Testimony of the New York City Department of Housing Preservation and Development to the New York City Council Committee on Housing and Buildings

2023 Housing and Vacancy Survey (HVS) and the Continuation of Rent Control and Rent Stabilization in New York City

March 6, 2024

Good morning, Chair Sanchez, and members of the Housing and Buildings Committee. I am Ahmed Tigani First Deputy Commissioner for the New York City Department of Housing Preservation and Development (HPD).

I am joined by colleague Dr. Elyzabeth Gaumer, HPD's Chief Research Officer.

I would like to thank the Committee for welcoming us today to testify in support of Preconsidered Resolution T2024-1227 and Preconsidered Introduction T2024-1228 and to discuss the initial findings from the 2023 New York City Housing and Vacancy Survey (NYCHVS). HPD submitted these findings to the Council on February 8, 2024.

For nearly six decades, the NYCHVS, has been one of our most important tools for addressing the housing needs of the City, has provided critical data that informs our understanding of the city's housing stock and has established the city's net rental vacancy rate, which the Council must consider when determining if New York City is in a state of housing emergency. Pursuant to State law, a housing emergency is determined based on the supply and condition of housing accommodations within a municipality and an identified need for regulating and controlling residential rents. The continuation of rent stabilization and rent control in the city depends on a determination by the Council that a state of housing emergency still exists. Local law also requires that a survey be conducted to examine the supply of housing, the condition of housing, and the need for continuing regulation and control of residential rents and evictions.

The NYCHVS is a representative survey of the city's housing stock that has been carried out about every three years since its first incarnation in 1962. It is the longest running housing survey in the country and is of critical importance for understanding how our city is changing and what we can and should do to support improvements in policy and programming. It is the most up-to-date and representative survey available.

As you know, if the Council believes that the city is still in a state of housing emergency, it must pass the Resolution and Introduction being heard here today between 30 and 60 days from receiving findings of the NYCHVS, and the Mayor must sign the legislation before April 1, 2024 in order to extend rent control and rent stabilization.

Before turning the microphone over to the Chief Research Officer, I want to emphasize my gratitude to Lyz and the entire team that ran the NYCHVS over the past two years; to the hundreds of New Yorkers who worked as Census field representatives; and to the thousands of

New Yorkers who dedicated their time and shared their information. The people of the City of New York – and especially the million households who live in rent-controlled and rent-stabilized housing – are deeply indebted to their service.

Good morning, I am Elyzabeth Gaumer, Chief Research Officer at HPD. Thank you for the opportunity to testify before the Council today.

My testimony today will present the main findings from the 2023 New York City Housing and Vacancy Survey Selected Initial Findings, including key statistics on the supply of housing, its condition, and the continued need for the regulation of residential rents and evictions. Before I present those findings, I would like to take a brief moment to talk about the source of these data and the importance of the survey.

All of the data presented today as well as those in our report come from data collected as part of the New York City Housing and Vacancy Survey. The 2023 survey is the 19th time the City of New York has conducted the NYCHVS, which is completed about every three years going back to 1965 in partnership with the US Census Bureau. It is the longest running housing survey in the country and is a unique source of timely and accurate data on various aspects of our city's housing and resident population that is relied on by policymakers working on topics as varied as poverty, immigration, health, and of course, housing, among others.

SLIDE 1

The NYCHVS is a scientific survey distinct from much of the other available data. It represents every residential housing unit in the five boroughs. Our sample is randomly drawn from a complete list of all residential addresses in the city to ensure our survey is inclusive of every type of housing in every community. At the heart of our data are the interviews completed each cycle with thousands of New Yorkers—in 2023, we completed about 10,000 interviews. These interviews are conducted by trained Census Field Representatives in multiple languages using a set of questions that are designed to collect accurate and complete information in a neutral way. Interview data are combined with other information from administrative sources matched to sampled units, buildings, and tax lots, such as HCR's rent registration data, code enforcement data, tax information from the NYC Department of Finance, HPD's housing production, and more. Our Census field team conducts in-person observations of each sampled unit. Our data are weighted by survey statisticians to ensure the NYCHVS represents all of the 3.7 million housing units and the more than 8 million residents who call New York City home.

All of the units sampled for the 2021 survey were also part of the 2023 survey, enabling us to examine not only point-in-time changes between the two surveys, but also look at changes within units or households. The NYCHVS survey methodology follows best practices used by academic and scientific studies across the country and enables us to report reliable and valid information to all of you and to the New Yorkers represented in our data.

The 2023 NYCHVS was conducted from January through the middle of June in 2023. Although the NYCHVS is the most up-to-date, representative information we currently have available, it is important to note that it reflects this point in time. The estimates we share today, as well as the information provided in the report, are based on that time period.

With that, let's turn to the findings.

SLIDE 2

The citywide net rental vacancy rate in 2023 was 1.41%. That is one of the lowest vacancy rates recorded since the NYCHVS began and stands in stark contrast to the 4.54% net rental vacancy rate reported for 2021, which was one of the highest vacancy rates on record.

SLIDE 3

There was very limited supply across all price ranges, but of those that were available most would not be affordable to the typical New Yorker. The median asking rent for units available for rent in 2023 was $3,000. A family would have to earn at least $120,000 to afford that, yet the median income of NYC renters in 2023 was $70,000.

SLIDE 4

We see a continued severe shortage of supply among lower-cost rental units—the net rental vacancy rate was less than 1% for units renting for less than $1,650 in both 2021 and 2023. Where we have seen significant change is among higher-cost units where the net rental vacancy rate has dropped to historically low levels.

To understand these changes, I'd like to walk through the components of our housing supply with a specific focus on how it changed by comparing the point-in-time estimates from 2021 and 2023 or the net change between the two surveys.

SLIDE 5

In 2023, there were 3.7 million housing units. This is the largest stock recorded since the NYCHVS began in 1965. That is a net increase of 61,000 housing units or about a 2% increase relative to 2021, which is the sum of both losses and gains. This growth in the housing supply continues the trend seen over the last several NYCHVS cycles.

SLIDE 6

Despite this increase in supply, it failed to keep pace with increased demand. Between 2021 and 2023, the total number of occupied units increased by 275,000 (or 9 percent) relative to just two years prior. This increase in households was seen for both renter- and owner-occupied units.

SLIDE 7

This tight housing market meant that more units of every kind were occupied in 2023, including far fewer units available for rent and far fewer units that were off-the-market.

SLIDE 8

Let's look at the changes in a different way. Here, we are looking at the units that were in both the 2021 and 2023 surveys to assess what happened to them over the last two years.

95% of the units that were occupied in 2021 were occupied in 2023, though not always by the same household. 83% of the units that were available for rent were occupied at our follow-up—as a reminder, most of the units that were for rent in 2021 were higher-cost units; and 62% of units that had been off the market in 2021 were occupied in 2023.

SLIDE 9

The NYCHVS measured housing conditions through self-report of the current occupants regarding housing problems. In 2021, 14 percent of occupied units reported three or more of the seven types of problems we asked about. The prevalence of housing problems increased again in 2023 to 15%.

SLIDE 10

Both rent stabilized and market rentals showed similar net changes in the rate of reported problems. Between 2021 and 2023, 8.2% fewer rent stabilized units reported no problems while 7.6% fewer market units reported no problems.

SLIDE 11

The median rent in NYC in 2023 was $1,641. Citywide, rents increased by 9% in nominal terms since 2021, generally in-line with our historically high rates of inflation during this period.

Rent stabilized units increased by 7% in nominal terms with a median rent below citywide-- $1,500 in 2023. In contrast, market rentals increased by 10% in nominal terms, with a median rent of $2,000.

SLIDE 12

When we examine the distribution of household incomes, we see a stark shift upward. Between 2021 and 2023, the median household income in NYC increased to $80,000 from just over $60,000. During this period, there was a large net increase in the number of households earning $100,000 or more—up by almost half a million households—and a net loss of the lowest income households.

SLIDE 13

Using the subset of NYCHVS units that were in both the 2021 and 2023 surveys, we examined the income of renters in different groups. The first group shows renters who stayed in the same unit and were interviewed in both surveys. The second group shows renters who moved out after the 2021 survey. The third group is the renters who moved into those same units that the second group vacated. The last group shows the renters who moved into a unit that was vacant in 2021.

We found that higher-income renters moved in where lower-income renters moved out and that a full half of the households that moved into units that had been vacant in 2021 earned $100,000 or more.

SLIDE 14

When we look at these same households by the race and ethnicity of the householder, we see that a larger share of renters headed by White New Yorkers moved in since 2021, including 50% of those who moved into units that were vacant in 2021.

SLIDE 15

We separately looked at those who moved to the city since 2021 to understand the composition of the newest New Yorkers. The vast majority (over 95%) were renters. 53% earned $100,000 or more. Overall, their median income was $105,000; among those earning $100,000 or more, the median income was $200,000. The newest New Yorkers were more likely to live alone (44% compared to 37% citywide) and to be headed by someone who was White (52% compared to 32% of renters citywide).

SLIDE 16

For the first time in many cycles of the NYCHVS, the share of renters who were rent burdened or paying more than a third of income toward rent went down, from 53% in 2021 to 43% in 2023. This was driven by the larger number of higher-income renters and not by increasing affordability of the rental stock.

When we look at rent burdened households by income, we see stark differences for low-income New Yorkers compared to those earning more. 86% of the lowest income renters who did not benefit from rental assistance were severely rent burdened or paying more than half of their income toward rent. An additional 4% were moderately burdened or paying between 30% and 50%. This remains unchanged since 2021. In contrast, 91% of renters with household incomes of $100,000 or more were in housing that was affordable to them—that is, paid less than a third of their income on rent.

SLIDE 17

Beginning in 2021, the NYCHVS also collected information about renters who were unable to make rental payments on time. In 2023, 13% of renter households reported being late or missing a rent payment at least once in the prior year. That was unchanged since 2021.

SLIDE 18

We also collected follow-up information on whether any of those 13% of renters were still behind on rent at the time of our NYCHVS interview. 34% reported still being in arrears, up from 29% in 2021.

SLIDE 19

In summary, the 2023 NYCHVS showed stark changes in the two years since our last survey. The citywide net rental vacancy rate was historically low at 1.41%. There was very limited supply across all price ranges, but of those that were available most would not be affordable to the typical New Yorker. While the overall supply continued to increase, it was insufficient to keep pace with the large net increase in the number of households. The prevalence of housing problems increased across all types of housing back to levels similar to what we found in the 2011 survey. Citywide, rents increased at a pace similar to our historically high inflation during this period—up 9% in nominal terms. Low-income New Yorkers continued to experience high levels of rent burden and many were unable make rent payments. Perhaps the most dramatic shift was in household incomes. Between 2021 and 2023, there were almost half a million more households earning $100,000 or more, with a net loss of the lowest-income New Yorkers. More than half of the households who moved to NYC between 2021 and 2023 earned $100,000 or more as were the renters who moved into units that had been vacant in 2021. New York City continues to see diverging experience where low- and middle-income New Yorkers face limited housing choice while more New Yorkers with more purchasing power continue to grow in numbers.

As Dr. Gaumer's testimony highlighted in detail, the findings from the 2023 NYCHVS are clear: as the city has emerged from the COVID-19 pandemic, our housing crisis worsened over the last two years, and New Yorkers are feeling this on multiple fronts. Too many New Yorkers are experiencing rising costs and are worried about being able to pay the rent and many others are unable to move to a new home because of the dearth of low-cost apartments on the market. While the housing shortage is felt by all households, low-income households feel this the most deeply – they face the lowest vacancy rates among homes they can afford and experience the highest levels of rent burden.

This brings us to the important role of rent stabilization housing in our city. A strong rent stabilization system, coupled with our unparalleled investments in affordable housing, has helped ensure that we have as much low-cost housing as we do and has helped many New Yorkers remain in their homes and exercise the choice to stay in their neighborhoods. Rent stabilization supports our work in affordable housing – the housing we finance is stabilized in exchange for our investment and provides an extra layer of protection for those renters. HPD is focused on advancing our pipeline of deeply affordable housing projects, preserving our remaining our stock of low-cost and affordable housing and on supporting critical efforts to build more housing citywide. However, we need to do more to address the need and it requires action and partnership at both the local and state levels.

With this year's State legislative session in full swing, we urgently need action from our partners in Albany to enact a housing agenda to allow us to build and preserve more housing efficiently, effectively, and equitably. At the local level, we need to work hand-in-hand to maximize all avenues for housing development including, but not limited to, affordable housing development.

We need the City Council to continue to advocate for and champion new housing development across every neighborhood in the city. We are thankful for Speaker Adams' leadership in passing the Fair Housing Framework Law, which is a consequential step towards ensuring every neighborhood contributes equitably to building more housing, including low-cost and affordable housing in our city. In passing the City of Yes for Housing Opportunity, the City Council can take a monumental step to unlock housing opportunities citywide and helping us fulfill the spirit of the Fair Housing Framework Law. At the same time, we must continue invest in and preserve our limited stock of low-cost housing to prevent further exacerbating the existing housing crisis.

To conclude this testimony, and in focusing on the legislation on which we are here to discuss, the net rental vacancy rate is less than 5 percent, a precondition to a finding of a housing emergency. We have provided information about the supply, condition and continued need within our housing stock. We shared data indicating that many of our neighbors, especially low-income New Yorkers, are struggling to remain stably housed in our city. It is now up to the Council to determine whether we remain in a state of housing emergency and, in turn, the future of our rent stabilized and rent controlled housing stock.

Thank you for the opportunity to testify. We are happy to answer any questions.

NYCHVS

New York City Housing and Vacancy Survey

SELECTED INITIAL FINDINGS

March 6, 2024

Elyzabeth Gaumer, PhD
Chief Research Officer
Department of Housing Preservation and Development

01 The New York City Housing and Vacancy Survey (NYCHVS)

All housing types, each neighborhood, every New Yorker.

- Units of all kinds systematically selected at random to ensure coverage of all housing types; every unit in the city has a chance of being selected
- The 2023 NYCHVS included a larger sample than 2021, adding ~3,000 rent stabilized units of all building sizes, ages, and rent levels
- Interview data from sampled units weighted based on inverse probability of selection and known counts of housing units of various kinds to ensure representativeness
- Standardized training of field interviewers; quality assurance by independent team, including re-interviews to ensure integrity
- Additional administrative data from various sources to increase types of information and ensure validity of the data; in-person observations of every unit

02 NET RENTAL VACANCY RATE

The citywide net rental vacancy rate in 2023 was 1.41 percent. That's across all prices, all types of rentals, and every neighborhood.

$$\frac{\text{AVAILABLE FOR RENT}}{\text{AVAILABLE FOR RENT + OCCUPIED RENTAL}} = \textbf{1.41\%} \text{ IN 2023}$$

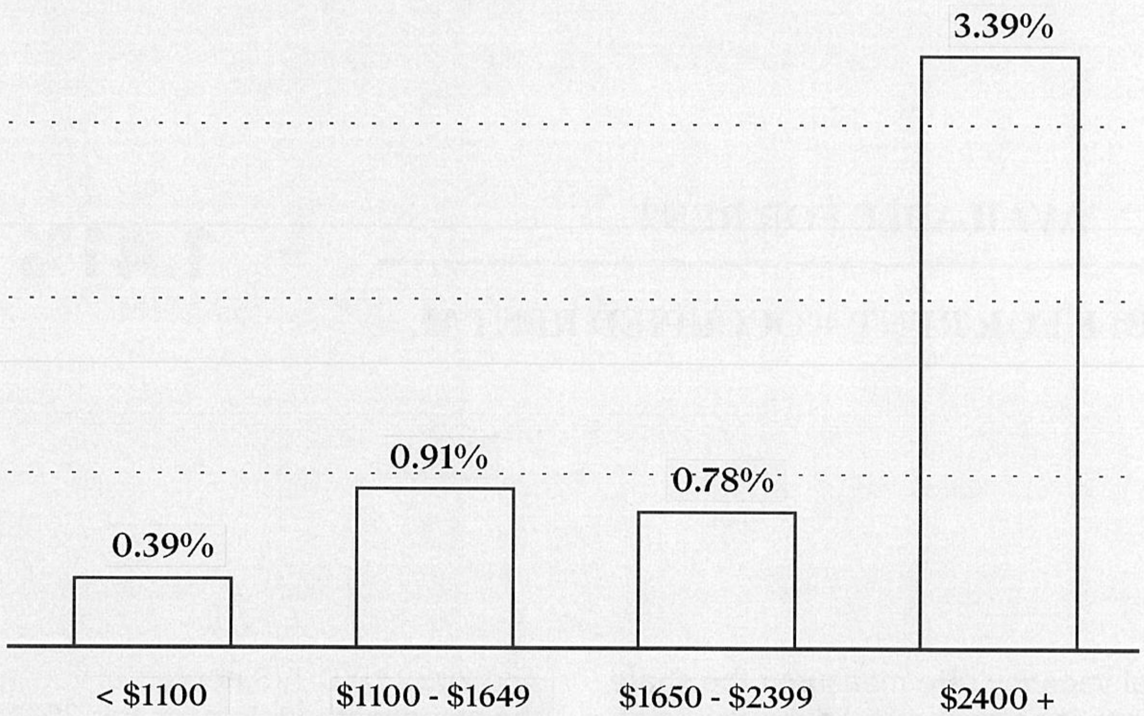
The net rental vacancy rate measures the share of rental units that someone could move into at the time of the survey.

The 2023 NYCHVS net rental vacancy rate uses the same methodology as the 2021 survey.

03

NET RENTAL VACANCY RATE, BY RENT

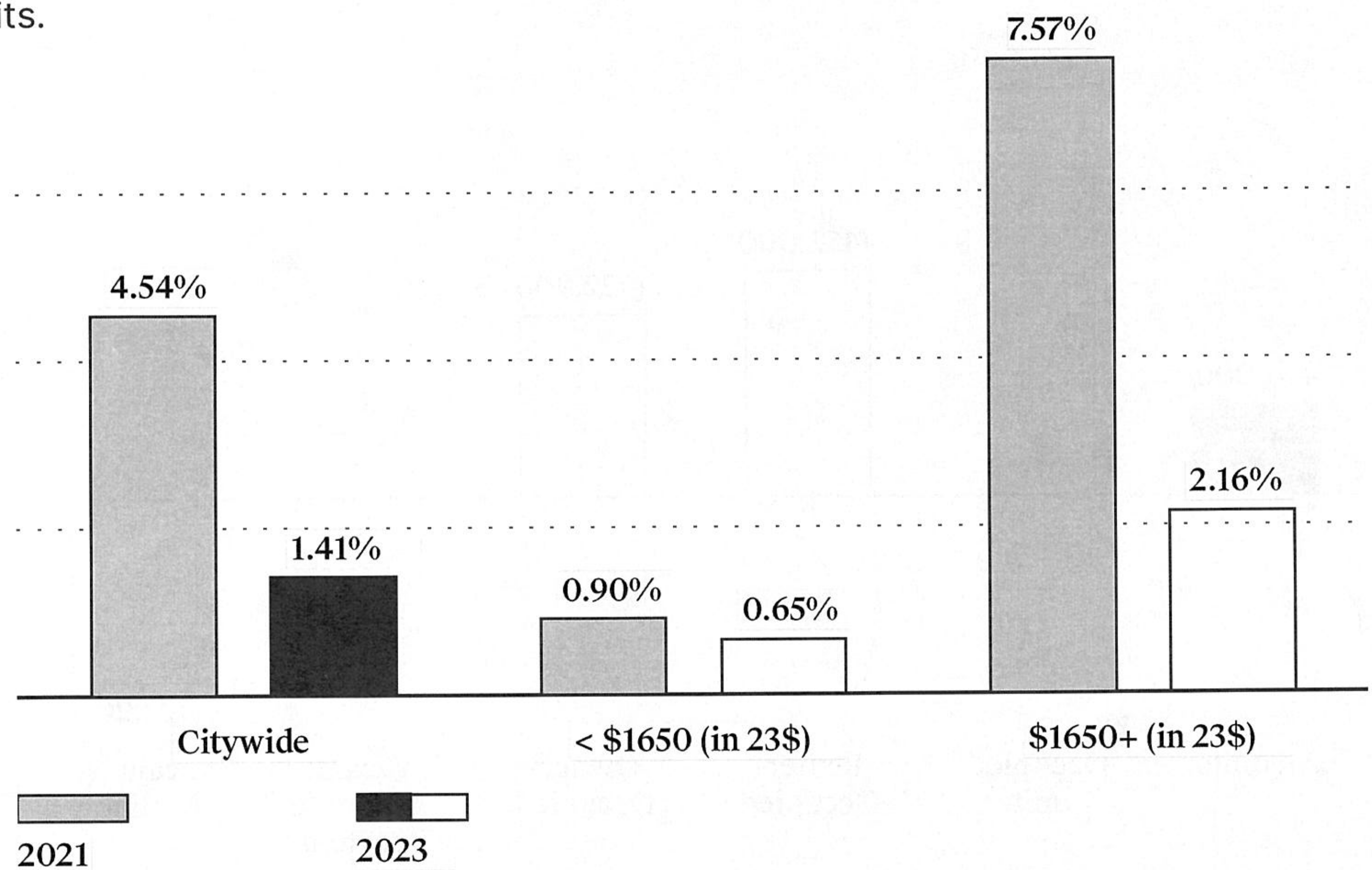
In 2023, the net rental vacancy rate for units with rents less than $2,400 was less than 1 percent.



