

EXPLANATORY STATEMENT - HOTEL ORDER #51

Explanatory Statement and Findings of the Rent Guidelines Board in Relation to 2021-22 Lease Increase Allowances for Hotels under the Jurisdiction of the Rent Stabilization Law

Explanatory Statement and Findings of the Rent Guidelines Board Concerning Increase Allowances for Hotel Units Under the Jurisdiction of the Rent Stabilization Law, Pursuant to Hotel Order Number 51, Effective October 1, 2021 through and including September 30, 2022.¹

Pursuant to the authority vested in it by the Rent Stabilization Law of 1969 and the Emergency Tenant Protection Act of 1974, implemented by Resolution Number 276 of 1974 of the New York City Council, and extended by the Housing Stability and Tenant Protection Act of 2019, it is the responsibility of the Rent Guidelines Board to establish guidelines for hotel increases. Hotel Order Number 51, adopted on June 23, 2021, applies to stabilized hotel units occupied by non-transient tenants.

Hotel Order Number 51 provides for an allowable increase of **0%** over the lawful rent actually charged and paid on September 30, 2021 for rooming houses, lodging houses, Class B hotels, single room occupancy buildings, and Class A residential hotels. The Order does not limit rental levels for commercial space, non-rent stabilized residential units, or transient units in hotel stabilized buildings during the guideline period. The Order also provides that for any dwelling unit in a hotel stabilized building which is voluntarily vacated by the tenant thereof, the rent charged for a new tenancy may not exceed the rent charged on September 30, 2021.

SPECIAL NOTE

In the past the Board has adopted rent increases to the rent stabilized hotel universe. In recent years, when increases were granted, the Board adopted a proviso that was designed to deny owners from taking these increases under certain conditions. Since the Board voted a 0% increase for all classifications of rent stabilized hotels, this proviso is not included in Hotel Order 51. In the event that increases are considered for subsequent Hotel Orders, at such time the current members of the Rent Guidelines Board urge future Boards to consider reinstating this proviso or some form thereof. Below is the proviso and explanatory language previously adopted in Hotel Order 41:

Rooming house, lodging house, Class B hotel, single room occupancy building, and Class A residential hotel owners shall not be entitled to any of the above rent adjustments, and shall receive a **0% percent adjustment** if permanent rent stabilized or rent controlled tenants paying no more than the legal regulated rent, at the time that any rent increase in this Order would otherwise be authorized, constitute fewer than **85%** of all units in a building that are used or occupied, or intended, arranged or designed to be used or occupied in whole or in part as the home, residence or sleeping place of one or more human beings.

The following outlines the Rent Guidelines Board's intent of the above proviso:

¹ This Explanatory Statement explains the actions taken by the Board on individual points and reflects the general views of those voting in the majority. It is not meant to summarize all viewpoints expressed.

The Board's intention for the meaning of this proviso is that ALL dwelling units in the hotel, whether occupied, vacant, rented to tourists, transients, contract clients, students or other non-permanent tenants, or to permanent rent stabilized tenants, be counted in the denominator of the calculation. The only type of units in the hotel that may be excluded from the denominator are units that are used as stores or for similar business purposes such as a doctor's office. The numerator of the calculation is the number of units occupied by permanent rent stabilized or rent controlled tenants.

Here are two examples. One: a hotel has 100 units and 2 stores. 32 units are rented to permanent rent stabilized tenants, 10 are vacant and 58 are rented to transients and tourists. The calculation is as follows, the denominator is 100 and the numerator is 32. This calculation results in an occupancy percentage of LESS than 85% under the formula (32%) and an increase CANNOT be taken for the permanent stabilized tenants.

Two: a hotel has 150 units, 2 of which are used by a dentist and a doctor for their businesses, 8 are rented to tourists, 5 are vacant and 135 are occupied by permanent rent stabilized tenants. The denominator would be 148 and the numerator would be 135. This calculation results in an occupancy percentage of GREATER than 85% under the formula (91%) and an increase CAN be taken for the permanent stabilized tenants.

DEFINITIONS

For the purpose of determining the appropriate classification of a hotel stabilized unit, the Board has set its definitions as follows:

- Residential hotels are “apartment hotels” which are designated as Class A multiple dwellings on the Certificate of Occupancy.
- Rooming houses are Class B multiple dwellings having fewer than thirty sleeping rooms as defined in Section 4(13) of the Multiple Dwelling Law.
- A single room occupancy building is a Class A multiple dwelling which is either used in whole or in part for single room occupancy or as a furnished room house, pursuant to Section 248 of the Multiple Dwelling Law.
- A Class B hotel is a hotel, which carries a Class B Certificate of Occupancy and contains units subject to rent stabilization.
- Lodging houses are those buildings designated as lodging houses on the Certificate of Occupancy.

BACKGROUND

Due to the COVID-19 health crisis, the Board held virtual public meetings and hearings.² Order No. 51 was issued following six virtual public meetings, two virtual public hearings, its review of

² On March 12, 2020, Governor Cuomo issued Executive Order Number 202.1 in part suspending “Article 7 of the Public Officers Law, to the extent necessary to permit any public body to meet and take such actions authorized by the law without permitting in public in-person access to meetings and authorizing such meetings to be held remotely by conference call or similar service, provided that the public has the ability to view or listen to such proceeding and that such meetings are recorded and later transcribed.”

written, oral and video submissions provided by the public, and a review of research and memoranda prepared by the Board's staff. Public meetings of the Board were held on April 15, 22 and 29; and June 3, 2021 following public notices. On May 5, the Board adopted proposed rent guidelines for hotels, apartments, and lofts.

Two virtual public hearings were held on June 15 and June 17, 2021 to hear comments on the proposed rent adjustments for rent stabilized hotels and apartments. The hearings were held from 4:00 p.m. to 7:20 p.m. on June 15, and from 5:15 p.m. to 10:23 p.m. on June 17. The Board heard testimony from approximately three hotel tenants and tenant representatives, one hotel owner, and one public official. In addition, the Board received approximately two written, oral and video submissions from tenants and tenant representatives, one hotel owner, and one public official. On June 23, 2021, the guidelines set forth in Hotel Order Number 51 were adopted.

