



**NEW YORK CITY DEPARTMENT OF BUILDINGS  
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL  
COMMITTEE ON HOUSING AND BUILDINGS  
NOVEMBER 20, 2025**

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Good morning, Chair Sanchez, and members of the Committee on Housing and Buildings. I am Gus Sirakis, Deputy Commissioner for Development and Technical Affairs at the New York City Department of Buildings (“the Department”). I am joined today by Joseph Ackroyd, Assistant Commissioner for Technical Affairs and Code Development as well as colleagues from the Department’s Sustainability and Enforcement Bureaus. We are pleased to testify before the Committee regarding Intro 1321 which would establish the first New York City Existing Building Code (“EBC”) to govern all alterations to existing buildings in New York City, Intro 1422 which makes corresponding changes to the New York City Construction Codes (“Construction Codes”) that are necessary to implement the EBC, Preconsidered Intro. T2025-4492-A which addresses periodic updates to the New York City Energy Conservation Code (“Energy Code”), and Intro 1456 which would extend the moratorium on fines related to violations of local laws and regulations governing signs on awnings and accessory signs (“accessory signs”) and require the Department of Buildings and the Department of Small Business Services to provide education and outreach regarding the applicable laws governing such signs.

Before discussing the subject Intros, I would like to thank the City Council and this Committee for its ongoing partnership with the Department. Our work together ensures that this City, with its over one million buildings and tens of thousands of active construction sites, not only has the safest built environment, but that we continue to evolve and keep pace with advancements in construction design and development. It is through this vital partnership that we keep those who live, build, and visit New York City safe.

## **Intro 1321**

New York City published its first full Building Code in 1899, and those rules have been updated periodically, including significant code updates in 1938, 1968, and 2008. While these code updates are primarily intended for new buildings, they also govern alterations to existing buildings through a patchwork of provisions and cross-references to prior codes, department memos and the State Multiple Dwelling Law. As a result, the current framework for existing buildings is cumbersome, often requiring owners and design professionals to interpret overlapping requirements. The complexity of the regulatory framework can be challenging to navigate, and current triggers can make significant alterations to existing structures cost-prohibitive for many owners, as those owners may not be able to comply with all the requirements for new construction.

The Department has been working toward an Existing Building Code since the development of the 2008 Construction Codes and in 2014 the Department embarked on a multi-year code development project to establish the City's first ever EBC. The EBC is based on the International Existing Building Code ("IEBC") and is the culmination of many years of research, analysis, and Committee work. The IEBC is a model code developed and maintained by the International Code Council and is widely adopted throughout the country, including New York State. Its framework has proven successful in providing a clear, incremental path for the rehabilitation and adaptive reuse of existing buildings while maintaining essential life-safety standards. By aligning New York City's regulatory framework with this nationally recognized code, the Department ensures consistency with best practices already in place across the state and nation while tailoring the provisions to the unique complexity and density of New York City's building stock.

The EBC provides a comprehensive and streamlined regulatory framework, eliminating the need to consult previous codes when renovating an existing building. Because current triggers for upgrades to existing buildings are not incremental and often require formal variance reviews, the approval and permitting processes can be lengthy. The EBC would



limit the need for owners to obtain code variances from the Department for certain scopes of work thereby minimizing impediments to modernizing buildings. Most importantly, the EBC would enhance the safety of the existing building stock by creating incremental compliance triggers regardless of alteration costs.

The improvements accomplished by the EBC fall into three (3) main categories – safety and modernization, efficiency, and sustainability. These improvements eliminate barriers to renovating existing buildings while ensuring a consistent level of safety across all building types. The proposed EBC accomplishes the following:

### **Safety and Modernization**

- Promotes compliance with modern codes by repealing the 1968 Building Code, which currently continues to apply to alterations, repairs, changes of occupancy, additions, and relocations of existing buildings.
- Provides comprehensive Tenant and Occupant Protection Plans for buildings occupied during construction activities, expanding on the current code regulations.
- Establishes new requirements for architectural investigations when the work area exceeds 50% of the floor area, ensuring that existing means of egress elements and rated assemblies are safe.
- Enhances fire safety by introducing new requirements for automatic sprinkler systems that address various unique conditions that occur in existing buildings.
- Creates a Limited Home Improvement Permit for 1- and 2-family dwellings to be filed by a homeowner or a licensed home improvement contractor, providing a path for homeowners to obtain work permits for specific types of home improvement alterations often performed illegally without permits.

- Introduces limited alteration application (LAA) permits for additional scopes of work, including window replacements, reroofing, and elevator repair and replacements which will result in improved compliance with the Building and Energy Conservation Codes.
- Increases accessibility in residential buildings when an alteration involves more than 50% of the dwelling units under a single ownership by requiring all common use facilities serving those units to comply with the accessibility requirements in Chapter 11 of the Building Code.
- Provides a standardized method to verify the stability of buildings being altered and requires a more thorough condition assessment when the proposed alterations increase the level of structural demand in the building.

### **Efficiency**

- Introduces the concept of “work area” to replace alteration cost as the trigger for when code requirements apply, which provides a more objective measure of an alteration’s size and code requirements.
- Streamlines and simplifies regulations related to changes of occupancy including changes to occupancy classification and use.
- Establishes a simplified framework for the multiple dwelling classifications to comply with the complex framework of the Multiple Dwelling Law (“MDL”) that details the technical provisions of the MDL that are applicable to alterations to existing residential buildings.

### **Sustainability**

- Increases the energy efficiency of the City’s building stock by facilitating renovation of existing buildings while requiring incremental energy conservation upgrades.

- Allows the use of like materials, assemblies and details in partial and restorative repairs of facades and roofs to facilitate incremental energy conservation upgrades.

In combination, these reforms simplify how the Department and the public navigate alteration projects, encourage investment in older buildings, and maintain public safety. The EBC will make it easier to preserve, modernize, and adapt our existing building stock while ensuring regulatory consistency across future code updates.

### **Intro. 1422**

Intro 1422, the companion bill to the EBC, sets forth changes to the Construction Codes that are necessary to ensure proper implementation and enforcement of the requirements of the EBC. The amendments ensure consistency across all applicable regulations and support the EBC's broader goals of modernization, simplification, and safety. The bill repeals references to the 1968 Building Code as well as provisions of the current construction codes that have been relocated to the EBC, including ordinary plumbing work, limited alteration applications, and tenant and occupant protection plans. This bill also includes changes to streamline the electrical final inspection process, and to allow for an extension of time to complete repairs following a periodic elevator inspection.

The Department views the EBC as a pivotal step in continuing the modernization effort that began with the 2008 Codes—building on our shared goal to make New York City's built environment safer to occupy and easier to maintain, and the regulatory framework simpler to navigate.

### **Preconsidered Intro. T2025-4492-A**

In addition to the EBC, the Committee also has before it Preconsidered Intro. T2025-4492-A, which updates the Energy Code. Just as the EBC modernizes the framework for existing buildings, this updated Energy Code ensures that new construction advances the City's goals for safety, efficiency, and sustainability, together forming a comprehensive,

coordinated approach to improving New York City's built environment. The Energy Code, last updated in 2020, must be revised periodically to remain more stringent than the State Code and to keep pace with evolving technology and climate standards. Buildings are the largest source of greenhouse gas emissions in New York City, and maintaining a strong Energy Code is essential to addressing this challenge.

The proposed revisions to the Energy Code are based on the 2025 New York State Energy Conservation Construction Code, which aligns with the 2024 International Energy Conservation Code developed by the International Code Council and with ASHRAE Standard 90.1. While the proposed revisions use the 2025 New York State Energy Code as a base, they also modify or add new language to the Energy Code tailored to the unique needs and characteristics of the City's built environment. Collectively, the proposed amendments will result in an average annual energy savings of 19.5 percent for newly constructed commercial buildings and 17 percent for new one- and two-family homes and small apartment buildings. The Energy Code revision involved over 35 industry professionals and stakeholders who volunteered their time to participate in the process and who sat on either a Residential Advisory Committee, or Commercial Advisory Committee, and who participated in various subcommittees. I'd like to take a moment to thank the Residential and Commercial Advisory Committees and their members who contributed their expertise and time to the Energy Code revision process. These improvements will bring the most advanced standards for building envelopes, mechanical systems, and equipment to new development, ensuring that buildings constructed in New York City use less energy and are better prepared to support the City's path toward carbon neutrality.

Finally, while this Energy Code update is the most stringent in the City's history, it represents only one component of the Department's climate work. Looking ahead, the Department will begin developing a performance-based Energy Code.

### **Intro 1456**

Turning now to Intro 1456, which would extend the enforcement moratorium concerning business accessory signs. Since 2019, when the initial moratorium was implemented, the Department has taken several steps to further support businesses and assist them in complying with applicable regulations. This includes educating businesses about sign regulations, conducting outreach to businesses who have received violations from the Department for illegally installed signs, establishing the Small Business Team, a dedicated resource to assist small businesses with any issues they might have, and launching an annual no-penalty accessory sign inspection program.

The Department is supportive of Intro 1456 which will extend the moratorium on the issuance of accessory sign violations for three additional years. We recognize and appreciate the need to continue to support small businesses. As such, we'd like to recommend two amendments to the bill. The first recommendation is expanding the universe of signs that would be covered by the moratorium. As drafted, the bill would extend the moratorium for signs installed prior to February 9, 2019. We suggest amending the bill to allow coverage for signs installed prior to February 9, 2025. This would provide relief to additional businesses, including small businesses. The second recommendation is expanding the pool of individuals who are allowed to install signs. Pursuant to Local Law 28 of 2019, there was a task force convened to evaluate the relevance and appropriateness of regulations concerning accessory signs. That task force issued several recommendations, including expanding the pool of individuals who are allowed to install signs to include other licensed trades with the relevant experience and expertise to safely install the subject signs. There are approximately 43 licensed sign hangers. It is possible the limited pool of licensed individuals may contribute to delays in businesses complying with applicable regulations. Expanding the pool could enable businesses to more timely comply and could result in cost savings for businesses.

Thank you for the opportunity to testify before you today. We look forward to working with you to move these important and critical pieces of legislation forward.

We welcome any questions you may have.



**Mayor's Office of Special Enforcement  
New York City Council  
Committee on Housing and Buildings  
November 20, 2025**

Chairperson Sanchez and committee members, thank you for the opportunity to discuss Intros 948-a and 1107-a. My name is Christian Klossner, and I am the Executive Director of the Mayor's Office of Special Enforcement (OSE), which is overseen by the Mayor's Office of Criminal Justice.

While the bills' stated intent is to be about one- and two-family homes, both bills impact every unit of housing in the city and threaten to fundamentally alter New York City's housing market.

In my testimony, I will focus on four important points:

- 1) How New York City's existing short-term rental laws currently operate;
- 2) How these bills could negatively impact the local housing market and for the many New Yorkers struggling to find stable housing;
- 3) How the bills will create a more dangerous environment for residents, guests, and first responders; and
- 4) How significant increases in short term rentals will negatively impact quality of life.

First, it is important to be clear about the current laws in New York City.

For decades, the city's Housing Maintenance Code and Building Code have required the legal use of the city's housing stock - in both apartment buildings and one- and two-family homes - to be for permanent occupancy by a family.<sup>1</sup> The term "family" allows not more than two "boarders, roomers, or lodgers" to rent part of the unit so long as the permanent occupant is occupying the unit and maintaining a common household with the lodgers. According to the legislative history, the limit of two boarders was proposed in 1967 to prevent excessive occupancy that would lead to "inadequate facilities" and "neighborhood deterioration."

When online booking services arrived, the short-term rental market significantly increased, taking thousands of long-term rental units off the housing market and, according to numerous studies, driving up the cost of rent.

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<sup>1</sup> See New York City Administrative Code, Title 28, Article 701, Building Code §§ 202 and 310 and New York City Housing Maintenance Code § 27-2004

To combat this significant increase in illegal activity and its impacts, City Council adopted the Short-Term Rental Registration law, also known as Local Law 18 of 2022.

But let me be very clear: For far longer than these online companies have existed, it has been illegal to rent out your entire unit for less than 30 days, or to rent part of your home to more than two guests, no matter how many units were in your building.

Local Law 18 didn't change the laws I just described, it simply required hosts to follow them. It did not ban short-term rentals. Instead, it made enforcement of existing protections far more efficient. It requires hosts to register, and it requires platforms to verify the registration status. Local Law 18 allows the city to actually prevent illegal activity from depleting our housing stock, it prevents the additional upward pressure on rents associated with short-term rentals, and it provides hosts the chance to know their rental is legal before putting it on the market. Now, Intros 948-A and 1107-A risk undoing the significant gains made under Local Law 18.

Let me start with a discussion of the impacts these bills would have on our housing stock. While both bills suggest they apply only to one- and two-family homes, each changes the definition of "family" in city laws. Changing the definition of "family" would apply to every home in the city, not just one- and two-family homes. For instance, 948-A would allow every tenant in the city to host four adult guests and an unlimited number of people under 18 in their apartment.

948-A also redefines one- and two- family homes from "exclusively" for permanent use to "primarily" for permanent use, and 1107-a contains the same provision although just for two family homes. While that may seem like an insignificant change, it is not. During litigation over Local Law 18, it was argued that one- and two-family homes should be allowed to have unhosted rentals for 182 days a year, relying on the phrase "as a rule" in the relevant Building Code occupancy classification. The city responded that the Building Code definitions of one- and two-family dwellings required they be used "exclusively" as permanent housing. The litigation against the city was dismissed, but now, through these bills, the City Council is being asked to legislate this interpretation and open the floodgates to unhosted short-term rentals.

Here is what could happen with those floodgates open.

One- and two-family homes make up over 28% of the city's housing stock and just over 14%, or 320,000 units, of our rental stock. This bill allows for the potential loss of this entire group of homes to the short-term rental market, which would be devastating, especially in the context of an ongoing housing crisis, and in a moment



when the 2023 New York City Housing and Vacancy Survey (NYCHVS) showed our net rental vacancy rate is just 1.41% and under 1% for the lowest-cost homes.

While difficult to quantify, the bill also has the potential to drive up purchase costs, making it even harder for families to afford their first home. Those who buy and take out a mortgage based on the short-term rental income may be severely overextended the next time New York sees a tourism slowdown or an international pandemic.

Ultimately, if these bills increase speculation and reduce inventory, they will also increase market rate rents.

948-A in particular would also incentivize investors to shop for properties as large as possible to accommodate four adult boarders and an unlimited number of children in order to maximize revenue. But that will squeeze large New York City families, especially multi-generational families, who will have to compete for the same inventory in an already-tight housing market.

We hope the Council will also consider that tenants generally have fewer rights in one- and two-family homes when compared to other parts of our housing stock. This legislation will incentivize displacement of current tenants to use the units for tourist rentals instead of homes.

Not only do these bills pose severe threats to the housing market, they create conflict with critical safety requirements. For example, allowing four boarders and an unlimited number of children will likely conflict with provisions of the Housing Maintenance Code related to how much light, ventilation, and space each occupant is required to have. It would also incentivize cramming large parties into small spaces or illegally converted basements, cellars, and attics. And according to the New York City Fire Department and the Department of Buildings, these bills pose unacceptable safety risks and do not make sense from a life safety point of view.

One- and two-family homes - which are also referred to as private dwellings - are exempt from many of the safety precautions required for the kind of activity these bills would allow. They don't have sprinklers or fire alarms that automatically summon the Fire Department. They aren't required to be built with the same level of flame-resistant materials. They are among the city's most combustible buildings, and amongst the most dangerous buildings in which the Fire Department conducts search, rescue, and fire-fighting operations. In fact, over the past few years, approximately a quarter of all structural fires have occurred in private dwellings, and fires in private dwellings have accounted for disproportionately greater percentages of serious fires and deaths from fires.

The bills compound these existing dangers by: 1) allowing commercial level use, 2) dramatically increasing the occupant load - effectively allowing conversion of private dwellings into multiple dwellings - including allowing an unlimited number

of children who are some of the most vulnerable and likely to require assistance when escaping a burning building, 3) eliminating the required presence of a permanent occupant who knows the layout and locations of exits, and 4) allowing a significant expansion of locked interior doors that pose safety risks for occupants and firefighters alike. In a fire situation, when seconds matter, any barrier that slows firefighters conducting search and rescue operations or that prevents a quick exit could cost lives.

Finally, I will turn to concerns about the impact on neighborhoods.

OSE has received over two thousand complaints both this year and last, and almost three thousand in 2023. Complaints from neighbors of short-term rentals express concern over quality-of-life impacts such as excessive noise, late night parties on weekdays, trash piling up, and tourists ringing the wrong doorbell in the middle of the night. Some tenants allege that the illegal activity is done to harass them into giving up their lease. And more and more short-term rental guests are reporting concerns about consumer deception, unsanitary conditions, and a concern that their stays were illegal. It stands to reason that a sharp increase in short term rentals where the host is not present will turn into a sharp increase in the impacts that lead to these complaints.