04

NET RENTAL VACANCY RATE: 2021 and 2023

Compared to 2021, there was a significantly lower vacancy rate for higher-cost units. But there continued to be an extremely low supply of available units for lower cost units.

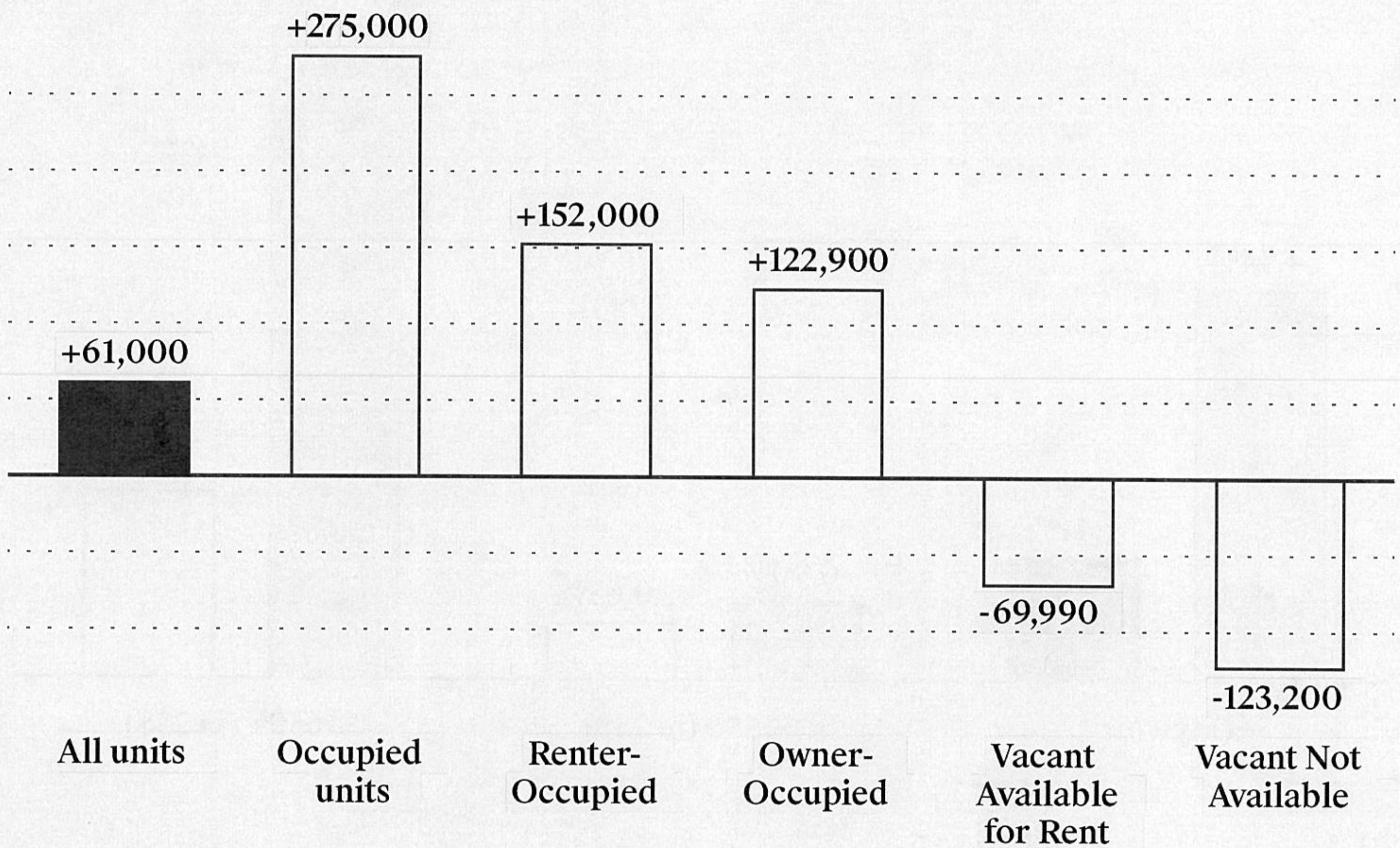


NYCHVS
New York City Housing and Vacancy Survey

05

NET CHANGE IN NYC'S HOUSING STOCK: 2021 - 2023

Between 2021 and 2023, there was a net increase in the overall supply of housing by about 61,000 units or 2%.

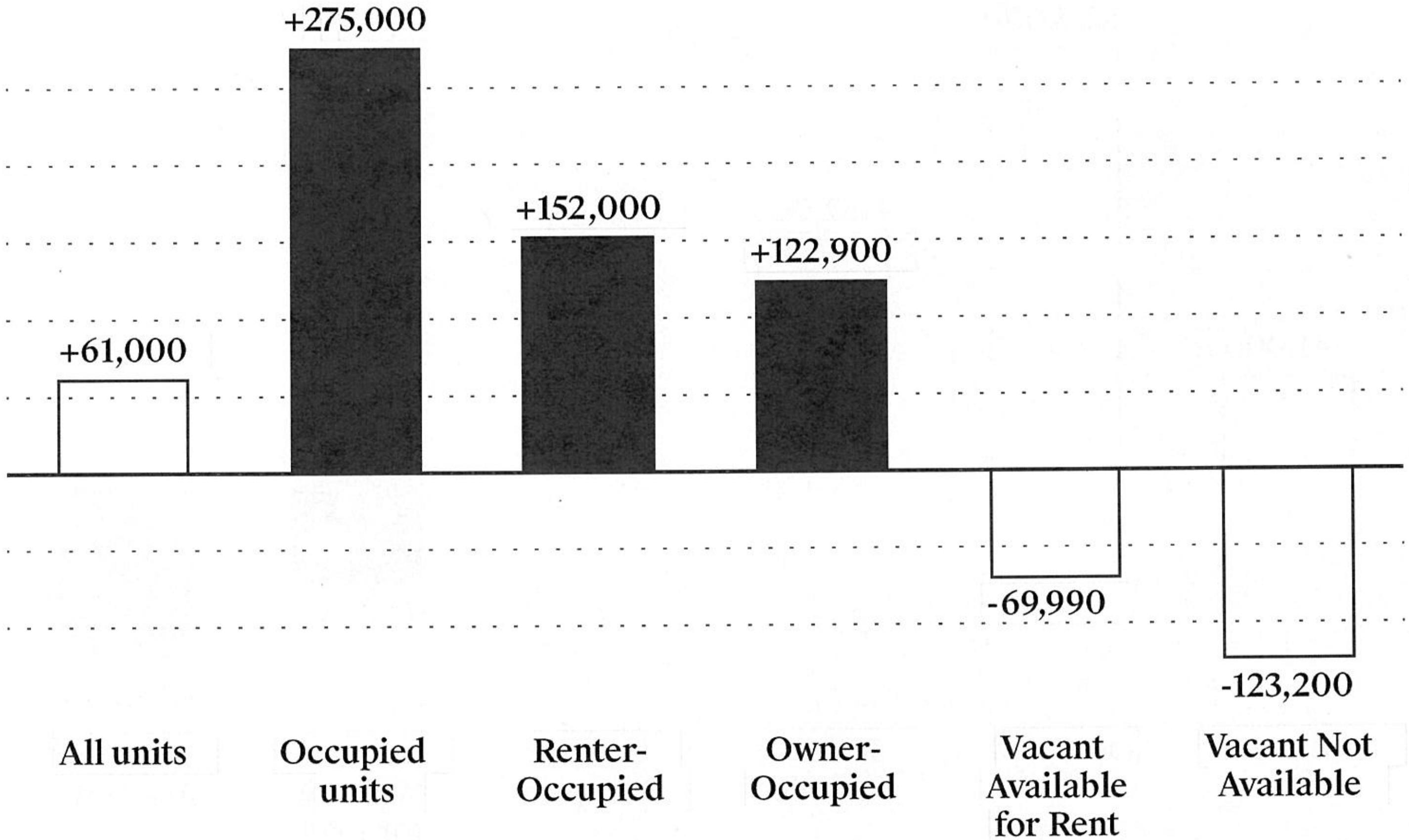


NYCHVS
New York City Housing and Vacancy Survey

06

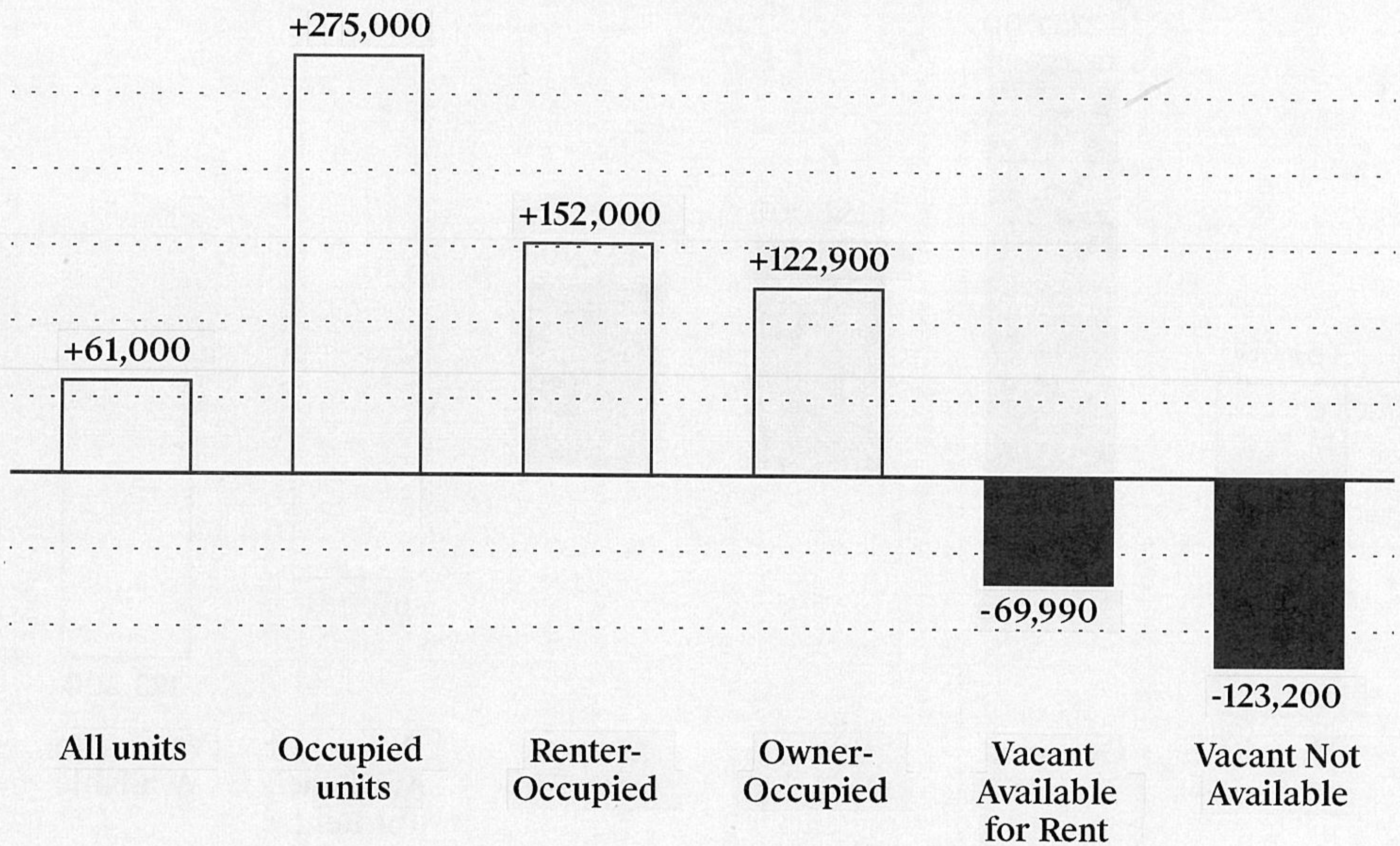
NET CHANGE IN NYC'S HOUSING STOCK: 2021 - 2023

There was a net increase of 275,000 occupied units—up 9% relative to 2021. This included large net increases for both renter- and owner-occupied units.



07 NET CHANGE IN NYC'S HOUSING STOCK: 2021 - 2023

More occupied housing units meant that there were fewer units available for rent and fewer units that were off-the-market in 2023.

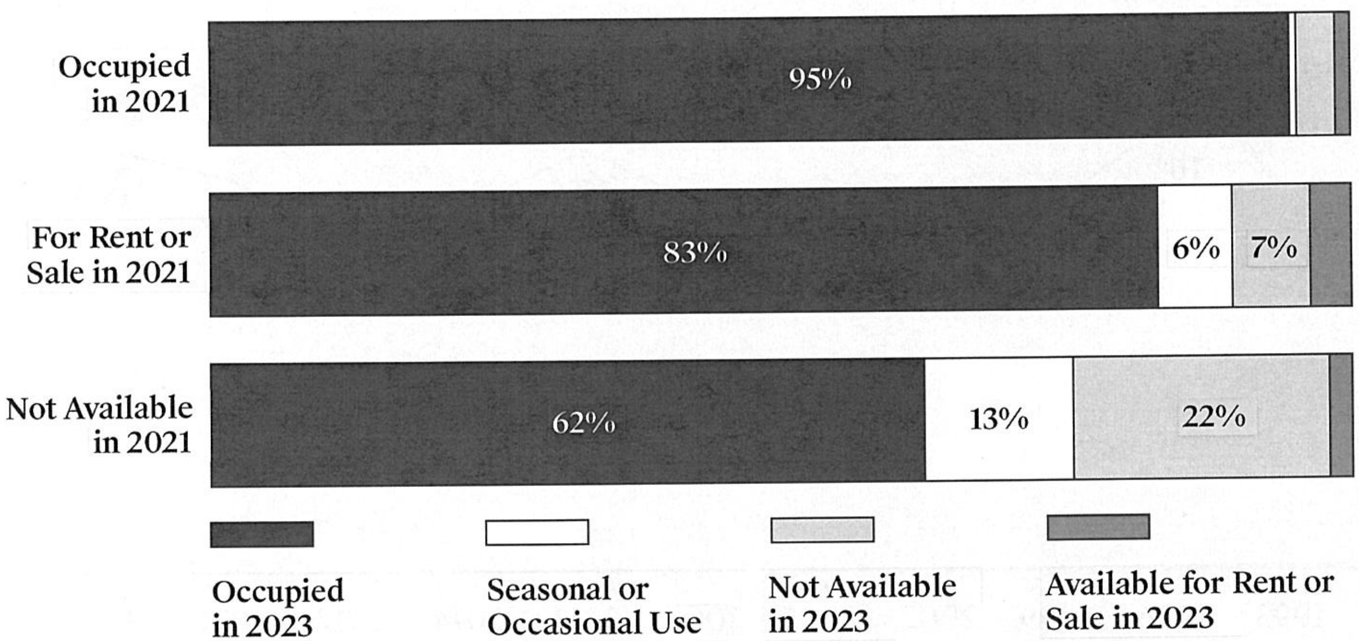


NYCHVS
New York City Housing and Vacancy Survey

08

CHANGES IN OCCUPANCY STATUS

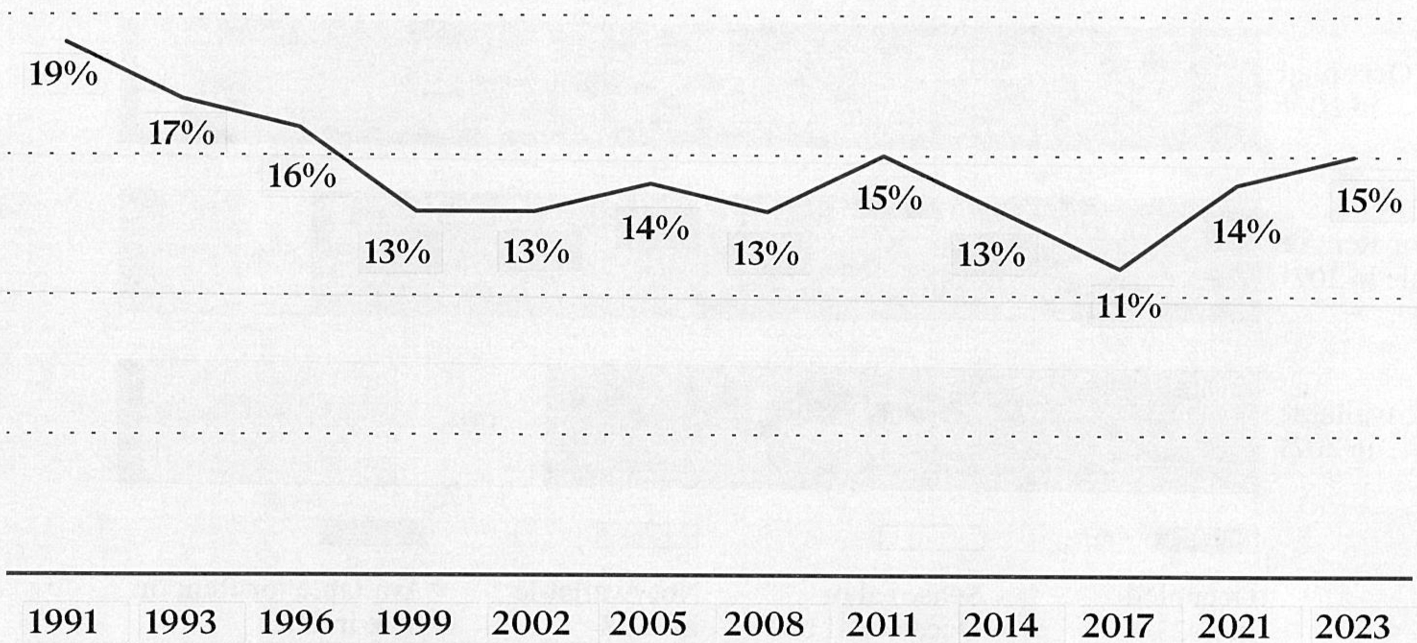
Most of the units that were vacant in 2021 were occupied in 2023, including a large share of units that had been off-the-market for various reasons.



