	Likely Admin	LL78/2019 (Cooling tower inspections)
Labor, Equity & Workforce		
Wage Mandates	Unknown	LL212/2019 (Prevailing wage for service employees)
Site Safety & Training	Likely Industry	LL196/2017 (SST)
Equity & Hiring	Unknown	LL21/2026 (community hiring)
Land Use & Zoning		
Inclusionary Zoning	Required	LL212/2017 (MIH fund)
Operating-Phase Mandates		
Recurring Inspections	Likely Admin	LL11/1998 (FISP)
Tenant Protection & Anti-Harassment	Required	LL47/2024 (Rent stabilization continuation)
Waste, Recycling & Env. Compliance	Likely Admin	LL36/2025 (Waste containers)
Recurring Reporting	Likely Admin	LL18/2022 (Short-term rental registration)
Tax Policy & Development Incentives		
Tax Incentives	Required	LL122/2024 (J-51 alterations)
Personal Property Tax Relief	Required	LL109/2023 (SCHE / DHE)

2.2. Affordable Housing Cost Model (AHCM)

The Affordable Housing Cost Model (AHCM) is an attempt to put per-unit cost estimates to the largest cost-drivers identified in the legislation database. For thirty seven high-impact laws, it estimates a one-time construction premium per dwelling unit and a recurring operating premium per dwelling unit per year across three project archetypes. The estimates are anchored in industry literature, agency documents, and our practitioner interviews – but they have not been validated against project-level financial data, which was not available to us. Many estimates rely on a single source. These are meant to be interpreted as order-of-magnitude starting points, not as confirmed figures. This is a policy model, and does not predict the cost of any specific project.

The model builds on an impact model provided to us by NYHC, which estimates the per-project cost effect of the Construction Justice Act across six Housing Preservation and Development (HPD) project types. The AHCM extends that work in three ways:

- First, it covers Council-enacted legislation more broadly – not just the CJA, but thirty seven high-impact laws in the legislation database
- Second, each row carries Low, Central, and High estimates rather than a single number.
- Third, the model groups projects in a different way than the NYHC model. Where the NYHC model produced estimates based on each project's financing (LIHTC subsidy, SARA Davis-Bacon, 421-a exempt, etc.), the AHCM produces estimates across three project archetypes that vary by scale and construction type: P1 (Large LIHTC new construction, 100+ units), P2 (Mid-size new construction, 40–99 units), and P3 (Preservation rehab on occupied stock).
    - Several cost-driving requirements are triggered by scale or construction type, not by financing. For example, Building Service Prevailing Wage applies to projects above 120 units; the Site Safety Manager requirement applies to projects above 7 stories; preservation projects are more impacted by lead-paint and mold compliance laws than new construction projects.

The model quantifies thirty seven of the highest-impact laws. The remaining 805 housing-relevant laws are not individually modeled because of a lack of citable evidence. They are unmeasured, which means that the model's overall estimates are a lower-bound estimate of the costs attributable to Council legislation.

The model's most useful feature is the list of sources cited for each row, showing which evidence anchors each estimate, where the estimate relies on a single source, and therefore where validation against additional data would most reduce uncertainty.

The full methodology, per-row sources, and reform scenarios are documented in Appendix A .

2.3. Stakeholder Interviews and Listening Session

In order to address our research question, we conducted eight semi-structured interviews and one developer listening session. As NYHC is very involved within the affordable housing space across sectors, they facilitated several introductions with affordable housing experts from other nonprofit organizations, relevant city agencies, private development firms, as well as an academic research institution. Our team wanted to grasp a comprehensive overview of the affordable housing landscape, so it was imperative that we interviewed experts across various sectors. City agencies have firsthand insight into the regulatory environment and bureaucratic approval processes; nonprofits approach the question of affordable housing from an advocacy perspective; for-profit developers have an in-depth understanding of the affordable housing construction and operations costs across the project lifecycle. Interviews were coordinated virtually and participants received a list of anchor questions prior to the interview (see Appendix B for full set of interview questions). Interviews were facilitated by student team members.

The developer listening session offered the researchers the opportunity to gather a high volume of qualitative data at once. The four listening session participants were representatives of development firms within the affordable housing space. The structure of the conversation enabled each developer to exchange ideas and follow up on the anecdotes of contemporaries in their field.

While our research question focuses on the impact of City Council LL's on affordable housing development, our participants were also asked more generally about *any* factors leading to increased construction and operating costs in New York City.

Participants are listed in tables 3 and 4 below.

Table 3

Interview Participants

Name	Title	Organization
Thomas Abbott	Executive Director, Credit & Special Underwriting	Housing Preservation & Development (HPD)
Ahmed Tigani	Commissioner	Department of Buildings (DOB)
Seth Bynum	Senior Advisor for Housing Policy and Development	Office of the Mayor
Emily Kurtz	Chief Housing and Development Officer	RiseBoro Community Partnership
Brendan Mitchell	Director of Real Estate and Finance	University Neighborhood Housing Program (UNHP)
Brad Greenburg & Hayley Raetz	Executive Director & Policy Director	NYU Furman Center
Carlo Casa	Senior Director of Policy and Research	NYC Building Congress
Mark Ginsberg	Architect, Partner	Curtis + Ginsberg Architects

Table 4

Listening Session Participants

Name	Title	Organization
Kirk Goodrich	Partner	Monadnock Development
Hercules Argyriou	Vice President	Mega Contracting
Liz Oakley	Chief Development Officer	Douglaston Development
Stephen Strateman	Senior Vice President, Acquisitions & Development	Gotham Organization

We recorded and transcribed each interview and the listening session, then manually coded the data using Atlas.ti to identify common themes. We grouped themes into broader categories (code groups), each representing a different type of cost driver.

- Timeline
- Equity
- Reform
- Local Law
- Market Factors
- Financing
- Zoning
- State Law
- Federal Law

3. Results & Discussion

Overview

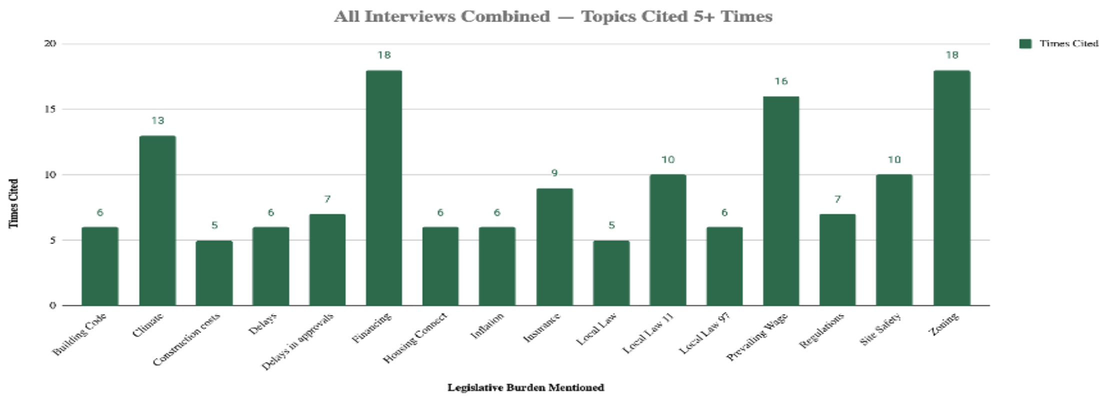
This section presents findings from the three data sources described in Section 2: practitioner interviews and a developer listening session, the legislation database, and the Affordable Housing Cost Model (AHCM).