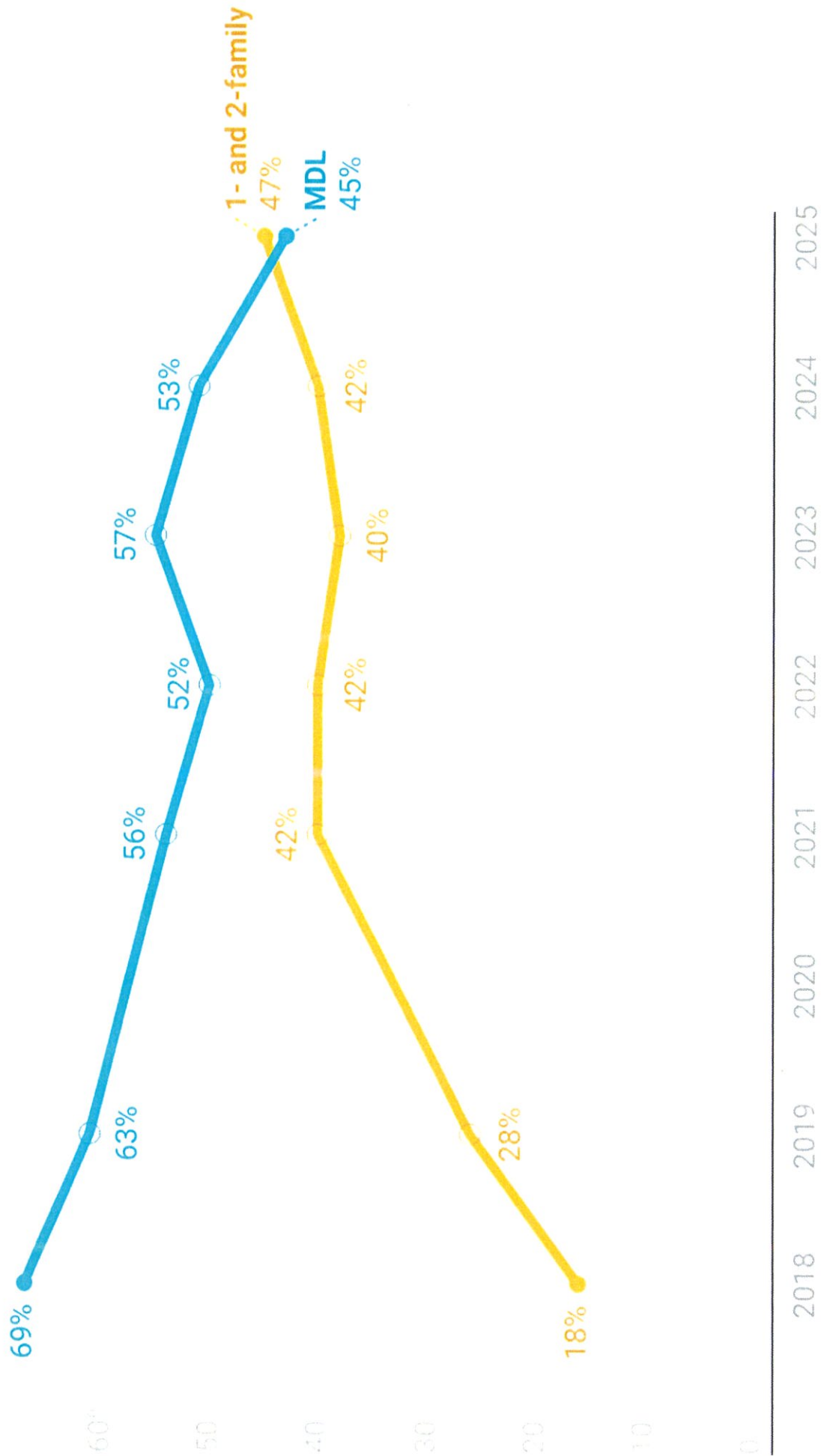
I have attached to my testimony a chart that shows the percentage of the complaints each year, broken down by building type. In 2018, the vast majority of complaints were from multiple dwelling units. Since then, complaints about one- and two-family homes have made up an increasing percentage of complaints, and as of earlier this month, 2025 will be the first year in which there are more complaints about activities in one- and two-family homes than in multiple dwellings. These are people who have asked the City for help, and OSE asks this committee to consider these complaints as though the people filing them were here today to testify.

For all of these reasons, the administration opposes these bills, and I ask the Council to seriously consider their harmful unintended consequences.

Thank you again for the chance to testify, and I look forward to your questions.

# 1- and 2-Family Homes Now Receive Most Illegal Short-Term Rental Complaints in NYC

Based on public complaint data from January 2018 to November 2025



• Data as of November 10, 2025

Source: Office of Special Enforcement • Created with Datawrapper



NEW YORK CITY DEPARTMENT OF  
HEALTH AND MENTAL HYGIENE  
Michelle Morse, MD, MPH  
*Acting Commissioner*

**Testimony**  
**of**  
**Corinne Schiff**  
**Deputy Commissioner for Environmental Health**  
**New York City Department of Health and Mental Hygiene**

**before the**  
**New York City Council**  
**Committee on Housing and Buildings**

**on**  
**Introduction 1217-2025**

**November 20, 2025**  
**City Hall**  
**New York, NY**

Good morning, Chair Sanchez and members of the Committee on Housing and Buildings. I am Corinne Schiff, Deputy Commissioner for Environmental Health at the New York City Department of Health and Mental Hygiene (Health Department). On behalf of Acting Commissioner Morse, thank you for the opportunity to testify today regarding the Health Department's pest control program and the legislation before your committee.

The Health Department takes a multi-pronged, evidence-based approach across New York City to control rats, building on decades of experience. Our approach, called Integrated Pest Management (IPM), emphasizes inspections, monitoring, and removal of conditions that rats need to survive. Rats thrive when they have ready access to food and water, a place to live, and effective transportation routes. That means that reducing the rat population requires managing garbage, eliminating nesting areas, and repairing cracks and holes in sidewalks, structures, and buildings. Safe, targeted treatment using best practices is the final piece of an effective IPM program.

Key components of our IPM program include:

- proactive inspections of every property in a particular area, enabling the Department to learn where rat activity is greatest and track progress over time;
- inspections in response to 311 complaints;
- enforcement actions against property owners who fail to maintain their properties free of rats;
- exterminations by our licensed pest management professionals on private properties where the owner fails to act and billing the owner for the work;
- monitoring, guidance, and technical assistance for City agencies to help them address areas in need of rat control;
- sealing or collapsing rat burrows in the public realm; and
- conducting outreach and education to help residents, property owners, and pest management professionals learn best practices for controlling rats. Many Council Members have sponsored our popular Rodent Academy sessions, and we look forward to continuing to hold those with you.

We describe our pest control activities on our Environment and Health Data Portal and provide detailed inspection information on our Rat Information Portal. New Yorkers can look up a specific property to learn what we observed at the inspection, whether we took enforcement action, and about any baiting by the Department at the property.

We know from the Health Department's inspection data that rat activity in NYC neighborhoods is not equally distributed. Some neighborhoods bear a higher burden of rat infestation. Those neighborhoods tend to be densely populated with high foot traffic, an abundance of food service establishments, and a higher proportion of public property. To effectively address rats, city agencies, property owners, and residents in these areas must work together. Rats do not observe property lines or distinguish between public and private ownership. To reduce rat populations in New York, everyone in a neighborhood, both private and public, must work together, across our usual boundaries and in times and places that matter most to rats.

Turning to the legislation being discussed today, Introduction 1217 would require the Health Department to conduct inspections for pest activity and conditions conducive to pests within ten days of receiving a 311 complaint, record information about our inspection findings, determine whether the location “passed” or “failed” the inspection, indicate whether the inspection resulted in a summons subject to civil penalties, and make such information available to the public.

The Department responds to every 311 complaint – our current response time is nine days – and we record our observations, make a pass or fail determination, and provide inspection and enforcement information on the Rat Information Portal. The Department has no concerns about mandating these rat control activities in the Administrative Code.

We would like to work with the Council to clarify certain terms and components of the bill, such as the broad use of the term “pests”; references to enforcement activities under the purview of other agencies; the consideration of a range of factors when setting our 311 response time; and regarding the details and timing of information on the Rat Information Portal. We look forward to working with you on the legislation.

Thank you for the opportunity to testify. I am happy to take questions.



**Joint Testimony of Assemblymember Linda B. Rosenthal, State Senator Liz Krueger and State Senator Brad Hoylman-Sigal Before the New York City Council Regarding Intros. 948-A and 1107-A**

**November 20, 2025**

As New York State elected officials serving in the Legislature who share a long history of championing affordable housing and fighting the illegal conversion of residential homes into short-term rentals for tourists, we are gravely concerned that Intros. 948-A and 1107-A would decrease New York City's existing affordable housing stock, lower homeownership rates and lead to the displacement of tens of thousands of tenants living in one- and two-family homes. We strongly urge the New York City Council to reject both bills.

Cities and municipalities across the globe have effectively banned or severely curtailed short-term rentals to preserve their shrinking affordable housing stock and to ensure that vacant residential units are rented to long-term residents instead of tourists. New York State and City similarly enacted common-sense regulations following the exponential growth of short-term rental activity that displaced long-term tenants, increased rents and removed tens of thousands of units from the city's housing market. A January 2018 analysis conducted by the Urban Politics and Governance research group at McGill University estimated that 67,100 residential units were removed from the city's housing stock to be used as short-term rentals. A 2018 report by the New York City Comptroller concluded that New York City renters paid an additional \$616 million in rent in 2016 alone because short-term rentals facilitated by Airbnb reduced the number of units available to rent on a long-term basis and drove up rental prices.

We have worked collaboratively with affordable housing, tenant and community advocates for decades to stop illegal hotel activity in New York City and preserve our extremely limited housing stock for New Yorkers. We sponsored and passed state legislation to prevent entire apartment buildings, including single room occupancy units (SROs), from becoming commercial businesses, and strongly supported the enactment of Local Law 18 by the City Council in 2022. We strenuously believe in protecting New York's housing stock from the proliferation of short-term rentals; otherwise, we will continue to bleed much-needed affordable units that must and should be made available to financially strapped New Yorkers during a housing shortage.

These bills will undo much of the hard-fought progress that has been made over the last two decades to regulate short-term rental activity and will exacerbate our city's existing affordability crisis.

As you know, this very body passed Local Law 18 in 2022, which establishes a universal framework for those who wish to supplement their income by using home-sharing platforms. The law reasonably requires that hosts be present when renting their units on a short-term

basis, however, Intro. 948-A does away with that common-sense provision, allowing entire one- and two-unit dwellings to be used by short-term guests.

The data is clear for why this provision is being proffered – a study conducted by the Community Service Society of New York revealed that the Net Present Value (NPV) for a one-unit Airbnb conversion would be worth approximately \$410,700. That number pales in comparison to the NPV of a long-term, one-unit rental. The NPV increases to \$4 million in a converted three-unit building.

Those numbers coincide with the results of a study that was conducted by the University of California's Marshall School of Business that analyzed the prevalence of Airbnb listings by zip code and their impact on surrounding housing prices. The study estimates that home-sharing platforms raise the cost of home prices by one-seventh of the average annual increases in U.S. housing prices. The University of California recommended an owner-occupied model, similar to what New York City eventually adopted, to protect against escalating rents and home costs.

By rolling back those reasonable protections in the Big Apple, the New York City Council would create a situation rife for speculation, and eventually, eviction of current tenants, during both an affordability and housing crisis. This effort undermines the state and city's collective quest to create a more affordable city for New Yorkers, especially young families who are being priced out of the housing market altogether.

New York State already has one of the lowest rates of homeownership in the country. On Long Island and other parts of the state, New Yorkers are competing with deep-pocketed corporate entities that are outbidding working-class and middle-class New Yorkers, tempting owners with all-cash offers for homes. Our constituents, many of whom are living on stagnant salaries, cannot possibly compete with big equity groups, such as Blackstone, that are targeting places like New York City as they expand their \$300 billion real estate portfolio.

These bills will eventually serve the city's 327,100 rental units in one-and-two-family homes on a silver platter to those corporate giants, making life more unaffordable for the people we represent. According to MetLife Investment Management, institutional investors will control approximately 40% of all single-family homes by 2030. This number will only increase as Donald Trump continues to implement tariffs on steel, aluminum and other building materials that make constructing new homes more expensive, and by extension, make it harder to keep pace with supply. Churning a profit on investment properties is a better bet for corporations given the realities at the federal level.

Speculation, in addition to pricing out first-time homebuyers, also increases the likelihood of eviction. Approximately 18% of the city's 5.2 million tenants live in one and two-unit dwellings and are particularly vulnerable to rent hikes and displacement. These residents are not protected by rent-stabilization or Good Cause eviction laws, and 45% of them do not have a lease. New York City renters in one- and two-unit dwellings are, on average, poorer than market rate tenants, with the typical one- and two-unit household earning 64% of Area Median Income, 14% less than the typical market rate tenant. What's more, these units are home to a larger share of Asian, Latino and Black New Yorkers than market-rate units.

These units, many of which anchor low-income tenants in our communities, will become vulnerable to the whims of institutional investors who can and will offer incredible sums of money to buy these properties.



New Yorkers are clamoring for a more affordable future, one in which they, not corporate investors, can comfortably plant roots in their neighborhoods. We absolutely understand that people use home-sharing platforms to make ends meet, and currently under Local 18, they can and should continue doing so. However, deliberately creating a system that encourages homeowners to convert one or both of the units in their buildings into short-term rentals for tourists instead of renting them to New Yorkers, or sell their homes to the highest corporate bidder, will reduce our housing supply, drive New Yorkers from their homes and pad the pockets of billion-dollar real estate investors.

Thank you.



TONY SIMONE  
75TH ASSEMBLY  
DISTRICT

# NEW YORK STATE ASSEMBLY

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Black, Puerto Rican, Hispanic  
and Asian Legislative Caucus  
Puerto Rican/Hispanic Task  
Force  
Task Force on New Americans

Good morning, Chairperson Sanchez and members of the Committee on Housing and Buildings. I am Assemblymember Tony Simone. I represent the 75th Assembly District on the West Side of Manhattan.

I am speaking today to express my strong opposition to Intro 948-A. Three years ago, our city passed Local Law 18 to address the scourge of unregulated short-term rentals, increase our housing stock, and make life here more affordable. Intro 948-A would erode this progress and bring us closer to the former regulatory environment where at its peak over 67,000 units were converted into de-facto unregulated hotel rooms according to a study at McGill University.<sup>1</sup> A 2020 study found that homes taken off the market and converted into short term rentals cost each New York City renter an additional \$470 a year.<sup>2</sup>

Our city and state are in the depths of a housing crisis, and the lack of supply is to blame. I hear it every day from my constituents, who tell me how they don't know how they can afford to continue living in New York City with rents this high. With a dangerously low vacancy rate in our city and tragically high levels of homelessness, the last thing we should do is reduce our housing stock even further by passing Intro 948-A.

I strongly urge the committee to oppose Intro 948-A. Passing this bill will make our city even more unaffordable than it already is. If you believe, like I do, that we should stand with New York City's residents and prioritize making life more affordable, I urge you to reject this bill.

Thank you for the opportunity to testify.

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<sup>1</sup> <https://www.mcgill.ca/newsroom/files/newsroom/channels/attach/airbnb-report.pdf>

<sup>2</sup> <http://insideairbnb.com/reports/platform-failures-how-short-term-rental-platforms-like-airbnb-fail-cities-en.pdf>



**JUMAANE D. WILLIAMS**

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS  
TO THE NEW YORK CITY COUNCIL COMMITTEE ON  
HOUSING AND BUILDINGS  
NOVEMBER 20, 2025**

Good morning,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. I thank Chair Sanchez and the members of the Committee on Housing and Buildings for holding this hearing today.

I've had extensive conversations around Int. 948 and Int. 1107. I came here today to give a statement because I believe this is an issue without one-size-fits-all solutions. As currently written, I cannot support this legislation. In an increasingly unaffordable city, I believe individual homeowners should be able to make a little pocket money and to my understanding, it was always the original intent of Local Law 18 of 2022 to exclude one to two-family homes. It is one thing for someone who lives in their neighborhood to utilize a short-term rental while on an occasional vacation. It is another to rent that same space for half the year while living in a completely different city or state. Or in the case of corporate LLCs who may fabricate proof of occupancy to run what is essentially an illegal hotel in a residential area.

I also believe there must be a limit to how many days a year an owner can utilize short-term rentals, as well as a cap on how many days the prime occupant can be away from the residence. Additionally, the expansion of the definition of "family" concerns me. When combined with other provisions of this bill it opens the door to corporate landlords and private equity firms abusing the rules to make a quick buck at the expense of long-term housing. If these bills become law with these loopholes unaddressed there must be clear accountability metrics to protect against abuses of the housing stock by such entities.

Short-term rentals can also run afoul of standard homeowner's insurance policies. We need to take into account the risk that is placed on homeowners and their mortgages that are not absorbed by the platforms hosting short-term rentals. Airbnb's own data in 2021



**JUMAANE D. WILLIAMS**

showed that 46% of NYC hosts said short term rentals helped them avoid eviction or foreclosure. We saw the devastating impact relying on tourism to make ends meet had on those renters during COVID-19. We need to do more to support homeowners so they're not regularly reliant on these short-term rentals to stay in their homes.

I don't believe there is enough data to unequivocally state Local Law 18 has brought potential rental units back onto the market, but we have seen 3,000 active registrations citywide with 40% of registration applicants approved and 550+ applications rejected for attempting to rent out rent-regulated apartments. As an enforcement mechanism, Local Law 18 is a success. Just as we need to do more to support homeowners, we also need to do more to ensure that there's increased supply in our housing stock.

I look forward to continuing these conversations and hearing more from stakeholders today. Thank you.



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**Mark Levine, Borough President**

**November 20, 2025**

## **Testimony of Manhattan Borough President Mark Levine**

### **NYC Council Committee on Housing and Buildings – Int 948 and Int 1107**

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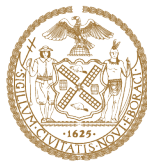
Thank you, Chair Sanchez and members of the Committee on Housing and Buildings for holding this hearing today on Intros 948 and 1107 regarding regulations of short-term rentals in New York City.

New York City is facing the most severe housing shortage and affordability crisis in its history. The City's historically low vacancy rate of just 1.4% and skyrocketing rents make clear that city policies must be laser focused on improving the supply of housing in every neighborhood that New Yorkers can afford, and that we ensure that existing homes are available for New Yorkers to live in. This is why maintaining strong regulations of short-term rentals is important and rolling back those regulations, as proposed in these bills, would be a mistake.

As a member of the City Council in 2021, I was proud to co-sponsor the bill that became Local Law 18 of 2022. This law created important safeguards to protect our rental housing stock. I am very concerned that Intros 948 and 1107 roll back key regulations and would hurt city residents. Allowing short-term rentals in 1- and 2-family buildings to proliferate again in New York City could have serious and lasting consequences for our city's housing market. In fact, recent analysis by the Community Service Society of New York shows that rolling back regulations of these units could make these homes less affordable for both prospective renters and buyers.

For years before Local Law 18, tens of thousands of apartments that should have housed New Yorkers were instead used for de facto hotel rooms listed on short-term rental platforms. Re-legalizing short-term rentals on a broad scale would undermine the progress the city has made in reclaiming these units for long-term housing for New Yorkers.

I urge the City Council to consider the damage that Intros 948 and 1107 could do to our city's available housing supply and to reject these bills. Thank you for the opportunity to testify, and I look forward to working with you to pursue policies that will address the historic housing crisis that our city is facing.



**DONOVAN RICHARDS JR.**  
President

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## **Testimony regarding Intro 948-A and Intro 1107-A**

### **Submitted to the NYC Council Committee on Housing and Buildings**

Chair Sanchez and members of the Committee,

Thank you for the opportunity to submit testimony on Intro 948-A and Intro 1107-A. As Borough President, I am committed to protecting Queens' scarce affordable housing stock and ensuring safe, stable communities for all residents. These proposed bills, if passed, would put both goals at risk.

New York City is still recovering from the height of the short-term rental surge. At one point, an estimated 67,100 homes were diverted from long-term use and turned into illegal hotels. The 2018 City Comptroller's report showed that Airbnb activity helped drive 9.2 percent of rent increases between 2009 and 2016. A 2020 Inside Airbnb analysis found that this loss of housing cost the average renter about \$470 in 2018 alone.

The effects were far from evenly distributed. In predominantly Black neighborhoods, Airbnb hosts were five times more likely to be white, and white hosts earned over 530 percent more than Black hosts. Research shows Black residents were six times more likely to experience displacement linked to short-term rentals. These trends widened existing inequities and accelerated instability in communities already under pressure.