Selected Oral and Written Testimony from Tenants and Tenant Groups:

- “Unfortunately, the conditions that warranted last year’s 0% vote remain unchanged: SRO tenants continue to struggle while buildings designated for residential use by rent-stabilized tenants are increasingly used for other purposes which generate significant profits in these buildings. Furthermore, SRO tenants have been and will continue to be particularly effected, especially in light of the COVID-19 pandemic. As a result, a 0% vote is even more justified.”
- “The picture painted in the 2021 Income and Affordability Study is alarming for low-income New Yorkers generally. Unsurprisingly, the report indicates that in 2020, NYC residents’ total wages and job availability have decreased, while the unemployment rates have more than tripled, from 3.9% to 12.3%. Accordingly, cash assistance caseloads and number of SNAP recipients have increased as well.”
- “SROs are housing of last resort for low-income people who would otherwise be homeless. Thousands of hard-working people as well as a disproportionate number of elderly and disabled people call an SRO their home. If the economic situation is difficult for low-income New Yorkers, it is dire for most residents of SRO because they are a historically marginalized and vulnerable population. Many rely on SSI, disability pensions, food stamps and other similar resources as their sole source of income. Tenants seeking assistance from our office routinely report incomes as lower than \$10,000 per year. For many, the affordability of their SRO home means the difference between having a roof over their head and being homeless.”
- “While all persons in NYC have undoubtedly been impacted by this virus, tenants have been and will continue to struggle even more so due to the limited relief available to them. In contrast, building owners have far more forms of relief available, in addition to the cushion provided to them by the high-rent, short-term rentals many SRO building owners have engaged in. This pandemic has only further incentivized landlords to prefer short-term rentals as opposed to continuing to house long-term SRO tenants. For example, building owners may see increased opportunity for short-term rentals as mandatory quarantine/isolation regulations increased. Furthermore, we have seen alleged violations of Covid-19 building policies be used as a way to harass, unlawfully evict, and/or relocate individuals. As if a global pandemic and incentivized harassment of SRO tenants weren’t enough, a rent increase this year will only worsen the physical, mental and economic hardships tenants have faced.”

Selected Oral and Written Testimony from Owners and Owner Groups:

- “In the seventeen years since 2004 and the adoption of Hotel Order No. 34, the Rent Guidelines Board has permitted aggregate increases of 9.5% for SRO buildings (2% in 2006, 4.5% in 2008 and 3% in 2011). By comparison, during the same period rent stabilized apartment buildings have received one-year renewal increases in excess of 33.75% and have been allowed substantial vacancy increases. In other words, stabilized apartments have been approved rent increases more than three times that of SRO’s.”

- “There is no justification to treat owners of predominantly stabilized SRO properties any differently than the owners of ordinary rent stabilized apartment buildings. The Rent Guidelines Board should recognize this fact and adopt an order making up for prior discrimination as well as putting predominantly stabilized SRO properties on equal footing with ordinary rent stabilized apartment buildings.”

- “I specifically propose that the 2021/2022 Hotel Order covering renewal leases in SROs permit rent increases similar to those allowed in the stabilized apartment buildings. In addition, Rent Guidelines Board should permit vacancy increases of 20% upon vacancy of a stabilized SRO unit. This will be only a small step in restoring fairness in the regulatory scheme governing SRO units.”

- “I understand it’s been a tough year for everybody, but it’s also been a tough year for landlords as well. I understand the emotional, anecdotal information we’re getting, but let me present some of the facts and you’ll see that it’s been a tough year. Besides the cleaning supplies and the need to clean more of the building, as an SRO we don’t get increases every year. The last time we got an increase was in 2011, so we don’t get a lot of the PIOC increases or anything like that. We’re asking for an increase because it’s been about ten years. At the same time, our real estate taxes have gone up 55%, our insurance has gone up about 35%, and our utilities have gone up 12%....Getting back to the real estate and tax increase, our real estate taxes went from approximately \$50,000 to about \$80,000 from 2011, \$82,000 to be exact, so we’re asking for an increase just to be in line with the increased cost to maintain the quality of standards in this building.”

Selected Oral and Written Testimony from Public Officials:

- ” I thank the Board for recommending 0% increase for SRO and lodging house tenants, as they are among the city’s most vulnerable residents.”

MATERIAL CONSIDERED BY THE BOARD

In addition to oral and written testimony presented at its public hearing, the Board’s decision is based upon material gathered from the *2021 Price Index of Operating Costs*, prepared by the staff of the Rent Guidelines Board, reports and testimony submitted by owner and tenant groups relating to the hotel sector, and reports submitted by public agencies. The Board heard and received written testimony from invited guest speakers on April 29, 2021. Guest

speakers representing hotel tenants included SRO tenant LeVera Sutton, Brian Sullivan from Mobilization for Justice, Inc. and Larry Wood from the Goddard Riverside Law Project.

FINDINGS OF THE RENT GUIDELINES BOARD

Rent Guidelines Board Research

The Rent Guidelines Board based its determination on its consideration of the oral and written testimony noted above, as well as upon its consideration of statistical information prepared by the RGB staff set forth in these findings and the following reports:

1. *2021 Mortgage Survey Report*, April 2021 (An evaluation of recent underwriting practices, financial availability and terms, and lending criteria);
2. *2021 Income and Affordability Study*, April 2021 (Includes employment trends, housing court actions, changes in eligibility requirements and public benefit levels in New York City);
3. *2021 Price Index of Operating Costs*, April 2021 (Measures the price change for a market basket of goods and services which are used in the operation and maintenance of stabilized hotels);
4. *2021 Housing Supply Report*, June 2021 (Includes information on the conversion of Hotels to luxury apartments and transient use, new housing construction measured by certificates of occupancy in new buildings and units authorized by new building permits, tax abatement and exemption programs, and cooperative and condominium conversion and construction activities in New York City); and
5. *Changes to the Rent Stabilized Housing Stock in NYC in 2020*, June 2021 (A report quantifying all the events that lead to additions to and subtractions from the rent stabilized housing stock).

The five reports listed above may be found in their entirety on the RGB's website, www.nyc.gov/rgb, and are also available at the RGB offices, 1 Centre St., Suite 2210, New York, NY upon request.

Price Index of Operating Costs for Rent Stabilized Hotel Units

The Hotel Price Index includes separate indices for each of three categories of rent stabilized hotels (due to their dissimilar operating cost profiles) and a general index for all rent stabilized Hotels. The three categories of hotels are: 1) "traditional" hotels — a multiple dwelling that has amenities such as a front desk, maid or linen services; 2) Rooming Houses — a multiple dwelling other than a hotel with thirty or fewer sleeping rooms; and 3) single room occupancy hotels (SROs) — a multiple dwelling in which one or two persons reside separately and independently of other occupants in a single room.