The discussion is organized by topic. We start with an overview of cost drivers, then dig into specific construction-phase and operating-phase learnings, then examine the question of which laws technically need to be laws. A brief synthesis at the end provides overall takeaways.

The landscape of cost-drivers

NYC Council legislation is one factor affecting affordable housing costs among many. Across our interviews and listening session, practitioners raised 72 distinct cost and time drivers. Only 21 (29%) traced directly to Council legislation. The remaining 51 (71%) sit outside Council action: state law (the Scaffold Law, 485-x), federal law (tariffs, Davis-Bacon), city processes that aren't Council legislation (CEQR, agency timelines), market conditions, and the insurance market.

Figure 1
Count of cost-drivers mentioned across all interviews.



The most-cited individual drivers were financing (18 mentions), zoning (18), prevailing wage (16), Local Law 11 (10), and site safety (10), shown in Figure 1 above.

Across our interviews, two things stand out:

1. Financing costs ranked highest, which reflects the reality that lengthy permitting, approval, and city agency response times generate hard dollar costs. Every month a completed building sits empty waiting for a Housing Connect sign-off, a Con Ed hookup, or an Fire Department of New York (FDNY) inspection is a month of interest on a construction loan with no revenue coming in. An executive at a housing advocacy nonprofit noted that her organization now underwrites 12 to 14 months of lease-up, double what it used to be several years ago.
2. Zoning ranked equally with financing despite being outside the scope of this project. This signals how the broader regulatory environment can impact the cost of affordable housing development in New York City.

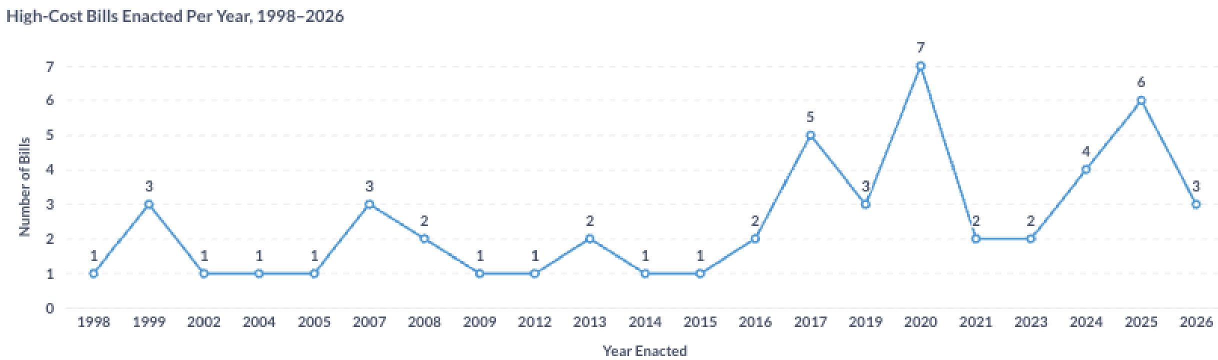
Within Council legislation itself, the cost burden is concentrated into a small set of laws and themes. Of 3,364 laws enacted since 1998, 844 (25%) are housing relevant, and just 39 are likely to have a high cost-impact. 33 of those 39 (85%) come from five legislation themes:

- Wage Mandates
- Energy & Climate Compliance
- Building Code Updates
- Recurring Inspections
- Lead-based Paint

The four laws most mentioned in interviews all fall under these themes: LL11, LL97, LL196, and the Construction Justice Act.

Figure 2

Amount of legislation passed by City Council over time.



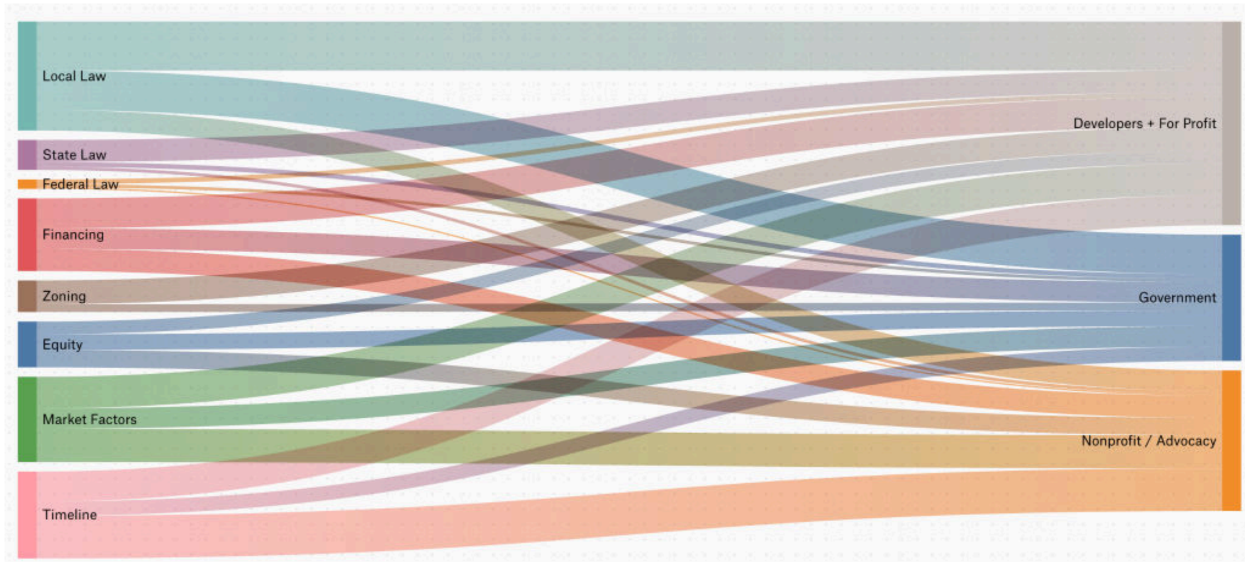
Using the publicly available NYC Council Legistar, we screened every NYC Local Law enacted between 1998 and 2026, 3,364 laws total, for whether it added cost to affordable housing construction, operations, or both. Of those 3,364, we identified 39 high-impact laws and built a dataset to analyze their cost impact. Over half of the 39 high-impact laws were passed after 2016, a period in which the de Blasio administration accelerated Council legislation and the city shifted its focus from one-time construction requirements toward energy, climate, and operating mandates.