To stop the bleeding, the Council passed Local Law 18 in 2021. It created a straightforward system: hosts must register, live in the unit, be present during rentals, and limit guests to two. The law has helped preserve housing and improve oversight.

Intros 948-A and 1107-A would reverse that progress. Removing the requirement that hosts be present would open the door to unmonitored, hotel-style operations in residential buildings. Allowing up to four adult boarders (and their children) without oversight raises serious safety and quality-of-life concerns. And weakening the primary-residence rule for two-family homes all but invites speculative investors to buy up properties for commercial rental use. With one- and two-family homes making up 29 percent of the city's housing stock, this shift could be massive.

We cannot ignore the influence shaping this debate. A great deal of money has been poured into efforts to loosen these regulations. But public policy must reflect what benefits New Yorkers—not what benefits well-funded corporations or investment groups. Residents across the city understand exactly how these bills would affect their neighborhoods, and they expect their government to protect their housing, not jeopardize it.

If these bills pass, thousands of rental homes could be lost. With a 1.4 percent vacancy rate and record homelessness, that is simply not an option. New York City needs more affordable housing, not fewer homes available to the people who rely on them.

For these reasons, I urge the Council to reject Intro 948-A and Intro 1107-A and uphold the protections established under Local Law 18. My office is ready to continue working with you to support fair, equitable housing policies that strengthen communities across our city.

Respectfully,

A handwritten signature in black ink, appearing to read "Donovan Richards", with a stylized, cursive script.

Donovan Richards  
*President*  
Borough of Queens

# Testimony on Intro. 948A

**Tech:NYC Written Comments — Last Updated: 11-19-25**

Thank you for the opportunity to provide written testimony on behalf of **Tech:NYC** regarding **Intro. 948A**, a Local Law to amend the administrative code of the City of New York in relation to short-term rental regulations and the ability of homeowners to responsibly share their primary residences.

Tech:NYC represents more than 550 member companies—from early-stage startups to global technology leaders—and we work closely with the City Council to keep New York a place where innovation and opportunity thrive. A core part of that mission is ensuring the city remains affordable and livable for the people who power its economy.

We support Intro. 948A because it takes a smart, balanced approach to updating short-term rental rules. The bill allows owners of one- and two-family homes to rent their primary residences under clear, enforceable conditions—helping New Yorkers earn supplemental income without affecting the city's housing supply or neighborhood stability.

## Why a Fix Is Needed

When Local Law 18 was enacted, its goal was to stop illegal hotel activity and protect long-term housing. Those goals are valid, but the policy has gone too far—restricting even responsible homeowners who use short-term rentals to cover rising costs. The results speak for themselves: despite removing more than 90% of listings, rents have continued to rise—up over 5% in Brooklyn and 4% in Queens this year—while vacancy rates remain unchanged.

The data is clear: these restrictions have not made housing more affordable. Instead, they've limited economic opportunity and innovation for residents who rely on technology platforms to make ends meet.

## A Practical, Affordable Solution

Intro. 948A is a focused reform that restores fairness and flexibility. It allows homeowners of one- and two-family dwellings to rent their primary residence for short periods—like during holidays or major events—while maintaining strict prohibitions on speculative or commercial use. The bill explicitly excludes corporate landlords, investors, and multi-unit operators, ensuring this flexibility applies only to genuine residents.

By updating outdated rules, Intro. 948A would help New Yorkers stay in their homes, generate local spending, and reduce financial pressures that drive residents and talent out of the city. Importantly,



it would not take housing off the market—because it applies only to primary residences, no long-term units are converted into short-term rentals.

## **Supporting Innovation and Economic Stability**

The tech sector understands how critical affordability is to maintaining New York’s position as a global innovation hub. If the city becomes unaffordable for the people who build and work in startups, creative industries, and small businesses, it risks losing its competitive edge. Allowing residents to use digital platforms responsibly—under fair, enforceable rules—is part of building a city that embraces innovation while protecting its people.

This is not about deregulation—it’s about modernization. The current short-term rental restrictions were written for a pre-digital era. Updating them to reflect how people actually live and work today will bring more economic activity into the regulated economy, expand tax revenues, and strengthen the city’s fiscal position. Those funds can help support housing initiatives and community investment while freeing enforcement agencies to focus on truly bad actors.

By creating a framework that recognizes technology as a tool for economic inclusion, the Council can ensure that New York remains a city where residents benefit from innovation, rather than penalized by it.

## **Modernizing for a Connected Economy**

Cities worldwide—from London to Los Angeles—have adopted homesharing frameworks that differentiate between corporate operators and homeowners. New York should do the same. Digital platforms are now integral to how residents earn supplemental income, cover costs, and remain part of their communities.

Intro. 948A aligns with this reality. It preserves neighborhood character and housing integrity while allowing homeowners to safely and responsibly participate in the platform economy. It’s a measured, 21st-century solution to a 20th-century regulatory challenge.

## **Conclusion**

Intro. 948A represents a pragmatic fix that promotes affordability, inclusion, and innovation. By empowering homeowners to responsibly share their primary residences, the City Council can help New Yorkers stay in their homes, support neighborhood small businesses, and strengthen the foundation of an equitable, tech-driven economy.

Tech:NYC urges the Council to adopt this legislation and continue working toward policies that reflect how New Yorkers actually live, work, and thrive in the digital age.

Sincerely,

Alex Spyropoulos

Director, Government Relations

## **Remarks to the Committee on Housing, New York City Council**

### **Warren Gardiner, Senior Manager for Public Policy, Airbnb**

Good morning Chair Sanchez and Members of the Committee. My name is Warren Gardiner, and I am the Senior Manager for Public Policy at Airbnb. I am joined by my colleague, Nathan Rotman, our North America Director for Policy.

This work is deeply personal to me. I am the son of immigrants who came to this city with nothing but determination. For 34 years, my father drove a yellow cab through these streets. He worked 18 hour days, 7 days a week. My mother worked those same brutal hours, all to buy our home in Southeast Queens. Like millions of working families across this city, they sacrificed everything, including time with their children, to keep a roof over our heads.

I often think: what if Airbnb had existed then? What if my parents could have rented out a room while they were working those endless shifts? Maybe they wouldn't have had to refinance their home so many times just to survive in this city they helped build.

This is why, after nearly two decades working in state and city government, I now stand before you representing Airbnb. Because at its core, our mission reflects the same principles that founded this company; helping ordinary people stay in their homes, and in their communities.

The message from homeowners today is: New York City has become the most restrictive short-term rental market in the entire country.

We're not here to dismantle Local Law 18. The registration system works. But the law's unintended consequences have created an untenable situation. Even the bill's original sponsor has acknowledged that it went too far.

The current restrictions are crushing opportunities for the very families we should be protecting. We've lost over 200,000 Black and brown families from this city in the last decade. And can't afford to lose any more.

Intro 948A is simply a modest correction to an overreach. This bill applies only to one- and two-family homes where a permanent resident lives. In these properties, it allows homeowners to host up to 4 adults when they're away.

These are common-sense adjustments that don't remove a single unit of housing from the market.

We're proud of the broad coalition of clergy, housing, and small business advocates supporting this bill. They have all recognized that when a family in Southeast Queens, East New York, or the South Bronx can earn extra income from their home, that money flows directly into local businesses. These are neighborhoods with few or no hotels. The visitors who stay there eat at

local restaurants, shop at local stores, and contribute to communities that tourism has historically bypassed.

With the World Cup coming next year, with our city still recovering economically, with homeowners struggling more than ever, this isn't just about policy. It's about values. It's about whether we believe New York City should be a place where working families can build wealth, where communities can thrive, where the American Dream still has meaning. We want to work with you to ensure New York remains a city where families like mine, families like the ones you'll hear from today, can not just survive, but thrive.

Thank you for your leadership and for the opportunity to testify today.



## **TESTIMONY TO THE NEW YORK CITY COUNCIL COMMITTEE ON HOUSING AND BUILDINGS**

**November 20, 2025**

The Building Owners and Managers Association of New York (BOMA NY) represents the commercial real estate industry across the five boroughs of New York City – the largest industry in the market area, contributing approximately \$27 billion to the New York economy annually. BOMA members are responsible for the ownership and management of approximately 529 million square feet of office space, including some of the world's most prestigious properties. Members include building owners, professional property management firms, professional service providers contract services providers in construction, elevator maintenance, cleaning services, and others.

BOMA is pleased to submit testimony on Intro 1321, creating an Existing Building Code (EBC), which is the result of the Department of Buildings' work to develop a new building code that would apply to alterations to existing buildings. BOMA supports the intent and goals of this important initiative and we have been in discussions with DOB to ensure that this new code is finalized and implemented in a manner that will truly benefit our members across the five boroughs...both now and during rule-making and adoption over the next two year. We are continuing to work collaboratively with DOB – and would be grateful for the opportunity to work with the Council staff as well – on a range of issues, clarifications and concerns, including:

- Mechanisms for tracking alterations that trigger EBC compliance and how triggers are determined
- Utilization of Architectural Conditions Assessments under the EBC
- Compliance with retrofitting on occupied floors in light of lease language and obligations to tenants
- Accessibility and other issues in areas that have challenges with conforming due to space constraints
- Clarifications regarding requirements/discretion for DOB inspectors

We are continuing to discuss these, and other issues, with NYC DOB and are hopeful that we can work with them and the NYC Council to ensure that the new EBC legislation can achieve its worthy goals and benefit the wide range of properties BOMA represents across New York City. Thank you.

**Lori Raphael**  
**Executive Director**



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Hotel and Gaming Trades Council  
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## **Memorandum in Opposition to Proposed Int. 948 and Int. 1107**

Proposed Intros 948-A and 1107-A seek to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present.

**These bills would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City's affordable housing from illegal hotel activity.**

### **REASONS FOR OPPOSITION**

At its peak, the short-term rental crisis in New York City saw roughly 67,100 residential units removed from the city's housing stock to be rented as de-facto illegal hotel rooms, creating a threat to housing, safety, the tourism economy and the jobs it supports, and the character of our neighborhoods.<sup>1</sup> Local Law 18 put in registration and enforcement requirements to protect New Yorkers and local communities. **Intros 948-A and 1107-A are an overt effort to dismantle existing protections against illegal short-term rentals.**

By permitting up to four adult boarders—and their children—without requiring the host's presence, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability. Framed as a clarification, this measure instead creates a massive loophole that would allow speculative landlords and short-term rental platforms to exploit the city's limited housing stock for profit.

New York City faces an unprecedented housing and affordability crisis. With record-high rents, a vacancy rate below 2%, and persistent inflation, the city cannot afford to lose more long-term housing to short-term rentals. Each home converted to transient use means fewer stable units for New Yorkers struggling to find affordable housing.

Removing the host-presence requirement invites quality-of-life and public safety problems—the same issues Local Law 18 was enacted to prevent. Expanding the number of boarders per dwelling increases the risk of overcrowding, code violations, and unsafe conditions.

With the recent surge in fires linked to lithium-ion batteries, now is not the time to loosen occupancy and safety standards. New York City should be reinforcing stricter fire safety and inspection protocols, not introducing new risks by allowing more unmonitored, transient occupants in residential homes. Removing the host presence requirement further diminishes oversight and emergency preparedness, putting tenants, guests, and first responders at risk.

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<sup>1</sup> <https://www.mcgill.ca/newsroom/files/newsroom/channels/attach/airbnb-report.pdf>

Without an on-site resident, there is no oversight of guests, noise, sanitation, or building safety. Residential neighborhoods could again experience the disruptions and hazards that accompanied the proliferation of illegal short-term rentals before 2023 enforcement began. This bill reverses the community stability and enforcement progress that Local Law 18 has achieved.

Local Law 18 established a registration and enforcement system to ensure short-term rentals are small-scale, owner-hosted, and safe. Proposed Intros 948-A and 1107-A would gut that framework by authorizing unhosted rentals, allowing for areas to be locked, and expanding occupancy limits, making enforcement nearly impossible.

Additionally, one- and two-family homes comprise **29% of the total housing stock in NYC**, and 100% of that housing would be up for grabs for use as permanent short-term rentals.<sup>2</sup> With a housing vacancy rate of just 1.4% and record-high levels of homelessness, this would be a dangerous and unnecessary blow to affordability for hundreds of thousands of New Yorkers.

The City's Office of Special Enforcement has successfully removed thousands of illegal listings since Local Law 18 took effect. This bill would undo those gains and return the city to the unregulated chaos of the illegal hotel era that, according to a 2018 report, **created a rental market ripple effect that cost every New York City renter an estimated \$470 that year.**<sup>3</sup>

At the same time, there is a thriving *legal* short-term rental market across the city, which has been growing at a clip of about 1,000 rentals per year, and is currently at over 3,100 units. New Yorkers currently have the option of participating in this market legally, in a manner that does not deny housing and job opportunities to others.

Much like other middle- and working-class New Yorkers, members of the Hotel & Gaming Trades Council are struggling to afford the cost of housing in the city. Hotel workers also contribute enormously to the city's economic activity and economic health by keeping hotels running in one of the most important tourism markets in the world. Expanding short-term rentals would unnecessarily cost them jobs, wages, and economic opportunity. Harming hotel workers and countless other New Yorkers by denying them housing and job opportunities, all to expand what is already a successful and growing legal short-term rental market, would be a grave mistake for the economic health of our city and its future.

## CONCLUSION

Proposed Intros 948 and 1107 represent a serious step backward for New York City's housing policy. At a moment when New Yorkers are confronting record rents, inflation, and a worsening housing shortage, the City Council must focus on preserving long-term housing and job opportunities—not weakening them.

**For these reasons, we urge the City Council to vote no on any iteration of Intros 948 and 1107.**

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<sup>2</sup> <https://censusreporter.org/tables/B25032/>

<sup>3</sup> <http://insideairbnb.com/reports/platform-failures-how-short-term-rental-platforms-like-airbnb-fail-cities-en.pdf>



**NYSFAH Testimony**  
**New York City Council Committee on Housing and Buildings**  
**Hearing on the Existing Building Code (EBC)**  
**November 20, 2025**

The New York State Association for Affordable Housing (NYSFAH) is a trade association representing developers and professionals dedicated to building and preserving affordable housing across New York City and State. We appreciate the opportunity to offer comments regarding Intro. 1321, to enact the Existing Building Code (EBC), as well as Intro. 1422 to align requirements across different codes to the changes made in the EBC, as well as mention of Local Law 142-2025 whose contents are referenced within the EBC.

**INTRO. 1321 - SUPPORT FOR UPDATED AND MODERNIZED BUILDING CODE**

NYSFAH strongly supports the City's work to finalize a modern EBC that reflects years of technical evaluation, consensus-building, and coordinated engagement with practitioners including affordable housing developers, architects, engineers, and code experts. We were proud to have a representative serve on the Managing Committee during this process and appreciate the City's inclusive, data-driven approach.

For decades, renovating existing buildings in New York City has meant navigating a patchwork of historical codes, sometimes requiring development teams to reference rules dating back to 1938 or 1968 – the major eras in New York City's building-code evolution. For affordable housing developers, this has led to unnecessary delays, increased costs, inconsistent interpretations, and reduced clarity for both design professionals and Department of Buildings (DOB) staff.

Intro. 1321 is an important step forward. It will be part of the family of New York Construction Codes, so that one does not need to reference old codes dating back to 1938, and only the EBC and current building code will need to be consulted. It aligns New York City with the International Building Code (IBC) framework used throughout the country, and it brings greater logic, transparency, and predictability to projects involving rehabilitation, adaptive reuse, additions, and changes of occupancy. For firms who build across multiple jurisdictions, this alignment reduces confusion and allows new development teams, especially architects from outside New York City, to understand and comply with the City's expectations.

**KEY IMPROVEMENTS FOR AFFORDABLE HOUSING**

We want to highlight several aspects of the EBC that will meaningfully improve the delivery of affordable housing:

**1. Incremental, scalable safety improvements.**

The EBC promotes incremental safety improvements to existing buildings based on the extent of alterations being made, without overburdening projects with unnecessary new regulations.

**2. Transition from a dollar-value threshold to an area-based system.**

Under the current code, whether a project triggers certain upgrades depend on whether work exceeds 50 percent of a building's "value." This system is imprecise and often contentious, requiring appraisals and creating potential disputes. The proposed area-based calculation is much clearer, focusing on the actual scope of renovation rather than subjective valuations. Routine work, like repointing brick, would no longer distort thresholds, avoiding costly delays and unnecessary back-and-forth.

**3. Integration of the Multiple Dwelling Law (MDL) into the EBC.**

Certain MDL requirements limit flexibility, such as when a building owner proposes adding a floor to a fully sprinklered building but lacks any discretion under the MDL. Under the EBC, the Commissioner will have more flexibility to evaluate realistic, safe, and modern solutions. Long-term, this integration should enable the State Legislature to repeal redundant portions of the MDL, simplifying regulatory reviews and improving the consistency of decision-making.

**4. Clearer guidance for occupancy standards.**

Currently, occupancy in dwelling units can be governed by four different codes, requiring evaluation against the most restrictive. The new EBC helps streamline these overlapping requirements and provides clearer direction for practitioners.

**5. A comprehensive, regularly updated system.**

The EBC is the product of an eight-year, consensus-driven process with subject-matter committees dedicated to specific chapters - mechanical, structural, materials, plumbing, fire suppression, and more. When disagreements emerged, they were mediated and resolved through a consistent, transparent process, with final decisions made by the Commissioner. Going forward, the EBC will be easier to update as codes evolve, ensuring New York City stays current with modern standards while incorporating local nuance.

**6. Training and industry support.**

We strongly support the multi-part training program the city is preparing to accompany the new EBC, including guidance on changes of occupancy, additions, and building relocations. Clear communication and early release of training materials are essential to a smooth implementation and to minimizing slowdowns in affordable housing production.

**INTRO. 1422 - ENSURE CLEAR AND CONSISTENT CODE ALIGNMENT**

Intro. 1422 contains important conforming changes to other codes to support the new EBC. We recommend that DOB make all accompanying guidance, FAQs, and technical bulletins publicly available as early as possible so project teams can prepare for the transition. Consistency and clarity will be key to ensuring this landmark update achieves its intended benefits.



## **LOCAL LAW 142-2025 – ORDINARY PLUMBING WORK AND LICENSING OVERSIGHT**

We also want to acknowledge Local Law 142-2025 (formerly Intro. 429-A), which passed the Council on September 25, 2025, and operates alongside the EBC within the broader city's Construction Codes.

While LL 142 clarifies routine activities, like replacing a dishwasher or other household gas appliances, will be treated as “ordinary plumbing work” requiring only a notice filing, several provisions would still create significant delays and burdens for affordable housing owners and contractors. These include limiting emergency repair work without a permit, further restricting who can perform gas piping inspections and imposing duplicative requirements on all-electric buildings. Ordinary work is referenced generally in the EBC under Section 105. Certain straightforward tasks, such as basic appliance swap outs, should be permitted for trained building staff to reduce costs and expedite repairs without compromising safety, something that should be explored in the context of establishing new code.