The Hotel Price Index for all hotels that contain rent stabilized units increased 1.9% this year, a 1.0 percentage point decline from the 2.9% rise in 2020.

This year there were increases in all of the Hotel PIOC components except Fuel and Administrative Costs. The Fuel component decreased, falling 4.4% and accounts for 14% of the entire Hotel Index. Administrative Costs, which account for 8.7% of the Hotel PIOC, fell by 1.8%. The remaining five components all rose, with Insurance Costs rising 18.8%; Maintenance, 2.7%; Taxes, 2.4%; Labor Costs, 2.2%; and Utilities, 1.9%. See the table on this page for changes in costs and prices for all hotels that contain rent stabilized units from 2020-2021.

Among the different categories of Hotels, the index for “Traditional” Hotels increased 1.7%, Rooming Houses by 2.0% and SROs by 2.6%.

**Percent Change in the Components of the Price Index of Operating Costs
April 2020 to March 2021, By Hotel Type and All Hotels**

Item Description	All Hotels	Hotel	Rooming House	SRO
TAXES	2.4%	1.6%	3.9%	3.0%
LABOR COSTS	2.2%	2.6%	0.8%	1.7%
FUEL	-4.4%	-3.2%	-15.3%	-0.1%
UTILITIES	1.9%	1.3%	2.4%	2.4%
MAINTENANCE	2.7%	2.6%	3.1%	2.7%
ADMINISTRATIVE COSTS	-1.8%	-1.9%	-1.3%	-1.7%
INSURANCE COSTS	18.8%	18.8%	18.8%	18.8%
ALL ITEMS	1.9%	1.7%	2.0%	2.6%

Source: 2021 Price Index of Operating Costs

Changes in Housing Affordability

NYC’s economy in 2020 showed many weaknesses as compared with the preceding year. Negative indicators include shrinking employment levels, which fell for the first time in 11 years, decreasing 11.1% in 2020.³ Gross City Product (GCP) decreased for the first time in 12 years, falling in inflation-adjusted terms by 6.3% in 2020.⁴ The unemployment rate rose, increasing by 8.4 percentage points, to 12.3%, the highest level recorded in at least the last 45 years⁵ There was also an increase in cash assistance caseloads of 8.6%, while SNAP caseloads rose 5.2%.⁶

Positive indicators during 2020 include a decrease in both the number of non-payment filings and calendared cases in Housing Court, which fell by 56.4% and 62.7%, respectively,⁷ as well as a decrease in tenant evictions, which fell by 82.0%⁸ (all largely due to various eviction moratoriums in place since the start of the pandemic). Homeless levels also fell for the second

³ NYS Dept. of Labor; <http://www.labor.state.ny.us>; Data accessed March 2021. Data is revised annually and may not match data reported in prior years.

⁴ Data from the NYC Comptroller’s Office as of March 12, 2021. GCP figures are adjusted annually by the New York City Comptroller’s Office. The figures in this report are the latest available estimate from that office, based on inflation adjusted 2012 chained dollars.

⁵ NYS Dept. of Labor; <http://www.labor.state.ny.us>; Data accessed March 2021. Data is revised annually.

⁶ New York City Human Resources Administration. HRA Charts: <http://www.nyc.gov/html/hra/html/facts/charts.shtml>.

⁷ Civil Court of the City of New York data.

⁸ NYC Department of Investigation, Bureau of Auditors data.

consecutive year, by 5.9%.⁹ There was also a decrease in Medicaid enrollees, which fell 3.3%.¹⁰ Concurrent with Court closures, bankruptcy filings also decreased sharply, falling 40.7%, to the lowest level since at least 2000.¹¹ In addition, average inflation-adjusted wages rose during the most recent 12-month period for which data is available (the fourth quarter of 2019 through the third quarter of 2020), rising 6.0% over the corresponding time period of the prior year (note that while average wages rose, total wages paid within NYC fell, by an inflation-adjusted 1.8%).¹² Inflation remained steady between 2019 and 2020, at 1.7% in each year.¹³

The most recent numbers, from the fourth quarter of 2020 (as compared to the fourth quarter of 2019), show many negative indicators, including cash assistance levels up 15.4%; SNAP recipients up 11.2%; Medicaid enrollees, up 1.2%; GCP falling, by 6.6% in real terms; employment levels down 13.2%; and the unemployment rate up 8.3 percentage points. However, homeless levels are down 10.6%; and in Housing Court, the number of cases heard (calendared) are down 50.9% and the number of non-payment filings are down 43.5%.¹⁴

We can also examine fourth quarter data in relation to the third quarter of 2020, which illustrates potentially positive trends. Accounting for seasonal changes in jobs, there was a decrease of 4.0 percentage points in the NYC unemployment rate in the fourth quarter of 2020 as compared to the third, and an increase of 2.6% in total employment. There was also a decrease of 2.1% in both homelessness and cash assistance recipients, while SNAP caseloads declined by 1.5% and Medicaid enrollment was virtually unchanged. On an annualized basis, GCP increased by 6.0% in the fourth quarter of 2020 as compared to the third.

Consumer Price Index

The Board reviewed the Consumer Price Index. The table that follows shows the percentage change for the NY-Northeastern NJ Metropolitan area since 2013.

Percentage Changes in the Consumer Price Index for the New York City - Northeastern New Jersey Metropolitan Area, 2013-2021 (For "All Urban Consumers")									
	2013	2014	2015	2016	2017	2018	2019	2020	2021

⁹ Data from NYC Department of Homeless Services (DHS), including DHS daily reports, DHS Data Dashboard Tables, Local Law 37 reports, and Citywide Performance Reporting reports. Note that in addition, the NYC Department of Housing Preservation and Development, the NYC Department of Youth and Community Development, and the NYC Human Resources Administration also operate emergency shelters, which house as many as 8,000 persons per night, which is not included in the totals presented in this report. These figures are not reported in order to make year-to-year data comparable.

¹⁰ New York City Human Resources Administration. HRA Charts: <http://www.nyc.gov/html/hra/html/facts/charts.shtml>.

¹¹ Administrative Office of the U.S. Courts; <https://www.uscourts.gov/statistics-reports/caseload-statistics-data-tables>; Accessed March, 2021.