Stakeholders emphasized different things across our interviews. Developers focused on specific named laws – LL11, LL97, prevailing wage. Nonprofit operators focused on timeline and bureaucratic processes. Government interviewees emphasized system-level dynamics

The Sankey diagram below shows how each stakeholder group's cost-driver mentions were distributed across key cost driver categories.

Figure 3

Cost Driver Code Groups Mentioned by Frequency Across Interviewee Types



Construction-phase cost drivers

Several major construction-phase cost drivers came up repeatedly in interviews: Prevailing Wage and the Construction Justice Act, Site Safety Training and the lowered Site Safety Manager threshold, the Energy Code, and the Fossil Fuel Ban.

A longer set of construction-phase cost drivers were identified in our database but did not come up in interviews. These include: Tenant Protection Plans, MWBE Compliance, Green and solar roof requirements, and Lead paint mitigation.

The Affordable Housing Cost Model produces a rough estimate of $70,000 to $110,000 per unit driven by Council legislation. This is an initial finding – the dollar figures have not been validated against project-level financial data, and many of the model's numbers rely on a single source.

The two case studies below – Site Safety and the Construction Justice Act – show how costs play out for two construction-cost drivers most named in interviews.

Site Safety (LL196/2017 and LL147/2021)

Site safety law is one of the clearest examples of what happens when legislation is passed without a cost estimate analysis. LL196 created a NYC-specific construction safety training credential known as Site Safety Training (SST), layered on top of existing federal OSHA training requirements. The law was passed in response to a documented cluster of construction worker fatalities in the mid-2010s. While the law contributed to a 58% drop in construction injuries on

covered sites, it also added $10,000 to $30,000 per project in administrative overhead (New York City Department of Buildings, 2017).
Many of our interviewees cited LL196 as a significant cost driver – the NYC-specific credential adds costs on top of OSHA training requirements that already apply to every construction site.

In 2021, LL147 lowered the threshold for requiring a dedicated Site Safety Manager from 10 stories to 7 stories. Argyriou at Mega Contracting explained what that meant in dollars. "A Site Safety Manager costs roughly $300,000 to $350,000 per year. On a large project with hundreds of units, that cost spreads thin and is workable. On a 60-unit building at 7 to 10 stories, which is the scale most affordable housing is actually built in in New York City, that same fixed cost goes up to $10,000 or $12,000 per unit."

Table 5

Site Safety Manager Cost Per Unit by Project Scale

Project Scale	Units	SSM Cost (2-year build)	Cost per Unit
Large project	600 units	$600,000	~$1,000
Mid-size project	150 units	$600,000	~$4,000
Small project (typical HPD)	60 units	$600,000	~$10,000
Very small project	30 units	$600,000	~$20,000

Commissioner Tigani acknowledged in our interview that "site safety rules were changed across multiple dimensions – credentialing, site thresholds, intensity levels – and all of that added costs at times," and indicated DOB has independently studied the threshold and is receptive to recalibration.

The Construction Justice Act

The Construction Justice Act is the single most cost-consequential law in the thirty-year dataset. It establishes a $40 per hour combined wage and benefits floor for workers on city-assisted projects, more than doubling the prior effective threshold (NYC Council, 2025). HPD has publicly stated it anticipates a cost impact of tens of thousands of dollars per unit. The NYHC Cost Impact Model projects that at the same city budget, annual affordable housing production could fall from approximately 26,200 to 15,290 units per year, a loss of roughly 10,910 units annually. For preservation projects funded through tax incentives only, the model projects production dropping to zero.

Table 6

Projected Impact of the CJA on affordable housing production, by project type

Project Type	Current Production	Projected (CJA)	Change
New Construction (subsidy)	4,000 units	2,815 units	−1,185
Supportive Housing	1,200 units	844 units	−356
SARA (Davis-Bacon)	1,000 units	1,000 units	No change
Preservation (subsidy)	8,000 units	4,370 units	−3,630
Preservation (tax-only)	6,000 units	0 units	−6,000
421-a (exempt)	6,000 units	6,000 units	No change
Total	26,200 units	15,290 units	−10,910

Thomas Abbott at HPD explained the budget consequences of the CJA directly: "it increases the wages, which increases the hard costs, which increases the cost of the project, and means that we have to put more subsidy into it to make it work." Our interviewees across sectors generally supported the principle that workers building publicly-subsidized affordable housing should be paid fair wages.

The developers we spoke with raised specific concerns about implementation: the wage floor took effect with no phase-in period, no cost analysis prior to passage, and no carve-out for MWBE-designated affordable housing developers – many of whom operate on margins that cannot absorb a doubling of their labor cost structure overnight.

Operating-phase cost drivers

Operating-phase laws drive recurring costs that accumulate over the lifetime of a building. Several laws came up repeatedly in our interviews: the Facade Inspection and Safety Program (FISP, LL11/1998 and the 2025 LL47–51 reform package), Local Law 97 (building emissions), Building Service Prevailing Wage (LL27/2012 and LL212/2019), and a set of recurring inspections (gas piping, steam radiator, elevator)

Our database identified additional operating-side drivers – lead-paint and mold compliance, the cooling mandate (effective 2030), mandatory composting, and the waste-container fee –that likely add cost but didn't come up in interviews.

Many of these laws share a common structure: a periodic inspection, audit, or reporting obligation that affordable housing operators must meet on a defined cycle. The most consistent of these are summarized in Table 7, which lays out each law's scope and frequency.

Table 7

Key Operating-Phase Local Laws

Law	Enacted	Requirement	Frequency
Local Law 11 (FISP)	1998	Facade inspection, buildings 6+ stories	Every 5 years
Local Law 84	2009	Annual energy + water benchmarking, 25K+ sq ft	Annual
Local Law 87	2009	Energy audit + retro-commissioning, 50K+ sq ft	Every 10 years
Local Law 88	2009	Lighting upgrades + sub-metering in non-residential spaces	One-time
Local Law 133	2016	Extends LL 84 benchmarking to mid-size buildings	Annual
Local Law 152	2016	Gas piping inspection by Licensed Master Plumber	Every 4 years
Local Law 97	2019	Escalating GHG emissions caps, buildings 25K+ sq ft	Annual (from 2024)

Across our interviews, practitioners described how these laws land on operators in practice. Brendan Mitchell of UNHP described how compliance demand can outstrip local labor supply: "Local Law 152 is gas piping inspection. There's only so many plumbers in the city. They know you need them and they can kind of name their price."