09

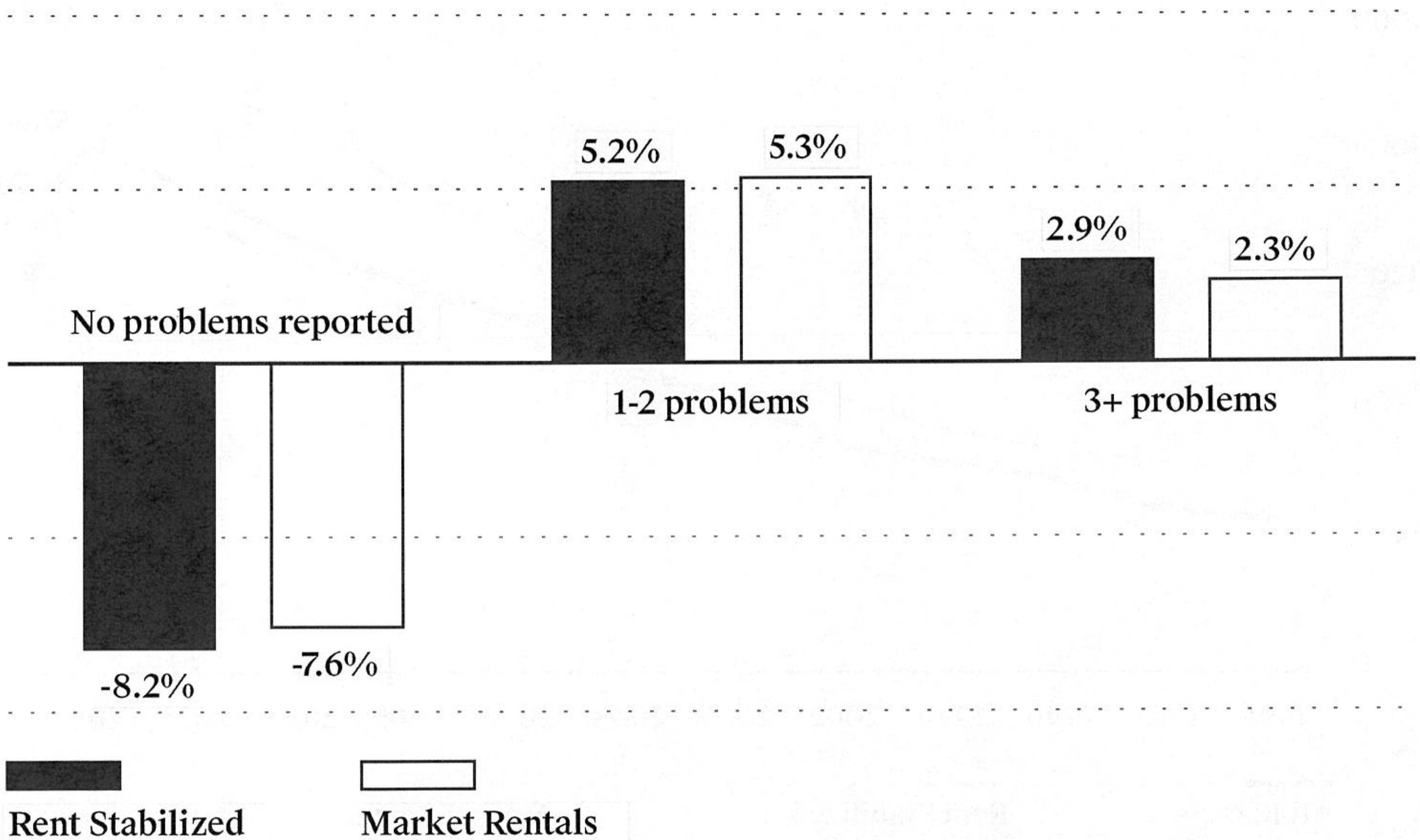
HOUSING CONDITIONS: 1991 - 2023

In 2023, the share of units that reported three or more housing problems increased across all housing types except public housing (which remained the same as in 2021).



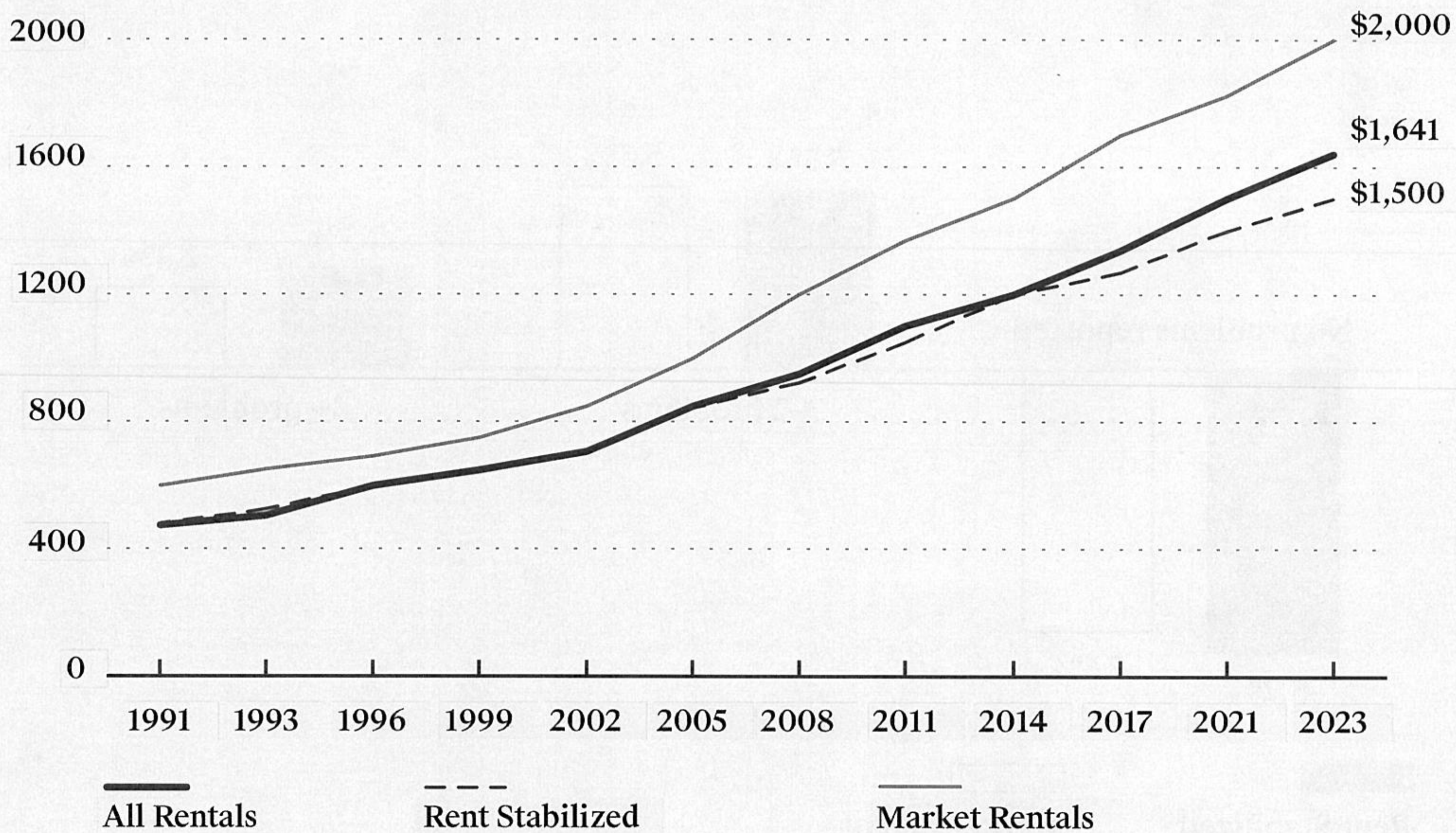
10 NET CHANGE IN HOUSING CONDITIONS: RENT STABILIZED AND MARKET RENTALS

Rent stabilized and market rentals saw similar changes in the rate of reported housing problems between 2021 and 2023.



11 RENTS OVER TIME: RENT STABILIZED AND MARKET RENTALS

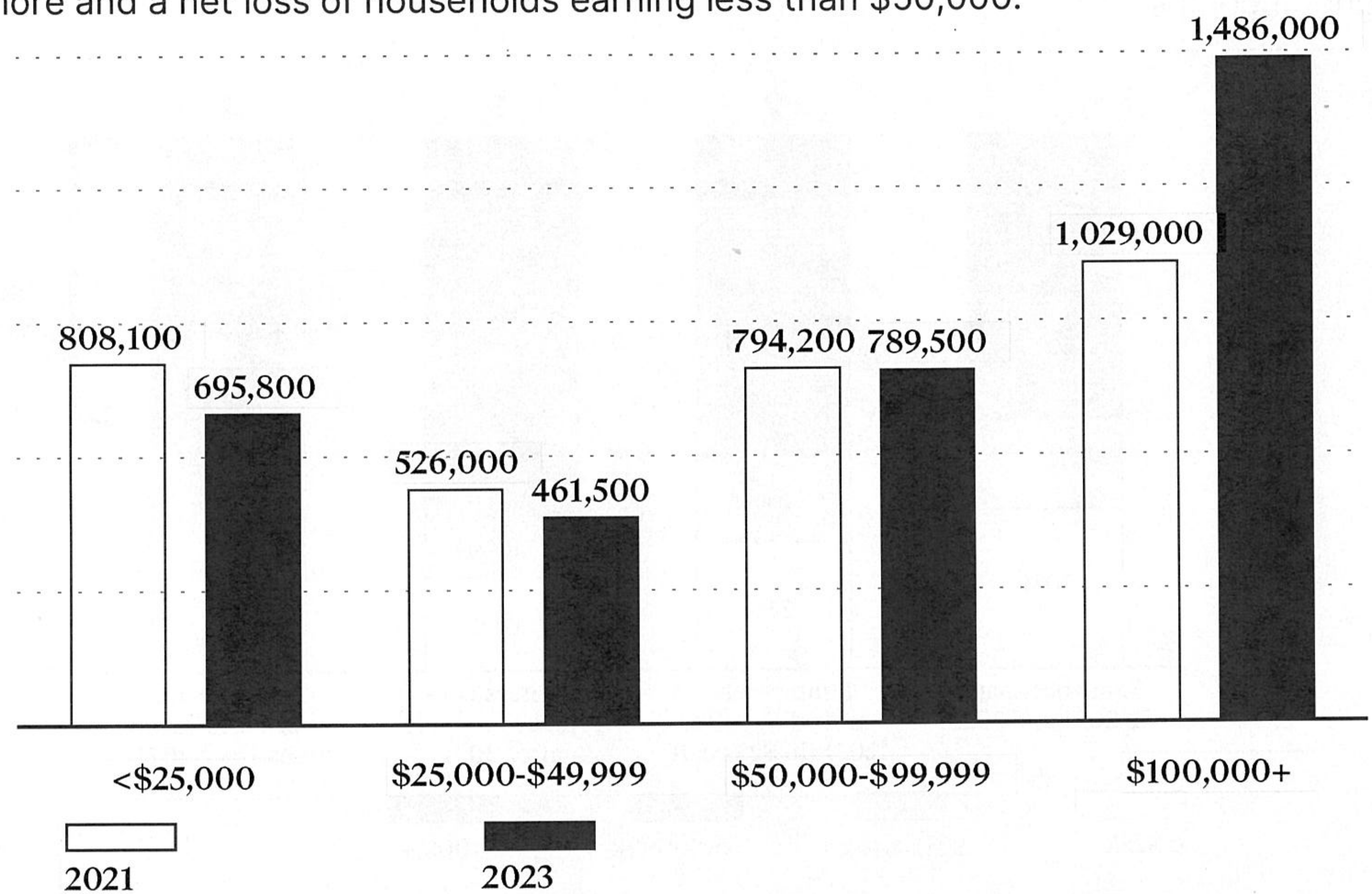
Between 2021 and 2023, rents increased by 9% (in nominal terms). This was generally in-line inflation, which increased by 10.2% during this period.



12

HOUSEHOLD INCOMES

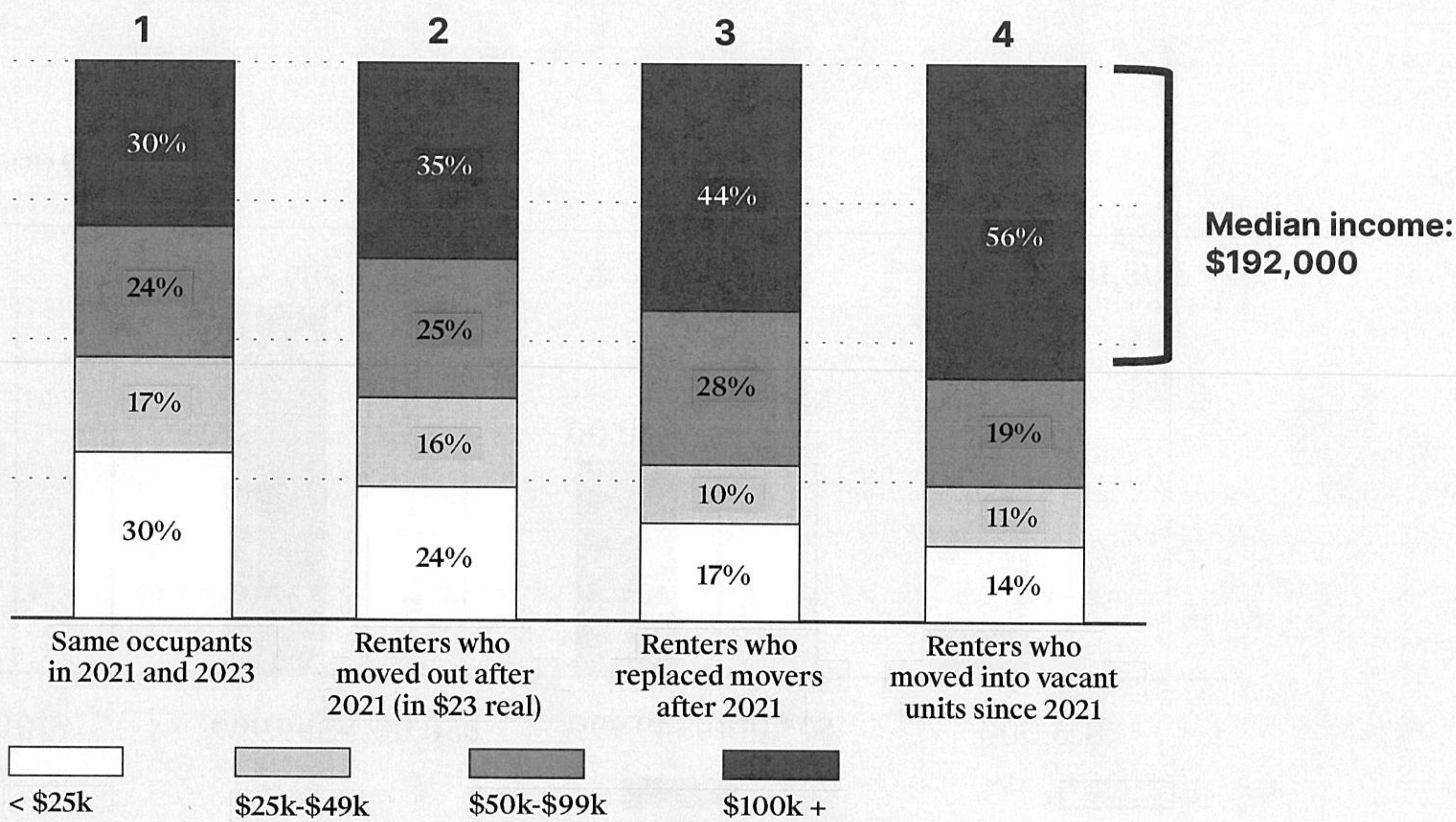
Between 2021 and 2023, there was a net increase in household earning $100,000 or more and a net loss of households earning less than $50,000.



13

NYC RENTERS WHO STAYED OR MOVED, 2021 TO 2023

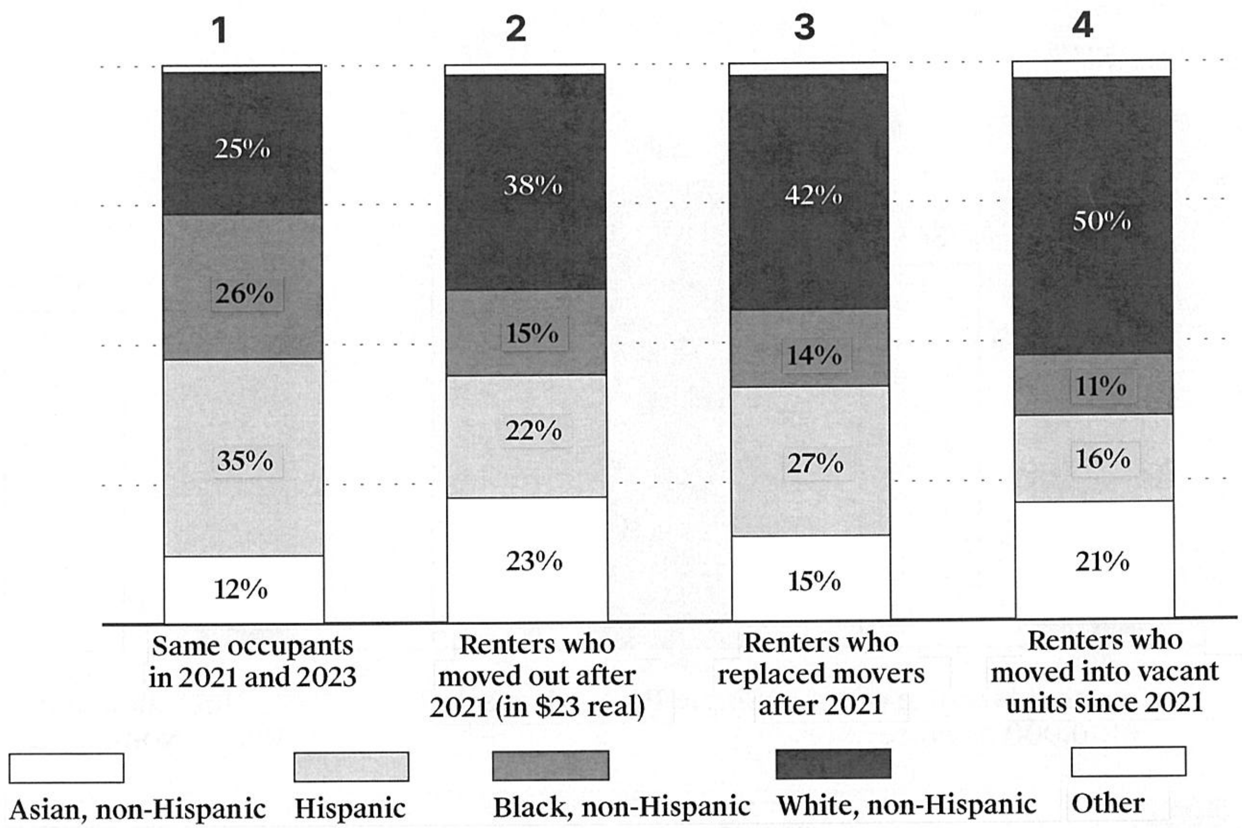
A larger share of renter households who moved in between 2021 and 2023 (3,4) had higher incomes.



NYCHVS
New York City Housing and Vacancy Survey

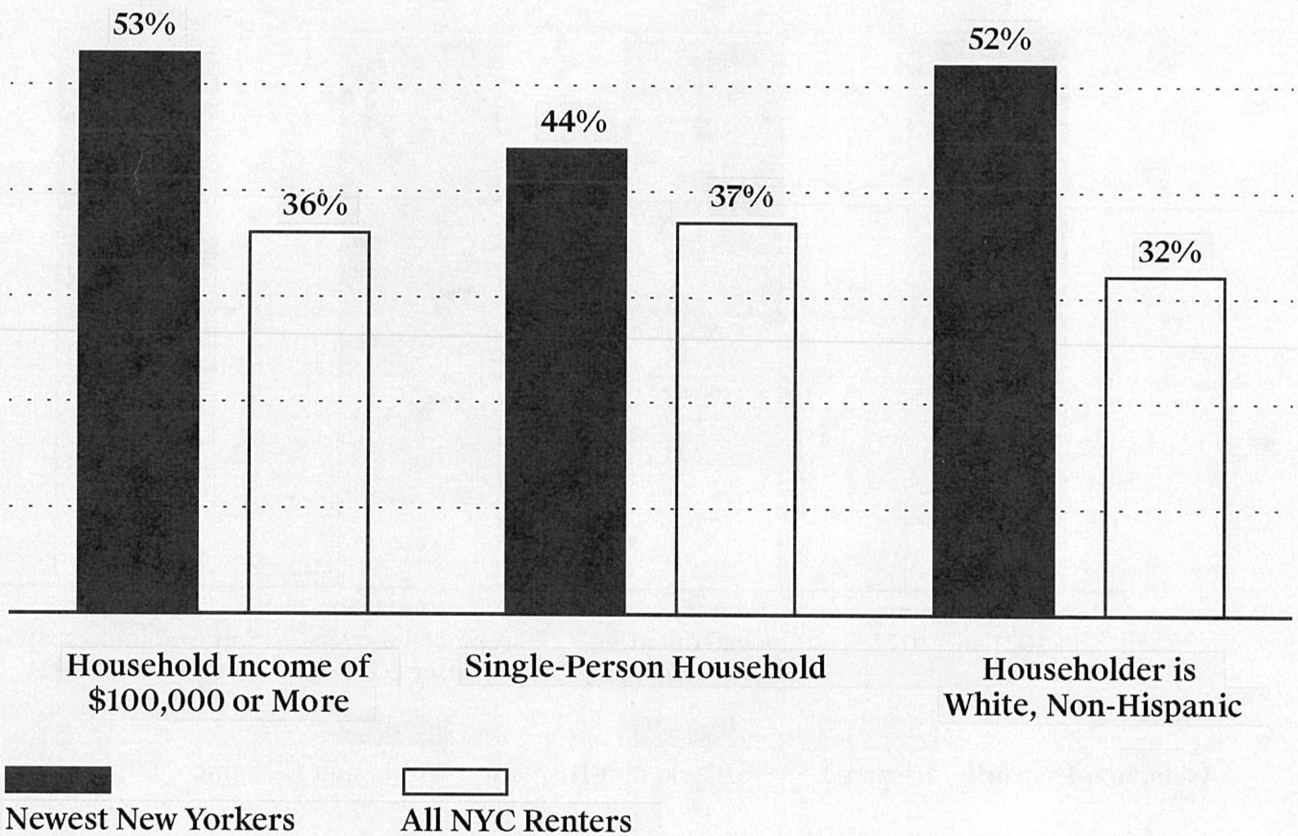
NYC RENTERS WHO STAYED OR MOVED, 2021 TO 2023

A larger share of renter households who moved in between 2021 and 2023 (3,4) were headed by someone who was White.