Finally, LL 142 codified a plumbing and fire suppression licensing board structure that is vulnerable to excessive turnover and subjective “character and fitness” reviews, giving union-affiliated appointees disproportionate influence over contractor certification while leaving multifamily affordable housing owners, those most affected, without representation. Although unrelated to the EBC, we would appreciate your noting that this remains a concern.

## **CONCLUSION AND NEXT STEPS**

New York City's existing building stock is the backbone of our affordable housing system. Modernizing the code that governs rehabilitation and reuse is essential if the city is to meet its housing goals, promote safer buildings, and reduce unnecessary barriers to construction.

The Existing Building Code is not perfect, but it is a major and necessary improvement. It replaces outdated, inconsistent rules with a coordinated framework integrated without New York City Construction Codes, creating greater clarity and a simpler, more predictable regulatory process. There will be an initial learning curve, but the long-term benefits are substantial and well worth this transition.

Further, our past and current comments on LL 142-2025 and its effects should be taken into consideration as you contemplate any changes to the new EBC.

NYSFAFH appreciates the chance to participate in the process to develop the EBC and looks forward to a smooth implementation period supported by strong training and clear communication from DOB. Thank you for the opportunity to contribute to this important conversation. If you have any questions or require further information, please do not hesitate to contact Irak Cehonski-Rivas, NYSFAFH's NYC Director of Policy, at (917) 717-8499 or [irak@nysafah.org](mailto:irak@nysafah.org).

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**PLUMBERS & GAS-FITTERS TRAINING CENTER**  
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ARTHUR O. KLOCK JR.  
Director of Trade Education

The New York City Council  
City Hall, New York, NY 10007

Re: Support for Intro. 1321

Honorable Members of the New York City Council,

I would like to express my full support for Intro. 1321. This proposed legislation will create New York City's first ever Existing Building Code (EBC). The proposed EBC will apply to regulated work performed in existing buildings. Having participated in the process of creating this legislation was a challenge, but also a privilege, and I was impressed by the diligence and commitment of the Code Committee and the employees of the New York City Department of Buildings (Department) over a period of years to bring this to fruition. The EBC will provide clear guidance for work to be executed in over 1 million existing buildings. It simplifies the process for owners, allowing appropriate variations for existing buildings built under older versions of the code. The Department was transparent and inclusive of all stakeholders throughout the Code creation process. My area of expertise is specifically Plumbing/Fuel Gas, and this was my primary area of participation, but I was impressed that the Department made sure that our committee was always kept aware of and coordinated with the other committees working on this project. I understand that there will be an opportunity to address any discrepancies which may be discovered, with legislative action (Clean-Up Bill) after the current Intro has been approved. This seems a prudent course of action.

Very Truly Yours,

Arthur Klock  
Director of Trade Education  
Plumbers Local 1 Trade Education Fund

REBNY Testimony | November 20, 2025

# The Real Estate Board of New York to The New York City Council Committee on Housing and Buildings on the Existing Building Code and Intro 948-A

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 appreciates this opportunity to submit comments to the Committee on Housing and Buildings on Intros 1321 and 1422, related to the Existing Building Code, and on Intros 948-A and 1107-A, related to boarders, roomers, and lodgers in private dwellings and short-term rentals.

**BILLS: Intros 1321 and 1422:** Existing Building Code

**SUBJECT:** Intro 1321 would enact the new Existing Building Code and repeal the 1968 Building Code; while Intro 1422 would amend the administrative and construction codes, and repeal relevant sections, to enact the new Existing Building Code

**SPONSORS:** Council Member Sanchez (at request of the Mayor)

Taken together, these two bills would establish a new Existing Building Code (EBC) that would apply to the alteration and maintenance of existing buildings. Currently, architects and other practitioners must sort through various past building codes to determine if such work is code compliant. Having all past code reiterations in a single document should significantly simplify code compliance, saving both time and money. As such, REBNY supports this legislation.

That said, this new EBC is a significant break from previous processes. It redefines the formula for when alterations require code upgrades due to the scale of the work by adding the concept of "work area." Therefore, the application of the EBC will require significant education of those who do work related to existing buildings. Because of this need, REBNY appreciates that the EBC will not take effect for two years. REBNY looks forward to working with the Department of Buildings on its outreach and education efforts to ensure the smoothest possible transition from current practices to doing work under this new ECB.

**BILL:** Intro 948-A: Changes regarding occupancy in relation to boarders, roomers, or lodgers in a private dwelling and short-term rentals in one- and two-family dwellings

**Sponsors:** Council Members Narcisse, Louis, Banks, Riley, Feliz, Stevens, Brooks-Powers and Salamanca

This bill would increase the number of people who can stay in short-term rentals that have been registered by the owner as a short-term rental unit. It would also allow residents to host guests in short-term rental units without being present. This bill also includes language related to access to common spaces.

**BILL: Intro 1107-A** Common room access for short-term rentals in one- and two-family dwellings

**SUBJECT:** This bill would require the owners of one- and two-family dwellings, who are hosting short-term rentals, to provide boarders, roomers, or lodgers with reasonable access to common areas within the home, not inclusive of bedrooms or offices or similar private spaces.

**SPONSORS:** Council members Louis, Narcisse, Riley, Brooks-Powers, Salamanca, Feliz, and Stevens

REBNY strongly supported the Council's overwhelming adoption of Local Law 18 of 2022 and its subsequent implementing regulations, which provided much needed oversight of short-term listings in New York City. The changes made by Local Law 18 have been a benefit to the city and its residents and should not be weakened.

While the stated objective of the legislation (Intros 948-A and 1107-A) is to expand short term rental listings in one- and two-family dwellings, many of the provisions in the bills apply much more broadly. For example, the legislation amends the definition of family, which impacts all property types without regard to whether the unit is a short-term rental. Further, these provisions eliminate the obligation that the host be present during the short-term rental stay and allow the host to restrict access to certain types of space in the unit in multifamily buildings and one- and two-family homes.

Given the breadth of the bills, the legislation will increase the volume of short-term rental activity across all types of properties and will result in a proliferation of the types of safety and quality of life issues that necessitated the enactment of Local Law 18 in the first place. For instance, by allowing tenants to restrict access to portions of a unit, the legislation has the potential to create fire and life safety issues by, for example, restricting access to fire escapes. Similarly, expanding the number of people who could use the unit has the potential to create noise and other quality of life issues for current residents. These types of issues directly impact property owners by creating property management challenges, unsafe situations, legal liability, and higher insurance costs.

Given these issues, REBNY urges the Council to more fully review the potential impacts of this legislation and resist changes that weaken the important protections made in Local Law 18.

**CONTACT:****Dev Awasthi**

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Real Estate Board of New York  
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**Daniel Avery**

*Director of Policy*  
Real Estate Board of New York  
davery@rebny.com



**PLUMBING  
FOUNDATION  
CITY OF NEW YORK**

**To:** NYC Council Committee on Housing & Buildings

**From:** April McIver, Executive Director, The Plumbing Foundation

**Date:** November 20, 2025

**Re:** Int. 1321-2025 & Int. 1422-2025

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## **INTRODUCTION**

My name is April McIver, and I am the Executive Director of the Plumbing Foundation City of New York, Inc. The Plumbing Foundation was founded in 1986 and is a non-profit organization of small and large, union and non-union plumbing contractors, engineering associations, supply houses, and manufacturers whose mission is to protect the public health and safety of New York City through the enactment and enforcement of safe plumbing codes.

I had the honor of sitting on the Administrative and Enforcement Code Committee for the Existing Building Code revision with the NYC Department of Buildings (DOB). The Plumbing Foundation has been part of the NYC Department of Buildings (DOB) Code Revision process for the past 15+ years. The Code Revision Committees are no doubt composed of well-known and respected experts in their fields who collectively volunteer thousands of hours towards the Code Revision process. We commend the DOB for its involvement of the stakeholder community and diligence in completing the Existing Building Code.

## **COMMENTS**

As noted in the Memorandums of Support for Int. 1321 and Int. 1422, under the current regulatory framework, design professionals and licensees must consult prior codes when performing alterations to existing buildings which can be confusing. Therefore, the “Existing Building Code” is critical to advancing a comprehensive, streamlined, and user-friendly framework governing alterations to existing buildings. Passage of this bill will ensure there are no conflicts or inconsistencies between the applicable code provisions, provide for ease of compliance with the regulatory framework, and make great strides in furthering the modernization of the City’s existing building stock. Therefore, we are supportive of the bills.

However, one important comment that we must ensure is considered by the NYC Council is to make sure the recently enacted Local Law 142 of 2025, which included important building code revisions, is incorporated into the Existing Building Code. One potential area of conflicting language surrounds Ordinary Plumbing Work. See below for reference:

For example, the following edit was made in LL142:

**§ 28-105.4.4 Ordinary plumbing work.** The following ordinary plumbing work may be performed without a permit, provided that the licensed plumber performing such work: (i) provides a monthly report listing completed work and work in progress during the preceding month, including the block, lot and address of each job, a description of the work performed or in progress at each address, and the location in each building where the work was performed or is in progress; (ii) pays the fees for such work in accordance with this code; and (iii) submits to the department a certification that the work was performed in accordance with this code and all applicable laws and rules. Ordinary plumbing work shall include:

1. The removal of a domestic plumbing system not connected to a fire suppression or fire protection system, or the removal of a portion of such system.
2. The relocation of up to two plumbing fixtures within the same room to a maximum of 10 feet (3048 mm) distant from the original location, except in health care facilities.
3. The installation, replacement or repair of a food waste grinder (food waste disposal) or secondary backflow preventer and the replacement or repair of a sump pump.
4. The ~~[replacement of closet bends]~~ repair components of a plumbing appliance or plumbing appurtenance or the replacement of a plumbing appurtenance.
5. In buildings classified as residential occupancy groups occupied by five families or fewer ~~[in occupancy group R-2 occupied by fewer than six families or in buildings in occupancy group R-3]~~, the replacement of a gas water heater, gas furnace, or a gas-fired boiler with a capacity of 350,000 BTU (103 kW) or less where the existing appliance ~~[gas cock]~~ shutoff valve is not moved, provided that the plumber has inspected the chimney and found it to be in good operational condition.
6. The repair or replacement of any non-gas, non-fire suppression piping not longer than ~~[10]~~ 25 feet (~~[3048]~~ 7620 mm) inside a building, or connected piping previously repaired or replaced under this provision.
7. The repair or replacement of any non-gas, non-fire suppression branch piping after the riser shutoff valve, including the replacement of fixtures~~[, limited to two bathrooms and one kitchen per building per monthly reporting period].~~
8. The replacement of ~~[flexible gas tubing no greater than 4 feet (1219 mm) in length located downstream of the existing gas cock to an appliance, provided such gas tubing does not penetrate a wall]~~ an appliance connector serving the following domestic gas appliances: ranges, ovens, stoves, barbecues, and clothes dryers where the existing appliance shutoff valve remains and replacement shall be in accordance with this code and the New York city fuel gas code. The existing appliance shutoff valve shall be accessible and in good working condition with no noticeable corrosion or deterioration.

9. The replacement of the following domestic gas appliances: ranges, ovens, stoves, barbecues, and clothes dryers where the existing appliance shutoff valve remains and when such appliance replacement is in accordance with this code and the New York City fuel gas code. The existing appliance shutoff valve shall be accessible and in good working condition with no noticeable corrosion or deterioration.

This is the new OPW section in Int. 1321:

**105.3.1.2 Ordinary plumbing work.** Ordinary plumbing work is not required to be performed with a permit, provided that the licensed plumber performs such work in accordance with this code and all applicable laws and rules.

**105.3.1.2.1 Documentation of ordinary plumbing work.** The licensed plumber shall record the block, lot and address of each job, a description of the work performed at each address, and the location in each building where the ordinary plumbing work was performed. The licensed master plumber shall furnish a copy of such record to the building owner upon the completion of work. The licensed master plumber shall submit a report of completed ordinary plumbing work items in accordance with the requirements of the Department.

**105.3.1.2.2 Category 1 ordinary plumbing work.** Category 1 ordinary plumbing work shall be performed in accordance with this code and shall be limited to the following items:

1. The relocation of up to two plumbing fixtures within the same room to a maximum of 10 feet (3048 mm) distant from the original location, and the replacement or alteration of related supply, waste, and vent piping associated with the fixture relocation, except in health care facilities.
2. The installation, replacement or repair of a food waste grinder (food waste disposal); dishwasher; instant hot water dispenser; icemaker; coffee machine; secondary back flow preventer; and the replacement or repair of a sump pump.
3. The repair or replacement of a plumbing fixture; faucet or fixture fitting from the exposed stop valve to the inlet side of a trap not constituting an ordinary repair.
4. The repair of components of a plumbing appliance or plumbing appurtenance.
5. The replacement of a plumbing appurtenance.
6. The repair or replacement of plumbing piping, except gas piping, not longer than 25 feet (7620 mm), or connected piping previously repaired or replaced under this provision.



7. The repair or replacement of plumbing branch piping except gas piping, serving the dwelling unit and including the replacement of fixtures, limited to two bathrooms and one kitchen per dwelling unit.

**105.3.1.2.3 Category 2 ordinary plumbing work.** Category 2 ordinary plumbing work shall be performed in accordance with this code and the *New York City Fuel Gas Code*. Work shall not include nor extend beyond the existing appliance gas cock or appliance valve. Prior to performing any of the described work, the plumber shall be responsible for verifying that the existing gas cock or appliance valve is accessible, in good working condition with no noticeable corrosion or deterioration, and in the closed off position. Where a replacement appliance is connected to a chimney, the plumber shall inspect the chimney and verify that it is in good operational condition. The replacement of any appliance must be in accordance with the manufacturer's instructions and all applicable listings. After such replacement, the plumber shall re-open the existing gas cock or appliance valve and perform a leak check on all newly made gas piping and tubing connections by means of a combustible gas indicator or a noncorrosive leak detection fluid. Category 2 ordinary plumbing work shall be limited to the replacement of the following items:

1. In residential buildings occupied by five families or fewer, the replacement of a gas water heater or a gas-fired boiler with a capacity of 350,000 BTU or less.
2. In buildings classified in occupancy group R-3, the replacement of a gas furnace with a capacity of 350,000 BTU or less.
3. The replacement of gas-burning domestic appliances limited to ranges, ovens, stoves, barbecues, and clothes dryers.
4. The replacement of an appliance connector serving a domestic range, oven, stove, barbecue, or clothes dryer.

Further, this is in Int. 1422:

**§ 28-105.4.4 Ordinary plumbing work.** ~~[The following ordinary plumbing work may be performed without a permit, provided that the licensed plumber performing such work: (i) provides a monthly report listing completed work and work in progress during the preceding month, including the block, lot and address of each job, a description of the work performed or in progress at each address, and the location in each building where the work was performed or is in progress; (ii) pays the fees for such work in accordance with this code; and (iii) submits to the department a certification that the work was performed in accordance with this code and all applicable laws and rules. Ordinary plumbing work shall include:~~

- ~~—— 1. The removal of a domestic plumbing system not connected to a fire suppression or fire protection system, or the removal of a portion of such system.~~

- ~~2. The relocation of up to two plumbing fixtures within the same room to a maximum of 10 feet (3048 mm) distant from the original location, except in health care facilities.~~
- ~~3. The installation, replacement or repair of a food waste grinder (food waste disposal) or secondary back flow preventer and the replacement or repair of a sump pump.~~
- ~~4. The replacement of closet bends.~~
- ~~5. In buildings in occupancy group R-2 occupied by fewer than six families or in buildings in occupancy group R-3, the replacement of a gas water heater or a gas-fired boiler with a capacity of 350,000 BTU (103 kW) or less where the existing appliance gas cock is not moved, provided that the plumber has inspected the chimney and found it to be in good operational condition.~~
- ~~6. The repair or replacement of any non-gas, non-fire suppression piping not longer than 10 feet (3048 mm) inside a building, or connected piping previously repaired or replaced under this provision.~~
- ~~7. The repair or replacement of non-fire suppression branch piping after the riser shutoff valve, including the replacement of fixtures, limited to two bathrooms and one kitchen per building per monthly reporting period.~~
- ~~8. The replacement of flexible gas tubing no greater than 4 feet (1219 mm) in length located downstream of the existing gas cock to an appliance, provided such gas tubing does not penetrate a wall.]~~ As defined in Chapter 2 of the New York city existing building code, the installation, relocation, repair and removal of certain plumbing work that may be performed without a permit provided the licensed plumber provides the department with monthly reports of work performed in accordance with section 105.3.1.2 of the New York city existing building code.

### **CONCLUSION**

We thank the Committee for their consideration of our comments and look forward to continuing to work with Council and DOB on Int. 1321 and Int. 1422. Please do not hesitate to contact us for any reason.

# UNIFORMED FIRE DEPARTMENT, CITY OF NEW YORK FIRE OFFICERS LOCAL 854, INTERNATIONAL ASSN. OF FIREFIGHTERS, AFL-CIO ASSOCIATION

125 MAIDEN LANE \* 6<sup>TH</sup> FLOOR \* NEW YORK, NY 10038

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## **Memorandum in Opposition to Proposed Int. Nos. 948-A and 1107**

The Uniformed Fire Officers Association (the UFOA) strongly opposes Intro 948-A and 1107, which has the potential to render search and rescue in one- and two-family dwellings more difficult, impeding access to victims and increasing the risk to firefighters tasked with searching these buildings.

The Uniformed Fire Officers Association, or UFOA, is the labor union that represents the Lieutenants, Captains, and Chiefs of the FDNY. While we are supervisors at fires and emergencies, we are not remote from the risk, positioned with the firefighters who are fighting the fire and searching for victims. In an engine, officers are with the hose line at the seat of the fire; on a ladder, we are searching for victims. We advocate for the safety of our members and for policies and laws which reduce the likelihood of victims becoming trapped or harmed at fires and emergencies.

With those principles in mind, we advocate against the passage of proposed Int. Nos. 948-A and 1107. Specifically, the law seeks to amend multiple sections of the New York City Building Code and Administrative Code which would allow for locked rooms in one- and two-family dwellings. These locks will waste the precious minutes available to firefighters to not just locate a victim in a fire, but to render first aid care such as CPR, treatment to burns, and oxygen. While the FDNY is trained in quickly gaining access through locked doors, doing so still takes time. Furthermore, the FDNY is accustomed to forcible entry (breaking through a locked door) in multiple dwellings such as apartment buildings. Gaining access in a wood framed private dwelling, on the other hand, the construction of most one- and two-family dwellings, will pose additional challenges which will lead to more loss of life.