The Affordable Housing Cost Model produces a rough estimate of $3,000 to $6,000 per unit per year driven by Council legislation. This is an initial finding – the dollar figures have not been validated against project-level financial data, and many of the model's numbers rely on a single source.

The Rent Guidelines Board's 2024 Income and Expense Study reports that rent-stabilized buildings operate at a net operating income of about $605 per door per month, or $7,260 per year. A $3,000 to $6,000 per door per year recurring cost would consume 40% to 80% of that NOI. Over a 30-year operating life, even a more conservative estimate compounds to a per-unit cost of ~$90k.

Legislative necessity

A separate question from *how much does Council legislation impact cost*? is: *are there laws whose goals legally could have been achieved through other means?*

Practitioners raised this question directly. Some noted that certain Council laws were things that agencies such as DOB or DOH could have issued through agency rulemaking. Others argued that agency rulemaking can be faster and narrower in scope than Council legislation.

We coded each of the 844 housing-relevant laws on whether it likely required Council action or likely could have been accomplished another way. This coding identifies where alternative legal paths may exist, but does not take a position on whether any given LL should or should not have been passed.

Across the 844 housing-relevant laws, the distribution is: required 25% (214 bills), likely administrative 31% (263), likely industry 2% (15), and unknown 42% (352)

Of the 39 High-tier laws, 24 (62%) required Council action – but 9 (23%) are flagged as likely achievable by agency rulemaking.

Of 156 laws marked as having low-impact on Operating Costs, 97 (62%) are flagged as likely achievable by agency rulemaking.

Takeaways

1. **Cost-driving legislation has accelerated since 2016 and shifted from construction to operations**. Two thirds of high-impact Operating-Phase and Energy & Climate laws were enacted after 2015, and many are still coming into effect.

Figure 4
High-cost impact laws enacted by 5-year window, by theme

Figure 4 above shows the count of high-cost-impact laws enacted in each five-year window since 1998, broken out by theme. Activity was relatively steady through 2017, then jumped sharply: 11 high-impact laws were enacted between 2018 and 2022, and another 10 between 2023 and 2026.

The composition shifted as well. Energy & Climate dominated the 2018–2022 window, while Operating-Phase Mandates dominated the 2023–2026 window. Many of these obligations are still phasing in – LL97 retrofit cycles tighten in 2030 and 2040, the cooling mandate is effective 2030, and the fossil-fuel ban takes effect in 2027 for most new construction. The recurring-cost burden documented in section 3.4 will continue to compound.

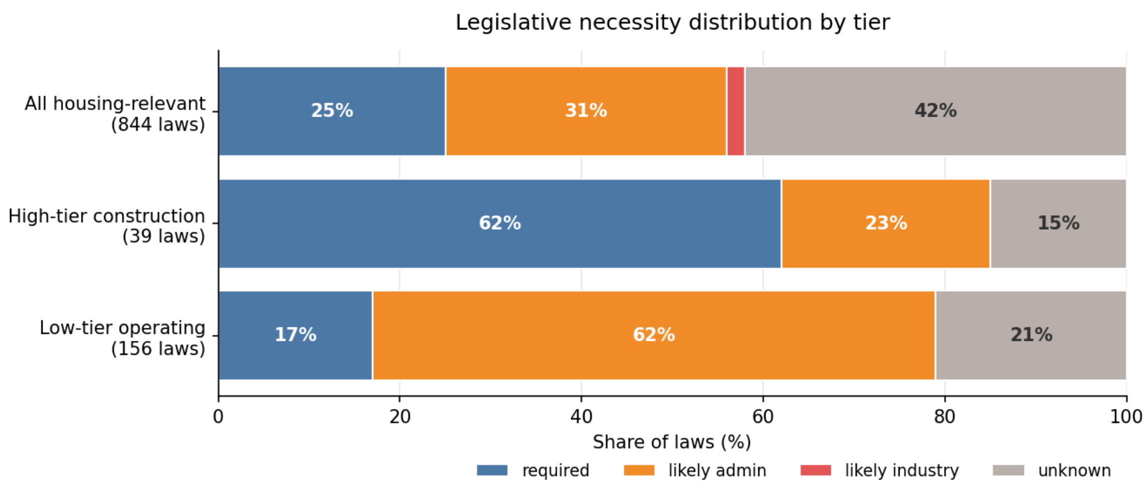
2. **NYC Council legislation accounts for only ~30% of cost drivers practitioners identified**. State law, federal law, administrative practice, market dynamics, and the insurance market account for the rest.

3. **Administrative timeline cost was the most-cited cost factor in interviews**, despite not being Council-driven. DOB permitting and FDNY sign-off were among the examples referenced.

4. **About a third of cost-impactful Council legislation may have been achievable through agency rulemaking**. We estimate that 31% of housing-relevant laws and 23% of high-cost-impact laws fall into this category, shown below in Figure 5.

Figure 5

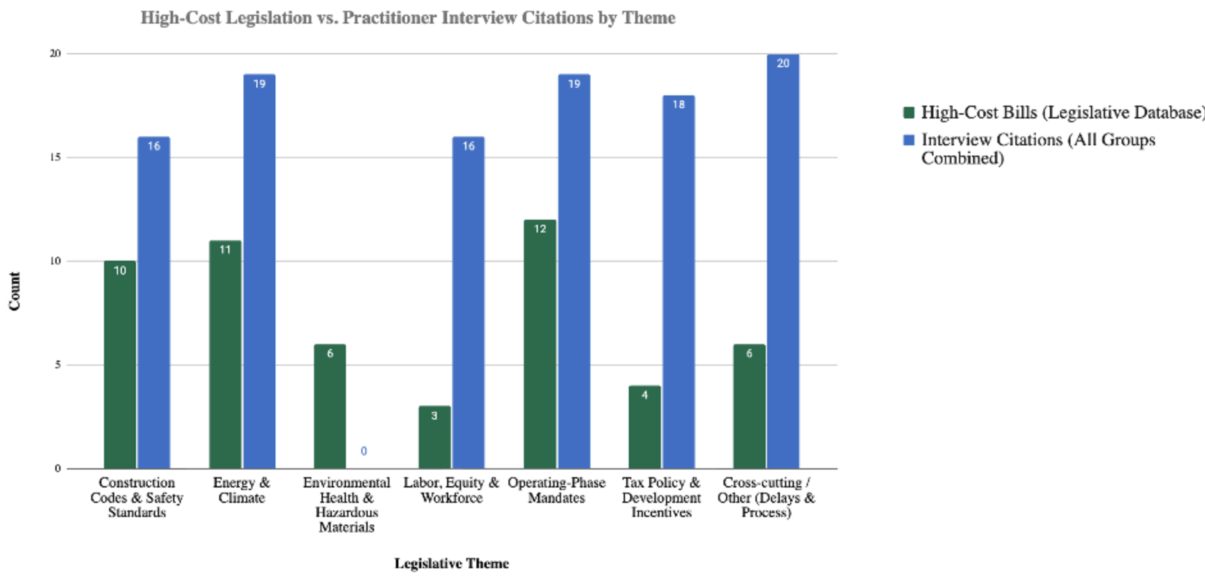
Legislative necessity by tier



5. **Half the categories in our database didn't come up in interviews**. 11 of 21 housing-relevant legislation themes had no practitioner mentions. This is shown below in Figure 6.