15 NEWEST NEW YORKERS

Between 2021 and 2023, about 130,000 households moved here from outside NYC. Compared to all NYC renters, these newest New Yorkers were more likely to be higher-income, to live alone, and to be headed by someone who was White.



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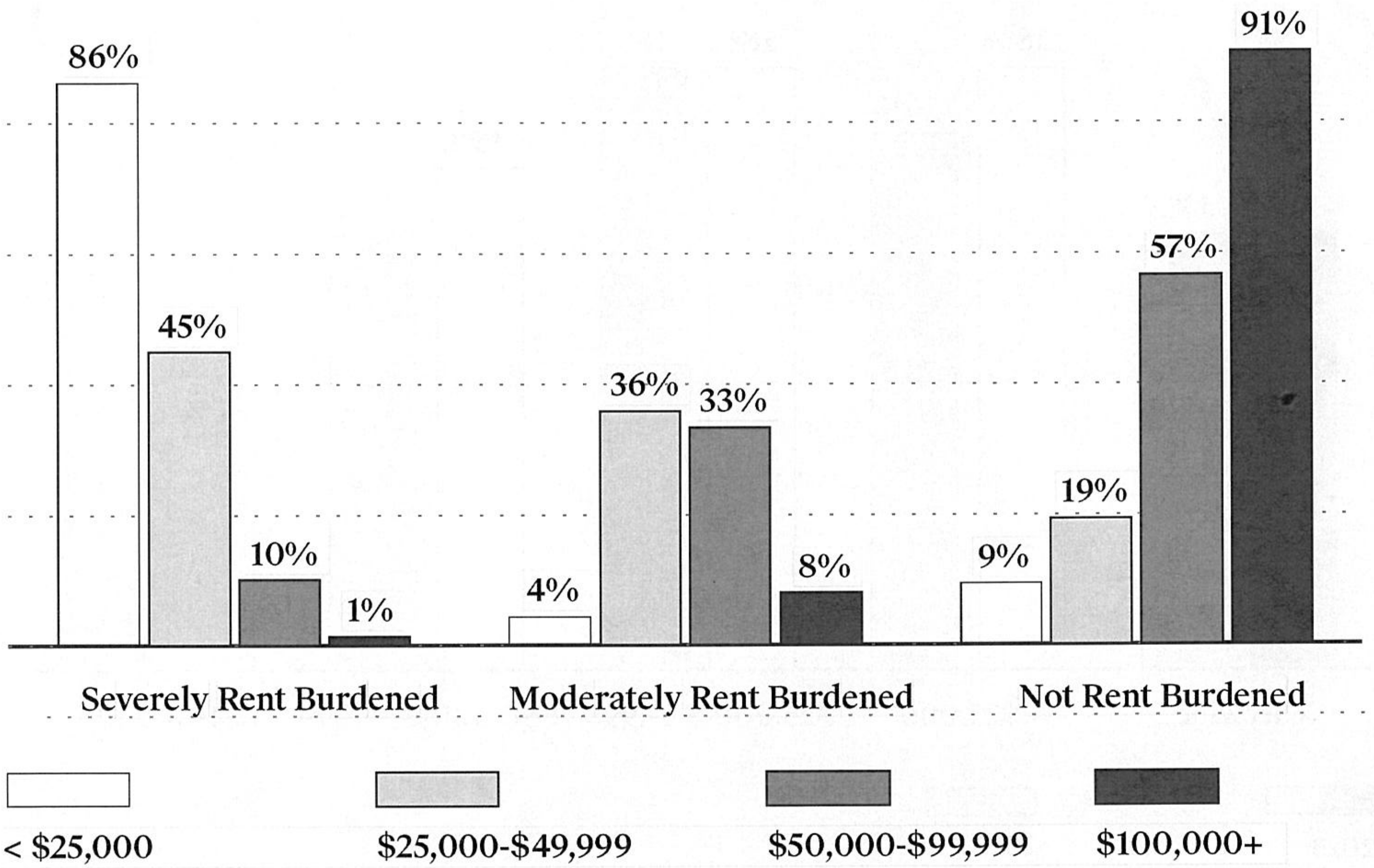
New York City Housing and Vacancy Survey

16 RENT BURDEN, BY INCOME

Low-income households without rental assistance continued to show high levels of rent burden. This remained unchanged since 2021.

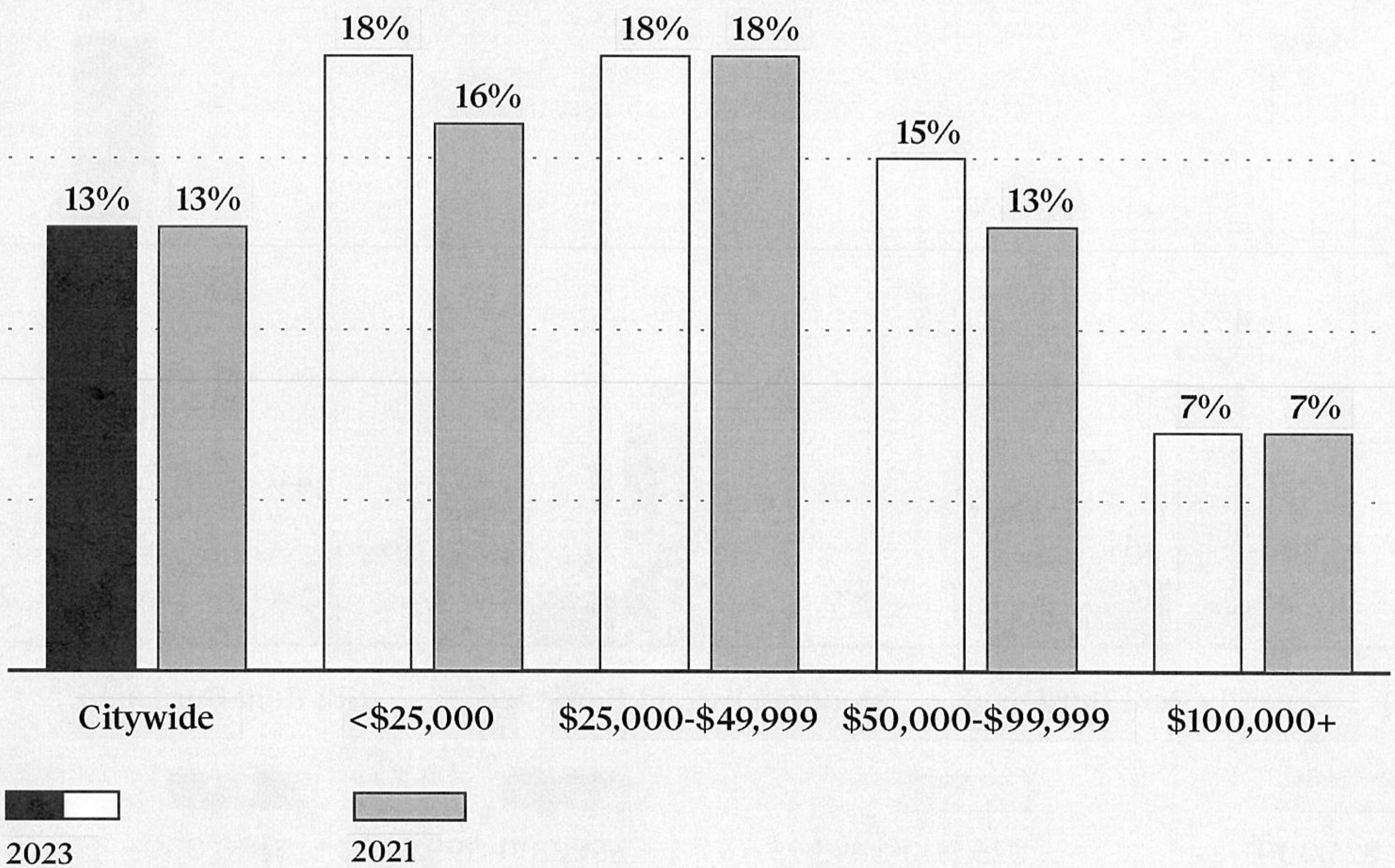


NYCHVS
New York City Housing and Vacancy Survey

17

MISSED RENT IN LAST YEAR, BY INCOME

The prevalence of missed rent payments remained at the same or higher levels than in 2021.

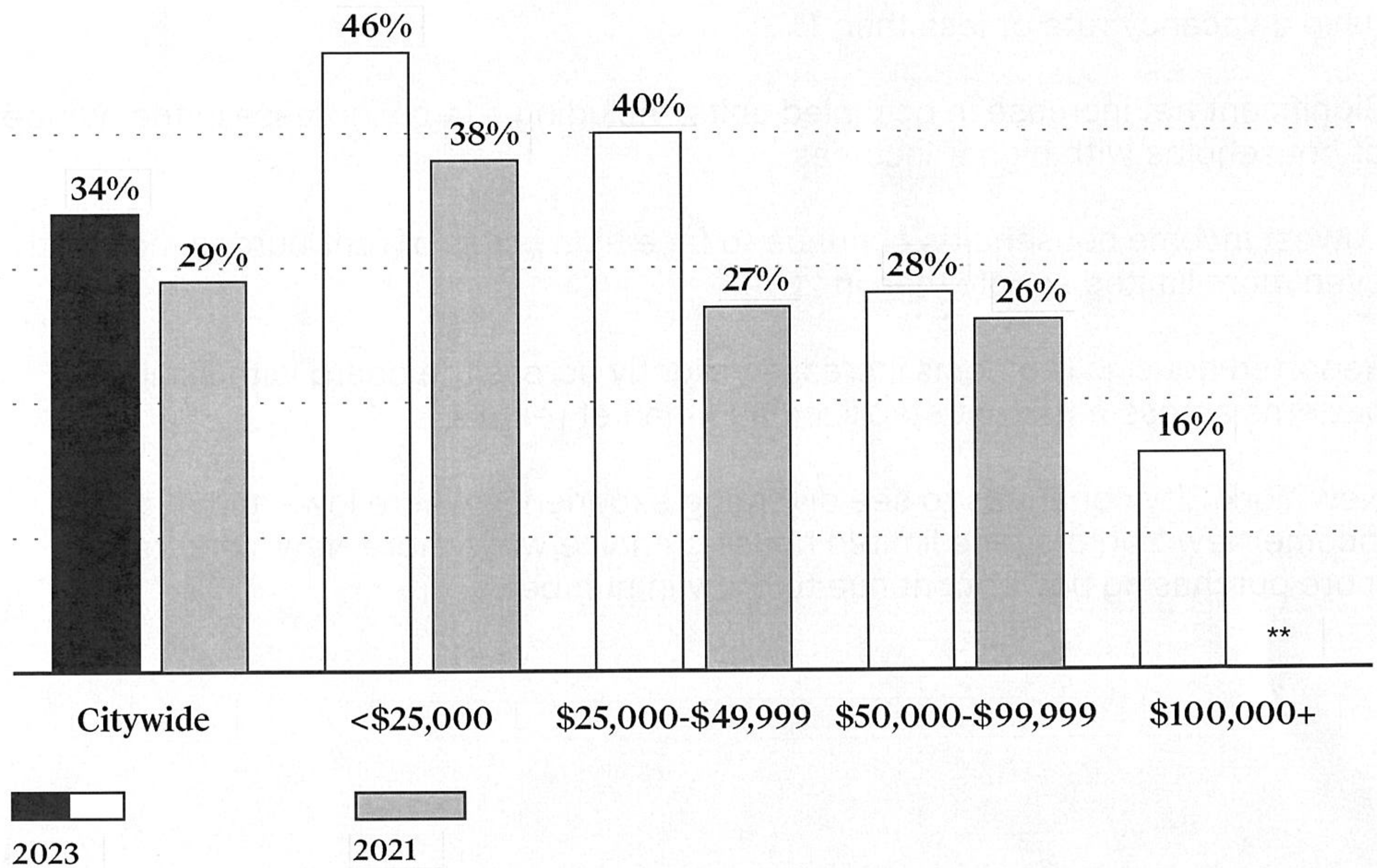


NYCHVS
New York City Housing and Vacancy Survey

18

STILL OWED RENT, BY INCOME

The share of renters who fell behind on rent and were in arrears at the time of the NYCHVS interview was higher in 2023 than in 2021.



NYCHVS
New York City Housing and Vacancy Survey

SUMMARY

- Historically low net rental vacancy rate of 1.41%. Units with rents below $2,400 all have a vacancy rate of less than 1%.
- Significant net increase in occupied units, including a large increase in the number of households with higher incomes.
- Lowest income households continue to face high levels of rent burden, now with even more limited supply than in 2021.
- Reported housing problems increased slightly across the board with similar patterns across both rent stabilized and market rentals.
- New York City continues to see diverging experience where low- and middle-income New Yorkers face limited housing choice while more New Yorkers with more purchasing power continue to grow in numbers.

NYC Department of
Housing Preservation
& Development

The Real Estate Board of New York to The Committee on Housing and Buildings on New York City's Housing Vacancy Rate

March 6, 2024

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY thanks the Committee for the opportunity to testify on New York City's net rental vacancy rate and findings from the 2023 Housing and Vacancy Survey (HVS).

New York City is in the throes of a housing crisis marked by a severe lack of new production and an absence of affordable housing needed to meet the City's diverse socioeconomic needs. The recent release of the 2023 HVS reveals that finding a safe and affordable home in New York City is more challenging than ever. According to the HVS, citywide vacancy rates are the lowest since 1968 at 1.41%, down from 4.5% in 2021.

Addressing this issue requires immediate action to boost supply, lest we find ourselves further outpaced by demand in the years ahead. Although the Mayor and Governor have set a goal of 500,000 new units in New York City in the next decade, we are far from that level of production. According to REBNY's December 2023 Foundation Permit Report, 9,909 units were proposed in 2023, a 78% decline from the 45,593 units proposed in 2022 and well below the roughly 50,000 units a year needed to meet the City's needs.

The private sector is a critical contributor to housing production in New York City. A New York Housing Conference report found that the amount of affordable housing the City can finance is typically only 20% to 30% of what the private market is building. Furthermore, since the expiration of 421a, there's been no uptick in not-for-profit or government development to make up for the deficit. This is because the construction of affordable housing by these actors is inherently constrained by the City's budget capital allocation, federal policy on private activity bonds, availability of municipal land, and staffing levels at the relevant City and State housing agencies.

With these findings in mind, REBNY asks the NYC City Council to support State action and legislation intended to provide regulatory relief and increase housing production in New York City. Firstly, the State must remove the existing 12 FAR cap in the Multiple Dwelling Law (MDL). This antiquated regulation significantly reduces development potential by artificially capping residential density regardless of rational land use principles such as adjacency to transit, the City's obligations under fair housing to create access to housing in neighborhoods of opportunity, and significant changes in residential construction technology. A voluntary tax incentive priced to encourage mixed-income rental housing as a result of office conversions to residential use would also help address the lack of supply. Lastly, the need for a new tax abatement for rental housing construction, such as 421a, cannot be overstated. Implementing a replacement program is essential in boosting the statewide supply of rental units, with its proven track record of providing new housing and ability to cross-subsidize both market rate and affordable units in high-cost neighborhoods. We urge the New York State Legislature to grant the City the autonomy required to develop lasting solutions to this crisis.

Finally, REBNY commends the Adams Administration for beginning the effort to increase housing production and enable commercial conversions through reforms in the City of Yes for Housing Opportunity platform, as well as the Council for its rigorous consideration of housing policy measures and land use actions that could help alleviate the crisis. Thank you for the opportunity to comment on these issues.

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RSA

RENT STABILIZATION ASSOCIATION ⬩ 123 William Street ⬩ New York, NY 10038

Comments on Preconsidered Intro.___

March 6, 2024

The Rent Stabilization Association of New York City represents 25,000 diverse owners and managers who collectively manage more than one million apartments in every neighborhood and community throughout the city. We thank the Committee for giving us the opportunity to submit these comments on Res. No. ___ declaring a housing emergency and Preconsidered Int. ___, which would extend the rent stabilization law through April 1, 2027.

As you go forward in inevitability declaring a housing emergency and extending the rent stabilization law, please consider these facts:

Rent stabilization is not a system built in equity, fairness or need. It is not a system designed to house the poor nor is it a program to provide affordable housing. It is not means tested.

Rather, rent stabilization perpetuates inequity. It benefits the wealthy. It is conferred by chance. It rewards longevity. It freezes the rental market.

Rent stabilization functions as a throttle on a healthy housing system. It arbitrarily sets rents. It denies resources to the city's oldest buildings. By keeping rents low it ignores the reality of rising costs, the biggest of which are property taxes that are set by the administration and City Council.

Rent stabilization is not a solution to New York City's housing crisis. It is a contributing cause. It staunches the flow of housing to market and makes finding housing harder for all but the fortunate few who have secured a subsidized unit. It is based on luck, not need.

Rent stabilization exacerbates the housing shortage. It increases overall rents. It worsens housing quality.

The rent stabilization law continues to fail those it purports to help. It has become about protecting a constituency that benefits from it, not about assisting those who need it.

Rent stabilization, which has been in place for 75 years, does not work.

Testimony of Brendan Cheney, New York Housing Conference

New York City Council Housing and Buildings Committee
Oversight Hearing- The 2023 Housing and Vacancy Survey

March 6, 2024

Good afternoon. My name is Brendan Cheney, Director of Policy and Operations at the New York Housing Conference (NYHC). I would like to thank Chair Sanchez as well as the other members of the City Council Committee for the opportunity to testify today.

NYHC is a nonprofit affordable housing policy and advocacy organization. As a broad-based coalition, our mission is to advance City, State and Federal policies and funding to support the development and preservation of decent and affordable housing for *all* New Yorkers.

Today we are testifying on the historic data released in the 2023 New York City Housing & Vacancy Survey and what it says about the urgent need for housing supply and rental assistance. The NYC Housing and Vacancy Survey is the most comprehensive snapshot of our city's housing stock and population available. It is an invaluable tool for advocates, academics and policy makers who want to see a more equitable city where safe, affordable housing is accessible to all.

The HVS clearly shows that NYC continues to face a housing emergency that warrants the continuation of rent stabilization laws. It also highlights the urgency of meeting a growing need for additional housing supply and calls for solutions to alarming rent burdens shouldered by low income renters who would greatly benefit from access to affordable homes and/or rental assistance.

The HVS survey revealed an alarmingly low 1.4% vacancy rate for rentals in 2023 – the lowest since 1968. Even though there was a net increase of about 61,000 units since 2021, the market remained extremely tight due to the long-term housing shortage and increased demand. Since 2021, the city added 275,000 new households.

To meet statewide demand, New York State needs to build over 800,000 housing units during the next decade to address current needs and meet expected population and job growth, according to the Regional Plan Association. The City alone will need 500,000 new housing units.