Additionally, this law will inevitably increase the chances that a firefighter may become trapped or have her egress cut off. Fire travel can be unpredictable and is even more so in the private dwellings that this misguided law affects. Locked doors can conceal fire conditions, preventing our members from becoming aware of heavy fire that can kill firefighters. This is no theoretical argument: In 2005, an illegal SRO in the Bronx contained locked doors which disguised a heavy fire condition. Firefighters operating on the floor above became trapped when that fire migrated upwards to them, cutting off their egress and forcing them to jump from the fourth floor. John G. Bellew and Lieutenant Curtis W. Meyran both died that day; Joe DiBernardo would die years later from his injuries; Brendan Cawley, Jeff Cool, and Gene Stolowski all suffered from life changing injuries. If anything, the buildings specified in Int. Nos. 948-A and 1107 would be *more likely* to have heavy fire conditions travel to floors above than the one in the Bronx on the FDNY's "Bloody Sunday."

The lessons of our past help guide how we can best protect our current members, and the public which we serve. It is for those reasons that we must staunchly oppose the passage of Int. Nos. 948-A and 1107.

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**AFFILIATED WITH**



NEW YORK STATE AFL-CIO \*  
NEW YORK CITY CENTRAL LABOR COUNCIL AFL-CIO \*  
\* UNION LABEL & SERVICE TRADES COUNCIL OF  
GREATER NEW YORK & LONG ISLAND \*  
NATIONAL SAFETY COUNCIL



**Testimony on Intro. 1321  
New York City Council, Committee on Housing and Buildings  
November 20, 2025**

The American Council of Engineering Companies of New York (ACEC New York) would like to thank Chair Sanchez and the members of the Committee on Housing and Buildings for your efforts over the years to update New York City's Building Codes. **We submit this testimony today on behalf of our association in strong support of Intro. 1321, which proposes to enact the Existing Building Code (EBC) and to repeal the 1968 building code. We recommend this bill's swift passage and enactment into law.**

Founded in New York City in 1921, ACEC New York is celebrating 104 years of engagement. We have approximately 300 engineering and affiliate firms in New York. Our members plan and design the structural, mechanical, electrical, plumbing, civil, environmental, fire protection and technology systems for buildings across New York.

An EBC in New York City has been long discussed by the design industry and the New York City Department of Buildings (DOB). The DOB has been working toward enacting an EBC since development of the 2008 Construction Codes.

The EBC will be the new framework for governing alterations and maintenance of existing buildings in New York City. The current regulatory scheme in the city has shortcomings in its approach to existing buildings. It includes multiple layers of requirements, some of which commonly require submission and review of variance requests. For this reason, the status quo results in longer approval and permitting processes. For project teams, establishing the EBC is an important change that will reshape how work in existing buildings is planned, approved, and completed.

The EBC will mean clearer rules for alterations and maintenance of buildings. It will establish a consistent code regime for existing buildings in alignment with modern Construction Codes. The EBC will simplify the regulatory structure, bridge the gap between the current and past codes, and remove barriers to the rehabilitation of buildings.

A great deal of time, knowledge and expertise was contributed to the development of this EBC by engineering industry leaders and experts across the safety, fire, mechanical, structural, and other disciplines. Through the code development process, several ACEC New York members, DOB and other stakeholders engaged in thoughtful collaboration. We thank DOB for this level of engagement, and for continually improving the process for updating the code.

The end result of this long effort is a consensus document embodied by Intro. 1321, which is before your Committee today. **ACEC New York is pleased to strongly support Intro. 1321, and we urge your Committee and the City Council to pass the bill.**

Going forward, ACEC New York members will continue to serve as a resource and engage with the DOB and the City Council to ensure the City's Codes reflect on-the-ground issues encountered by engineers, architects and builders every day, as well as best practices for safety and sustainability.



**Testimony on Preconsidered Proposed Int. No. \_\_-A  
in relation to conforming the NYC energy code to the NYS energy code with amendments  
unique to construction in the city,  
New York City Council, Committee on Housing and Buildings  
November 21, 2025**

The American Council of Engineering Companies of New York (ACEC New York) is celebrating 104 years in existence. We are the business associated representing approximately 300 engineering and affiliate firms in New York, collectively employing 33,000 New Yorkers.

Our members plan and design the energy, structural, mechanical, electrical, plumbing, civil, environmental, fire protection and technology systems for buildings across New York. Our members design these systems for both public buildings, as well as commercial and residential buildings.

**ACEC New York supports this Preconsidered Proposed Introduction, to conform the New York City Energy Code with the New York State Energy Code.**

However, if the bill is enacted, it is then imperative that New York State delay the effective date of the State Energy Code (and therefore the City Energy Code) from the current effective date of December 31, 2025 until at least April 1, 2026.

Without this delay, if the new code takes effect six weeks from when it was first made publicly available to all relevant stakeholders this week, adequate time has not been provided for:

- Development of necessary software: There is currently an absence of an updated ComCheck software version applicable for the new NYC/NYS Energy Code. It is unknown when this software will be available, but it is not expected by the current December 31<sup>st</sup> effective date. Due to structural changes in the code, including the inclusion of Additional Efficiency Credits and more complex modeling requirements, existing ComCheck tools cannot be used for compliance submissions. Not having COMCheck software available for determining code compliance will be a significant challenge across NYC. This will substantially impact both engineering design submissions as well as reviews.
- Training engineer/architecture professionals in private firms who design buildings in the city. The industry has not had adequate time to review the published draft code or prepare compliant building designs under the new framework.
- Training of DOB staff for the same reason stated above.

If you have questions, members of our Energy Code Committee are happy to serve as an informational resource.

Contact: Bill Murray, Vice President of the Metro Region, ACEC New York



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New York, NY 10004  
[www.alignny.org](http://www.alignny.org)

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Jose Lopez  
*Co-Executive Director,  
Make the Road NY*

## **Memorandum in Opposition to Int. No. 948-A**

ALIGN opposes Intro 948-A, which is an overt effort to dismantle existing protections against illegal short-term rentals and is a threat to our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods

ALIGN (Alliance for a Greater New York) brings together labor, climate, and community organizations for a more just, sustainable New York. Working at the intersection of economic and climate justice, ALIGN builds coalitions with those most impacted and uplifts worker and community voices to fight for dignity in the workplace and a just path to a renewable energy economy for all.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose Int. No. 948-A because this bill will result in the loss of homes in NYC. Thousands of existing housing units will be converted to full-time short-term rentals. At its peak, the short-term rental crisis in New York City saw roughly 67,100 residential units removed from the city's housing stock to be rented as de-facto illegal hotel rooms, creating a threat to housing, safety, tourism jobs, and the character of our neighborhoods. Short-term rentals played a significant role in exacerbating the affordable housing crisis across New York. A 2018 report from the Comptroller studied 8 neighborhoods with high numbers of Airbnb listings and found that between 2009 and 2016, approximately 9.2% of the citywide increase in rental rates could be attributed to Airbnb.

This crisis has harmed New Yorkers of color. Across predominantly Black neighborhoods, Airbnb hosts were 5 times more likely to be white, and white hosts in those neighborhoods earned more than 530% that of Black hosts.

Black neighborhoods with the highest number of Airbnb listings were experiencing heavy amounts of gentrification, and the economic benefits disproportionately benefitted new, white residents at the expense of existing Black communities. A recent study showed that the loss of housing and neighborhood displacement caused by Airbnb is 6 times more likely to affect Black residents.

In 2021, a broad coalition came together to pass Local Law 18, which requires hosts of short-term rentals in New York City to register with the Office of Special Enforcement and ensures that only hosts who live in the unit and are present during the stay, with no more than two guests at a time, can legally operate.

By permitting up to four adult boarders—and their children—without requiring the host's presence, Int. 948-A would legalize de facto hotels in residential neighborhoods. Removing the host-presence requirement invites quality-of-life and public safety problems, and most importantly opens the floodgates for private equity and unscrupulous investors to push families out of or outbid them on homes to turn them into short-term rentals. Expanding the number of boarders per dwelling increases the risk of overcrowding, code violations, and unsafe conditions.

One- and two-family homes comprise 29% of the total housing stock in NYC, and 100% of that housing would be up for grabs for use as permanent short-term rentals. With a housing vacancy rate of just 1.4% and record-high levels of homelessness, this would be a severe blow to affordability for hundreds of thousands of New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, we urge the City Council to vote no on Proposed Int. No. 948-A**

Allied Building Inspectors  
*International Union of Operating Engineers*

**Local No. 211**

225 Broadway (43<sup>rd</sup> Floor)  
New York, NY 10007

Matthew Gugliotta  
President & Business Manager



Tel: (212) 233-2690  
Fax: (212) 962-2523

email:info@iuoe211.com  
Affiliated: AFL-CIO

November 19th, 2025

New York City Council

Committee on Housing and Buildings

Dear Members of the Committee:

Please be advised that Allied Building Inspectors Local 211 IUOE is opposed to the passage of Int. No.948-A & Int. No.1107-A due to public safety concerns such as potential fire hazards being created under this law by restricting access to secondary means of egress in 1 and 2 family homes by allowing hosts to lock internal doors in the home and not requiring the host to be present during a short-term rental. This endangers the renter, the general public at large and the Civil Servants who would have to respond in the event of an emergency such as a fire or for 311 complaint inspections. Additionally, my members who are assigned to the Office of Special Enforcement would have to shoulder the inevitable increase in 311 complaints that the City would receive due to the massive expansion of dwelling units that would be eligible for short term rentals under the proposed laws. Our members have been doing more with less over the past few years as it is due to cuts in staffing levels, low salaries, and problems with recruitment and retention.

Local 211 strongly urges this Committee to not move forward with Int. No. 948-A & Int. No. 1107-A.

Thank you for your consideration.

Sincerely,

*Matthew Gugliotta*

Matthew Gugliotta  
President and Business Manager  
Allied Building Inspectors Local 211 IUOE



NYC Council Housing and Buildings Committee  
City Hall  
New York, NY 10007

November 23, 2025

**RE: AIA New York Chapter Testimony to the City Council Committee on Housing and Buildings on T2025-4492 (Changes to New York City Energy Conservation Code)**

Dear Chair Sanchez and Members of the City Council Committee on Housing and Buildings,

American Institute of Architects New York Chapter (AIANY) writes to express our support and share feedback on the proposed changes to the New York City Energy Conservation Code (NYCECC).

Recognizing the condensed timeline, we encourage the City Council to pass T2025-4492; however, we urge the New York State Department of State to delay the effective date of the state energy code from December 31, 2025 to April 1, 2026. Ensuring a successful implementation is AIANY's top priority. Without a delay, design professionals will not have adequate time to review the proposed changes and adapt the changes to projects currently in the design pipeline. Similar challenges apply for Department of Building's staff.

AIANY is disappointed with New York State's decision to not adopt a stretch code as it hampers the City's ability to continue its leadership on energy efficient building development and overall decarbonization. As a result of the last-minute change, many critical provisions were taken out of the proposed code changes, including but not limited to:

- Increased efficiency in opaque and glazing R and U values
- A raised floor for overall envelope performance requirements, for buildings complying through energy modeling
- Option to consider site energy and carbon emissions instead of energy cost when complying through energy modeling, making electrification a greater challenge
- Tightening of allowable light levels for facades and the time facade lighting should be turned off for energy saving and light pollution purposes
- Removal of the historic building exemption and requirement to ensure NYCECC compliance does not result in damage to existing assemblies
- Electric vehicle and energy storage provisions

In a future NYCECC, AIANY would like to see an additional alternative compliance pathway for Passive House certification as seen in many jurisdictions in the U.S; peak energy demand requirements to

support overall grid electrification and storage as seen in California Title 24; and energy efficiency credits or requirements to incentivize embodied carbon reduction and deconstruction recycling and reuse for demolition in major alternation projects.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jesse Lazar', with a long horizontal flourish extending to the right.

Jesse Lazar  
Executive Director  
American Institute of Architects New York Chapter



# BELLE HARBOR

PROPERTY OWNERS ASSOCIATION

President  
Paul King

1<sup>st</sup> Executive VP  
Edward Lynch

2<sup>nd</sup> Executive VP  
Linda Benigno

3<sup>rd</sup> Executive VP  
Wayne Miller

4<sup>th</sup> Executive VP  
Bryan Hoffman

Secretary  
Jacqueline Tansey

Treasurer  
Greg Valvo

November 20, 2025

To the NYC Council Committee on Housing and Buildings:

The Belle Harbor Property Owners Association (BHPOA) strongly opposes Intro 948-A regarding short-term rentals in one- and two-family dwellings. We urge the Committee to go back to the drawing board and find a more balanced solution.

BHPOA believes that Intro 948-A bill is an over-correction. It opens the door to abuse too wide. The combination of too many renters in a single location and no requirement for the homeowner to be onsite will lead to:

- Reduced quality of life due to “bad” renters
- More competition for street with parking
- Strife and legal disputes between neighbors
- Reduced property values
- Even fewer apartments on the market

Our Association would support a more reasonable solution in the City Council. Please do not advance Intro 948-A. Retool it with advice from Community Boards in residential areas.

Please call me if you have any questions regarding the above matter.

Sincerely,

Paul King  
President

# Broadway Community Alliance

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**Testimony to NYC Council Committee on Housing and Buildings  
November 20, 2025**

**Re: Opposition to Proposed Int. No. 948-A**

I am speaking on behalf of the Broadway Community Alliance, a volunteer civic association formed in 2013 to address quality of life issues on and around the Broadway corridor in north Riverdale. Our unique sections of one and two family homes coexist among high risers in our diversified neighborhood. The recent passage of City of Yes zoning changes and Charter revision land use changes already threaten the future existence of low scale residential areas.

**Do not amend New York City's Building and Administrative Code in order to expand short-term rentals in one and two family homes without the owner being physically present.** This bill will incentivize large-scale investors, private equity firms, hedge funds, LLC's to buy up private homes not to live in, but for commercial gain through transient rentals.

Home ownership brings stability to our blocks and neighborhoods. The transient nature of commercialization by corporate landlords will destroy residential character and quality of life. You won't even know who your neighbors are anymore.

The city must preserve our precious housing stock for permanent homes for New Yorkers, not tourists and other transients who have no stake in the community. This bill is not about helping homeowners cover the mortgage. Do not allow pressure from the relentless short-term rental industry to dismantle our long held legal protections. **We urge the Committee on Housing and Buildings to vote no on Intro 948-A. Thank You.**

Sincerely,

*Laura Spalter*, co-chair

**Broadway Community Alliance**

Cc: Councilman Eric Dinowitz

<https://www.facebook.com/BroadwayCommunityAlliance>

[bdwayalliance@gmail.com](mailto:bdwayalliance@gmail.com)

## **Brooklyn Chamber of Commerce Int. 948A Testimony**

- Thank you for the opportunity to testify here today. My name is Randy Peers, President & CEO of the Brooklyn Chamber of Commerce. We represent thousands of small businesses across Brooklyn and work to promote economic development, job creation, and long-term growth in our neighborhoods.
- I'm here today because Local Law 18 has had real and measurable consequences for New York's business community, especially in the outer boroughs outside of Midtown, Manhattan. For two years, we have heard over and over again from local entrepreneurs, retailers, restaurant owners, and other hospitality businesses. The message has been the same: restrictive short-term rental laws have meant fewer visitors, fewer tourists, and ultimately fewer dollars going into our local economies.
- And these impacts are born out not just anecdotally, but in hard numbers. A recent poll underscores what we're hearing every day:
  - 92% of small business owners say the decline in short-term rentals has led to fewer tourists in the outer boroughs, and an even higher percentage support reforming the current short-term rental laws.
- When visitors stay in places like our neighborhoods they spend money in local restaurants and bodegas. They go shopping at small boutique stores and support local taxi drivers. So when housing rules eliminate the option for visitors to stay in these neighborhoods – especially where there aren't many hotels – small businesses lose out. For many, that is the difference between growing their business or having to cut back on employees' hours.
- Hotels are overwhelmingly concentrated in Midtown, Manhattan, and they alone cannot support the tourism numbers needed to support small businesses across all five boroughs. It's the neighborhood-based tourism that matters, and short-term rentals are a key component to ensuring that local economic success.
- That's why we support Intro. 948. It introduces modest and balanced reforms that would restore economic opportunity for our city's small businesses while still protecting our housing market. By allowing responsible short-term rentals, the bill will help revive the tourism and visitor trends that our neighborhoods rely on.
- I urge the City Council to pass this commonsense bill and help ensure that every borough and every small business can share in the economic benefits of thriving local tourism.

- Thank you again for having me here today and for your commitment to New York City's business community.

Randy Peers

President & CEO

Brooklyn Chamber of Commerce

[rpeers@brooklynchamber.com](mailto:rpeers@brooklynchamber.com)

## **Revised Testimony in Support of Int. 0948A**

### **Submitted by Joan Alexander-Bakiriddin, President, Brooklyn NAACP**

Chair Sanchez, Members of the City Council, Their Staff, Public Advocate Williams, Agency Reps and fellow New Yorkers:

Thank you for the opportunity to submit testimony in support of Int. 0948A, a bill urgently needed to restore fairness and stability to both families and small businesses across our city. As President of the Brooklyn NAACP, representing a borough that is home to more than 2.7 million people of every background and income, I know firsthand the critical role that supplemental income plays in helping families—especially Black and Brown homeowners—stay rooted in the communities they have long built and sustained.

### **Why Int. 0948A is Needed Now**

For too long, the rules around short-term rentals have excluded the voices of those most affected: responsible, everyday homeowners fighting rising costs and historic disinvestment. Black and Brown homeowners, in particular, have had to overcome decades of discriminatory housing policies, only to find their hard-earned paths to stability threatened once again—not by absent investors or bad actors, but by regulations that go too far and overlook the needs of struggling families.

### **The Harms of the Status Quo**

Local Law 18, while well-intentioned, has made it nearly impossible for ordinary families to legally offer short-term rentals of their primary homes. Instead of increasing housing affordability, it has stripped homeowners of a vital lifeline that once made the difference between default and keeping the roof over their heads. In neighborhoods like Bedford-Stuyvesant and Canarsie, our families have lost a crucial source of income that helped cover mortgages, taxes, and everyday life expenses. HFE-Int-0948A-Prep-Collateral-Package.pdf

Small businesses—corner stores, barbershops, local restaurants—are also feeling the pain. With fewer visitors able to stay in our neighborhoods, local foot traffic and vital customer spending have declined, worsening the economic crisis for working-class families and entrepreneurs alike.

### **Int. 0948A: A Fair and Balanced Reform**

Int. 0948A offers modest, targeted reforms to these rules while keeping crucial protections in place for renters and preventing the conversion of housing into de facto hotels. It extends a fair pathway for honest homeowners to host up to four guests—even if away from home in

the short term—without creating loopholes for speculators. These reforms maintain key safeguards including registration requirements and owner-occupied rules while addressing privacy and safety concerns by allowing hosts to lock private spaces and provide reasonable access to shared areas.