Figure 6

High cost legislation by appearance in interviews.



This figure compares our legislative database against what practitioners raised in interviews, organized by theme.

The most striking gap is found within the Labor, Equity & Workforce category, which includes three laws in our database but 16 citations in interviews.

Wage mandates came up constantly, across every sector we spoke to, far more than the law count alone would suggest. The Construction Justice Act is one law that has yet to come into effect, but it dominated conversations with representatives from city agencies and every developer we spoke to in the listening session.

On the other hand, Environmental Health & Hazardous Materials had six laws in the database but generated zero mentions in the interviews.

4. Recommendations

The recommendations below are grounded directly in what stakeholders asked for across every sector we interviewed. They are organized into two tracks: legislative reforms that require City Council action, and administrative and executive reforms that agencies can implement without new legislation.

4.1. Institutional Reforms: How Council Legislates

4.1.1. Require a Cost Analysis Before Any Housing-Related Bill Comes to a Vote

This was the single most consistent recommendation across all interviews, raised in the majority of conversations. Emily Kurtz of RiseBoro put it directly: “Stop passing unfunded mandates. Number one is that every single local law should have an economic impact report. And also a dedicated budget line to support it.” Hayley Raetz of the Furman Center agreed that “the city council should do a cost-benefit analysis” when passing laws. Carlo Casa of the NYC Building Congress named LL97 as the *clearest* example of legislation passed without a cost analysis.

Before any housing-related bill comes to a vote, the Council should be required to calculate what it adds to the cost of building or operating an affordable unit. No such requirement currently exists. Mandatory economic impact analysis is the structural reform that provides transparency around the costs of building and maintaining affordable housing. There is precedent for cost-benefit analysis taking place on a federal level, as the Congressional Budget Office (CBO) is required to perform cost estimates at various points throughout the lawmaking process (Congressional Budget Office, n.d.). Any mandates that entail costs or recurring expenses can be factored into affordable housing development budgets.

4.1.2. Streamline Pre-Development, Environmental Review, and Approval Timelines

This recommendation was raised in some form in every one of our interviews. Seth Bynum of the Mayor's Office described the costs directly: “environmental review and planning, just going through the Uniform Land Use Review Procedure (ULURP) process – just the payments for paying to go through environmental review, to get pre-certified – the cost goes into millions of dollars.” HPD's average loan approval takes 47 months (New York Housing Conference, 2025). Every month a project sits in the pipeline is a month of construction loan interest with no revenue coming in.

Example: Transfer Construction Sign-Offs from FDNY Back to DOB

Sign-offs at construction close-out were moved to the FDNY following a 2007 Deutsche Bank fire which killed two FDNY firefighters and exposed inspection failures at both DOB and FDNY (DOI, 2009). The documented goal of this change was to improve fire safety by giving FDNY direct visibility into construction conditions.

While that intent is understandable, in practice, FDNY backlogs have meaningfully delayed project closings. The FDNY itself acknowledged the problem in an official 2023 notice: "the Fire Department has not been able to keep up with the demand for re-inspections and there are now substantial delays in scheduling them… This can result in significant delay costs for owners" (FDNY, 2020). One developer in the listening session conveyed their frustration: "People thought that FDNY would be less corrupt than DOB. And oh my goodness, was that not the case." Emily Kurtz confirmed that RiseBoro now budgets six months of contingency into every project schedule for FDNY sign-off delays.

4.1.3. Right-Sizing Existing Laws

LL147 (2021) lowered the Site Safety Manager threshold to seven stories, with SSM presence required from day one of excavation.

A site safety manager runs approximately \$300,000–\$350,000 per year (Argyriou, 2026), or roughly \$600,000 over a typical two-year build. Because that cost is fixed regardless of project size, the per-unit burden depends entirely on scale: about \$1,000 per unit on a 600-unit project, or \$10,000–\$12,000 per unit on a smaller 60-unit project.

Hercules Argyriou proposed in the listening session that the SSM requirement should begin only when construction reaches the floors where fall risk actually exists (the fifth floor), not from day one of excavation. In his interview, DOB Commissioner Tigani confirmed DOB has independently studied this threshold. The 58% reduction in NYC construction injuries since LL196 – the underlying training requirement, distinct from LL 147 – is preserved by this reform. Estimated impact of this recommendation based on the AHCM: 13–58% reduction in SSM costs, depending on project size.

Example: Extend the Local Law 11 Inspection Cycle and Grant Credit for Clean Histories

The Facade Inspection Safety Program (FISP), which requires facade inspections every five years for buildings six stories or taller, came up repeatedly as too short for buildings with clean compliance histories. Brendan Mitchell of UNHP noted that buildings completing two full compliance cycles should be granted longer between facade inspection cycles. Emily Kurtz suggested extending the cycle to ten years for buildings with clean records. DOB Commissioner Tigani noted a six-year cycle is already under DOB consideration. This is corroborated by public statements from DOB in 2025 (Habitat Magazine, 2025).

4.2. Structural and State-Level Reforms

Phase in Construction Justice Act Policies

The CJA was raised in more interview conversations than any other single law. One developer in the listening session put it plainly: “They increased the minimum wage for affordable housing from $18 to $40 per hour in one shot without any gradual increases. And that is effective next year and will be a super big hurdle for the industry.” Thomas Abbott at HPD explained the budget consequence directly: “It increases the wages, which increases the hard costs, which increases the cost of the project, and means that we have to put more subsidy into it to make it work.” Under static city housing budgets, NYHC's cost model projects production falls from approximately 26,200 to 15,290 units per year – a loss of roughly 10,910 units annually attributable to the CJA wage floor. Phasing in the Construction Justice Act wage requirements will enable developers to adjust to market conditions and have less of an adverse impact on nonprofit and MWBE firms (who may not have the same resources to counter the shock).

5. Areas for Further Research

5.1. MWBE-Specific Cost Impact

Several housing experts we interviewed advised that several pieces of legislation including the CJA, the LL 147 SSM cost layer disproportionately impact smaller MWBE-led projects. The $300,000–$350,000 annual SSM salary requirement – raised directly in the developer listening session – is one concrete example of a cost that hits smaller MWBE contractors far harder per unit than larger developers. The tradeoff between equity-oriented legislation and the firms it is designed to support deserves its own dedicated analysis.