¹² NYS Dept. of Labor; <http://www.labor.state.ny.us>; Data accessed March 2021. Data is revised annually.

¹³ Bureau of Labor Statistics; <http://www.bls.gov>; Data accessed March, 2021.

¹⁴ This data is obtained from the Civil Court of the City of New York, which cannot provide exact "quarterly" data. The Court has 13 terms in a year, each a little less than a month long. This data is for terms 10-13, which is from approximately the middle of September through the end of the year. It is compared to the same period of the prior year.

1st Quarter Avg. ¹⁵	2.1%	1.4%	-0.2%	0.7%	2.5%	1.6%	1.5%	2.3%	1.5%
Yearly Avg.	1.7%	1.3%	0.1%	1.1%	2.0%	1.9%	1.7%	1.7%	N/A

Source: U.S. Bureau of Labor Statistics.

Effective Rates of Interest

The Board took into account current mortgage interest rates and the availability of financing and refinancing. It reviewed the staff's *2021 Mortgage Survey Report* of lending institutions. The table below gives the reported rate and points for the past ten years as reported by the *Mortgage Survey*.

2021 Mortgage Survey ¹⁶ Average Interest Rates and Points for New and Refinanced Permanent Mortgage Loans 2012-2021										
New Financing of Permanent Mortgage Loans, Interest Rate and Points										
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Avg. Rates	4.6%	4.4%	4.9%	4.3%	4.0%	4.3%	4.8%	4.7%	4.0%	3.8%
Avg. Points	0.63	0.59	0.54	0.70	0.42	0.44	0.44	0.38	0.22	0.38

Source: 2012–2021 *Annual Mortgage Surveys*, RGB.

SRO Housing and Airbnb Rentals

Conversion of single room occupancy (SRO) buildings also continued over the past year. SRO owners may convert SRO housing to other uses after obtaining a “Certificate of No Harassment” from HPD. For the fourth time in the past five years, the number of approved certificates fell, from 90 in 2019 to 49 in 2020, a decrease of 45.6%.¹⁷

Efforts are also underway to ensure that SROs are used for permanent housing rather than as transient hotels. As of May 1, 2011, laws were newly passed strengthening the City’s ability to crack down on housing being used illegally for transient occupancy. Transient occupancy is now clearly defined as stays of fewer than 30 days.¹⁸ Governor Cuomo signed a bill in October of 2016 that created fines up to \$7,500 for illegally advertising short-term rentals in Class A Multiple Dwellings.¹⁹

Between May of 2011 and March of 2021, approximately 20,000 violations have been issued by the Mayor’s Office of Special Enforcement (OSE) to illegal hotel operators (including private apartments, hostels, and SROs). This includes 575 violations issued between April 2020 and March 2021), an 82.8% decrease from the 3,335 violations over the same time period of the

¹⁵ 1st Quarter Average refers to the change of the CPI average of the first three months of one year to the average of the first three months of the following year.

¹⁶ Institutions were asked to provide information on their "typical" loan to rent stabilized buildings. Data for each variable in any particular year and from year to year may be based upon responses from a different number of institutions.

¹⁷ NYC Department of Housing Preservation and Development.

¹⁸ “Mayor Bloomberg Announces Results of City’s Efforts to Curb Dangerous Illegal Hotels in New York City After State Legislation Enhances Enforcement Abilities.” Mayor’s Office Press Release 157-12. April 27, 2012.

¹⁹ “Cuomo Signs Bill that Deals Huge Blow to Airbnb,” New York Post, October 21, 2016.

prior year. Per OSE, the number of violations declined because the COVID-19 pandemic dramatically reduced tourist travel. In response, hosts briefly adjusted much of their illegal short-term rental listings to advertise month-to-month rentals during the peak of the pandemic. In addition, in response to the pandemic, much of OSE’s field activity shifted to protecting New Yorkers through social distancing enforcement, predominately at retail and restaurant locations.²⁰

Among OSE’s activity over the past year, the agency announced in August of 2020 that they had won a permanent injunction (and a \$290,000 fine) against the Imperial Court Hotel in Manhattan to prevent 227 SRO units from being used for illegal short-term rental activity.²¹ In addition, following a series of lawsuits, an agreement was reached between the City of New York and Airbnb in June of 2020 that would require short-term rental platforms to share information about their listings with OSE.²² Following this agreement, on January 3, 2021, New York City’s Booking Service data reporting law took effect.²³ All transactions for listings that have five or more nights booked per quarter will be reported to OSE if the listings offer entire home rentals or home rentals to three or more individuals at the same time. Listings for units in “Class B multiple dwellings” — which are lawfully used for short-term rental — are exempt from the reporting requirements. The reports will be submitted quarterly to OSE and will include information on the physical address of the short-term rental unit; the location online of the advertisement that resulted in the short-term rental; information relating to the identity of the host, including contact and payout account information; and information related to the scope of the short-term rental transaction.

OTHER RELEVANT INFORMATION

The NYS Division of Housing and Community Renewal released a memo to the Board dated April 21, 2021 in which they outline information from their registration database relating to Hotels/SROs/Rooming Houses. The following is an excerpt from that memo (Pages 2-3):

6. What is the total number of SRO/Hotel units registered with the DHCR in 2020? How many of these units are rent stabilized? How many are temporarily and permanently exempt? How many are registered as transient? How many as vacant?

Rent Stabilized Units	9,652
Vacant Units	1,310
Temporary Exempts Units	3,190
Permanent Exempt Units	76
Total Number of Units	14,228

7. What is the total number of SRO/Hotel units registered with the DHCR on an annual basis from 2009-2020?

- **In 2012 the total number of units registered was 19,757**

²⁰ Office of the Criminal Justice Coordinator, Mayor’s Office of Special Enforcement.

²¹ Press Release, Mayor’s Office of Special Enforcement. “New York City Wins Permanent Injunction to Prevent Illegal Short-Term Rental Activity at More Than 220 Housing Units in Manhattan Building.” August 10, 2020.

²² “Airbnb agrees to give listing info to city.” The Real Deal. June 12, 2020.

²³ <https://www1.nyc.gov/site/specialeenforcement/reporting-lawreporting-law.page>.