### **Safety Considerations for Homeowners**

While we support these reforms, we must also apply a wholistic approach and acknowledge the safety responsibilities that come with hosting. Illegal short-term rentals can pose dangers to neighbors, guests, and first responders when proper fire safety systems, adequate exits, and security measures are not in place. We strongly urge all homeowners considering short-term rentals to:

- Ensure full compliance with all registration and safety requirements, including proper fire alarms, sprinklers, smoke detectors, and carbon monoxide detectors
- **Carefully review their homeowner insurance policies**, as many standard policies do not cover short-term rental activities and may require additional commercial liability coverage
- Understand that operating without proper insurance coverage could leave families financially exposed to liability claims or property damage

Responsible hosting means protecting not only your financial investment but also the safety and well-being of your guests and neighbors. NAACP Brooklyn Branch encourages all homeowners to consult with their insurance agents before beginning any short-term rental activity to ensure adequate coverage.

### **Maintaining Equity and Community Wealth**

Passing Int. 0948A is not just a policy adjustment—it is a step for economic justice and equity. Black and Brown New Yorkers are being pushed out of the city at record rates. This bill empowers those who have endured redlining, predatory lending, and exclusion to hold on to their homes—not lose them to rising costs and restrictive regulation. It offers a lifeline at a time when so many are on the verge of losing generational assets and the stability they provide to future generations.

### **Call to Action**

Brooklyn's communities, families, and small businesses need practical solutions now. Restrictive policies have not made housing more affordable, but have instead hurt the very people they promised to help. Int. 0948A is a practical, fair compromise that balances the



need for housing protections with the economic realities our communities face every day—while maintaining important safety standards and registration requirements.

In closing, the Brooklyn NAACP stands firmly with homeowners, small businesses, and all families fighting to stay and thrive in our city. We urge the City Council to pass Int. 0948A while also calling on all prospective hosts to operate responsibly, comply with all safety regulations, and secure appropriate insurance coverage. Let's restore opportunity, protect hard-won stability, and ensure Brooklyn remains a place where all can build wealth and lasting community—safely and responsibly.

Thank you.

**Joan Alexander-Bakiriddin**

President, NAACP Brooklyn Branch



A New York Government Relations & Communications Firm

New York City Long Island Albany

**Date:** November 19<sup>th</sup>, 2025

Intro 1321-2025 - Existing Building Code (EBC)

Chapter 15: ADDITIONAL SAFEGUARDS DURING CONSTRUCTION OR DEMOLITION FOR EXISTING BUILDINGS AND OCCUPIED BUILDINGS

**Subject:** Comments on various Section of Intro 1321-2025

**101.6 Safeguards during construction.** Construction work covered in this code, including any related demolition, shall be governed by Chapter 33 of the New York City Building Code and the requirements of Chapter 15 of this code.

**105.3.2.1.1 Protection of adjacent or adjoining properties.** Building owners shall ensure the adjacent or adjoining properties are protected in accordance with Chapter 33 of the *New York City Building Code*.

**105.3.2.1.2 Protection of occupied building.** During construction in an occupied building, as applicable to the scope of work, the owner shall:

1. Maintain the means of egress free of any obstruction.
2. Provide means to dispose of debris, control dust and noise, and pest control.
3. Notify tenants of any interruption to building systems.
4. Maintain life safety systems in accordance with the New York City Construction Codes and the New York City Fire Code.
5. Maintain essential services such as heat, cold and hot water, gas, and electricity in residential buildings, other than one- and two-family residences. Where disruption of service may occur due to the scope of work, the tenants shall be notified of the anticipated duration of such disruption.
6. Maintain the existing level of accessibility to building spaces and facilities.

**Comment:** Should differentiate between vacant and occupied buildings. Existing means of egress (as well as life safety systems) cannot always be maintained without modification during construction work in an occupied building. In a vacant building that will remain vacant until all work is completed and signed off, existing egress (and life safety systems) should not have to be maintained, i.e., the requirements should be similar to a new building. As to accessibility (ADA compliance), a vacant building should not have to comply.



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**1502.2 Common areas.** Common areas open to the public shall be left clean and free from hazards at the end of the workday.

**Comment:** I would think that *publicly accessible* spaces should *always* be clean and free from hazards, not just at the end of the workday.

**SECTION EBC 1505**  
**MAINTAINING MEANS OF EGRESS**

**1505.1 Maintenance of means of egress.** Existing required means of egress shall be maintained at all times during construction or demolition operations in an occupied building and shall not be removed, obstructed, or altered in any manner that would diminish the full effectiveness of such means of egress.

**Exceptions:**

1. Where a new permanent or temporary means of egress that complies with all applicable egress requirements of Chapter 10 of the New York City Building Code is provided in substitution, and the new permanent or temporary means of egress has satisfactorily passed an inspection by the department or another party designated by the department prior to the diminishment of any existing required means of egress in the building.
2. A variance approved in accordance with Section 28-103.3 of the Administrative Code.

**Comment:** It is good that this section applies to “occupied” buildings and not vacant buildings. Workers and “occupants” are different. When the modification is in a residential building requiring a TPP, the required special inspector could make the inspection required in exception 1. However, in a non-residential building requiring only an OPP, special inspection is not required. Perhaps, OPPs for occupied non-residential buildings where work will result in egress change should be submitted and approved by the department and require special inspection? As such, the special inspector could make the inspection required in exception 1 for both TPP and OPP.



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**SECTION EBC 1506**  
**AUTOMATIC SPRINKLER SYSTEM**

**1506.1 Sprinkler systems during alteration or demolition.** Existing sprinkler systems in buildings undergoing an alteration or demolition shall comply with the requirements of Section 3303.7.4 of the *New York City Building Code* and Section 1506.2 of this code.

**1506.2 Sprinkler protection during construction in fully sprinklered buildings.** Where alterations are proposed to a floor on which the sprinkler system is to be temporarily disconnected in the work area, **Temporary Core Sprinkler Protection (TCSP) shall be provided in accordance with Sections 1506.2.1 through 1506.2.5.** Alterations shall also comply with the *New York City Fire Code*, including referenced standards therein.

**Comment:** These sections are taken from BB 2020-012. It has never been clarified whether TCSPs (and BB 2020-012 in general) apply to existing buildings that are *vacant* during construction and that will not be re-occupied until the work is completed and signed off. I would think that this should not apply to vacant buildings. The existing vacant building would then be no different from a NB that does not require sprinklers, fire alarm, wet standpipe, etc. until first TCO.

###



## Member Organizations

Association for Neighborhood and Housing Development (ANHD)  
Cooper Square Committee  
Goddard Riverside Law Project  
Hell's Kitchen Neighborhood Association  
Housing Conservation Coordinators  
Housing Justice Data Lab  
Inside Airbnb  
Lower Manhattan Loft Tenants  
Metropolitan Council on Housing  
MFJ Legal Services  
Tenants Political Action Committee  
West Side Neighborhood Alliance (WSNA)

November 16<sup>th</sup>, 2025

## Memorandum of Opposition

Intro. 948 and Intro. 1107 — Short-Term Rentals in 1- and 2-Family Homes

### Statement of Position

We **strongly oppose** Intro. 948 and Intro. 1107.

While helping 1- and 2-family homeowners in financial distress is an important and commendable goal, these bills would unintentionally convert **every residential dwelling unit in New York City** into a **permissible permanent short-term rental (STR)** — during a severe housing crisis.

These bills do not offer targeted relief. Instead, they dismantle the city's only effective safeguard preventing dwelling units from being converted into full-time STRs, inviting large-scale commercial exploitation and increasing housing costs for New Yorkers.

### Summary of the Bills

The bills' sponsors state that the legislation is intended to support 1- and 2-family homeowners by allowing them to rent space in their homes. However, the text:

- Permits "one or more living rooms in an apartment" to be rented short-term;
- States that the "family member or members need not be physically present" during the STR;
- Redefines "family" in ways that conflict with state law; and
- Effectively overrides the Housing Maintenance Code's requirement that STR hosts be *on-premises* in Class A dwellings.

As drafted, these provisions apply **not only to 1- and 2-family homes but to all apartments and dwelling units citywide**, opening the door to permanent STR use across NYC.

### Key Concerns

#### 1. Eliminates the Only Protection Against Permanent STR Conversion

Under current law, 1- and 2-family homeowners may legally rent **spare rooms** in their homes for additional income.

What they **cannot** do is rent out the **entire dwelling unit while they are off-premise**.

This is the only regulation preventing residential homes from being turned into year-round STR hotels. The bills explicitly vacate this safeguard for **all dwelling units**.

This would allow:

- Entire homes to be STRs year-round, and
- "Primary occupants" who are **on paper only**, making enforcement impossible.

In practice, large investors could designate a nominal "primary occupant" who "travels 365 days a year," leaving units permanently available as STRs. The City would have no reliable means to prove actual primary occupancy.

#### 2. Creates a Pathway for Private Equity and Commercial Operators

If entire residential units can operate as permanent STRs:

- Private equity firms can outbid NYC families for housing
- Housing supply decreases

- Prices for both rentals and home purchases rise
- Neighborhood stability declines

This bill invites commercial STR conversion at citywide scale.

### 3. Conflicts Directly With State Law

The language allowing short-term rental of apartments **without a permanent occupant present** directly contradicts the NYS MDL, which requires Class A units to be occupied for permanent residence. Redefining “family” to facilitate STR use also conflicts with state law.

Passing a bill with provisions that cannot be legally implemented constitutes **negligent legislation**.

### 4. Significant Fire and Life Safety Risks

Current law allows 1- and 2-family homeowners to use privacy locks on bedrooms, offices, and bathrooms. However, **deadbolt locks on interior doors are prohibited** because they impede emergency access and endanger firefighters. By normalizing entire-unit STR use without the owner present, these bills create incentives for unsafe interior deadbolts. This increases the risk of tragedies such as **Black Sunday (January 23, 2005)**, where firefighters were killed due to obstructed egress — a risk measured in seconds.

### 5. The Bills Do Not Contain Guardrails

These proposals do *not* include:

- Requirements for the permanent occupant to actually live in the residence
- Protections against corporate STR operators
- Restrictions ensuring units remain exclusively residential

As written, any dwelling unit can be used as a full-time STR with **no meaningful limits**.

### Conclusion

Helping struggling homeowners is an important objective — one that the Council should pursue. But these bills do not provide targeted relief.

Instead, they effectively allow **every residential dwelling unit in NYC** to become a **permanent short-term rental**, worsening the housing crisis, raising rents, and reducing the availability of homes for New Yorkers. For these reasons, we urge the Council to **reject Intro. 948 and Intro. 1107**.





**CAMBRIA HEIGHTS CIVIC ASSOCIATION**

**Founded in 1932**

**United for Community Progress**

**New York City Council Members,**

As President of the Cambria Heights Civic Association, I am writing to express our strong opposition to Intro 948-A and Intro 1107-A, which we believe pose serious risks to homeownership, stability, and quality of life in communities like ours. These proposals, while presented as support for small homeowners, may instead create openings for speculation and displacement that threaten the very foundation of Southeast Queens.

Historically, Black families in New York City have faced decades of discriminatory lending practices and systemic barriers to homeownership. Despite these challenges, Southeast Queens emerged as one of the most significant centers of Black homeownership in the country—a place where families could invest, build stability, and create generational wealth. Homeownership remains one of the most effective wealth-building tools available to our community, and any legislation that jeopardizes that foundation must be viewed with extreme caution.

We are increasingly concerned that these bills could unintentionally enable new forms of speculation. Investors and corporate buyers are already approaching homeowners with aggressive purchase offers, often targeting seniors or long-time residents. Many families worry they will be priced out of the very neighborhoods they helped build. When longtime homeowners sell under pressure, they often cannot afford to purchase another home in the same community, placing the transfer of generational wealth at serious risk.

Our community has endured and overcome the impacts of redlining and predatory lending. Today, we face a new challenge in the form of potential short-term rental expansion encouraged by these bills. Our homes are meant to be places of residence, not commercial enterprises or business opportunities for absentee operators and outside investors. Allowing increased short-term rental activity would destabilize residential blocks, weaken community ties, and undermine the hard-earned progress Southeast Queens has made over generations.

For these reasons, we urge the City Council to stand firmly with homeowners and protect the stability of our neighborhoods. We respectfully ask that you vote **NO** on both Intro 948-A and Intro 1107-A.

In solidarity,

**Bryan Block**

President

Cambria Heights Civic Association

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Brya f. Block

Address:

120-43 219 Street  
Camden Hgts, N.Y.



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Sincerely,

Name:

\_\_ **Valerie Philpotts**

Address:

\_\_ 120-36 223<sup>rd</sup> Street

\_\_ Cambria Heights, NY 11411

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Sincerely,

Name:

**CORDELL BAGLEY**

Address:

117-44 229TH STREET

CAMBRIA HEIGHTS, NY 11411-1805

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Sincerely,

Name:

\_\_\_\_\_ **Arlene Baxter**

Address:

11734 Springfield Blvd



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For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Erika Cummins

Address:

Cambria Heights, NY 11411

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

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**Our Concerns:**

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Sincerely,

Name:

Wendy James

---

Address:

118-01 224 STREET

CAMBRIA HEIGHTS NEW YORK 11411

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Sincerely,

Name:

Valencia S. [Signature]

Address:

115-101 227th ST

Cambria Heights, NY 11411



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**Our Concerns:**

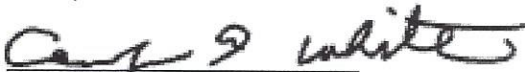
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Sincerely,

Name:

Carolyn A White



Address:

11634 217 Street \_\_\_\_\_

Cambria Heights, NY 11411 \_\_\_\_\_

November 18, 2025

To the Members of the New York City Council:

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

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Sincerely,

Name:

Donna M. Hives *Donna M. Hives*

Address:

118-59 221 Street  
Cambria Heights N.Y. 11411



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Sincerely,

Name:

Clive Dawkins

Address:

115-09 223rd Street

Cambria Heights, NY 11411-1207



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Sincerely,

Name:  
Signed by:

  
647A1677D7A5488...

Address:

118-08 231 Street

Cambria Heights, NY 11411



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Sincerely,

Name:



**Harry Lauture**

Address:

217-14 Francis Lewis Boulevard

Cambria Heights, NY 11411

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Sincerely,

Name:

**Sheilah Vaughan**

Address:

11595 222 Street

Cambria Heights, NY 11411

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Sincerely,

Name:

**Doris Bodine**

Address:

1 Bay Club Drive

Bayside NY 11360

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Sincerely,

Name:

**Gideon Sargeant**

Address:

11463 223 Street

Cambria Heights New York, 11411

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Sincerely,

Name:

**Elizabeth Pantaleon**

Address:

11463 223<sup>rd</sup> Street

Cambria Heights New York, 11411

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Sincerely,

Name: Warren A. Thomas



Address:

114-90 228<sup>th</sup> Street

Cambria Heights, New York 11411-1323



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- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

\_marie jeanPaul\_\_\_\_\_

Address:

\_\_\_\_\_119 47 221 street cambri heights ny 11411\_\_\_\_\_

\_\_\_\_\_

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Alfreda Lewis

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Address:

220-20 121 Ave Cambria heights, Ny 11411

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**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the "common household" or "unlocked doors" requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
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For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Veronica Walters

Address:

220-15 118 Ave  
Cambria Hts, N.Y 11411



## **MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**

**November 12, 2025**

**Carroll Gardens Association**

Carroll Gardens Association (CGA) is a nonprofit affordable housing and community development organization based in Brooklyn. CGA has developed over 500 units of affordable housing and organizes tenants and workers to protect and expand affordable housing and economic justice across New York City. We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.

Ben Fuller-Googins

Executive Director, Carroll Gardens Association



November 20, 2025

The Honorable Pierina Ana Sanchez  
Chair, Committee on Housing and Buildings  
The New York City Council  
City Hall  
New York, NY 10007

**Re: Pass Int. No. 948-A and restore homesharing opportunities in the City**

Dear Chair Sanchez and members of the Committee:

On behalf of Chamber of Progress – a tech industry association supporting public policies to build a more inclusive society in which all people benefit from technological advancements – I write to express our **strong support for Proposed Int. No. 948-A**, which takes a balanced and practical approach to restoring lawful, common-sense homesharing opportunities for New Yorkers and offering visitors more affordable and diverse lodging options.

At a time when New Yorkers are grappling with rising costs and worsening affordability challenges, Proposed Int. No. 948-A offers a thoughtful and much-needed update to outdated regulations that allow residents to responsibly earn supplemental income and better reflect how people live and travel today.

**Removing barriers created by the City’s de facto ban on short-term rentals**

Proposed Int. No. 948-A provides long-overdue, much-needed changes to the de facto ban on short-term rentals created by Local Law 18. While Local Law 18 was intended to curb illegal hotel operators, its rigid structure, requiring hosts to be physically present, limiting occupancy to two guests, and imposing significant registration barriers, effectively eliminated most lawful home-sharing opportunities for everyday New Yorkers. As a result, thousands of residents lost an important source of supplemental income, and the city lost flexible lodging options at a time of soaring hotel prices. By creating clear, practical rules that distinguish small-scale, resident hosting from commercial misuse, Proposed Int. No. 948-A responsibly corrects the overreach of Local Law 18 while preserving core safety and consumer protections.

**Helping New Yorkers supplement their income and stay in their homes**

Short-term rentals are an essential means of supplemental income for New Yorkers seeking to remain financially stable as the cost of living continues to rise, creating affordability

challenges. Proposed Int. No. 948-A creates a clear, legal pathway for permanent occupants, including eligible renters, to earn supplemental income through short-term rentals. For renters and homeowners alike, the ability to bring in this additional revenue can help offset rising housing costs, making it easier to make ends meet in an increasingly expensive city. In fact, a recent survey across all five boroughs shows that 78% of New York residents are open to revisiting or changing the city's ban on short-term rentals,<sup>1</sup> primarily driven by concerns over affordability and flexibility.

Most short-term rental hosts are not corporate operators or investors. They are ordinary New Yorkers living in their primary homes who rely on modest, flexible income to stay afloat. Allowing residents to rent a spare room or portion of their home helps them offset rising mortgage payments, keep up with utility bills, and absorb financial emergencies.

New York City homeowners spend about one-third of their income on housing.<sup>2</sup> Although average household income in the City is nearly 19% higher than the national average, housing costs are 48% higher and rising.<sup>3</sup> Renters face similar financial pressures with high rents, limited vacancy, and frequent periods away for work or other personal obligations, and many renters have even less flexibility to absorb unexpected costs.<sup>4</sup>

### **Empowering and supporting historically marginalized communities**

Short-term rentals are especially important for households that have been historically excluded from wealth-building opportunities, including Black and Latino homeowners who often face higher borrowing costs, lower intergenerational wealth, and greater vulnerability to displacement as neighborhoods grow more expensive.<sup>5</sup> Rising housing pressures continue to fall hardest on working-class families, immigrants, communities of color, and long-time residents in rapidly changing neighborhoods, many of whom rely on supplemental income to remain rooted in their communities. By restoring a clear, legal pathway for reasonable, registered hosting, Proposed Int. No. 948-A offers these New Yorkers a practical and lawful way to stay in their homes and remain part of the vibrant neighborhoods that define the city.