When supply of housing doesn't meet the demand, renters are forced to compete for the same limited number of apartments. This drives up costs and creates an even greater power imbalance between renter and landlord.

It also disproportionately impacts the lowest income renters where the market is tightest and the need greatest. For example, the vacancy rate for units renting for less than $1,100 was just 0.39%.

As a result, low-income households are disproportionately rent burdened, housing insecure and have less residential mobility. The HVS revealed that virtually all renter households earning under $25,000 are rent burdened and 86% of them pay more than half of their income on housing. And renter households earning less than $70,000 had a median rent-to-income ratio of 54%. This means the typical renter in NYC was paying more than half of their income on housing.

In addition, housing instability is growing. The number of residential warrants issued and marshall evictions carried out tripled from 2022 to 2023. Additional data showed that not only do lower-income renters have less ability to move from their current apartments, but when they do move, that unit often rents to higher income households.

The most recent data also showed a significant increase in the median income of renters from $50,000 in 2021 to $70,000 in 2023. This was driven by big changes in the city's population which now has more higher income households and fewer lower income households. Households earning $100,000 or more increased by 11% while the number of households in the city at the lower incomes decreased.

The grim findings of the 2023 HVS show that New York must both increase housing supply and assist renters in need right now.

We know lack of affordable housing is the primary driver of homelessness and it is the lowest income, rent burdened households who are most at risk of joining the more than 145,000 individuals experiencing homelessness in NYC. At the city, state and federal level we must all fight for more funding for affordable housing construction and preservation and funding for rental assistance. At the state level, this means supporting the proposed Housing Access Voucher Program. It also makes expansion of CityFHEPS as critical policy intervention.

We are supportive of the City of Yes for Housing Opportunity framework to address zoning barriers to housing production citywide and to build a little more housing in every neighborhood. Housing production, especially affordable housing production, is not shared equitably across the city. According to our data in our New York City Housing Tracker, from 2014 – 2022, 16 City Council districts produced more than 2,000 units of new affordable housing while 17 districts produced fewer than 400 units over that time. We encourage the members of the City Council to support City of Yes zoning reforms that will ensure housing is built in every neighborhood.

A new as-of-right rental tax abatement is necessary to incentivize rental housing production with an affordable housing requirement. Without a rental tax incentive, rental housing production is likely to plummet, and NYC's zoning authority will be undermined, making Mandatory Inclusionary Housing unworkable. A rental tax incentive will help to add housing across the city but it is especially effective in creating affordable housing opportunity in high-cost neighborhoods. We hope to see a 421-a replacement that complements the city's Mandatory Inclusionary Housing Program and requires affordable housing with rents that are actually affordable to low-income New Yorkers.

The lack of housing supply overall is affecting our efforts for low income households. Insufficient supply makes it difficult for households with rental assistance to find housing. A third of households were unsuccessful in using their voucher to lease an apartment in New York City in 2021.

In an extremely tight housing market like this one, tenant protections are necessary. State legislation in 2019 to improve tenant protections increased stability for renter households. However, HTSPA should be reformed to better encourage investment in stabilized housing and allow for adequate rent increases to cover costs. While we support reforming the Individual Apartment Improvements rules, we oppose changes that would jeopardize affordability across the rent stabilized stock and bring back incentives to push out tenants.

The scale of the housing affordability crisis is staggering. One change will not be enough. We must enact multiple changes at different levels of government it we are to truly address the crisis.

Thank you for this opportunity to testify.

Association for Neighborhood & Housing Development

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Testimony Before the New York City Council Committee on Housing and Buildings Regarding the 2023 Housing Vacancy Survey and Continuation of the New York City Rent Stabilization Law

March 6, 2024

Thank you to Chair Pierina Sanchez and members of the Committee on Housing and Buildings for the opportunity to testify today on the state of New York City's housing vacancy, our housing emergency, and the continuing need for strong and robust rent stabilization. My name is Lucy Block, and I am the Senior Research and Data Associate at the Association for Neighborhood & Housing Development (ANHD).

About the Association for Neighborhood and Housing Development

ANHD is one of New York City's lead policy, advocacy, and technical assistance and capacity-building organizations. We maintain a membership of 80+ neighborhood-based and citywide nonprofit organizations that have affordable housing and/or equitable economic development as a central component of their mission. We are an essential voice, bridging the power and impact of our member groups to build community power and ensure the right to affordable housing and thriving, equitable neighborhoods for all New Yorkers. We value justice, equity and opportunity, and we believe in the importance of movement building that centers marginalized communities in our work. ANHD turns 50 years old in 2024, and across five decades and five boroughs we have consistently focused on addressing New York's housing affordability crisis, displacement, and economic inequity to build community power.

ANHD's work directly supports the needs of our members who develop, manage, and organize to preserve affordable housing, and who fight to bring equity into low-wealth communities in New York City—especially communities of color. Our groups rely on us for technical assistance and capacity-building resources that allow them to maximize their resources, skills and impact. The support services, research, analysis, public education, and coalition building we do helps to identify patterns of local neighborhood experiences and uplift citywide priorities and needs. Our work translates into the capacity to win new programs, policies and systems that ensure the creation and preservation of deeply and permanently affordable housing, and economic justice.

As many will point out today, the newest vacancy numbers in New York City are alarming. There is a major overall decline in vacancy since the last Housing and Vacancy Survey (HVS) in 2021. Because of the citywide vacancy rate of 1.41% and many other indicators of a worsening housing emergency, we believe that the need to maintain strong rent stabilization for New Yorkers is amply clear.

Our housing emergency and low vacancy rates are concentrated at the bottom and middle of the market, not the top.

Many will claim that the new Housing and Vacancy Survey (HVS) results point to a need for an overall increase in housing supply by any means necessary: be they zoning amendments, government subsidy via tax exemptions, or other mechanisms.

We want to point to some of the more granular details in the newest HVS, and the fact that despite overall declines, the top end of our housing market maintains a vacancy rate that is monumentally higher than the vacancy rate of the housing that the vast majority of New Yorkers can afford.

- ➔ There are nine times as many units available in the top quarter of the market versus the bottom quarter (21,205 units available renting above $2,400, versus 2,297 units below $1,100)
- ➔ The vacancy rate of the top quarter of the market is 3.39%, three to eight times higher than any other segment of the market, all of which are below 1%.
- ➔ To get to a "healthy" vacancy rate of 5% across the board, we would need 7.5 times as many units renting below $2,400 than above it.

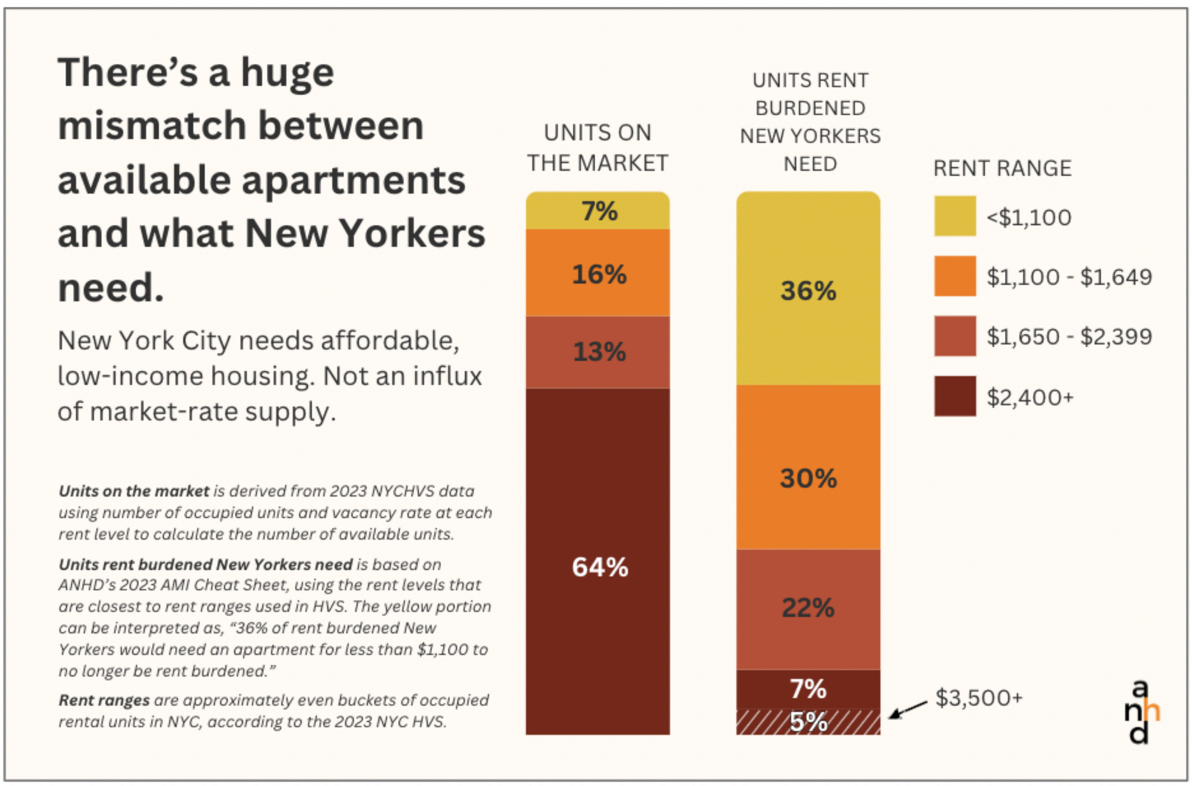
The number of units needed in New York City varies greatly by rent range, and vacancy is concentrated at the top of the market.

Rent range	Number of occupied units	Vacancy rate	Number of units available for rent	Number of additional units needed for a 5% vacancy rate	Difference between available units and needed units
< $1,100	586,800	0.39%	**2,297**	**30,884**	**28,587**
$1,100 - $1,649	578,100	0.91%	**5,309**	**30,426**	**25,117**
$1,650 - $2,399	554,300	0.79%	**4,414**	**29,174**	**24,760**
$2,400+	604,300	3.39%	**21,205**	**31,805**	**10,601**
Overall	2,324,000	1.41%	33,210	**122,316**	**89,106**

Data source: 2023 NYCHVS Selected Initial Findings. ***Bolded*** *numbers were calculated by ANHD.*

While vacancy has tightened overall, we miss the story if we don't examine the details of the numbers. The number of units available to rent in each of the HVS-defined rent ranges (which are split roughly into quartiles) varies dramatically. There are an estimated 21,205 units available to rent at the top end of the market, with a vacancy rate of 3.39%, but only 2,297 units available to rent at the bottom, with a vacancy rate of just 0.39%.[1] **We indeed have a vacancy crisis; but the true emergency lies in the availability of units for average New Yorkers, who can't afford new market-rate units.** In order to achieve a 5% vacancy rate across all segments of the market, we would need 7.5 times as many units below $2,400/month than above it.

Using the typical 30% of income affordability standard, a $2,400 two-bedroom apartment is affordable to a household making $96,000 per year – slightly less than 80% AMI for a three-person household in 2023. While an estimated 36% of New York City renter households make above $100,000,[2] those households constitute just 12% of the city's rent-burdened population.[3] The remaining 88% of the rent-burdened population makes less than that amount. Therefore, the top quarter of the rental market, with the highest vacancy rate of 3.39%, is affordable to approximately 12% of the city's rent-burdened population.



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[1] To calculate the number of available rental units, we used the following formula for each rent range: $a = bc \div (1\text{-}c)$ where a = the number of available units, b = the number of occupied units, and c = the vacancy rate.

[2] 2023 NYCHVS Selected Initial Findings, https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf, Table 14. Note: according to ANHD's 2023 AMI Cheat Sheet, 40.5% of the New York City renter population makes at least $101,680, which we consider to be a similar estimate.

[3] ANHD, 2023 AMI Cheat Sheet, https://anhd.org/report/2023-ami-cheat-sheet.

Furthermore, most new units are much more expensive than $2,400 – apartments on the market had a median rent of $3,500/month or higher throughout 2023.[4] A $3,500 apartment is affordable to just 4.7% of New York City's rent-burdened population.

The HVS results also show us how our housing crisis continues to disproportionately impact people of color and immigrant New Yorkers. 47% of renters with a Black householder[5] were rent burdened (with 28% of households severely rent burdened), followed by 46% of foreign-born households (with 27% of households severely rent burdened), and 45% of Hispanic households (with 27% of households severely rent burdened).[6] Even more starkly, 23% of Black households, 21% of households of two or more races, and 20% of Hispanic households reported more than three housing problems, compared to just 9% of White and Asian households.[7]

The Selected Initial Findings of the HVS tell a clear story. Of all available vacant units, the vast majority are concentrated at the highest end of the rental market, which has the lowest share of New York City's rent-burdened population. The median available unit has a rent that less than 5% of our city's rent-burdened population can afford. So who are $3,500 apartments serving, and what are they doing to alleviate our housing crisis?

We must focus our policies and resources on the preservation of affordable low-income housing, including strong protections to keep low-income tenants in their homes, and plan for and develop new deeply and permanently affordable housing for those who most need it.

While we do not have enough of it, our rent stabilized housing stock is a fundamental source of affordability for millions of tenants, and even more so since harmful loopholes were closed in 2019. Median rents of occupied rent-stabilized apartments are three-quarters of market-rate apartments: $1,500 versus $2,000. Without a doubt, the **City Council must extend our rent stabilization laws, one of the core mechanisms for low- and middle-income New Yorkers to remain in our city.**

We must expand and creatively use existing operating subsidies such as Section 8 and CityFHEPS vouchers to prevent evictions and secure homes for people experiencing homelessness. This means implementing the CityFHEPS package that the City Council has championed, fighting source of income discrimination, and expanding the overall voucher pool. We appreciate the City Council's determination to ensure the package's full implementation. **We hope to continue working alongside the Council to exercise every means at our disposal – including enforcement of source of income discrimination and expanded funding – to enable New Yorkers to use vouchers to access safe, secure, and permanent housing.**

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[4] NYC Comptroller Brad Lander, Spotlight: New York City's Rental Housing Market, January 17, 2024. https://comptroller.nyc.gov/reports/spotlight-new-york-citys-rental-housing-market
[5] The race, ethnicity, and origin of renter households is defined by that of the respondent to the survey, also called the "householder" or "head of household" (see Appendix A, p.82).
[6] 2023 NYC HVS Selected Initial Findings, Table 18.
[7] Ibid, Table 16.

The City Council must defend Right to Counsel, one of our best ways to protect tenants who are facing eviction and displacement and may have viable options to stay in their homes, including one-shot deals and vouchers. New York City's Right to Counsel has been gravely weakened by an unwillingness by the courts to slow cases until eligible tenants can obtain representation that they are entitled to, resulting in over 46,000 tenant households that have faced eviction alone.[8] Underfunding is also a major source of the problem, which is why the city must **fully fund Right to Counsel with at least $351 million this year.** The Office of Civil Justice (OCJ), which was created to implement Right to Counsel, has instead taken a back seat and done little to advocate for tenants' rights to representation. In addition to full funding, **we urge the City Council to publicly support the Right to Counsel Coalition's demands to OCJ, Chief Judge Rowan Wilson, the Office of Court Administration, and the state legislature.**

We urge the City Council to prioritize the development of housing for those who most need it via policy and allocation of capital dollars. We need more capital subsidies for permanently and deeply affordable housing and more resources for mission-driven and community-controlled developments that New Yorkers want and that best align with their needs. We need to make sure that our public resources and our public land go to where they are needed most and to actors who will steward those resources in the best interests of our communities. Given the clear need and lack of availability of units under $2,400 per month, **our city's subsidy programs must prioritize housing at this level, which the market is simply not inclined to address on its own.** This could include updated term sheets, further use of income-averaging, and new options to include project-level operating subsidy to make lower rents sustainable.

We also ask the City Council to pass the Community Land Act, which will provide communities with more tools to fight speculation, develop responsibly, and move distressed buildings into the hands of responsible community stewards.

Thank you for providing the opportunity to testify today and to the New York City Council for its leadership and commitment to true solutions to our housing affordability crisis. We look forward to ongoing work to make sure our city can be a place for low- and middle-income New Yorkers to thrive.

If you have any questions or for more information, do not hesitate to contact Lucy Block at lucy.b@anhd.org.

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[8] Right to Counsel Coalition and ANHD, NYC Eviction Crisis Monitor. https://www.righttocounselnyc.org/nyccrisismonitor.

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Testimony on Housing and Vacancy Survey

The Center for Independence of the Disabled, NY (CIDNY) is the voice of people with disabilities in the five boroughs of New York City. We are a nonprofit organization founded in 1978. We are part of the Independent Living Centers movement, a national network of grassroots and community-based organizations that enhance opportunities for people with disabilities to direct their own lives. We hereby testify our support for the legislation 0653-2024.

Fairness in the applications
We advocate for a fair and just proceeding of housing applications to combat the discrimination that people with disabilities may encounter when their disabilities are disclosed. This can be classified as "ableist." That is why we strongly advocate for fairness in selecting applicants for apartments and homes without disqualifying people because they live with disabilities.

Reasonable Accommodation
Individuals with disabilities are entitled to reasonable accommodations and modifications so that they can fully enjoy their homes. Denying services, refusing modifications, and not accepting service dogs can be characterized as "ableist." Trying to meet the needs of people with disabilities moves New York City closer to an equitable and fair housing system.

Rent Control and Stabilization
Landlords should only charge one month's rent and a security deposit or "advance payment" equal to a month's rent when a new tenant moves into an apartment. They should not charge broker fees (which often equal the whole rent), application fees, background check fees, etc. For someone moving into an apartment that rents for $1,700 a month, for example, the most the landlord should be able to charge would be $3,400 (the first month's rent and an equal amount for a security deposit). Any additional fees should be reprimanded or subjected to penalties.

Lease Termination Made Easy
If someone must move out of an apartment for any reason before the lease ends, the landlord must look for another tenant to rent it. If the landlord finds a new tenant who would pay equal to or higher than the current rent, the lease should be considered terminated, and the tenant who is moving out should no longer be subject to paying anything to the landlord.

CIDNY strongly supports this legislation. Thank you for the opportunity to testify today, and we look forward to working with you to ensure that New York City is an affordable, inclusive and equitable place to live for everyone.

This testimony is approved by our Executive Director, Dr Sharon McLennon Wier.

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March 6, 2024

CHIP Testimony on Rent-Stabilization and HVS

Thank you for holding this hearing today. I am Adam Roberts, Policy Director for the Community Housing Improvement Program (CHIP). We represent New York's housing providers, including apartment building owners and managers. Our members operate New York's rent-stabilized housing, which makes up nearly one million units of affordable housing.

Most types of affordable housing in New York are facing a financial crisis, including NYCHA, supportive housing, and pre-1974 rent-stabilized housing. These aging buildings are expensive to maintain and upgrade. Considering the $80 billion needed to renovate NYCHA's 178,000 units of housing, the cost must be far higher for the one million units of rent-stabilized housing.

Rent-stabilized housing is in even more dire circumstances because the cost of renovations cannot be recouped. Rental income barely covers daily operating costs. This prevents banks, non-profits, and government agencies from lending for renovations, while simultaneously reducing building value. Without lending, it is impossible to pay contractors, tradespeople, architects, and engineers for renovating vacant units. When long-term tenants move out, these units require lead abatement, asbestos remediation, subfloor replacement, electrical rewiring, and bathroom and kitchen renovations, which totals around $100,000 for a one-bedroom unit.

Furthermore, those banks who did previously lend to rent-stabilized housing are themselves facing collapse because of plummeting building values. Since building values are so low, banks cannot recoup losses through foreclosure. Signature Bank collapsed last year, and New York Community Bank, now the largest lender to rent-stabilized housing, is facing imminent collapse.

Without funding for renovations, units are being left vacant after long-term occupancies. The Independent Budget Office (IBO) found over 42,000 vacant units in 2022, an 18% increase from pre-COVID. Over 13,000 units were vacant for multiple years, a 65% increase from pre-COVID. Furthermore, we received numbers from the Department of Finance (DOF) showing nearly 9,000 units were vacant in both 2021 and 2022. Meanwhile, the Census Bureau found over 26,000 units "vacant but not available" in the 2023 Housing and Vacancy Survey (HVS).