5.2. The State and Federal Regulatory Impacts

Only 29% of the cost and timeline drivers raised by practitioners trace to NYC Council legislation. State law, federal labor and environmental requirements, and agency administrative practices account for the remaining 71%. A parallel research effort focused on state and federal levers would complete the picture of what is driving affordable housing costs in New York City.

5.3. Project-Level Financial Data Access

Cost estimates here draw on industry literature, agency reports, and practitioner interviews because project-level financial documents were not available. HPD, HDC, and large nonprofit operators hold this data and could provide it under appropriate confidentiality protections. Direct access would let future research test the model's central estimates against actual realized costs.

5.4. Lease-up and Housing Connect Process Costs

Operating cost begins not at certificate of occupancy but at lease-up. Lengthy Housing Connect, agency staffing, and tenant qualification timelines keep finished affordable units empty for months. A focused study of lease-up costs would extend the operating-cost analysis and inform a related Housing Connect reform agenda.

5.5. Market Factors

Council legislation is not the only force driving up costs. Practitioners consistently raised market factors that operate entirely outside the Council's control. Understanding these is an important context for what reform can and cannot accomplish. Interest rates came up in nearly every conversation. From 2021 onward, the cost of construction financing increased significantly as interest rates rose. Every additional month a project sits in the approval pipeline is a month of interest on a construction loan with no revenue coming in. As Thomas Abbott at HPD put it, financing costs are now one of the biggest cost drivers on any given project. Insurance has more than doubled. Operating costs, particularly for older buildings, include surging water rates, electricity, oil, and repairs – all rising faster than the rent revenue these buildings can collect.

Tariffs were raised as a newer pressure on materials costs, particularly for steel and concrete, though practitioners noted it has been difficult to quantify: as one developer put it, "it's been such a moving target that it's been essentially impossible to assess what the impact has been on our projects." Post-pandemic inflation on both wages and materials added to hard construction costs. And market consolidation – fewer general contractors competing for work – has removed competitive pressure on pricing. Emily Kurtz noted that when there are fewer players in the market, it is simply harder to drive to a lower number.These factors are real and significant. They are also outside the scope of what City Council can directly address. We name them here because any honest accounting of why affordable housing is so expensive in New York has to acknowledge them – and because legislative reform, however important, will not by itself close the gap.

5.6. Zoning

Zoning ranked equally with financing in our interview coding – 18 citations each – despite being entirely outside the scope of this project. That finding is itself worth pausing on. Even when we asked specifically about local laws and their cost impact, practitioners kept returning to zoning: the difficulty and cost of rezonings, the ULURP process, the length of environmental review, and the way that spot-rezoning practices have historically created uncertainty and community opposition that adds time and cost to projects. Seth Bynum of the Mayor's Office described paying millions of dollars just to go through environmental review – to have someone tell you that your building won't be too loud – as one of the most significant and least-scrutinized cost drivers in the system.

The Mamdani administration's Streamlining Procedures to Expedite Equitable Development (SPEED) Task Force, City of Yes, and the 2024 Charter Revision Commission's expedited ULURP track are all attempts to streamline the zoning process to support building affordable housing. The zoning finding reinforces the broader point that the Council's legislative cost exists inside a much larger regulatory environment.

Strengths, Challenges, and Limitations Reflection

Over the course of this project this team had the opportunity for exclusive conversations with affordable housing industry leaders, who shared their time, experience, and reform recommendations with us. Our orientation as Hunter grad students, along with introductions via the NYHC team, was a strength in access to these experts and their time.While we made a conscious effort to interview affordable housing experts across various sectors, our sample size was limited and therefore not representative of the affordable housing industry as a whole. en Our client asked us to specifically mention local laws as cost drivers in our interview questions. While our conversations with our participants revealed a multitude of additional cost factors, our framing of the problem statement may have primed participants in their responses to focus on local laws.

Although multiple group members have worked in affordable housing and their knowledge base was valuable, we needed to spend time during our literature review and data collection to gain background knowledge on the state of legislation that impacts housing costs. Another limitation was the lack of data on affordable housing project-level hard and soft costs. The cost modeling we did was based on published data on construction economics, as well as estimates from affordable housing practitioners in our interviews. Thus, any mentions of estimated cost impact of reforms in this report are ballpark figures. The cost modeling does not affect market volatility, nor is representative of the affordable housing development space at large. We recommended cost-benefit analysis of any proposed affordable housing legislation, and this cannot be effectively done without tangible cost data.

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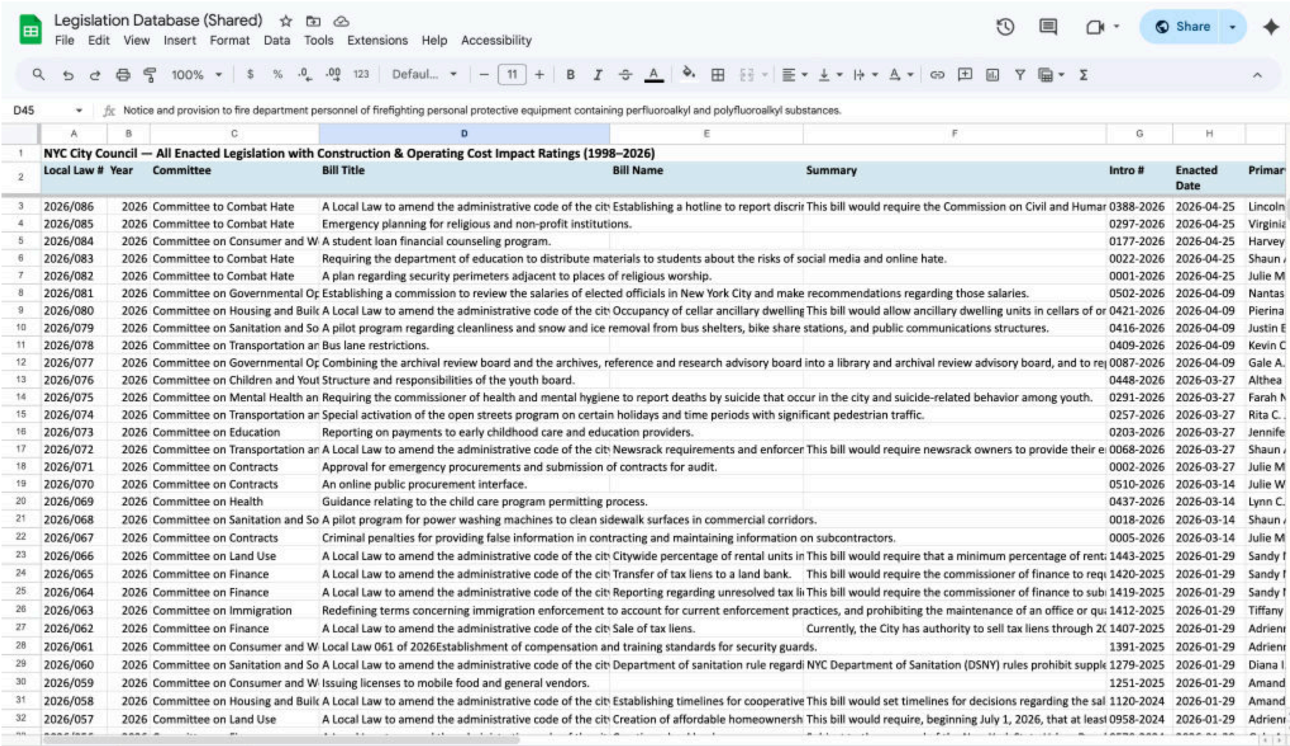
Appendices