- In 2013 the total number of units registered was 17,792
- In 2014 the total number of units registered was 18,787
- In 2015 the total number of units registered was 18,322
- In 2016 the total number of units registered was 16,996
- In 2017 the total number of units registered was 16,469
- In 2018 the total number of units registered was 16,480
- In 2019 the total number of units registered was 15,418 and
- In 2020 the total number of units registered was 14,228

8. What is the average and median rent for rent stabilized SRO/Hotel units in 2020?

- The average rent stabilized rent for SRO/Hotel units in 2019 is \$1,545.22; the median rent is \$1,269.39.

On May 28, 2021, staff released a memo to the Board analyzing hotel data contained in the NYS Homes and Community Renewal's 2019 and 2020 apartment and building registration databases. Below is the memo in its entirety.

Since 2007, Rent Guidelines Board staff has periodically²⁴ analyzed registration data²⁵ filed with New York State Homes and Community Renewal (HCR) by owners of hotels and rooming houses.²⁶ Owners register their properties annually with HCR, including the type of property (in this case, hotel or rooming house) as well as the legal rent as of April 1 of each year. If applicable, the registration information also includes actual and preferential rents. Prior to 2017, staff relied on the registration information provided by the owner or managing agent to identify hotels and rooming houses. However, a close analysis of the data showed that there were registration errors and many apartment buildings were being registered as hotels or rooming houses.

A memo issued on June 12, 2017 outlined a new methodology, which attempted to correct for registration errors in HCR data (the full methodology can be found in that memo).²⁷ As it's very unlikely that rooming houses or hotels will newly register with HCR, the basis for the 2021 analysis (and those that will follow) are the same set of buildings identified in 2017.²⁸ At that time, staff identified and reported data on 174 rooming houses and 83 hotels. For the 2021 analysis, staff

²⁴ Previous memos are from June 4, 2007; June 4, 2009; June 12, 2012; June 4, 2013; May 22, 2015; June 12, 2017, May 31, 2018, April 22, 2019, and May 1, 2020, which analyzed hotel registration data filed with the NYS Homes and Community Renewal (HCR) in 2005, 2008, 2011, 2012, 2014, 2015/2016, 2016/2017, 2017/2018, and 2018/2019, respectively.

²⁵ Each year owners are required to provide HCR with listings of every rent stabilized unit in their buildings, including the rent level and whether the unit is currently rent stabilized; vacant; or permanently or temporarily exempt.

²⁶ Single Room Occupancy (SRO) residence is not a category available for registration. SRO residences would most commonly be registered as hotels.

²⁷ Prior to 2017, staff had relied on owners to provide correct information regarding the type of building being registered. In some cases, staff individually examined selected records with especially high rent levels to determine if the building was in fact a hotel or rooming house, and then omitted these records from the analysis if it was found to be incorrectly registered. However, as a general rule, staff used the building type information reported by owners without any secondary checks. The 2017 analysis attempted to compile a more accurate list of rooming houses and hotels by individually researching those buildings which self-identified as such and eliminating those buildings that were more likely to be Class A apartment buildings. The full methodology for that process is outlined in the June 12, 2017 memo.

²⁸ While the purpose of the 2017 analysis was to more accurately identify hotels and rooming houses (and that analysis forms the basis of all subsequent memos), there is no guarantee that every record identified in 2017 was a rooming house or hotel, or that every rooming house or hotel was identified and included as part of the analysis.

searched the two most recent HCR registration files for the same group of buildings identified in the 2017 memorandum.²⁹

This memorandum sets forth staff's most recent analysis, which includes data on rent levels for rent stabilized units in rooming houses and hotels identified from HCR registration filings for 2019 and 2020.³⁰ This analysis identified 123 rooming houses and 74 hotels for which detailed information (including a portion with rent data), is provided in the tables that follow. In summary:

- The analysis identified 3,495 units in rooming houses and 5,438 in hotels (for a total of 8,933 units).
- The median legal rent for rooming houses is \$1,189 and the median legal rent for hotels is \$745 (with a combined median of \$856).
- The median "rent received" (the legal rent, except in cases where there is a preferential rent provided) is \$983 for rooming houses and \$734 for hotels (with a combined median of \$790).
- A longitudinal analysis of rooming houses shows that the median legal rent rose 1.5% between 2019 and 2020 and the median "rent received" rose 1.6%. For hotels, the median legal rent did not change between 2019 and 2020 and the median "rent received" rose 2.8%.

Rooming Houses

Staff identified 123 rooming house buildings in the 2019 and 2020 HCR registration files, a decrease from both the 144 identified in the 2020 memo, and the 174 identified in the 2017 memo that formed the basis for this study.³¹ The number of these buildings that contain rent information is 101, less than the 116 in the 2020 memo. These 123 buildings contained a total of 3,495 housing units.³² By category, 2,362 (67.6%) of these units were registered as "rent stabilized" (indicating that they were occupied by a rent stabilized tenant at the time of registration). HCR files contain rent information for 2,361 of these units. Of the remaining units, 600 units (17.2%) are reported as "temporarily exempt" or "permanently exempt" (with all but two "temporarily exempt"); and 533 units (15.3%) as "vacant." Among the temporarily exempt units, the most common reason given for the exemption is "Hotel/SRO (Transient)" (52.7% of temporarily exempt units). The second most common reason is "Not Prime Residence" (25.3% of temporarily exempt units), followed by "Owner/Employee Occupied" (14.7% of temporarily exempt units). The remaining 7.3% of units are classified as either "Not for Profit," "Commercial/Professional" or "Other." Of the 123 buildings identified for this analysis, 22 (17.9%) consist entirely of exempt and/or vacant units (403 units or 11.5% of total units). In addition, 71 of these 123 buildings (57.7%) contain

²⁹ Rent data was used from 2020 registration files where available, and from 2019 only if the building was not registered in the early 2020 registration database.

³⁰ Because the 2020 registration data is not final, two years of registration data were examined to capture buildings that may not appear in the 2020 data due to late registration. Note also that HCR registration filings may not reflect a complete count of hotels and rooming houses, as not all owners register their buildings, may register late, or may fail to correctly identify a building as a hotel or rooming house.

³¹ Using the list of buildings identified in 2017 as a starting point, staff searched the most recent HCR registration records, from 2020 (as released to the RGB in May of 2021), for the 174 buildings identified in the 2017 memo. A total of 94 buildings that were previously identified as rooming houses were contained in the most recent registration filings available to staff. Another 29 buildings were matched with 2019 registration data. A total of 51 buildings could not be located in either registration file. Staff did not research whether any new rooming house buildings may have been registered in 2020.