It is important to note that both the IBO and DOF numbers, respectively, come from rent registrations and RPIEs. These are filings rent-stabilized buildings submit, not survey samples like the HVS. This makes those filing numbers hard to refute. It is an important consideration for the council in evaluating HPD's claim the HVS shows no vacancy issue.

While renewing the city's rental emergency and reviewing the results of the HVS, we ask that the Council find a solution to the financial crisis plaguing rent-stabilized housing. Waiting to act means more foreclosures, more vacancies, and the need for a government bailout, which would divert tens of billions of dollars from necessary social services. We want to be your partner in ensuring this crisis is solved now. Again, thank you for holding this hearing today.

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Community Service Society

New York City Council
Committee on Housing and Buildings
March 6th, 2024

Thank you to the New York City Council's Committee on Housing and Buildings for holding this hearing on the 2023 Housing and Vacancy Survey (HVS), the determination of a housing emergency, and the continuation of rent stabilization and rent control.

Our names are Oksana Mironova and Samuel Stein and we are senior policy analysts at the Community Service Society of New York (CSS), a leading nonprofit that promotes economic opportunity for all New Yorkers. CSS uses research, advocacy, and direct services to champion a more equitable city and state.

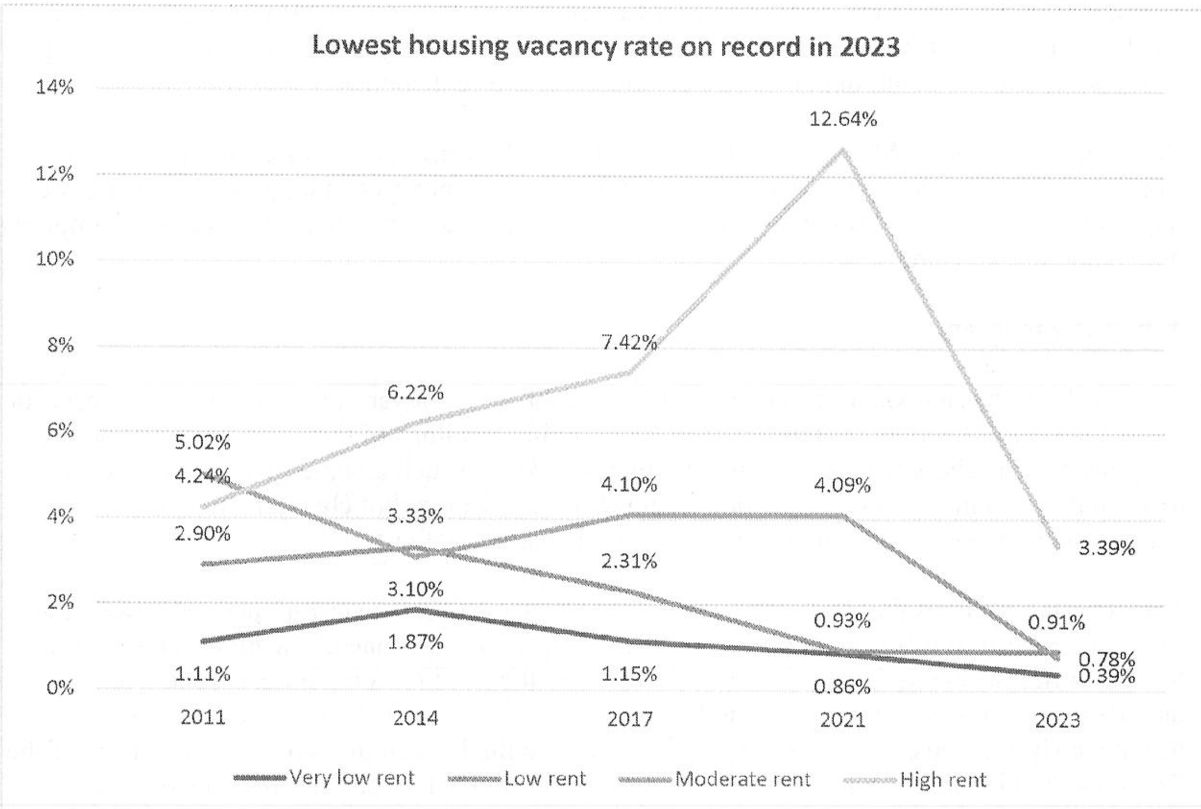
A Public Emergency

New York defines a housing emergency by a clear threshold: a vacancy rate below 5 percent for rental housing in habitable condition. The Select Initial Findings of the 2023 Housing and Vacancy Survey show that New York City remains *deep* in such an emergency, not only justifying the continuation of rent control and rent stabilization, but clarifying the very connection between low vacancy and the need for rent regulation.

The 2023 HVS shows that New York City's net rental vacancy rate is 1.41 percent, one of the lowest on record. It is a steep fall from 2021's 4.54 percent rate, one of the highest on record. Such an extreme swing denotes extreme times when the need for a regulatory framework that balances the scales between tenants and landlords is most needed. This swing captures turbulence in the housing market, as New York City pulled out of the most extreme phase of the Covid pandemic, and a remarkable 22 percent of households moved into their current home (including both intra-city moves and moves from elsewhere).

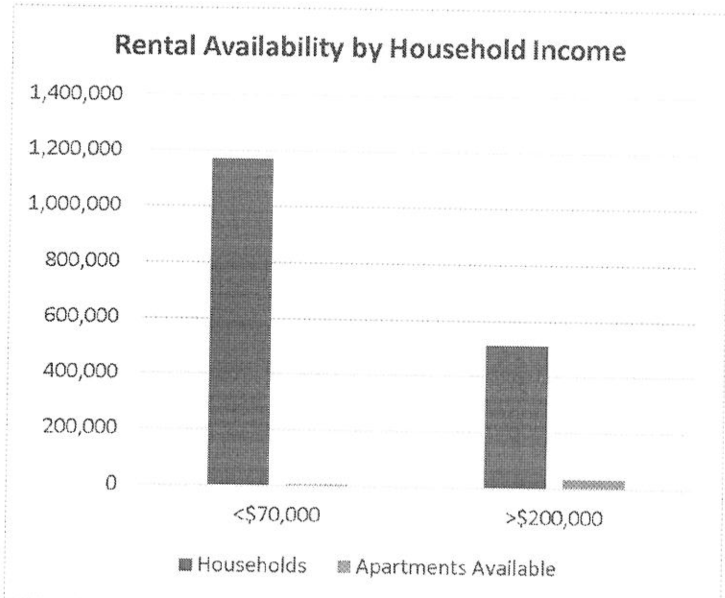
The Fewest Apartments with the Lowest Rents

The survey also highlights that within that overall tight housing market, available low-cost housing remains the scarcest. The vacancy rate for apartments at the bottom quartile of the rental market (what the survey calls "very-low rent" apartments) is virtually non-existent at 0.39 percent. Shockingly, the vacancy rates for the next two quartiles ("low rent" and "moderate rent" apartments) are also below 1 percent, at 0.91 percent and 0.78 percent respectively. And while the vacancy rate for the top quartile ("high rent" apartments) has dropped dramatically since its historic high last year, by comparison to the rest of the market it soars at 3.39 percent. This trend of rent-polarized vacancy rates is a clear trend that has developed over time, but the convergence of the bottom three quartiles at extremely low vacancy is a new phenomenon. (See chart below.)



The 2023 HVS reports that not only is vacancy is essentially non-existent among low-rent units, but New York City has lost such apartments altogether at an alarming rate. Between 1993 and 2023, New York City lost over 600,000 units with rents at or below $1,500 (adjusting for inflation). Meanwhile, we have added 75,000 units with rents over $5,000.

As a result, the HVS finds that there were less than 5,000 apartments available in the city for households making less than $50,000 – a population that, according to the 2022 American Community Survey includes over 1.17 million households, or 36 percent of the population. Meanwhile, there were more than 33,000 apartments available to the 16 percent of New York City Households (512,267 households) who earn more than $200,000 a year.



Low Vacancy Rate Demands Strong Regulation

New York's rent control and rent stabilization laws are backed by a clear premise, which this year's HVS clearly demonstrates: ***when vacancy rates are low, individual tenant households lack market power.***

While many Councilmembers today are tenants themselves, but for those who are not: imagine that you are a renter, that we don't have rent regulation, and that housing conditions are as reported in the most recent HVS. Your landlord raises your rent above what you can afford to pay, simply because they can – they think someone will pay more for the space, and they want higher profits. Meanwhile, conditions in your apartment and your building keep getting worse, so you know the money isn't going toward repairs and investments. What do you do? In such a tight housing climate, you can't exercise your power as a housing "consumer" and pick up and leave, because there are so few places available – and particularly so few that you can afford. Instead, you're forced to stay put, watch your rent burden grow, and suffer through bad conditions lest you speak up and your landlord retaliates by refusing to renew your lease. It's that, doubling up with family or friends, or homelessness.

This is the legal justification for rent control and rent stabilization. When there is such an extreme imbalance in market power between landlords and tenants, it is incumbent on the state to step in and prevent the most severe forms of exploitation. Rent stabilization (in 996,600 apartments) and rent control (in 24,020 apartments) keeps landlords from exploiting this housing crisis and gives tenants the legal backing to push back against deferred maintenance and neglect with the confidence that their lease will be renewed at a rate allowed by the law.

A Note on the Housing Stability and Tenant Protection Act (HSTPA)

This is the second RSL hearing since the Housing Stability and Tenant Protection Act (HSTPA) of 2019 went into effect. Before the HSTPA, when a tenant moved out, rent stabilized apartments were eligible for a 20 percent as-of-right increase and unchecked and often inflated increases resulting from Individual Apartment Improvements. Apartments that reached a legal rent of $2,816 were eligible for decontrol. Unscrupulous landlords developed business practices contingent on these loopholes, all geared toward increasing the net operating income of their stabilized properties, which allowed them to overleverage their buildings with more and more debt. Conditions for tenants got so bad that the city and state were forced to sharpen their definitions of tenant harassment.

Lenders were complicit in these practices. As the Association of Neighborhood and Housing Development's (ANHD) Equitable Reinvestment Committee (ERC) has shown, some multifamily lenders' core business practices relied on "making multifamily loans to bad acting landlords." For example, "year after year, building after building, Signature Bank consistently made multifamily loans that were speculative and underwritten to practices of displacement, harassment, or building neglect."

If rent stabilized building values are now falling, it's because the market is resetting to the prices associated with the rents in the buildings – no more, no less. If previous rounds of sky-high valuations were based on dreams of ever-rising rents and net operating income, today's are based on realistic assessments of what tenants pay each month according to the law.

At the same time, the reality is that there are financially distressed, rent stabilized properties on the market today. As this committee considers the implications of the 2023 HVS and the RSL, we hope that it also engages with the opportunity to rescue overleveraged properties and turn them into permanently affordable housing. The city could intervene by funding Neighborhood Pillars, a program created by the de Blasio administration in the long shadow of the 2008 foreclosure crisis. It can also pass the Community Opportunity to Purchase Act (Int 1977), to establish a legal framework for the transfer of buildings from distressed private ownership to public, tenant community-controlled social housing.

Today, we strongly urge the council to determine that a public emergency requiring rent control in the City of New York continues to exist and will continue to exist past April 1, 2024, and that the Rent Stabilization Law of 1969 be continued.

If you have any questions or want to discuss further, please reach out to us at omironova@cssny.org and sstein@cssny.org.

Legal Services NYC
DEMAND JUSTICE

Testimony of Adam Edwards-Rivera and Sarah Hainbach
Before the NYC Council, Committee on Housing and Buildings
Re: Housing Vacancy Survey, Rent Stabilization, & the NYC Housing Emergency
March 6, 2024

Good morning, I am Adam Edwards-Rivera, a Law Graduate with the Housing Rights Unit at the Queens Legal Services program of Legal Services NYC. I am here testifying with my colleague, Sarah Hainbach, who is also an attorney in our housing unit in Queens.

We thank the Committee for the opportunity to testify today about Rent Stabilization as it relates to addressing the ongoing housing emergency in New York City. We are here today to shed light on the day-to-day reality of New Yorkers who rely on Rent Stabilization to keep a roof over their heads.

Our organization, Legal Services NYC (LSNYC), is the country's largest organization providing free civil legal services to low-income communities. LSNYC is a nonprofit organization that fights poverty and seeks racial, social and economic justice for low-income New Yorkers. For over fifty years, we have helped our clients meet basic human needs in order to protect and restore human dignity. Our staff members assist more than 100,000 low-income New Yorkers each year. Annually, we provide legal assistance to thousands of low-income New Yorkers facing eviction and seeking to enforce NYC housing standards in their homes. Along with other legal services providers in New York City, LSNYC is at the forefront of the fight to prevent evictions and preserve affordable housing.

Legal Services NYC
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Rent Stabilization not only has a personal stabilizing effect for our clients, it is a crucial response to a housing crisis in our city. On February 8, 2024, the New York City Housing and Vacancy survey published their semi-annual report, which indicated the rental vacancy rate in the city had reached its lowest point since 1968. According to the report, only 1.4% of rentable apartment units in New York City were vacant between January and June of last year. The majority of all vacancies were in apartments renting for over $2,400/month. Low-rent vacancies accounted for less than one half of one percent of all rentable housing stock.

There is no reason to think that the vacancy rates have increased since June. In fact, there are indications that the housing emergency in New York City has only gotten worse. Starting in July of 2023, and continuing through today, New York City's shelter population has unfortunately spiked to record highs. According to the Department of Homeless Services, as of March 2, 2024, nearly 87,000 people were living in New York City's homeless shelters, including nearly 33,000 children.

At the same time, evictions are spiking. Following the end of the COVID eviction moratoria in 2022, eviction numbers rocketed back towards pre-pandemic levels. There were nearly three times as many evictions in 2023, as in 2022. In October of 2022, 571 New Yorkers were evicted from their homes. In October 2023, that number jumped to 1,329.

The final nail in the coffin is the suffocating heights that rents have reached in New York City. In 2022 alone, average rent rose by 28% from the year before. Rents in 2023 rose by nearly 10% on top of that.

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Many of us here today know at least one person that went through sticker shock after seeing the renewal rent on their leases in the last couple years. Many people dip into emergency funds and make painful cuts in their day-to-day expenses to meet spiraling rent levels, and many people simply cannot afford to stay in their homes.

All of this combines to create a dire housing crisis in New York City, which is perhaps as bad as it's been since the rent stabilization laws of 1969 came into effect.

In many of the cases where our office represents tenants, the tangible difference in how vulnerable someone is to eviction and facing homelessness is whether their home is rent stabilized. Rent Stabilized tenants receive renewal leases as of right. They can only have their rents increased by fixed, relatively affordable amounts, and landlords may only evict those tenants if they have cause such as the failure to pay rent.

Meanwhile, market rate tenants across the city wait with bated breath every year to see if they will receive a renewal lease and, significantly, if they will be able to afford their home anymore. The vulnerability and volatility inherent in market rate tenancies is evident in nearly every client we come across who lives in a market-rate apartment.

In one ongoing case, a client faces an eviction after the landlord raised the rent to almost $4,000. The landlord claims that the unit was legally deregulated, but our investigation suggested otherwise. If a tenant in a rent regulated apartment falls behind on rent, the landlord can file a nonpayment case, which provides the tenant with the opportunity to save their housing if they can come up with the money to pay what's owed. But, in an unregulated unit, once the lease expires, or if there was no lease to begin with, a landlord can raise the rent to astronomical levels and, if the tenant falls behind, the landlord can bring a "no cause" holdover, on the basis of overstaying their lease. Then, even if a tenant can come up with the money, there is not a legal basis for the court to grant them the right to remain in their apartment. In the case mentioned earlier, whether the client and her family can remain in their home will likely hinge on whether we can prove that the apartment should still be rent stabilized.

In another case of mine, my client lived in a Rent Stabilized apartment and faced eviction based on her apparent non-payment of rent. My client had been withholding her rent because she unsure if she should be paying because of two separate eviction proceedings that had been launched against her by the same landlord. She came to me, worried that she would be unable to stay in her home, since her lease was ending and she was sure her landlord would refuse to offer her a renewal. If she had lived in a market-rate apartment, her landlord would likely have declined to renew her lease. However, by virtue of the Rent Stabilization law, her lease was renewed. Our representation resulted in our client's multiple eviction proceedings all being discontinued, the landlord receiving back rent, and our client returning to their apartment with a lease. If our client had instead been in a market rate apartment, it is likely that the end result of the case would have been an elderly, disabled woman facing a gut-wrenching upheaval of her life into the impossible NYC housing market, and a landlord who would have most likely not have been repaid the rent that had been withheld.

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Many of our clients are low-income families living in month-to-month tenancies. In many of these cases, our clients are shocked to discover that their diligent monthly payments are rendered meaningless with a single 90-day notice, which announces the termination of what are sometimes decades of stable family life in a single unit. In many of these cases, our clients clean and make repairs in the apartment and building on their own and have gone out of their way over the years to not cause problems with their landlord.

Stories like these abound in our offices: families finding themselves in housing court facing eviction and homelessness, confused as to what is happening to them and why. We can only imagine how much these stories would proliferate, and how deeply the housing emergency would be felt if Rent Stabilized tenancies were to no longer exist.

The Rent Stabilization Law protects tenants in approximately 946,000 apartments in New York City, or about half the city's rental housing stock. One fifth of these apartments house families living below the poverty line, and nearly two-thirds house families classified by the Department of Housing and Urban Development as low-income, very low-income, or extremely low-income. In recent years, approximately 175,000 households in Rent Stabilized housing were unable to afford even a $25 increase in their monthly rent.

Given the extreme income vulnerability of many Rent Stabilized tenants, it stands to reason that if their Rent Stability protections were to lapse, the city would be faced with an unprecedented deluge of evictions, homelessness, and another heavy burden added to a city already in crisis.

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Dear Committee on Housing and Buildings,

My name is Sarah Hainbach, and I am also an attorney with the Housing Unit at Queens Legal Services, part of Legal Services NYC. I appreciate the opportunity to testify on Rent Stabilization as it relates to addressing the ongoing housing emergency in NYC. I am here today to share the experiences of my clients, some of whom live in regulated housing and some of whom live in unregulated housing, and to demonstrate to the Committee how rent regulation impacts New Yorkers' housing experiences.

New York State's system of rent regulation has existed in some shape or form for over one hundred years. It began in 1920 in response to severe housing shortages caused by World War I. The Rent Stabilization Law ("RSL") as we know it today was initially passed in 1969 and applied to buildings with six or more units that were built before 1947 and 1969. Then in 1974 the Emergency Tenant Protection Act ("ETPA") permitted NYC to expand rent stabilization for buildings with six or more units constructed before 1974. In 2019, the Housing Stability and Tenant Protection Act ("HSTPA") amended the RSL. Among other changes, the HSTPA altered the formulas for permissible rent increases based on apartment or building improvements and repealed mechanisms for deregulating apartments based on high rent or high income of tenants. Today, while the number of rent regulated units has decreased, rent stabilization *still* applies to nearly one million units in New York City.

My colleague Adam Edwards-Rivera just shared an overview of the current scarcity of affordable housing in New York City that contributes to an ongoing crisis. The following client stories demonstrate the severity of this crisis.

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As lawyers at LSNYC, when we meet new clients and evaluate their cases, one of the first questions we ask is, "Is this apartment regulated?" Whether a tenant's home is rent-controlled, rent-stabilized, or not regulated at all makes a huge difference to their case. While all New York City tenants are fortunate to benefit from some protections, such as the protection from "self-help" or illegal landlord lockouts and the warranty of habitability, rent regulated tenants reap the benefit of additional protections, most importantly, the right to renew their leases and the right to limited rental increases.

Where I work in Queens, countless LSNYC clients live in unregulated housing. For these tenants, nothing stops their landlords from deciding, at the end of a lease term, that they don't want to offer a renewal lease. Similarly, landlords of unregulated units are entitled to increase the rent by hundreds or thousands of dollars, as long as they provide sufficient notice (they are never required to provide more than three months). As lawyers, we are limited in what we can do to advocate for unregulated tenants. I cannot count the number of times I've said to a client, "unfortunately, because your apartment is unregulated, your landlord can decide not to renew your tenancy." It is frustrating to have to explain, again and again, that while we may be able to negotiate time for more time to move or to lower the amount of arrears claimed, ultimately, the tenant has no long-term right to remain in housing that is unregulated.