Appendix A: Legislative Analysis



NYC City Council — All Enacted Legislation with Construction & Operating Cost Impact Ratings (1998–2026)

Local Law #	Year	Committee	Bill Title	Bill Name	Summary	Intro #	Enacted Date	Primar
2026/086	2026	Committee to Combat Hate	A Local Law to amend the administrative code of the cit	Establishing a hotline to report discri	This bill would require the Commission on Civil and Humar	0388-2026	2026-04-25	Lincoln
2026/085	2026	Committee to Combat Hate	Emergency planning for religious and non-profit institutions.			0297-2026	2026-04-25	Virginia
2026/084	2026	Committee on Consumer and W	A student loan financial counseling program.			0177-2026	2026-04-25	Harvey
2026/083	2026	Committee to Combat Hate	Requiring the department of education to distribute materials to students about the risks of social media and online hate.			0022-2026	2026-04-25	Shaun
2026/082	2026	Committee to Combat Hate	A plan regarding security perimeters adjacent to places of religious worship.			0001-2026	2026-04-25	Julie M
2026/081	2026	Committee on Governmental Op	Establishing a commission to review the salaries of elected officials in New York City and make recommendations regarding those salaries.			0502-2026	2026-04-09	Nantas
2026/080	2026	Committee on Housing and Builc	A Local Law to amend the administrative code of the cit	Occupancy of cellar ancillary dwelling	This bill would allow ancillary dwelling units in cellars of or	0421-2026	2026-04-09	Pierina
2026/079	2026	Committee on Sanitation and So	A pilot program regarding cleanliness and snow and ice removal from bus shelters, bike share stations, and public communications structures.			0416-2026	2026-04-09	Justin E
2026/078	2026	Committee on Transportation ar	Bus lane restrictions.			0409-2026	2026-04-09	Kevin C
2026/077	2026	Committee on Governmental Op	Combining the archival review board and the archives, reference and research advisory board into a library and archival review advisory board, and to rep			0087-2026	2026-04-09	Gale A.
2026/076	2026	Committee on Children and Yout	Structure and responsibilities of the youth board.			0448-2026	2026-03-27	Althea
2026/075	2026	Committee on Mental Health an	Requiring the commissioner of health and mental hygiene to report deaths by suicide that occur in the city and suicide-related behavior among youth.			0291-2026	2026-03-27	Farah N
2026/074	2026	Committee on Transportation ar	Special activation of the open streets program on certain holidays and time periods with significant pedestrian traffic.			0257-2026	2026-03-27	Rita C.
2026/073	2026	Committee on Education	Reporting on payments to early childhood care and education providers.			0203-2026	2026-03-27	Jennife
2026/072	2026	Committee on Transportation ar	A Local Law to amend the administrative code of the cit	Newsrack requirements and enforcer	This bill would require newsrack owners to provide their e	0068-2026	2026-03-27	Shaun
2026/071	2026	Committee on Contracts	Approval for emergency procurements and submission of contracts for audit.			0002-2026	2026-03-27	Julie M
2026/070	2026	Committee on Contracts	An online public procurement interface.			0510-2026	2026-03-14	Julie W
2026/069	2026	Committee on Health	Guidance relating to the child care program permitting process.			0437-2026	2026-03-14	Lynn C.
2026/068	2026	Committee on Sanitation and So	A pilot program for power washing machines to clean sidewalk surfaces in commercial corridors.			0018-2026	2026-03-14	Shaun
2026/067	2026	Committee on Contracts	Criminal penalties for providing false information in contracting and maintaining information on subcontractors.			0005-2026	2026-03-14	Julie M
2026/066	2026	Committee on Land Use	A Local Law to amend the administrative code of the cit	Citywide percentage of rental units in	This bill would require that a minimum percentage of renta	1443-2025	2026-01-29	Sandy N
2026/065	2026	Committee on Finance	A Local Law to amend the administrative code of the cit	Transfer of tax liens to a land bank.	This bill would require the commissioner of finance to requ	1420-2025	2026-01-29	Sandy N
2026/064	2026	Committee on Finance	A Local Law to amend the administrative code of the cit	Reporting regarding unresolved tax li	This bill would require the commissioner of finance to sub	1419-2025	2026-01-29	Sandy N
2026/063	2026	Committee on Immigration	Redefining terms concerning immigration enforcement to account for current enforcement practices, and prohibiting the maintenance of an office or qu			1412-2025	2026-01-29	Tiffany
2026/062	2026	Committee on Finance	A Local Law to amend the administrative code of the cit	Sale of tax liens.	Currently, the City has authority to sell tax liens through 20	1407-2025	2026-01-29	Adrien
2026/061	2026	Committee on Consumer and W	Local Law 061 of 2026Establishment of compensation and training standards for security guards.			1391-2025	2026-01-29	Adrien
2026/060	2026	Committee on Sanitation and So	A Local Law to amend the administrative code of the cit	Department of sanitation rule regardi	NYC Department of Sanitation (DSNY) rules prohibit supple	1279-2025	2026-01-29	Diana I.
2026/059	2026	Committee on Consumer and W	Issuing licenses to mobile food and general vendors.			1251-2025	2026-01-29	Amand
2026/058	2026	Committee on Housing and Builc	A Local Law to amend the administrative code of the cit	Establishing timelines for cooperative	This bill would set timelines for decisions regarding the sal	1120-2024	2026-01-29	Amand
2026/057	2026	Committee on Land Use	A Local Law to amend the administrative code of the cit	Creation of affordable homeownersh	This bill would require, beginning July 1, 2026, that at least	0958-2024	2026-01-29	Adrien

Full Legislation Database:
https://docs.google.com/spreadsheets/d/16wzrylk2xXBDpfN-lanQBwOc6o7wg-FRjEnv0ny3vp4/edit?usp=sharing

Appendix B: Interview & Listening Session Questions

1. Tell us about yourself and your background.
    a. How long have you been in affordable housing (years)?

2. Where in the affordable housing management and development timeline are most of the expenses incurred?

3. Describe some of the trends in affordable housing construction and operating costs that you have observed throughout your tenure at [insert organization/position here].
    a. Do you feel like there are new regulations that required you to change how you do business or factor into your decision-making for your affordable housing projects?