### **Providing affordable options for visitors in New York's many neighborhoods and events**

As hotel room rates in New York City continue to climb, ensuring a wider range of affordable lodging options across all boroughs is essential to sustaining a diverse and accessible visitor economy. The city's average nightly hotel rate has surpassed \$320, up 5.4% year over year and more than twice the national average,<sup>6</sup> and during high-demand events, limited supply

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<sup>1</sup> See Brooklyn Chamber of Commerce [https://www.amny.com/wp-content/uploads/2025/08/NYC-Survey-Memo-072125\\_Share.pdf](https://www.amny.com/wp-content/uploads/2025/08/NYC-Survey-Memo-072125_Share.pdf)

<sup>2</sup> See Chase <https://www.chase.com/personal/mortgage/education/buying-a-home/house-poor>

<sup>3</sup> *Ibid.*

<sup>4</sup> See The Urban Institute <https://www.urban.org/urban-wire/high-rents-are-posing-financial-challenges-renters-all-income-levels>

<sup>5</sup> See National League of Cities <https://www.nlc.org/article/2024/04/09/narrowing-the-racial-wealth-divide-supporting-the-homeownership-journey/>

<sup>6</sup> See Airbnb <https://news.airbnb.com/nyc-sees-record-rents-hotel-rates-as-short-term-rental-law-continues/>

and lack of competition can push prices above \$650 per night.<sup>7</sup> Because most hotels are located in Manhattan,<sup>8</sup> travelers have few alternatives elsewhere in the city, limiting both visitor access and the economic benefits that tourism brings to small businesses in other neighborhoods.

Short-term rentals offer visitors more affordable ways to experience more of the city and its small businesses than other lodging options, which tend to be concentrated around tourist attractions and downtown areas. Neighborhood-based, homeowner-hosted lodging offers a meaningful alternative. Guests who opt for short-term rentals contribute to local economies not only directly to hosts but also by patronizing nearby shops and restaurants. According to survey data, 92% of hosts provided recommendations for local restaurants and cafes, and guests reported that 41% of their overall trip spending occurred in the neighborhoods they stayed in.<sup>9</sup>

The City's role as a 2026 FIFA World Cup host<sup>10</sup> makes accessible lodging more important than ever. With the final match set to take place at MetLife Stadium, the region will welcome an extraordinary influx of visitors: fans, workers, and families, who will need affordable places to stay across all five boroughs. Ensuring a diverse range of lodging options helps New Yorkers share in the economic benefits of the tournament while allowing fans of all backgrounds to experience one of the world's most celebrated sporting events. Enabling short-term rentals also makes visitors more likely to stay in the City rather than across the river, keeping tourism dollars and local spending in the communities that make New York a world-class destination.

### **Supporting families, protecting consumer choice, and protecting host privacy**

Protecting access to short-term rentals is essential to preserving consumer choice, particularly for visitors whose needs cannot be met by traditional hotels. For example, traveling workers on temporary assignments and families with children often need more space, kitchen access, and features that hotels typically cannot provide. Proposed Int. No. 948-A expands consumer- and family-friendly lodging options by allowing permanent occupants of one- and two-family homes to host up to four adult boarders, roomers, or lodgers and their children, making it easier for extended families to stay together rather than splitting across multiple expensive hotel rooms. Proposed Int. No. 948-A establishes a regulated, safe pathway for modest neighborhood lodging, ensuring that visitors who come to New York for family events, medical care, or temporary work assignments can access accommodations that truly meet their needs.

Proposed Int. No. 948-A also incorporates practical privacy and safety protections for both hosts and guests by ensuring that hosts are not required to provide access to their private

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<sup>7</sup> See Ramp <https://ramp.com/velocity/un-fashion-week-send-n.yc-hotel-prices-soaring>

<sup>8</sup> See New York City Department of City Planning [https://www.nyc.gov/assets/planning/download/pdf/plans-studies/citywide-hotel/nyc-hotel-market-analysis.pdas they eliminate.f](https://www.nyc.gov/assets/planning/download/pdf/plans-studies/citywide-hotel/nyc-hotel-market-analysis.pdas%20they%20eliminate.f)

<sup>9</sup> See Airbnb <https://news.airbnb.com/airbnb-estimated-direct-economic-impact-in-the-u-s-nears-34-billion/>

<sup>10</sup> See FIFA <https://www.fifa.com/en/tournaments/mens/worldcup/canadamexicousa2026/articles/new-york-new-jersey-stadium-host-world-cup-2026-final>

bedrooms, offices, or similar spaces, while still guaranteeing visitors reasonable access to essential areas of the home. These common-sense rules allow New Yorkers to share their homes responsibly, preserve the dignity, privacy, and safety of all parties, and offer visitors accommodations that reflect the way people actually live and gather.

### **Shielding the hotel industry at the expense of New Yorkers and visitors**

Many New Yorkers view Local Law 18 as a bailout for the hotel industry rather than a meaningful response to the City's affordable housing challenges – and they're right. Since the law's restrictive rules took effect in 2023, the affordable housing shortage has persisted and rental prices have continued to rise.<sup>11</sup> By imposing requirements so strict that they essentially eliminate lawful homesharing, Local Law 18 protected hotel revenues while doing nothing to expand or preserve affordable housing. Homesharing in primary residences has never been a major driver of New York's housing crisis, yet the law treated ordinary residents as if they were commercial operators.<sup>12</sup> The result has been thousands of New Yorkers losing a modest but important source of income and visitors losing access to affordable lodging across the boroughs. The growing public frustration makes it clear that Local Law 18 has failed to address the City's housing needs while effectively shielding the hotel industry from competition, to the detriment of residents and visitors alike.

Proposed Int. No. 948-A is a practical and necessary fix. It restores a fair, legal path for New Yorkers to earn supplemental income, expands affordable lodging options amid record-high hotel prices, and establishes clear rules that protect both residents and visitors. Local Law 18 has done nothing to improve housing affordability in the City, yet it has succeeded in stripping residents of earning opportunities and limiting consumer choice. By correcting that overreach, Proposed Int. No. 948-A supports working families, strengthens neighborhood economies, and ensures that everyday New Yorkers across all boroughs, not just the hotel industry, can benefit from the City's visitor economy.

For these reasons, I respectfully urge the Council to move swiftly to **pass Proposed Int. No. 948-A** and deliver a fairer, more flexible, and more accessible New York City for all.

Sincerely,



Brianna January  
Director of State & Local Government Relations, Northeast US

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<sup>11</sup> See Chamber of Progress <https://progresschamber.org/insights/new-nyc-data-shows-that-airbnb-restrictions-arent-solving-housing-crunch/>

<sup>12</sup> See Harvard Business Review <https://hbr.org/2024/02/what-does-banning-short-term-rentals-really-accomplish>





**ADVANCING OUR  
COMMUNITY**

**Chinese-American Planning Council, Inc.  
Memorandum in Opposition to Intro. 948A & Intro. 1107A**

The Chinese-American Planning Council (CPC) strongly opposes Intro 948-A and Intro 1107-A as it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

CPC is the largest Asian American social service organization in the U.S., providing vital resources to more than 80,000 people per year through more than 50 programs at over 30 sites across Manhattan, Brooklyn, and Queens. CPC employs over 700 staff whose comprehensive services are linguistically accessible, culturally sensitive, and highly effective in reaching low-income and immigrant individuals and families. With the firm belief that social service can incite social change, CPC strives to empower our constituents as agents of social justice, with the overarching goal of advancing and transforming communities.

These bills would expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities. Over 50% of Asian American New Yorkers are rent-burdened,<sup>1</sup> and we know that our community members who are primarily low-income and immigrants cannot survive these harmful measures. Compounded with the rise in the cost of living, displacement, and cuts to public benefits, our City must prioritize working class New Yorkers and reject these bills.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would

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<sup>1</sup>Asian American Federation Data Center. (2023). *Housing & living arrangements, New York City*. Asian American Federation Data Center. <https://datacenter.aafederation.org/nyc/housing/>



**ADVANCING OUR**  
**COMMUNITY**

reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in one of the worst housing crises in history and that requires real solutions: true and sustainable affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. Rather, it puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject these bills and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.

Thank you for your time and consideration. If there are any questions or concerns, please reach out to Ashley Chen, Policy & Research Manager at [achen9@cpc-nyc.org](mailto:achen9@cpc-nyc.org).



## MEMORANDUM IN OPPOSITION

### Short Term Rentals Intro No. 948-A

November 11, 2025

Citizen Action of New York, a membership organization dedicated to social, racial, economic and environmental justice with eight chapters and affiliates in New York State, including a very active chapter in New York City, opposes Intro No. 948-A, which would amend the New York City Building and Administrative Codes to, among other things, increase the number of boarders allowed in one- and two-family homes to up to four adult boarders and their children, and allow short-term rentals without requiring the permanent occupant to be physically present.

By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This legislation is an overt attempt to dismantle existing protections against short-term rentals and would limit our housing supply, thus putting upward pressure on rents. The bill will also impact on the revenue generated through tourism and undermine the character of New York City neighborhoods. Intro. 948-A directly conflicts with the intent of Local Law 18, enacted in 2021, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

Citizen Action has a large number of low and moderate income renters among its members and supporters. We are deeply concerned by a 2018 State Comptroller's report finding that between 2009 and 2016, roughly 9.2% of the citywide increases in rental rates could be attributed to Airbnb alone, and other research indicating that Black neighborhoods with the highest number of Airbnb listings were experiencing high levels of gentrification.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality, jobs, and directly contributed to increased rents. Intro. 948-A would effectively reopen the door to unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from the impacts of short-term rentals that are de facto hotels.

For these reasons, we urge the City Council to vote no on Proposed Int. No. 948-A.

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*For more information, contact Rebecca Garrard, Co-Executive Director, at [rgarrard@citizenactionny.org](mailto:rgarrard@citizenactionny.org) or at (845) 797-9210, or Bob Cohen, Esq., Policy and Research Director at [bcohen@citizenactionny.org](mailto:bcohen@citizenactionny.org) or (518) 265-6183*



Org name: CACF

Sender name: Felicia Singh

Email: [fsingh@cacf.org](mailto:fsingh@cacf.org)

## **MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**

**11/22/25**

Coalition for Asian American Children and Families is the nation's only pan-Asian children and families' advocacy organization bringing together community-based organizations as well as youth and community allies to fight for equity for Asian Americans and Pacific Islanders. We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City, including harming AAPI communities.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally, and both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color, including AAPI communities, and putting it in the hands of large real estate interests.



New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.



Dear Chair Sanchez and Members of the Committee,

My name is \_\_ (Shaquana Boykin) \_\_, and I am \_\_ (a tenant organizer) \_\_ with Communities Resist. We are a housing legal services and advocacy organization representing low-income tenants in marginalized communities who are facing eviction, harassment, and displacement by their landlords. Our organization works with thousands of tenants and families across Brooklyn and Queens. Every day, we work with New Yorkers whose landlords have turned off their heat and hot water, failed to rectify mold and pest infestations in the buildings, illegally increased their rents, or even threatened to call ICE on them. We are here to oppose this legislation because it will worsen conditions for New Yorkers everywhere.

We are in the midst of the worst affordable housing crisis in decades. Meanwhile, Intro 948-A and Intro 1107 are both corporate giveaways that would significantly reduce New York City's affordable housing stock. If passed, this bill would allow corporations, like Airbnb, to take tens of thousands of apartments off the market and displace more tenants for corporate gain by creating a backdoor provision to allow more rental units to be used as short-term stays.

What that means for everyday New Yorkers is that more landlords will be incentivized to use underhanded tactics to force tenants out of their homes so that they can convert these apartments into short term stay hotels. It means that there will be fewer apartments on the market leading to higher rent demands because of the limited supply.

The Comptroller's own website shows that nearly 70% of all New Yorkers are renters. More than 50% of all New Yorkers are already rent burdened - paying more than 30 cents of every dollar they earn to rent. And 1/3rd of low-income renters are *severely* rent burdened - more than 50 cents of every dollar they earn goes to rent.

We - the people of New York - cannot afford any more policies that raise rents on everyday working class New Yorkers. Both Intro 948A and 1107A will only exacerbate the housing and affordability crisis, they would weaken our communities, harm tenants, and line the pockets of billionaires at the expense of everyday New Yorkers. ***It's the epitome of putting profit over people.***

These bills are a blatant attempt to dismantle the protections against illegal short-term rentals, as well as the protections our tenants need to stay in their homes. They are a threat to our housing supply, the tourism economy, jobs, community safety, and the fabric of our neighborhoods. Communities Resist's mission is to fight for housing justice and against displacement and gentrification. And for these reasons, on behalf of the tenants and the

communities we represent, ***we urge you to put people over profit and reject Intro 948-A and Intro 1107-A.***



**Communities Resist (CoRe)  
Memorandum in Opposition  
to Proposed Intro No. 948-A and Intro No. 1107-A**

**Communities Resist (CoRe) strongly opposes Intro 948-A and Intro 1107-A**, which is a clear effort to dismantle existing protections against illegal short-term rentals and is a threat to our housing supply, housing stability for renters, community safety, and the character and cohesion of our neighborhoods.

Communities Resist is a community-based housing legal services and advocacy organization representing low-income tenants in marginalized communities preventing gentrification and displacement. Since our inception in 2019, CoRe has stopped approximately 1,000 evictions, filed 4,000+ affirmative litigation cases, engaged more than 8,000 New Yorkers at housing rights workshops and advocated for New York's poorest tenants. Every day, our attorneys and organizers meet with tenants and families who are being pushed out of their homes by landlords wanting to turn a quick dollar. These tenants are subject to abuse and neglect, dangerous and undignified building conditions, personal harassment, and more, as landlords try to get them to leave their homes. Intro 948-A and Intro 1107-A would incentivize more landlords to engage in these abusive tactics.

This legislation would greatly exacerbate our city's housing crisis both by restricting supply and increasing instability for current tenants. Intro 948-A and Intro 1107-A expands the number of boarders allowed in one- and two-family homes and, crucially, allows short-term rentals without requiring the permanent occupant to be physically present. Put plainly, it would legalize de facto hotels in residential neighborhoods by directly displacing working class New Yorkers. It is a duplicitous end-run around Local Law 18, which requires that short-term rentals be hosted by a permanent resident in order to ensure safety, accountability, and community stability and prevent homes from being converted into hotels.

We are in the midst of the worst housing crisis New York has faced in decades. Communities Resist stands firm in opposing this legislation because it hurts New York's tenants and communities. It would allow corporations, like Airbnb, to remove tens of thousands of apartments off the market and displace more families for corporate profit by creating a backdoor provision to undercut our tenant protections. This legislation would weaken our communities, harm tenants, and line the pockets of billionaires at the expense of everyday New Yorkers.

Prior to Local Law 18, the unchecked proliferation of short-term rentals took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Intro 948-A and Intro 1107-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

For these reasons, **we urge the City Council to reject and vote no on Proposed Intro No. 948-A and Intro No. 1107-A.**





**THE CITY OF NEW YORK  
COMMUNITY BOARD NO. 16**

E-mail: [bk16@cb.nyc.gov](mailto:bk16@cb.nyc.gov)  
Website: [www.nyc.gov/brooklyn16](http://www.nyc.gov/brooklyn16)  
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**ANTONIO REYNOSO**  
**Borough President**

**SYDONE THOMPSON**  
**District Manager**

**MARGARET BREWER**  
**Chairperson**

November 19, 2025

Re: Intro Bill 948A (Home Sharing)

Dear Housing Chair Pierina Sanchez, NYC Council Housing and Building Committee, and City Council Members, Darlene Mealy, Sandy Nurse, Chi Osse, et al.

On behalf of Community Board 16, representing Brownsville and Ocean Hill in Brooklyn—an area home to approximately **100,800 residents**—we strongly support Intro Bill 948A. With a **median household income of \$41,300**, a **median property value of \$621,300**, and only **16.1% homeownership**, responsible home-sharing is critical for many residents confronting rising costs.

Many one and two-family homeowners in CB16 struggle with property taxes, insurance premiums, utilities, and repairs. Intro Bill 948A offers vital financial relief, helping to keep families in their homes and preserve neighborhood character.

The bill allows responsible home-sharing, enabling modest supplemental income that supports mortgage payments and property upkeep, safeguards generational wealth, and stimulates local businesses—all while protecting residential integrity.

Importantly, the bill includes robust safeguards to prevent commercial abuse and uphold tenant protections consistent with city housing goals.

We appreciate your commitment to supporting homeownership in Brooklyn and urge you to pass Intro Bill 948A. This action would strengthen CB16's stability and foster a fairer, more sustainable housing future for Brooklyn and NYC.

Thank you for your leadership.

**Sydone Thompson**

District Manager - Community Board 16, Brooklyn



## **Testimony: NYC Must Maintain Universal Short-Term Rental Regulations**

NYC Council Committee on Housing and Buildings hearing, 11/20/2025

Thank you to the New York City Council's Committee on Housing and Buildings for the opportunity to testify today. My name is Samuel Stein, and I am a senior policy analyst at the Community Service Society of New York (CSS), a nonprofit that promotes economic opportunity for all New Yorkers. CSS uses research, advocacy, and direct services to champion a more equitable city and state. Over the past 180 years, we have consistently fought for housing resources and rights for New Yorkers at the city, state, and federal levels, including the establishment of universal housing quality standards, the production of social housing, the enactment of rent regulations, and the expansion of rental assistance programs.

I am testifying today in opposition to Intro 948, a bill that would, among other things, allow owners of one- and two-family homes to convert their residential units into unregulated hotels. As CSS demonstrated in our recent report, *Homes Not Hotels*, this would be a grievous error, which could lead to the displacement of largely low-income, plurality African American tenants, and make homeownership even less attainable for first-time homebuyers.

Here are a few of our key findings:

- **Eighteen percent of New York City renters live in small, market-rate buildings.<sup>1</sup>**
  - While New York City is known for its high-rises, there are 327,100 rentals in buildings with one or two units, housing nearly 894,000 tenants. In fact, there are more rentals in one- and two-unit buildings than in three-to-five-unit buildings or six-to-nineteen-unit structures.
  - Few of these tenants are protected by rent stabilization or Good Cause, and 45 percent (approximately 400,000 people) do not have a lease. The vast majority of these leaseless tenants—86 percent—never had a lease in their current home. All this makes it easier for landlords to displace long-term tenants to make way for more profitable short-term renters.
  - Most long-term tenants in one- and two-unit buildings pay lower rents than market-rate renters in bigger buildings. In 2022, the median rent in market-rate units (those not covered by rent stabilization or any another form or rent regulation) was \$2,000 per month, while the median rent in one- and two-unit buildings was \$1,860. Twenty-six percent of tenants in one- and two-unit rentals are Black—nine percentage points higher than in market-rate apartments overall.