In the past couple of years of working as a housing attorney, I've also seen, on the other side of the spectrum, the positive impact rent stabilization can have on my clients' lives. I've worked with a mourning widow, whose name was never on the lease, to gather documents that proved her relationship to her deceased husband and their co-residency so that we were able to obtain a renewal lease in her name, for the same amount of rent. In a non-stabilized apartment, whether a spouse is allowed to stay after the death of their partner would be up to the landlord's discretion, and even if a landlord were willing to allow the tenant to stay, they would likely use the occasion to draw up a new lease with an increased rent. In this widow's case, however, she and her three children were entitled to remain in the apartment that they had called home for years, allowing some stability in the midst of mourning their husband and father.

In another case, after investigating a unit's history with New York State's Division of Housing and Community Renewal ("DHCR"), I helped defend a working mom of two against the nonpayment case her landlord had filed by arguing that her apartment was rent stabilized, even though the landlord had been treating it as unregulated. In this case, the landlord had improperly increased the rent by hundreds of dollars at a time, despite the unit not only being rent stabilized, but also being under a building-wide Rent Reduction Order ("RRO") that was supposed to freeze the rents of all tenants in the building until the landlord corrected conditions. The landlord tried to use those illegal rent increases to bring the unit out of rent regulation and was claiming that the tenant owed rent, even though for years she had been paying the higher, illegal rent. I helped the tenant to raise a rent overcharge defense and counterclaim that in fact the landlord owed her damages for the years that she had been overcharged.

Tenants of rent stabilized units also have more avenues to push for repairs and safe living conditions. While all New York City tenants enjoy the ability to call 311 and report unsafe housing conditions to the New York City Department of Housing Preservation and Development ("HPD"), only rent regulated tenants can also report conditions to DHCR. DHCR, like HPD, will

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send inspectors to confirm a tenant's complaint. But DHCR, unlike HPD, has the power to impose a rent freeze when they find a condition. To lift the rent freeze and increase the rent, the landlord must fix the condition and demonstrate that they've made the fix. This system is designed to financially incentivize owners to maintain their properties.

Another benefit that rent regulated tenants enjoy, but unregulated tenants are deprived of, is the ability to enroll in NYC Department of Finance's Senior Citizen Rent Increase Exemption ("SCRIE") and Disability Rent Increase Exemption ("DRIE"). These programs freeze the rents of some of the most vulnerable rent regulated tenants, those who are elderly or disabled and have an annual household income of less than $50,000. The program works by "freezing" the tenants' regulated rents and giving property owners a tax benefit that equals the difference between the "frozen" rent amount and the increase that would otherwise be allowable. In other words, the landlords continue to raise the rent as permitted by the Rent Guidelines Board orders, but the tenants' rent burden remains the same. This benefit can be life changing for vulnerable tenants on a fixed income, who have no way of affording even a modest rent increase when the public benefits they live off stay the same. The SCRIE and DRIE benefits, however, are only available to rent regulated tenants; tenants of unregulated apartments are not eligible.

The right to succeed to a family member's apartment, the right to a renewal lease, caps on rent increases, and the ability to participate in SCRIE and DRIE are just a few of the benefits that rent regulated tenants enjoy. Countless New Yorkers rely on these protections every day. Without rent regulation, all of our clients would be living in unregulated apartments, and none of them would be able to count on the relative security that rent stabilization brings. New York City needs not only to preserve the existing rent regulated housing stock, but also an infusion of new, affordable and rent regulated housing.

THE LEGAL AID SOCIETY CIVIL

Civil Law Reform Unit
49 Thomas Street, 5th Floor
New York, NY 10013

TESTIMONY OF THE LEGAL AID SOCIETY IN SUPPORT OF T2024-1227, A LOCAL LAW TO AMEND THE ADMINISTRATIVE CODE OF NEW YORK, IN RELATION TO EXTENDING THE RENT STABILIZATION LAWS AND T2024-1228 A RESOLULTION DETERMINING THAT A PUBLIC EMERGENCY REQUIRING RENT CONTROL IN THE CITY OF NEW YORK CONTINUES TO EXIST AND WILL CONTINUE TO EXIST ON AND AFTER APRIL 1, 2024.

New York City Council Committee on Housing and Buildings

March 7, 2024

Thank you to Chair Sanchez, and the New York City Council Committee on Housing and Buildings for the opportunity to speak at this very important hearing.

The Legal Aid Society

The Legal Aid Society (Legal Aid) is the nation's oldest and largest not-for-profit legal services organization. Legal Aid provides comprehensive legal services in all five boroughs of New York City for people who cannot afford to pay for private counsel. Since 1876, Legal Aid has advocated for low-income families and individuals and has fought for legal reform in City, State, and federal courts across a variety of civil, criminal and juvenile rights matters. Legal Aid takes on 300,000 cases annually, including thousands of cases in which we fight for the rights of tenants in regulated and unregulated apartments across the city. Legal Aid also takes on law reform and appellate cases, the results of which benefit more than 1.7 million low-income New Yorkers; the landmark rulings in many of these cases have a state-wide and national impact.

The Legal Aid Society welcomes this opportunity to testify before the New York City Council Committee on Housing and Buildings concerning the continuing housing emergency and the importance of extending the rent laws.

Introduction

The primary purpose of rent regulation in New York City has been to eliminate abnormal rents in an overheated market. Indeed, the Rent Stabilization Law's stated goal is to protect "public health, safety, and welfare…and to prevent exactions of unjust, unreasonable, and oppressive rents and rental agreements." The findings from the law recognized that prior to the law, tenants were facing these increases which caused "severe hardship to tenants of such accommodations and were uprooting long-time city residents from their communities[1]"

Rent Stabilization can only exist during a housing emergency, defined by law as a market where the vacancy rate has fallen below 5 percent. New York City first declared an emergency in 1974. This emergency has endured throughout the years but the crisis which had been chronic has become acute. Because the vacancy rate is so low, tenants cannot move and exercise market power. The Rent Stabilization Law was meant to – and has acted to – approximate the workings of a market where both parties have the power to negotiate contracts.

The purpose of this committee hearing is to consider whether that housing emergency continues to exist and thus whether Rent Stabilization should be extended. Our answer to these questions is yes. The Selected Findings of the Housing Vacancy Survey (HVS) is shocking and shows an unprecedented vacancy rate for renter in NYC of 1.41 percent – a rate not seen since the 1960's and well under the 5 percent threshold[2]. Thus, the emergency continues to exist and these essential laws must be extended. If the City does not act, millions of New Yorkers will be at risk of "unjust, unreasonable and oppressive rents" and will face "uncertainty, hardship and dislocation." Without rent regulation, programs that have been created to protect our elderly residents and residents with disabilities, such as SCRIE (the rent increase exemption law for senior citizens) and DRIE (the rent increase exemption law for persons with disabilities), will become meaningless, and elderly New Yorkers and New Yorkers with disabilities will be threatened with eviction and homelessness.

[1] The Supreme Court has recognized that the government has a "legitimate interest in local neighborhood preservation, continuity, and stability" *Nordlinger v. Hahn*, 505 U.S. 1, 12 (1992)

[2] Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings. New York, NY*: New York City Department of Housing Preservation and Development; 2024. Page 21. https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf

Who Lives in Rent Regulated Housing?

Rent stabilization primarily serves low-income people, people of color, and immigrants[3]. The median household income for rent-stabilized households is $60,000 a year and the median income for rent controlled households is $36,020. The median income of households in private non-regulated rent units is $90,800[4]. The majority of households that owned their own home (59 percent) earned $100,000 or more[5]. 41 percent of renter households live in rent-stabilized units.[6]

Declining Affordability of Housing

Many New York City renters are facing dire circumstances. In the face of fewer rental opportunities and higher prices, renters are suffering from a growing disparity between what they can afford and their actual rent. According to the Housing and Vacancy Survey, the median rent for New York City renters was $1641.[7] According to the HVS, between 1993 and 2023, there was a net loss of over 600,000 units renting under $1500 and a net gain of over 75,000 units with rents of $5000 and more.[8] The median renter income is 70,000 and for half of New York City's renter households, those earning under 70,000, the typical renter is severely rent burdened.[9] Among households earning less than $25,000 a year who do not live in public housing or report having a voucher, an astonishing 86 percent are severely rent burdened.[10]

According to the HVS, there were 33,210 apartments vacant and available to rent.[11] Of that number, only 4442 apartments, or 13 percent, were affordable to New Yorkers earning less than 50,000 a year.[12] Only 12,500, or 37 percent, were available to New Yorkers earning under 100,000 a year.[13] The median income a household would need to afford one of the vacant

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[3] Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings. New York, NY*: New York City Department of Housing Preservation and Development; 2024. Page 48.
https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf
[4] Id. at 49
[5] Id at 44.
[6] Id at 5
[7] Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings. New York, NY*: New York City Department of Housing Preservation and Development; 2024. Page 13.
https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf
[8] *Id*. at 19.
[9] *Id*. at 55.
[10] *Id*. at 57.
[11] Gaumer, E. *The 2023 New York City Housing and Vacancy Survey: Selected Initial Findings. New York, NY*: New York City Department of Housing Preservation and Development; 2024. Page 26.
https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf
[12] *Id.*
[13] *Id.*

apartments is somewhere between 100,000 and 150,000 a year.[14] The median household income for a renter household is $70,000.[15] Needless to say, the clients of The Legal Aid Society cannot afford these rents.

Declining Availability of Housing

Unfortunately for New York City renters, declining affordability is coupled with declining availability. The number of vacant units affordable to low-income New Yorkers is meager. In 2023, the vacancy rate for all units with rents less than $1100 was only 0.39 percent.[16] The 2023 vacancy rate for units between $1100 and $1649 was no better at 0.91 percent. The vacancy rate for units between $1650 and $2399 was frighteningly 0.78 percent. The scarcity of available rent-stabilized housing is a part of an overall decline in the availability of affordable housing. There remain only 77,000 units covered by either the Mitchell-Lama program or the federally subsidized Project Based Section 8 program. This is a loss of 35 percent since 1990.[17] Applicants for public housing face similar shortages: 274,745 families are on the waitlist for NYCHA public housing, with 17,576 applicants on the waiting list for Section 8 housing vouchers in New York City.[18] This combination of market forces and governmental decisions has worked together to have a devastating effect on low and moderate income New Yorkers. The declining number of vacant units available for rent, the fact that housing expansion has not kept pace with population growth, and the ongoing public housing crisis have all contributed to the scarcity of available affordable housing.

Homelessness Epidemic

Homelessness has reached epidemic levels in New York State. Last year's point in time census of homeless New Yorkers was 103,200.[19] But that survey is done in January and includes sheltered and unsheltered homeless New Yorkers throughout our entire state. As of November 2023, there were 92,824 individuals living in New York City's homeless shelters.[20] At the end of December 2023, the total number of people shelters in New York City's shelter was

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[14] *Id.*

[15] I*d*. at 42. There was a large increase in the median household income which was driven by the huge influx of higher income households coming into New York City.

[16] *Id*. at 21

[17] Oksana Miranova, *Closing the Door: Subsidized Housing at a Time of Federal Instability*, Community Service Society, March 2018. https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Closing_the_Door_FINAL_WEB.pdf

[18] NYCHA-Fact-Sheet-2023.pdf

[19] 2007-2023 PIT Counts by State, https://www.huduser.gov/portal/datasets/ahar/2023-ahar-part-1-pit-estimates-of-homelessness-in-the-us.html

[20] https://www.coalitionforthehomeless.org/facts-about-homelessness/

123,000.[21] The number of homeless New Yorkers sleeping in New York City's shelters is 76 percent higher than it was 10 years ago.[22] A record 119,300 New York City students were homeless last year.[23]

Housing Stability Leads to Better Outcomes in Health, Education and Employment

When families have stable housing, it leads to better outcomes in health, education, and employment. Housing instability has been linked to greater risk of depression[24], worse outcomes for chronic illnesses like diabetes,[25] low-weight and/or pre term infants[26], and general adverse childhood health.[27] Frequent moves before a child is seven years old leads to greater thought-related and attention-related problems.[28] These problems can reduce educational achievement. Children who experience high mobility between third and eighth grades do worse in school.[29] Moreover, forced moves are also a predictor for job loss.[30] If keeping employment without stable housing is difficult, finding new employment while unstably housed is even more difficult. If we are to recover from this pandemic, people who were employed prior to the pandemic need assistance to find and keep new jobs. The cost of adverse health outcomes, poor education achievement and lack of employment is significant and will ultimately harm New York State's ability to grow its economy.

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[21] https://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/
[22] https://www.coalitionforthehomeless.org/basic-facts-about-homelessness-new-york-city/
[23] Closson, Troy, A Record *119,300 New York City Students Were Homeless Last Year*, New York Times, November 1, 2023, https://www.nytimes.com/2023/11/01/nyregion/homeless-students-nyc.html
[24] Burgard, S. et al, *Housing Instability and Health: Findings from the Michigan Recession and Recovery Study*, Social Science & Medicine, December 2012. https://www.sciencedirect.com/science/article/abs/pii/S0277953612006272?via%3Dihub
[25] Berkowitz, et al. *Unstable Housing and Diabetes-Related Emergency Department Visits and Hospitalization: A Nationally Representative Study of Safety-Net Clinic Patients*, 2018 https://pubmed.ncbi.nlm.nih.gov/29301822/#:~:text=Conclusions%3A%20Unstable%20housing%20is%20common,for%20vulnerable%20individuals%20with%20diabetes.
[26] Leifhart, et. al, *Severe Housing Insecurity during Pregnancy: Association with Adverse Birth and Infant Outcomes*, Int J Environ Res Public Health. 2020, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7700461/
[27] Sandel, et al, *Unstable Housing and Caregiver and Child Health in Renter Families*, Pediatrics, 2018, https://publications.aap.org/pediatrics/article/141/2/e20172199/38056/Unstable-Housing-and-Caregiver-and-Child-Health-in
[28] Gaylord, et al., *Impact of housing instability on child behavior at age 7,* Int J Child Health Hum Dev., 2018, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8442946/
[29] Cutuli, et al, *Academic achievement trajectories of homeless and highly mobile students: Resilience in the context of chronic and acute risk*. Child Development 2013.https://www.researchgate.net/profile/Jeffrey-Long-6/publication/24250390_Academic_achievement_of_homeless_and_highly_mobile_children_in_an_urban_school_district_Longitudinal_evidence_on_risk_growth_and_resilience/links/5c9b85c2a6fdccd4603f111c/Academic-achievement-of-homeless-and-highly-mobile-children-in-an-urban-school-district-Longitudinal-evidence-on-risk-growth-and-resilience.pdf
[30] Desmond, et al, *Housing and Employment Insecurity among the Working Poor*, Social Problems, 2016. https://scholar.harvard.edu/files/mdesmond/files/desmondgershenson.sp2016.pdf?m=1452638824

Extend the Rent Stabilization and Rent Control laws.

In light of the continuing housing emergency, the City must extend the Rent Stabilization and Rent Control laws. In Section 2 of the Emergency Tenant Protection Act, the Legislature found that

> a serious public emergency continues to exist in the housing of a considerable number of persons in State of New York . . . there continues to exist in many areas of the state an acute shortage of housing accommodations caused by high demand, attributable in part to new household formations and decreased supply, in large measure attributable to reduced availability of federal subsidies and increased costs of construction and other inflationary factors.

The Legislature further found

> preventive action by the legislature continues to be imperative in order to prevent exaction of unjust, unreasonable and oppressive rents and rental agreements and to forestall profiteering, speculation and other disruptive practices tending to produce threats to public health, safety and general welfare; that in order to prevent uncertainty, hardship and dislocation, the provisions of this act are necessary. . . .

These words are as true today as they were in 1974 when the ETPA was enacted. For all these reasons, we urge this Committee to extend the Rent Stabilization and Rent Control Laws.

Conclusion

Thank you for the opportunity to testify before the New York City Council Committee on Housing and Buildings today. We hope that the City will extend the rent laws and protect the housing of over one million families.

Respectfully Submitted:

Robert Desir

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Milford Street Association ("MSA" or "Association") and its wholly-owned Milford Street Association Captive Insurance Company ("MSACIC" or "Captive")

MSACIC is a Vermont captive insurance company created by MSA, a New York Association, to provide more stable and affordable insurance coverage for the Members of MSA. In forming MSA and MSACIC, a group of affordable housing developers and managers, led by Dick Ravitch chose to take control of their risks in light of ever-increasing insurance costs. MSACIC resembles a traditional insurance company, but its sole focus is to provide insurance coverage for affordable housing projects in NY. MSACIC is an association Captive owned by MSA, which is in turn owned by its Members who are affordable housing operators that need the insurance coverage to operate.

Some other benefits

1) Tailored Coverage: MSACIC provides a multi-family liability solution tailored to the specific needs of affordable housing operators in NY. Affordable Housing requires stable and predictable rates for goods and services wherever possible; the captive makes this a reality by basically delivering wholesale pricing.
2) Cost Efficiency: MSACIC will lower insurance costs by eliminating some overhead and creating more accurate claims experiences. MSACIC is also free of the seemingly insatiable profit desires of the existing commercial market insurers which has resulted in premiums increasing exponentially over the last few years.
3) Better Risk Management Control: shared underwriting, claims handling, and security evaluations/ audits are a decided benefit of the Captive.
4) Financial Benefits: MSACIC will build excess surplus both from investment income and collected premiums that ultimately don't get paid out. This will allow the Association to hold premiums costs down over time and create more stability of rates going forward. We can also look to invest in strategies or technologies that can help members to further lower costs and reduce liabilities.

Membership

All membership applications will be approved by the board on the basis of our guidelines for requirements for membership in the Association. Most significantly, MSA is for properties with a regulatory agreement AND that have received a subsidy from either the City, State or Federal housing financing agencies. The Association will also have a risk manager who will make recommendations to help minimize the insured current and future liability at the individual property level.

Financial terms

Every member will pay the same fee structure with different individualized pricing based on the property's individual risk and loss history. The Captive's insurance pricing has 3 main components with each serving a different purpose - 1) Premium 2) Capital, and 3) Association fees.

The premium is adjusted based on the individual risk of each insured. Those with better loss experiences will have lower rates than those with worse loss experiences. The average premium is pegged to reflect the collective loss experience of the members who submitted their data to STG Risk (The Actuaries) for the feasibility study to be ~$500 per door with a range of ~30% ($575 to $425) for Members.

The Capital per door charge will be ~$250 per door. This is a one-time charge that will provide capital as required by the Vermont Regulator at a premium capital ratio of 2:1. The capital will be invested in a strategy that is initially focused on capital protection. Over time the investment objectives will broaden to seek yields that another similar sized insurance firms would expect to achieve. In either scenario the main objective is to protect capital for two main reasons; 1) strengthen the captive and 2) ensure the money can be returned to the respective investors, with yield, after 5 years.

The association fee is used to pay for the start-up costs and other operating expenses of the Association. To the extent there are funds not used by the Association, they will flow back to the Captive. The fee is set to be ~$25 per door.

We have asked both NY housing finance agencies to help fund the investment portion of Captive. While they made a good faith effort, they were unable to make the pre-launch investment as their core mandate is to provide mortgages. Upon launch, however, we believe they can participate in structures that can further capitalize MSA which related to the issuance of insurance through the Captive for their borrowers. The Association has also had a number of conversations with the Federal Home Loan bank. They indicated they should be able to lend on 50% of the assets of the Captive after a quarter or two of operations. This leverage will further strengthen the asset base of the captive while producing more yield. The growth of the asset base will benefit MSA and its Members.

Vendors

Captive Manager – Daniel George & AVID Management Solutions LLC
https://avidsolutionsllc.com/

Actuary https://sgrisk.com/about/

Auditor

Johnson and Lambert https://www.johnsonlambert.com/industries/insurance/captive-insurance/

Claims

Network Adjusters https://www.networkadjusters.com/

QUESTIONS RECEIVED:

1. What would you think the loss history of a building would have to be to be covered by the Captive (50% - 60% loss to premium dollars paid). How many years would they need to be at or below this ratio. Would higher loss ratios be considered if more premium dollars are paid?

EVERYONE'S RISK WILL BE PRICED INDIVIDUALLY WITH PLUSES AND MINUS BASED ON INDIVIDUAL RESULTS. LOSS RUNS ARE GENERALLY LOOKED AT ON 5 YEAR BASIS. THE CAPTIVE MANAGEMENT WILL REVIEW THE INDIVIDUAL'S HISTORICAL PERFORMANCE ON A ROLLING FORWARD BASIS.