³² Registration records were not checked against other sources in regard to the number of housing units. Note that while some owners may register all their units, regardless of regulation status, others may register only those that are rent stabilized.

less than 85%³³ permanently stabilized units. These 71 buildings contain 1,478 units (42.3% of total units).

Table 1 presents the number of rent stabilized rooming house units and buildings that registered legal rents with HCR in 2019/2020. Legal rents are the maximum amount that an owner can charge to tenants (or potentially to government agencies subsidizing tenants), but do not necessarily reflect what a tenant is actually paying. Table 1 also provides the median and average legal rents for these units, Citywide.

Table 1: 2019/2020³⁴ Median and Average “Legal” Rents for Rooming House Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i># of Stabilized Units</i>	<i># of Buildings (containing rent info)</i>	<i>Median Legal Rent</i>	<i>Average Legal Rent</i>
Citywide	2,361	101	\$1,189	\$1,124

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 2 presents information with respect to median and average “preferential” rents. Of the rent stabilized rooming house units that reported rent, 40% report preferential rents. Preferential rents are rents that owners voluntarily choose to charge to tenants, which are lower than legal rents.

Table 2: 2019/2020³⁵ Median and Average “Preferential” Rents for Rooming House Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i># of Stabilized Units</i>	<i>Median</i>		<i>Average</i>	
		<i>Preferential Rent*</i>	<i>% Difference from Legal Rent**</i>	<i>Preferential Rent*</i>	<i>% Difference from Legal Rent**</i>
Citywide	941	\$997	-26%	\$968	-25%

*Only for those units reporting a preferential rent.

**Refers to the legal rents of just those units that reported preferential rents.

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 3 presents median and average “actual” rents. Of the rent stabilized rooming house units that reported rent, 43% report actual rents. These are the rents that are paid by tenants out of pocket, with the balance being paid by government programs such as Section 8, Shelter Plus or SCRIE. Also shown is the percentage difference from the median and average legal rents of *just those units with reported actual rents*. Theoretically, the owners of the 1,011 units reporting actual rents can receive the difference between the actual and legal rents from government programs, and in fact, 46% of these units do not report any “preferential” rents, suggesting that close to half of owners do receive the full legal rent for these units. The median Citywide *legal* rent for these units is \$1,281 and the average *legal* rent is \$1,251. Not reported here are detailed statistics for the 547 units that report both actual and preferential rents (which would indicate that the owners of these units *do not* receive the full legal rent). The Citywide median *preferential* rent for these 547 units is \$1,202 and the average *preferential* rent is \$1,117.

³³ The proviso in RGB Hotel Order 41, the last time the Board granted a renewal lease increase, limited permitted increases to rooming houses with at least 85% permanently rent stabilized occupancy. Note that if the owner has not registered every unit in the building with HCR (as they may not with unregulated units), the percentage of buildings that are 85% or more rent stabilized could be inflated.

³⁴ 2020 data used whenever available.

³⁵ 2020 data used whenever available.

Table 3: 2019/2020³⁶ Median and Average “Actual” Rents for Rooming House Units Identified as Rent Stabilized (excludes exempt and vacant units)

	# of Stabilized Units	Median		Average	
		Actual Rent*	% Difference from Legal Rent**	Actual Rent*	% Difference from Legal Rent**
Citywide	1,011	\$251	-80%	\$462	-63%

*Only for those units reporting an actual rent.

**Refers to the legal rents of just those units that reported actual rents.

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 4 presents median and average “rent received,” which uses a combination of preferential and legal rents to identify the rent actually being collected by owners of rent stabilized rooming houses. For the purposes of this table, “rent received” is defined as the legal rent, unless a preferential rent is registered, in which case the preferential rent is used.

Table 4: 2019/2020³⁷ Median and Average “Rent Received” Rents for Rooming House Units Identified as Rent Stabilized (excludes exempt and vacant units)

	# of Stabilized Units	Median “Rent Received”**	Average “Rent Received”**
Citywide	2,361	\$983	\$996

**“Rent Received” refers to the preferential rent (if one is provided), or the legal rent (if a preferential rent is not provided).

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 5 provides a longitudinal analysis³⁸ of 77 buildings (with rent information, 90 total) that registered in both 2020 and 2019. The median and average rents of this group of buildings in both years are presented below. Note that while no rent increases to legal rents were granted by the RGB, both median and average legal rents increased for rooming houses. A closer look at the rent increases of individual units shows that 2% of units reported a decrease in legal rents, 56% reported no change in legal rents, and 43% showed an increase in legal rents. Of the 905 units that reported an increase in legal rents, 742 (82%) increased legal rents by exactly 1.5%. This indicates that owners either illegally charged the increase authorized under Apartment Order #51 (1.5% for a one-year lease from 10/1/2019 through 9/30/2020) or that units were incorrectly registered as rooming houses, and were in fact apartments.

³⁶ 2020 data used whenever available.

³⁷ 2020 data used whenever available.

³⁸ Note that unlike Tables I-4, which rely on a combination of two years’ worth of data to report a single median or average rent figure, the longitudinal analysis relies solely on comparing 2020 data to 2019 data. All but four of the rooming houses registered in 2020 were also registered in 2019.

Table 5: 2020 Longitudinal Citywide Rent Data for Rooming House Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i>Legal Rent</i>	<i>Preferential Rent</i>	<i>Actual Rent</i>	<i>"Rent Received"*</i>
# of Units	2,118	813	871	2,118
Median 2019	\$1,188.53	\$1,000.00	\$247.00	\$1,000.00
Median 2020	\$1,206.36	\$1,000.00	\$251.00	\$1,031.30
% Change (Median)	1.5%	0.0%	1.6%	3.1%
Average 2019	\$1,136.07	\$958.44	\$467.45	\$992.46
Average 2020	\$1,151.08	\$983.65	\$475.66	\$1,022.30
% Change (Average)	1.3%	2.6%	1.8%	3.0%

*"Rent Received" refers to the preferential rent (if one is provided), or the legal rent (if a preferential rent is not provided)
Source: 2019 and 2020 HCR Building and Apartment Registration filings