4. What are the primary factors that contribute to rising affordable housing construction and operations costs in NYC?

5. To what extent does policy (city, state, federal) impact…
    a. Construction costs?
    b. Operating costs?

6. Which local laws specifically contribute to increased construction costs and operating costs?
    a. If you could provide an estimate ($ amount), how much cost does each local law add per affordable housing project/unit/annually?
    b. Do they have examples or anecdotes of when a LL had a notable cost impact (for instance, a project running an operating deficit directly linked to (a) LL(s))?

7. What are some equity considerations that [insert organization here] has in mind prior to the development of an affordable housing project? Are there any specific equity outcomes your organization aspires to achieve?
    a. Some local laws were designed to protect workers or tenants. How do you reconcile the trade-offs in your work?
8. Do you have any policy reform recommendations to streamline affordable housing construction and operations and lower costs?
    a. What are potential trade-offs (if any) and opportunities that come with your recommendations?

Appendix C: Affordable Housing Cost Model

Affordable Housing Cost Model (Shared)

Cost Theme	LL / Intro #	Year	Theme	Premium - Low ($/DU)	Premium - Central ($/DU)	Premium - High ($/DU)	Source(s)
FISP / sidewalk shed obligation	LL 11/1998; LL 47–51/2025 reforms	1998; 2025	Recurring Inspections	$300	$800	$1,500	Citizens Union. (2023, December). Sidewalk shed reform in New York City. Citizens Union.; Thornton Tomasetti. (2024). NYC updates FISP: FISP recommendations report — A review of the NYC Facade Inspection & Safety Program. NYC Department of Buildings / Thornton Tomasetti.; Mayor Adams & Mastercard. (2024). Mayor Adams releases new study finding sidewalk sheds and scaffolding cost NYC economy $9.5 billion. NYC Office of the Mayor.
Local Law 97 (GHG cap, retrofit obligation)	LL 97/2019	2019	Energy & Climate	$150	$500	$1,500	Chervonski, E., Guerrero, M. A., & Rom, W. N. (2025). From skyscrapers to sky savers: How New York City's Local Law 97 advances climate resilience and public health. Frontiers in Climate, 7.; NYC Department of Housing Preservation and Development (HPD). (2025, July). Local Law 97 guidance for affordable housing. NYC HPD.; Urban Green Council. (2024–2025). LL97 research suite: 'LL97 in Focus: Multifamily Pathways to 2030'; 'Exploring Equitable Electrification';
Insurance premium (LL 11 / LL 97 attributable share)	Various	Cumulative	Cross-cutting	$200	$400	$600	Enterprise Community Partners & National Equity Fund. (2025, October). Distress in New York's affordable housing stock. Enterprise Community Partners / National Equity Fund.; University Neighborhood Housing Program (UNHP). (Ongoing). Affordable housing research series. UNHP, Bronx, NY.
Building Service Prevailing Wage (supers, porters, maintenance)	LL 27/2012; LL 212/2019	2012; 2019	Labor & Workforce	$100	$300	$700	Kessler, D. P., & Katz, L. F. (2001). Prevailing wage laws and construction labor markets. Industrial & Labor Relations Review, 54(2), 259–274.; Ormiston, R., Belman, D., & Hinkel, M. (2017). New York's prevailing wage law: A cost-benefit analysis. Illinois Economic Policy Institute / EPI.; Center for Housing Policy and Community (CHPC NY). (2019). Prevailing wisdom: The potential impact of prevailing wages on affordable housing. CHPC.; NYC Department of
Living Wage (property service workers at city-assisted projects)	LL 38/2002; LL 37/2012	2002; 2012	Labor & Workforce	-	$50	$200	NYC Admin Code §6-134 (Fair Wages for New Yorkers Act); Center for Housing Policy and Community (CHPC NY). (2019). Prevailing wisdom: The potential impact of prevailing wages on affordable housing. CHPC.
Organics waste / mandatory composting	LL 42/2010; LL 146/2013; 2022 expansion	2010; 2013; 2022	Waste & Recycling	$50	$120	$250	NYC Independent Budget Office. (2021). Going green: Can the organics collection program be fiscally and environmentally sustainable? NYC IBO.; NYC Department of Sanitation (DSNY). (2024, March). 2024 zero waste report. DSNY.; Habitat Magazine. (2024, November). New York City's composting mandate goes into effect on Oct. 6. Habitat Magazine.
Lead paint compliance (recurring)	LL 1/2004; 2020 Lead Package	2004; 2020	Environmental Health	$80	$200	$400	Jones, D. J. (2012). Primary prevention and health outcomes: Treatment of residential lead-based paint hazards and the prevalence of childhood lead poisoning. Journal of Urban Economics, 71(1), 151–164.; NYC Department of Housing Preservation and Development (HPD). (2024). FY24 implementation of Local Law 1 of 2004: Annual report to City Council. NYC HPD.
Mold remediation (LL 55)	LL 55/2018; LL 61/2018	2018	Environmental Health	$50	$150	$400	Green Orchard Group. (2024). The NYC landlord's guide to understanding Local Law 55 requirements. Green Orchard Group.; Upper Restoration. (2026, March). How much does mold remediation cost in Brooklyn apartments? 2026 guide. Upper Restoration.
Inspection stack: cooling tower + gas piping + steam radiator + elevator	LL 77/2015; LL 152/2016; LL 142/2025; LL 151/2025	2015–2025	Building Systems	$300	$700	$1,300	NYC Independent Budget Office. (2024). Cooling tower inspection and reporting cost analysis. NYC IBO.; LL 142 gas piping FIS; LL 151 steam radiator FIS $1.325M
Cooling mandate (AC in tenant-occupied units)	LL 23/2026	2026 (effective 2030)	Tenant Protection	$100	$300	$800	NYC Independent Budget Office. (2024). Air conditioner usage and associated energy costs: Testimony on Intro. 994-2024 (Cool Homes for All). NYC IBO.; FIS $68M citywide
Estimated Cost Total (per DU per year, recurring)				**$1,330**	**$3,520**	**$7,650**	

Full Cost Model:
https://docs.google.com/spreadsheets/d/1qSyUFAZ38noEUOqq9PzZz5XxnFSp50c1Uoy0ZacWYwM/edit?usp=sharing