2. About excess coverage of $10M-$25M, the captive will be able to obtain this coverage from existing carriers at a reasonable cost based on its capitalization.
   WE ARE TRYING TO GET RE-INSURANCE FOR THE NEXT $5M EXCESS LAYER. THE ACTUARIES HAVE DETERMINED, HOWEVER, THIS MAY NOT BE NECESSARY AS HISTORICAL LOSSES EXAMINED INDICATE EXCESS COVERAGE IS GENERALLY NOT WARRANTED WE EXPECT THAT COST SAVINGS ON PREMIUMS WILL BE ~25%+ VS. TODAY'S PRICING. WHILE WE INITIALLY CONTEMPLATE PROVIDING UP TO $5M IN EXCESS COVERAGE. THE CAPTIVE INITIALLY WILL NOT BE ABLE TO PROVIDE $10M-$25M OF EXCESS COVERAGE. SUCH LIMITS WILL HAVE TO BE SEPARATELY PROCURED, BUT MEMBERS WILL HAVE ACCESS TO AN ASSOCIATION-OWNED BROKERAGE THROUGH WHICH SUCH PLACEMENT CAN OCCUR. THIS SHOULD LEAD TO FURTHER SAVINGS BY THE MEMBERS SEEKING HIGHER EXCESS LIMITS. MOST OF THE EARNINGS OF THE BROKERAGE WILL FLOW TO THE ASSOCIATION FOR THE BENEFIT OF ITS MEMBERS.

3. Will the captive be New York admitted.
   THE CAPTIVE IS DOMICILED IN VERMONT. THE INSURANCE POLICY WILL BE ISSUED BY AN A-RATED SURPLUS LINES INSURER IN NEW YORK AND REINSURED BY THE CAPTIVE AND OTHER REINSUERS. FOR THE MEMBER WHO IS AN INSURED, THERE WOULD BE NO DISTINCTION TO BUYING THE INSURANCE DIRECTLY FROM THE FRONTING INSURER IN THE COMMERCIAL MARKET, IF SUCH A POLICY IS AVAILABLE, EXCEPT FOR THE LOWER PREMIUMS. NYS DFS HAS REVIEWED THE PLAN AND STATED THEY HAVE NO OBJECTION.

4. If an owner has both affordable and market-rate units, would the captive consider insuring the market rate units. What is considered affordable?
   THE ASSOCIATION BOARD FORMED THE CAPTIVE AS A VEHICLE FOR AFFORDABLE HOUSING. WE HAVE DEFINED AFFORDABLE HOUSING AS AFFIRMATIVE ON TWO TESTS 1) FINANCING FROM CITY, STATE, OR FEDERAL 2) A REGULATORY AGREEMENT.

5. Will we be able to finance the policy?
   WE HAVE ASKED BANCDIRECT TO PROVIDE FINANCING GENERALLY AVAILABLE IN TODAYS MARKETPLACE. WE ARE WORKING ON SEEING WHAT IS POSSIBLE AS IT WOULD BE HELPFUL TO MEMBERS.

6. Will Captive meet the AM Best rating required by banks/investors.
   IT HAS BEEN DESIGNED AND APPROVED BASED ON THE FEASIBILITY STUDY. WE WILL NOT BE SEEKING A RATING FOR A WHILE. IN SUCH INSTANCE, THE CAPTIVE MAY ISSUE POLICIES DIRECTLY TO THE MEMBERS. UNTIL THEN, THE POLICY WILL BE ISSUED BY AN A-RATED INSURER, WHICH THE CAPTIVE WILL REINSURE.

7. Has a captive manager in VT been selected?

YES, DAN GEORGE AND HIS FIRM AVID MANAGEMENT HAVE BEEN SELECTED. IT WAS A COMPETITIVE PROCESS WHERE 3 FIRMS BID. AVID / DAN'S CREDENTIALS ARE EXCELLENT AND HE IS WELL-REGARDED BY THE REGULATORS.

8. Will the Captive be a single parent wholly owned captive (owned by the association)
   THE MILFORD STREET ASSOCIATION, LLC OWNS 100% OF THE CAPTIVE.

9. How often will Captive Financials be released to all members?
   THE ACTUARIES WILL REVIEW FINANCIALS REGULARLY AS REQUIRED BY THE VERMONT REGULATOR. THAT POLICY WOULD MIRROR THE REGULATORY REQUIREMENT OF A QUARTERLY STATEMENT, BUT MORE IMPORTANTLY, IT SHOULD PROVIDE THE MEMBERS ASSURANCE THAT THE CAPTIVE IS DOING WELL. THE ASSOCIATION AND CAPTIVE MANAGEMENT UNDERSTAND ANY PERFORMANCE DEVIATION AGAINST THE PLAN WILL NEED TO BE ADDRESSED RAPIDLY. THE BEST SURPRISE IN THE INSURANCE BUSINESS IS NO SURPRISE!

10. How will surplus capital be handled? Assuming it will be invested by the board, will there be investment guidelines/limitations established to protect all members?

    100% HELD IN CAPTIVE ACCOUNT. GUIDELINES DEVELOPED BY THE BOARD TO BEST SERVE THE NEEDS OF THE CAPTIVE ARE FOCUSED ON CAPITAL APPRECIATION IN THE SAFEST WAY POSSIBLE. THE INVESTMENT GUIDELINES WILL EVOLVE AS THE CAPTIVE GROWS TO REFLECT INDUSTRY STANDARDS FOR SIMILARLY SIZED OPERATIONS.

11. Will the Captive be fully fronted by a rated carrier without a SIR? Will the carrier require significant collateral?
    WE WILL HAVE A FRONTING FOR THE CAPTIVE. ONE WHO IS COMFORTABLE WITH OUR PREMIUM PROJECTIONS ON A PER-DOOR BASIS. THE SIR WILL BE SIMILAR TO COMMERCIAL MARKET POLICIES. THE FRONT WILL REQUIRE THAT A PORTION OF PREMIUMS BE MAINTAINED IN A COLLATERAL TRUST ACCOUNT KNOWN AS A REG 114 TRUST.

12. Will the carrier be licensed (i.e. admitted) in NY? Free Trade Zone? Or excess and surplus lines?
    THE FRONTING INSURER WILL WRITE AS SURPLUS LINE CARRIER LICENSED IN NY.

13. How will service providers to the association be established? Is there a bid process? Especially defense counsel, will there be select firms to assign claims to (subject to conflicts)? Will the fronting carrier require these services to be bundled or can the captive elect to unbundle?
    THE ASSOCIATION AND THE CAPTIVE HAVE ALWAYS FOCUSED ON TRANSPARENCY AS THE CORNERSTONE OF OUR OPERATION FROM THE BEGINNING. THE VENDORS WERE SELECTED BASED ON REPUTATION AND ENTHUSIASM FOR THE PLAN. SOME WERE COMPETITIVELY BID, AND OTHERS WEREN'T. AT EVERY FUNCTION WE ARE COMFORTABLE WITH THE CHOSEN

SERVICE PROVIDERS AND INTEND TO REVIEW EVERYONE'S PERFORMANCE REGULARLY.

14. Will the claims information of individual members be kept confidential? Who will have access to review individual claims? Who will oversee claims handling?

    OUR THIRD-PARTY ADMINISTRATOR, NETWORK ADJUSTERS, WILL HANDLE CLAIMS FOR THE CAPTIVE MEMBERS, ENSURING EVERYTHING IS HANDLED CONSISTENTLY AND IN THE BEST INTEREST OF BOTH THE MEMBER AND THE CAPTIVE. ALL INDIVIDUAL CLAIM INFORMATION WILL STAY BETWEEN NETWORK ADJUSTERS AND THE ACTUARIES WHEN THEY ARE BELOW THE LIMITS GIVEN TO THE CLAIMS ADJUSTER. CLAIMS ABOVE THOSE LIMITS WILL BE BROUGHT TO THE CLAIMS COMMITTEE OF THE CAPTIVE AND THE ASSOCIATION WHICH WILL ULTIMATELY DETERMINE THE BEST OUTCOME FOR ALL.

15. Who will control all settlement authority of the association and will individual members have any control over their claims?
    THE THIRD-PARTY ADMINISTRATOR, NETWORK ADJUSTORS, WILL HAVE AUTHORITY UP TO A CERTAIN LIMIT. THE CAPTIVE AND ITS BOARD WILL ALSO HAVE SERVICE PROVIDERS WHO MAY ASSIST IN LEGAL CLAIM EVALUATION AND THE CAPTIVE WOULD DECIDE ON CLAIMS OVER SUCH LIMIT. THE BOARD OF THE ASSOCIATION WILL ALSO HAVE A CLAIMS SUBCOMMITTEE TO ADDRESS THE DECISIONS OF THE CAPTIVE. INSUREDS WILL BE ABLE T TO SELECT LAW FIRMS FROM AN APPROVED LIST AND ULTIMATELY WILL HAVE TO AGREE TO THE SETTLEMENTS AS WELL IN TERMS OF CONTROL.

16. How are program limits intended to be structured? Are limits shared amongst all buildings and all members? Is there any reinstatement, 'per member', or 'per building' coverage?

    THE FRONTED PRIMARY POLICY LIMIT REINSURED BY THE CAPTIVE WILL BE $1M PER OCC AND $2M IN AGGREGATE FOR EACH AND EVERY BUILDING/PROPERTY. IT IS ANTICIPATED THAT THE NEXT $5M IN EXCESS LIMITS WILL BE REINSURED ON A FACULTATIVE BASIS.

17. We understand that a "base premium" has been established for participants to ensure solvency, but that individual association members will receive debits/credits based on an 'underwriting review'. How and by whom will the credits/debits be established? Is there a max credit/debit that any member can obtain?

    THE ASSOCIATION MEMBERS WILL RECEIVE A DEBIT OR CREDIT OFF THE "BASE RATE/PREMIUM" BASED ON THEIR ACTUAL EXPERIENCE AND INSURANCE APPLICATION WHICH WILL ALSO REQUIRE DISCLOSURE OF CERTAIN FACTORS RELATED TO THE INSURED PREMISES. THE INDIVIDUAL RATE WILL DEPEND ON WHAT CREDITS AND DEBITS ARE APPLIED, TAKING INTO UNDERWRTING CONSIDERATIONS SUCH AS LOSS HISTORY, LOCATION, WHETHER THE BUILDING IS VIDEO MONITORED, INSPECTION RESULTS, ETC. THE MEMBERS'

FINAL RATE WILL BE CAPPED BY A MAXIMUM DEBIT/CREDIT PROPOSED BY THE UNDERWRITER AND ACTUARY, AND APPROVED BY THE BOARD. IT WILL BE A 30% RANGE FROM TOP TO BOTTOM WITH A BASE RATE/PREMIUM OF $541 PER DOOR.

18. The majority of the premium will be charged on a ‘per unit/door’ basis; but for mixed-use buildings is there a charge for retail space? If so, what is to be included in the retail space? (i.e. is laundry included, what about parking garages, community rooms, bike rooms, etc.)

    PER DOOR/UNIT IS THE POINT OF COMPARISON. THE CAPTIVE WILL APPLY COMPARABLE RATES BASED ON SQUARE FOOTAGE WHERE APPLICABLE AND FOR MIXED-USE BUILDINGS AND PARKING GARAGES/LOTS. RETAIL MUST ALSO HAVE THEIR OWN COVERAGE THAT NAMES THE BUILDING OWNER FOR THE RETAIL PREMISES.

19. Is there are certain # of total units for this to be cost-effective?

    NOT REALLY. THE FIRST-YEAR COST SHOULD BE BELOW THE CURRENT MARKET PRICING FOR YOUR EXISTING PREMIUMS. KEEP IN MIND MORE THAN 30% OF YOUR FIRST-YEAR COSTS IS INVESTMENT INCOME WHICH WILL COME BACK TO YOU WITH A YIELD. THAT CAPITAL INVESTMENT SHOULD BE RETURNED IN 5 YEARS. THE SUBSEQUENT YEARS WILL ONLY HAVE THE PREMIUM CHARGE WHICH IS 60% OF THE CURRENT PREMIUMS.

20. How do we deal with "over insurance" in the event the captive does not have sufficient funds to cover bad claims?

    THE OBLIGATION TO PAY THE LIMITS FOR CLAIMS LIES WITH THE A-RATED FRONTING CARRIER. AS THE FRONTING CARRIER’S OBLIGATIONS ARE REINSURED BY THE CAPTIVE, THE CAPTIVE MUST HAVE SUFFICIENT FUNDS TO MEET THAT OBLIGATION. THE AMOUNT OF COVERAGE AND CAPITAL NECESSARY HAS BEEN ANALYZED AND APPROVED BY THE VERMONT REGULATOR AND THEIR VIEW IS THAT THE CAPTIVE IS STRONGLY CAPITALIZED. Also, 65% OF PREMIUMS ARE HELD IN A REG 114 TRUST SO THE FRONTING CARRIER CAN ACCESS THOSE FUNDS TO PAY CLAIMS. EVEN IF THE CAPTIVE DOES NOT HAVE SUFFICIENT CAPITAL, IT IS ULTIMATELY THE FRONTING CARRIER THAT IS ON THE HOOK TO THE INSURED MEMBER. THE FEASIBILITY STUDY, THE FRONTING CARRIER AND THE VERMONT REGULATOR ALL AGREE THAT THE CAPTIVE IS STRONGLY CAPITALIZED AND WILL BE ABLE TO HONOR LOSSES FROM UNEXPECTED AND UNLIKELY LOSSES. THE PRICING IS ALSO PRUDENTLY CONSERVATIVE, WITH THE LONG-TERM SUSTAINABILITY OF THE CAPTIVE IN MIND. THE CAPTIVE WILL ALSO

SEEK TO REINSURE 50% OF ITS RISK FURTHER REDUCING THE EXPOSURE TO THE CAPTIVE.

21. What if a majority of the losses come from 1 or 2 firms, while others are more diligent about their safety practices, how does that get solved?
    EVERYONE'S RISK IS PRICED BASED ON THEIR SPECIFIC LOSS RUNS AND UNDERWRITING FACTORS, STARTING FROM A BASE RATE. DEBITS AND CREDITS WILL BE APPLIED BASED ON THE DIFFERENT RISK PROFILES OF EACH MEMBER. THEIR PRICING WILL REFLECT THEIR LOSSES.
    THERE IS GOING TO BE A RISK MANAGER FOR THE CAPTIVE WHO WILL INSTRUCT INSUREDS ON BEST PRACTICES AND WEAKNESSES IN THE INDIVIDUAL OPERATIONS OF THE BUILDINGS. THESE WON'T BE SUGGESTIONS AS MUCH AS THEY WILL BE NECESSARY CONDITIONS TO ENSURE CONTINUED PARTICIPATION IN CAPTIVE. THE CAPTIVE MUST DO THIS TO AVOID ADVERSE PRICE SELECTION. THE ASSOCIATION HAS THE RIGHT TO THROW OUT MEMBERS WHO'S LOSSES EXCEED ACCEPTABLE LEVELS WITHOUT RESERVATION. THE SUCCESS OF THE CAPTIVE REQUIRES THIS DISCIPLINE.

Welcome Dear Friends and Neighbors,

3 years ago nycha residents were introduced to related cos., as a pact/ rad proposed partner who would rehabilitate our homes and campuses, while becoming our new office manager, in exhange all rent receipts would go directly to related investors, the residents tolerated this proposal as our current nycha management office is directly responsible for any delapitation of our lovely buildings, homes, campuses and community centers, nycha management tries the best they can, as employee vetting at nycha currently, something Mayor LaGuardia opposes, has nothing to do with applicants ability to perform duties of position with competence.

Suspiciously:

The first resident meeting related along with nycha executives offered to bribe us with free iPads.

When the quarterly meetings with jamaar fronting for essence to discuss the rehabilitation project, jamaar immediatly shut down any conversation about any building rehabilitation such as windows plumbing, etc..

Maybe the only thing that jamaar ever presented, was a rendering of the new building that related proposes to put on top of the grave of Hudson guild that would cast a permanent shadow on to the heavily trafficked city athletic field across the street. Alarmingly, the same old renderings used recently to show new updated plans on Elliot-Chelsea.

My building is scheduled to begin rehabilitations July 2023, to be complete Dec. 2023, the current proposed developers are in default of this contract.

In February 2023, the tenant association president, darlene waters, who was installed by Jeffrey lafrancois when he was "managing" our tenant association, acting as manager of godfried's office, a violation of our tenant association by-laws, and a representation of conflict-of-interest, mailed out "surprise invitations", which does not fulfill our hud/nycha contract to notify residents of the developers intentions of adding a "transfer of Assistance rider" to the proposed developer's proposed contract.

In march/April the developer started bussing a small incentivized number of residents in Mercedes busses to a daytrip in a new waterview east river highrise and catered to by the owners, they were immediatly bussed back to Hudson guild were they were hot boxed in a conference room for 60 minutes with jamaar, acting like vanna white, illustrating the luxuriousness of an electric dishwasher if residents voted for the quickest build promise giving the developers also a zoning change from residential to commercial. Absolutely no prospectuses were offered to any voters, and nycha management attempted to stop residents from even taking a photo of the paper ballots that they never handed out, giving everyone an iPad to vote on.

From the described false manufactured residential consensus, that had a inflated 18% participation rate, did not even meet the minimum threshold of 20% participation to move forward with proposal, "related co." and nycha management decided to commit perjury at city hall claiming "well over 50% Participated".

Over the last 12 months, residents have been attempting to organize, and some are doing a great job of it... Though as one CB4 member said in January, 'the residents show up to every meeting very well organized, with information and concerns, yet cb4 members ignore the residents and do not engage the residents, dismiss the residents concerns, do not even acknoledge the residents'.

We ask in light of the incriminating malcious evidence, of racketeering and organized crime, that the proposed usurping of nycha public housing homes be halted today...

And that,

We, the residents of Chelsea-Elliott Fulton Houses and community neighbors, call upon the southern district ny, fbi, homeland security to arrest, immediately stevie ross, jamar adams, erik botcher, hou employees, nycha management, tenant association officers, nycha grounds-crew and all associated organizations and peoples involved in this racketeering, bribery, trespassing, corruption and extortion scandal occurring presently with this malicious rad/pact Elliot-Chelsea Fulton Houses proposal, Amen!

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☒ in favor ☐ in opposition

Date: 03.06.24

(PLEASE PRINT)

Name: Oksana Mironova

Address: [redacted] NY NY 10040

I represent: CSSNY

Address: 633 Third Ave NY NY 10017

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☐ in favor ☐ in opposition

Date: ________

(PLEASE PRINT)

Name: Brendan Cheney

Address: ________

I represent: New York Housing Conference

Address: ________

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☒ in favor ☐ in opposition

Date: 3/6/24

(PLEASE PRINT)

Name: Lucy Block

Address: 50 Broad St #1402 NY NY 10004

I represent: Association for Neighborhood + Housing Development (ANHD)

Address: ________

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☐ in favor ☐ in opposition

Date: ______

(PLEASE PRINT)

Name: Dr Elizabeth Gaumer, Chief Research Officer

Address: 100 Gold

I represent: HPD

Address: 100 Gold

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. T2024-1227 T2024-1228 T2024-1229 Res. No. ______

☐ in favor ☐ in opposition

Date: 3/6/24

(PLEASE PRINT)

Name: Adam Edwards-Rivera

Address: [redacted] Jackson Heights NY 11372

I represent: Queens Legal Services

Address: 89-00 Sutphin Blvd 5th Fl Jamaica NY 11435.

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. T2024-1229 Res. No. ______

☑ in favor ☐ in opposition

Date: 3/6/24

(PLEASE PRINT)

Name: Sarah Heimbach

Address: [redacted] Woodside NY 11377

I represent: Legal Services NYC

Address: 8900 Sutphin Blvd 5th Fl Jamaica, NY

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☑ in favor ☐ in opposition

Date: 03/6/24

(PLEASE PRINT)

Name: Ahmed Tigani

Address: 100 Gold Street

I represent: HPD

Address:

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

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

☐ in favor ☐ in opposition

Date: 3/6/24

(PLEASE PRINT)

Name: Dr. Elyzabeth Gaumer

Address:

I represent: HPD

Address:

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