Hotels

The 2019 and 2020 HCR registration files contained 74³⁹ buildings that could be identified as hotels, the same number of buildings as the 2020 memo,⁴⁰ but a decrease from the 83 identified in the 2017 memo that formed the basis for this study.⁴¹ The number of these buildings that contain rent information is 65, nine less than the number in the 2020 memo. According to HCR records, these buildings contained a total of 5,438 units of housing.⁴² Of the units registered with HCR, 1,940 (35.7%) were registered as "rent stabilized." Rent information was provided for 1,937 of these units. Of the remaining units, 3,163 (58.1%) were registered as "temporarily exempt" or "permanently exempt" (with the vast majority "temporarily exempt"); and 335 (6.2%) as "vacant." With respect to temporarily exempt units, the most common reason given for this status is "Hotel/SRO (Transient)" (70.7%). The second most common reason provided for temporarily exempt status is "Not Prime Residence" and "Not for Profit" (each with 12.2%). Of the remaining temporarily exempt units (4.9%), the reasons for exemption are almost entirely "other" or "owner- or employee-occupied." Of these 74 buildings, 11 (14.9%) consist entirely of exempt and/or vacant units (501 units or 9.2% of total units). In addition, 40 buildings (54.1%) contain less than 85% permanently stabilized units.⁴³ These 40 buildings contain 3,957 units, or 72.8% of the total units registered with HCR.

HCR registration files provided to the RGB provide information only for hotel units that owners register, which may or may not accurately reflect the total number of units in the building. Staff therefore researched two additional sources of information to determine the number of units in

³⁹ Five of these "buildings" filed more than one registration with HCR, for adjacent addresses (a total of 10 records, treated here as five records). They are generally considered to be a single building, and are treated as such in this analysis.

⁴⁰ While the number of buildings remained the same between the 2020 and 2021 memo, the set of buildings were slightly different.

⁴¹ Using the list of buildings identified in 2017 as a starting point, staff searched the most recent HCR registration records available to staff, from 2020 (as released to the RGB in May of 2021), for the 83 buildings identified in the 2017 memo. A total of 61 buildings that were previously identified as hotels were contained in the most recent registration filings available to staff. Another 13 buildings were matched with 201 registration data. A total of nine buildings could not be located in either registration file. Staff did not research whether any new hotel buildings may have been registered in 2020.

⁴² Note that while some owners may register all their units, regardless of regulation status, others may register only those that are rent stabilized.

⁴³ The proviso in RGB Hotel Order 41, the last time the Board granted a renewal lease increase, limited permitted increases to hotels with at least 85% permanently rent stabilized occupancy. If the owner has not registered every unit in the building with HCR (as they may not with unregulated units), the percentage of buildings that are 85% or more rent stabilized could be inflated.

registered hotels.⁴⁴ For each hotel building, staff researched both registration records from the Department of Housing and Preservation Development (HPD), as well as internet sites, such as Expedia and Hotels.com, and the individual websites of the hotels, where available. In many cases, the unit count data from these different sources was inconsistent. For purposes of this analysis, staff has generally used the highest of the figures (whether HCR, HPD, or the travel or hotel websites) to estimate an actual unit count in these buildings. Taking this approach, staff found that these 74 buildings contained an *estimated* total of 16,448 units of housing. As a proportion of this higher number of units, units registered as “rent stabilized” are 11.8% of the total (versus 35.7% of the registered HCR units). As a proportion of the higher number of units, 70 buildings (94.6% of the total buildings) contain less than 85% permanently stabilized units.⁴⁵ These 70 buildings contain 15,742 units, or 95.7% of the total units.

Table 6 presents the number of rent stabilized units and buildings that registered legal rents with HCR in 2019/2020. Legal rents are the maximum amount that an owner can charge to tenants (or to government agencies subsidizing tenants), but do not necessarily reflect what a tenant is actually paying. The table also provides the median and average legal rents for these units, Citywide.

Table 6: 2019/2020⁴⁶ Median and Average “Legal” Rents for Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i># of Stabilized Units</i>	<i># of Buildings (containing rent info)</i>	<i>Median Legal Rent</i>	<i>Average Legal Rent</i>
Citywide	1,937	65	\$745	\$1,044

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 7 presents median and average “preferential” rents. Of the rent stabilized hotel units that reported rent, 11% report preferential rents. Preferential rents are rents that owners voluntarily choose to charge to tenants, which are lower than legal rents.

Table 7: 2019/2020⁴⁷ Median and Average “Preferential” Rents for Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i># of Stabilized Units</i>	<i>Median</i>		<i>Average</i>	
		<i>Preferential Rent*</i>	<i>% Difference from Legal Rent**</i>	<i>Preferential Rent*</i>	<i>% Difference from Legal Rent**</i>
Citywide	221	\$600	-55%	\$719	-75%

*Only for those units reporting a preferential rent.

**Refers to the legal rents of just those units that reported preferential rents.

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 8 presents median and average “actual” rents. Of the rent stabilized hotel units that reported rent, 26% report actual rents. These are the rents that are paid by tenants out of pocket, with the balance being paid by government programs such as Section 8, Shelter Plus or SCRIE. Also shown is the percentage difference from the median and average legal rents of *just those*

⁴⁴ Note that this analysis was not undertaken for rooming houses.

⁴⁵ See footnote 43.

⁴⁶ 2020 data used whenever available.

⁴⁷ 2020 data used whenever available.

units with reported actual rents. Theoretically, the owners of the 505 units reporting actual rents can receive the difference between the actual and legal rents from government programs, and in fact, 85% of these units do not report any “preferential” rents, suggesting that in most cases owners do receive the full legal rent for these units. The median Citywide *legal* rent for these units is \$755 and the average *legal* rent is \$888. Not reported here are detailed statistics for the 78 units that report both actual and preferential rents (which would indicate that the owners of these units *do not* receive the full legal rent). The median Citywide *preferential* rent for these units is \$1,173 and the average *preferential* rent is \$1,071.

Table 8: 2019/2020⁴⁸ Median and Average “Actual” Rents for Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)

	# of Stabilized Units	Median		Average	
		Actual Rent	% Difference from Legal Rent**	Actual Rent	% Difference from Legal Rent**
Citywide	505	\$389*	-48%	\$490*	-45%

*Only for those units reporting an actual rent.

**Refers to the legal rents of just those units that reported actual rents.

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 9 presents median and average “rent received,” which uses a combination of preferential and legal rents to identify the rent actually being collected by owners of rent stabilized hotels. For the purposes of this table, “rent received” is defined as the legal rent, unless a preferential rent is registered, in which case the preferential rent is used.

Table 9: 2019/2020⁴⁹ Median and Average “Rent Received” Rents for Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)

	# of Stabilized Units	Median “Rent Received”*	Average “Rent Received”*
Citywide	1,937	\$734	\$797

*“Rent Received” refers to the preferential rent (if one is provided), or the legal rent (if a preferential rent is not provided).

Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 10 provides a longitudinal analysis⁵⁰ of 49 hotel buildings (with rent information, 58 total) that registered in both 2019 and 2020. The median and average rents for this group of buildings are presented below. Note that while no rent increases to legal rents were granted by the RGB, a small proportion of hotel units had their legal rent increase and average legal rents increased by 3.1% (median legal rents remained the same). A closer look at the rent increases of individual units shows that 1% of units reported a decrease in legal rents, 94% reported no change in legal rents, and 5% showed an increase in legal rents. Of the 63 units⁵¹ that reported an increase in

⁴⁸ 2020 data used whenever available.

⁴⁹ 2020 data used whenever available.

⁵⁰ Note that unlike Tables 6-9, which rely on a combination of two years’ worth of data to report a single median or average rent figure, the longitudinal analysis relies solely on comparing 2020 data to 2019 data. All but six of the hotels registered in 2020 were also registered in 2019.

⁵¹ Note that 39 units (from a single building), with a rent increase of 79%, were excluded from both the data on the number of units with legal rent increases, as well as Table 10. The registration data indicates that most of the units in question were increased due to a regulatory agreement, while most units in the building showed no increase in rent. Other registration data was not examined for similar discrepancies.

legal rents, there was no discernable pattern to the rent increases (unlike rooming houses, as noted in the introductory paragraph of Table 5).

Table 10: 2020 Longitudinal Citywide Rent Data for Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)⁵²

	<i>Legal Rent</i>	<i>Preferential Rent</i>	<i>Actual Rent</i>	<i>"Rent Received"</i> ^{**}
# of Units	1,366	187	366	1,366
Median 2019	\$744.83	\$536.63	\$288.00	\$640.34
Median 2020	\$744.83	\$533.03	\$290.57	\$658.09
% Change (Median)	0.0%	-0.7%	0.9%	2.8%
Average 2019	\$991.78	\$667.47	\$453.25	\$688.25
Average 2020	\$1,022.90	\$707.78	\$451.00	\$692.24
% Change (Average)	3.1%	6.0%	-0.5%	0.6%

^{**}"Rent Received" refers to the preferential rent (if one is provided), or the legal rent (if a preferential rent is not provided).
Source: 2019 and 2020 HCR Building and Apartment Registration filings

SUMMARY

In summary, while this memo cannot capture every rent stabilized hotel or rooming house in New York City, it provides information on the universe of registered units that are likely to be rent stabilized. Tables 11 and 12 summarize some of the data presented above.

Table 11 summarizes data on the regulatory status of rooming house and hotel units registered with HCR in 2019/2020.

Table 11: 2019/2020⁵³ Rent Regulation Status of Registered Rooming Houses and Hotels

	<i># of Units*</i>	<i>Occupied Rent Stabilized</i>	<i>Vacant</i>	<i>Temporarily or Permanently Exempt</i>
Rooming Houses	3,495	2,362	533	600
Hotels	5,438	1,940	335	3,163
Rooming Houses and Hotels (combined)	8,933	4,302	868	3,763

*Includes only those units registered with HCR.
Source: 2019 and 2020 HCR Building and Apartment Registration filings

Table 12 provides a summary of the legal and received rents for rooming houses and hotels, as well as the average and median rents of rooming houses and hotels combined.

⁵² See footnote 51.

⁵³ 2020 data used whenever available.

Table 12: 2019/2020⁵⁴ Median and Average Legal Rent and “Rent Received” Rents for Rooming House and Hotel Units Identified as Rent Stabilized (excludes exempt and vacant units)

	<i># of Stabilized Units*</i>	<i>Median Legal Rent</i>	<i>Average Legal Rent</i>	<i>Median “Rent Received” *</i>	<i>Average “Rent Received”**</i>
Rooming Houses	2,361	\$1,189	\$1,124	\$983	\$996
Hotels	1,937	\$745	\$1,044	\$734	\$797
Rooming Houses and Hotels (combined)	4,298	\$856	\$1,088	\$790	\$906

*Includes only those units with registered legal rents with HCR.

**“Rent Received” refers to the preferential rent (if one is provided), or the legal rent (if a preferential rent is not provided).

Source: 2019 and 2020 HCR Building and Apartment Registration filings.

[END OF MEMO]

VOTE

The vote of the Rent Guidelines Board on the adopted motion pertaining to the provisions of Order Number 51 was as follows:

	<u>Yes</u>	<u>No</u>	<u>Abstentions</u>
Guidelines for Hotels	7	2	-

Dated: June 23, 2021

Filed with the City Clerk: June 30, 2021

David Reiss
Chair
NYC Rent Guidelines Board

⁵⁴ 2020 data used whenever available.

BIBLIOGRAPHY

The City of New York Rent Stabilization Law of 1969 Section 26 - 501 et seq.
Chapter 576 of the Laws of 1974 (The Emergency Tenant Protection Act).
Resolution Number 276 of 1974 of the New York City Council.
Chapter 203 of the Laws of 1977.
Chapter 933 of the Laws of 1977 (Open Meetings Law).
Local Laws of the City of New York for the year 1979, No. 25.
Chapter 234 of the Laws of 1980.
Chapter 383 of the Laws of 1981.
Local Laws of the City of New York for the Year 1982, No. 18.
Chapter 403 of the Laws of 1983.
Chapter 248 of the Laws of 1985.
Chapter 45 of the New York City Charter.
Chapter 65 of the Laws of 1987.
Chapter 144 of the Laws of 1989.
Chapter 167 of the Laws of 1991.
Chapter 253 of the Laws of 1993.
Rent Regulation Reform Act of 1997.
Chapter 82 of the Laws of 2003.
Chapter 97 of the Laws of 2011.
Rent Act of 2015.
Housing Stability and Tenant Protection Act of 2019.
RGB Staff, *2021 Price Index of Operating Costs*.
RGB Staff, *2021 Income and Affordability Study*.
RGB Staff, *2021 Mortgage Survey Report*.
RGB Staff, *2021 Housing Supply Report*.
RGB Staff, *Changes to the Rent Stabilized Housing Stock in NYC in 2020*.
Written, oral and video submissions by tenants, tenant organizations, owners, and owner organizations.