- **Allowing host-less short-term rentals would increase the price of purchasing a one- and two-unit property.**
  - In 2022, the median rent for one- and two-unit rentals was \$1,860. With a standard 95 percent occupancy rate, a landlord can expect to generate \$21,200 in annual gross income from one unit or \$42,400 from two units on the long-term rental market. In contrast, the median daily price for a whole-home rental in a one-or two-unit building was \$150 on Airbnb, plus a typical \$95 cleaning fee.<sup>2</sup> Over the course of a year, with a 50 percent occupancy rate, an owner turning a one-unit building into an Airbnb could expect more than double the annual gross income: \$44,700. If they list both apartments, they could earn up to \$89,400.
  - Deregulation of one- and two-unit buildings could impact certain buildings with three rentable units. Accessory Dwelling Units (ADUs)—allowed in some parts of the city through the passage of Mayor Adams’ City of Yes for Housing Opportunity rezoning program—do not count as additional units for these purposes.<sup>3</sup> Therefore, if an owner of a duplex adds an ADU, the three rentable units would *still* be considered a two-unit building under this potential legal change. There is a \$70,000 difference in annual gross income between a building with three long-term tenants (\$63,600) versus three short-term rentals (\$134,000).
  - From a real estate investment perspective, the most important metric is a property’s Net Present Value (NPV), which calculates the current investment value of a property based on the profit it may generate in the future. The higher the NPV, the greater the speculative pressure on a property, making the ongoing tenure of pre-existing tenants more tenuous. CSS’s model shows that the NPV for a one-unit Airbnb conversion (\$410,700) is nearly eight times higher than that of a long-term, one-unit rental (\$52,400). For a two-unit Airbnb, the NPV climbs to nearly \$970,000, and for a three-unit Airbnb (i.e. a two-unit building plus an ADU), the NPV soars to more than \$4 million.
  - These potential profits could drive sales prices far beyond the reach of working-class New Yorkers seeking to purchase their first home.
- **Higher sales prices would result in higher rents for homes in one- and two-unit properties.**
  - Like in other overheated real estate submarkets, investors would bid up the sales price of any one- and two-unit dwelling on the market. They would also doggedly pursue (and even harass) homeowners to convince them to sell—whether or not that is the homeowners’ wish.<sup>4</sup>
  - A regulatory rollback would drive up sales prices, eventually making renting to long-term tenants no longer economically feasible. Under these conditions, either the sellers or the new owners would seek to displace long-term tenants, who have



very few tenure protections. This would create great hardships for individual households and put further strain on New York City's already historically tight rental housing market.

We recognize that struggling homeowners need ways to maintain the affordability of their homes, but we urge the city to pursue public policy interventions that address this problem directly, rather than re-introducing short-term rentals in a way that will negatively impact a large and legally vulnerable segment of New York's renter population. New York City must retain its universal short-term rental policies and prevent tenant displacement and rental stock loss.

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<sup>1</sup> 2023 New York City Housing and Vacancy Survey.

<sup>2</sup> Data on Airbnb listings was compiled by Inside Airbnb, which collects publicly-available listings on the platform around the country. We then cross-checked that data with New York City's PLUTO land use database to confirm the building's unit count. Cleaning fee estimates are more difficult to calculate. The estimate we used for our analysis is based on online Airbnb data aggregators like Rentals United.

<sup>3</sup> Although the final version of "City of Yes" passed in December 2024 limited the expansion of Accessory Dwelling Units (ADUs) in many districts, ADUs will still be allowed under certain circumstances. Future zoning reforms may increase their availability in more one- and two-unit buildings.

<sup>4</sup> *The City*, ["Harried East New York homeowners seek ban on house flippers."](#) March 2, 2020.



## CONNECTING COMMERCE AND TRANSFORMING THE FUTURE

“Conectando el comercio y transformando el futuro”

1

November 14, 2025

### New York City Council

Committee on Housing & Buildings  
City Hall, New York, NY

### RE: Testimony in Support of Int. 948-A (Sanchez)

Submitted by: Maria Khury, Chief Executive Counsel  
Dominican American Chamber of Commerce  
[REDACTED] / [communications@dachamber.org](mailto:communications@dachamber.org)

Dear Chair Sanchez and Members of the Committee:

On behalf of the Dominican American Chamber of Commerce (DACHamber), I am submitting this written testimony in **strong support** of Int. 948-A, which amends the New York City Building Code and Administrative Code regarding, roomers, or lodgers in private dwellings and short-term rentals in one- and two-family homes.

Approximately **23% of our membership and affiliates** rely on short-term rental platforms as a modest but essential form of supplemental income. Many are first-generation homeowners facing rising housing costs who depend on this revenue to keep their homes. Under the current system, they have faced significant hardship and uncertainty.

Our membership and affiliates were formally surveyed, and **96% of respondents support the amended legislation**. They have asked that we advocate for a fair, balanced, and culturally appropriate regulatory framework.

Short-term rentals in owner-occupied one- and two-family homes do **not** compete with hotels or the housing market. These hosts are not commercial operators but local, responsible homeowners. Furthermore, short-term rentals serve an important **community and cultural need**: families traveling to visit relatives, especially in immigrant communities, seek to stay **close to their loved ones**, in their neighborhoods, at a price they can afford. Downtown hotels are not accessible to many working-class visitors, and families prefer to remain near their relatives even when those relatives cannot house them.

Int. 948-A provides a responsible and equitable regulatory structure that supports homeowner stability, neighborhood cohesion, and local economies while maintaining safety and compliance requirements.



## CONNECTING COMMERCE AND TRANSFORMING THE FUTURE

“Conectando el comercio y transformando el futuro”

2

**RE: Testimony in Support of Int. 948-A (Sanchez)**  
**Submitted by: Maria Khury, Chief Executive Counsel**  
**Dominican American Chamber of Commerce**  
**917-940-1612 / communications@dachamber.org**

**Our survey is summarized by the Q/A included below and our key observations in support of Int. 948-A is as follows;**

### **How does Int. 948-A affect the hotel industry?**

- Short-term rentals in owner-occupied homes are not commercial operations.
- They serve community travel needs that large hotels cannot or do not meet.
- There is no competition. These are different markets entirely.

### **Any safety concerns?**

- Int. 948-A emphasizes compliance with fire, building, and occupancy standards.
- Homeowners welcome clarity and want to comply. They simply need rules that reflect real living conditions.

### **Why do families prefer short-term rentals over hotels?**

- Affordability: hotels downtown are too expensive for many immigrant families.
- Proximity: families want to stay near relatives for major life events.
- Cultural reasons: many families prefer a home environment, not a commercial hotel.

### **Do you believe this hurts housing availability?**

- No. These are **owner-occupied** one- and two-family homes, not large apartment units removed from the rental market.
- This law distinguishes responsible hosts from illegal operators.



## CONNECTING COMMERCE AND TRANSFORMING THE FUTURE

“Conectando el comercio y transformando el futuro”

3

**RE: Testimony in Support of Int. 948-A (Sanchez)**  
**Submitted by: Maria Khury, Chief Executive Counsel**  
**Dominican American Chamber of Commerce**  
**917-940-1612 / communications@dachamber.org**

### Who benefits most from this amendment?

- First-generation homeowners
- Seniors on fixed incomes
- Immigrant families
- Small businesses located in those neighborhoods
- Visitors who cannot afford hotels but still want to be near family

### Why is our Chamber involved?

- 23% of our Chamber community rely on Airbnb income.
- 96% support the amendment.
- Our mission is to advocate for economic stability, opportunity, and fair treatment of and for our community.

For these reasons, the Dominican American Chamber of Commerce supports and urges passage of **Int. 948-A**.

We thank you for your consideration.

Respectfully submitted,

**Maria Khury**

Chief Executive Counsel

Dominican American Chamber of Commerce

**communications@dachamber.org**



## **MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**

**11/23/2025**

### **DRUM Beats**

DRUM Beats organizes working-class Indo-Caribbean and South Asian communities to build movements, and our capacities to transform political systems so that they serve our collective needs. We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.

*THE ELEVATOR  
INDUSTRIES  
ASSOCIATION, INC.*

November 20, 2025

New York City Council  
Committee on Housing & Buildings  
City Hall  
New York, NY 10007

To Whom it May Concern:

The members of the Elevator Industries Association (“EIA”) write in support of Int. 1422 (Sanchez, by request of the Mayor). Int. 1422 would make certain conforming provisions to the city’s building code, including provisions regarding elevator inspections and resulting repairs. The EIA represents unionized contractors (the employees are members of Local 3, IBEW, Elevator Division) that modernize, maintain and repair elevators in New York City and surrounding localities.

Of particular note is §152 of the bill that would update an existing code provision, §28-304.6.6.2, regarding the periodic inspections of elevators (which are performed periodically during each year). Currently, unlike any other elevator inspections mandated by the Building Code, the Department of Buildings may not grant an extension for an owner to address any issues identified by the periodic inspection even when circumstances beyond the owner’s control make it impossible to correct the issues within the initial 90-day period (e.g. a delay in getting necessary parts). In contrast, when issues are identified in Category One (a safety inspection performed annually) and Category Five inspections (a load carrying safety test performed every five years), the Department of Buildings is empowered to grant up to two 45-day extensions to remedy and file the necessary paperwork about the identified issues.

In connection with both Category One and Five tests, the DOB may grant up to two 45-day extensions when the remedial work cannot reasonably be performed during an initial 90-day period following the inspection and the delay in performing the remedial work does not create any safety risk to the riding public. This proposal would allow the DOB to grant a single 45-day extension to correct the issues noted from the periodic elevator inspection when there are

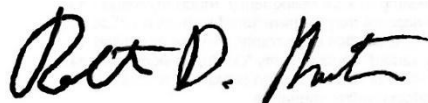
demonstrated difficulties in being able to correct the issues and file the necessary paperwork within 90 days of the initial test and the extension does not cause a safety risk.

The need for a waiver is critical for periodic inspections as elevator contractors have to navigate a variety of hurdles including, but not limited to agency approvals, sign-offs from building owners, working with other entities such as Verizon and Con Ed, ordering certain equipment and parts that are not readily available, and the scheduling of qualified individuals to do the repair work identified in the periodic inspection. In no way does the proposed extension provision compromise the safe and approved operation of elevators, rather it offers relief from fines and penalties for work that reasonably takes more than 90 days to complete, which includes permits, approvals, and other paperwork. Moreover, this proposed extension provision is less lenient than the extension provisions, already in the Building Code, for Category 1 and Category 5 elevator inspections.

In addition, the EIA is supportive of Int. 1321 (Sanchez, by request of the Mayor) which would create a new "Existing Building Code." The provisions featured in Int. 1321 regarding elevators will streamline the process for permits for certain work in existing buildings. Any streamlining of processes will create a better workflow and get approved elevators back into service for buildings in a more efficient manner.

The EIA would like to thank Speaker Adams, Chair Sanchez and the members of the committee for their attention to these bills. We continue to appreciate the support of the City Council for contractors that employ highly skilled and professionally trained union workers. Our member contractors and employees are proud to continue to maintain and modernize elevators in all types of buildings throughout the five boroughs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert D. Martin". The signature is fluid and cursive, with the first name "Robert" and last name "Martin" clearly distinguishable.

Robert Martin  
President

Contact

Robert Martin  
ROBDMAR@optonline.net



November 19, 2025

Hon. Pierina Ana Sanchez  
Chair, City Council Committee  
On Housing and Buildings

Hon. Members of the Council  
Committee on Housing and Buildings

City Hall, New York, NY 10007

**Re: Int. No. 948-A**

Dear Chair Sanchez and Members of the Committee on Housing and Buildings:

This firm is special New York City land use counsel to AirBNB for the purpose of reviewing land use and zoning considerations related to the provisions of Int. No. 948-A. This letter is submitted as written testimony before the City Council Committee on Housing and Buildings at its public hearing on November 20, 2025.

Int. No. 948-A would amend the New York city building code (the "Building Code") and the administrative code of the city of New York (the "Administrative Code") to increase the number of allowable boarders, roomers, and lodgers in one and two family dwellings from 2 to 4, provided that the permanent occupant of the dwelling unit has registered the dwelling unit for use as a short term rental under the provisions of Chapter 31 of the Administrative Code ("Registration Requirements for Short-Term Rentals"). Int. No. 948-A would also allow the registered permanent occupants of one and two family dwellings to host such guests without being present at the property, and would clarify that the permanent occupant hosting a short-term rental must provide the guests with a reasonable access to the dwelling unit, which need not include the bedrooms, offices or similar private spaces of any permanent occupant of the dwelling. It should be noted that Int. No. 948-A would not make any changes to the types of dwelling units eligible for registration for short term rental.

We address three points in turn below:

First, whether the provisions of the Zoning Resolution which define the permitted occupants of a single or two family dwelling are consistent with the amendments to the Building Code and Administrative Code in Proposed Int. No. 948-A;

Second, whether the amendments to the Building Code and Administrative Code in Proposed Int. No. 948-A are consistent with provisions of the Zoning Resolution relating to permitted density; and

Third, whether the provisions of Proposed Int. No. 948-A would allow one of the dwelling units in a two family dwelling to be used exclusively for short-term occupancy.

**1. The Zoning Definitions of “Family”, “Single Family Residence” and “Two Family Residence”**

Section 12-10 of the Zoning Resolution, as most recently amended under the City of Yes Housing Opportunity Zoning Text Amendment (“COYHO”) on December 5, 2024, defines the term “Family” as follows:

A “family” is either a person occupying a dwelling and maintaining a household, with not more than four boarders, roomers or lodgers, or two or more persons occupying a dwelling, living together and maintaining a common household, with not more than four boarders, roomers or lodgers. A “boarder,” “roomer” or “lodger” residing with a family shall mean a person living within the household who pays a consideration for such residence and does not occupy such space within the household as an incident of employment therein.

The term “Single-Family Residence” and “Two-Family Residence’ are in turn defined under the Zoning Resolution as follows:

A “single-family residence” is a #building# containing not more than one #dwelling unit# and occupied by only one #family#. A #single-family residence# may additionally include an #ancillary dwelling unit # in the same or an ancillary #building#.

A “two-family residence” is a #building# containing not more than two #dwelling units# and occupied by only two #families#. A #two-family residence# may additionally include an #ancillary dwelling unit# in the same or an ancillary #building#.

Accordingly, under the Zoning Resolution, a “family” residing in a single- or two- family residence may include up to four boarders, roomers, or lodgers who pay a consideration for such residence. This is consistent with the provisions of Int. No. 948-A which would amend the Building Code and Administrative Code to allow the short-term rental of a dwelling unit within a one-family or two-family dwelling by up to four boarders, roomers, or lodgers.

Prior to COYHO, the Zoning Resolution definition of “family” allowed for not more than one boarder, roomer or lodger and further provided that “[a] common household shall be deemed to exist if members thereof have access to all parts of the dwelling.” The COYHO amendments removed this requirement, and there is therefore no conflict between the Zoning Resolution and the provisions of Int. No. 948-A which provide that the permanent occupant or occupants of a dwelling unit shall provide short-term occupants “reasonable access” to the dwelling unit, but are “not required to provide access to the bedrooms, offices, or other similar private spaces of any permanent occupant in the dwelling unit.” The Zoning Resolution does not require that the permanent occupant or occupants of a single-family or two-family residence must be physically present in the dwelling unit during the period of a short-term stay, and is therefore also not in conflict with the provisions of Int. No. 948-A which provide that a registered permanent occupant need not be physically present in the dwelling unit during the period of the short-term rental. In short, the amendments to the Zoning Resolution made by COYHO align with the provisions of the Building Code and Administrative Code proposed in Int. No. 948-A.

## **2. Short-Term Rentals and Regulation of Population Density Under the Zoning Resolution**

Unlike provisions of the Administrative Code such as Section 27-2077 which govern maximum occupancies in dwellings, the Zoning Resolution does not regulate the occupancy levels of residential buildings, with the exception of the provisions of Section 12-10 discussed above with respect to the maximum number of boarders, roomers or lodgers. The provisions of the Zoning Resolution which set forth the amounts of floor area permitted within a zoning district are sometimes described as ‘density’ regulations; however, these provisions regulate the overall size of a development rather than the permitted number of occupants. Accordingly, there is no conflict between the Zoning Resolution, as amended under COYHO, and other statutory provisions such as are found in the Housing Maintenance Code that relate to population ‘density.’

## **3. Use of Units in a Two Family Residence in Common Ownership For Short Term Rental**

It is our understanding that questions have been raised that Int. No. 948-A would allow the owner of a two-family residence to dedicate one of the dwelling units to short-term stays.

Chapter 31 of the Administrative Code provides in this regard that a person entitled to be a “Registered Host” for short term rentals means a “natural person who is a permanent occupant of a dwelling unit..”. Ad. Code Sec. 26-3101. Chapter 31 further provides that:

[n]o short-term rental registration shall be issued unless: 1. *The applicant is a natural born person who is a permanent occupant of the dwelling unit* and is either: (i) the owner of such dwelling unit, or (ii) a tenant of such dwelling unit



November 19, 2025

Page 4

who certifies in a form and manner to be specified by the administering agency that they are not prohibited by the terms of a lease or other agreement from applying for a short-term rental registration for such dwelling unit and from subsequently acting as a host for short-term rentals within such dwelling unit. (e.a.). Ad. Code Sec. 26-3102 (c)(1)

The above provisions of the Administrative Code are further implemented by rule under 43 RCNY Chapter 21: "Required Registration of Short-Term Rentals. ". See esp. Sec. 21-01 defining a "Permanent Occupant" ("The term 'permanent occupant' shall mean a natural person or family occupying a dwelling unit for 30 consecutive days or more, except that a boarder, roomer, or lodger shall not be considered a permanent occupant for the purposes of this chapter"); Sec. 21-03(7) setting forth the documents an applicant for registration must provide to prove permanent occupancy; and Sec. 21-10(9) prohibiting the transfer of a short-term rental registration from one dwelling unit to another.

Accordingly, a person who owns a two family residence and resides in one of the dwelling units cannot lawfully register as a host for the second unit and thereby dedicate it for use as a short-term rental. It is our understanding that the foregoing requirements and restrictions also apply to an ancillary dwelling unit, as defined under ZR 12-10 of the Zoning Resolution.

We appreciate this opportunity to provide the Committee with the above information and analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "David Karnovsky", with a long, sweeping horizontal stroke extending to the right.

David Karnovsky

My testimony related to bill 407 relates to the onerous nature of these requirements and the shifting of personal and criminal liability on to cooperative board members.

Even though this liability might be covered by D&O insurance, the cost of that insurance is sure to rise, adding to the ever-growing financial burden of managing coops. But in addition, placing this liability on board members will likely discourage many (including me) from serving on coop boards. Members of coop boards are generally not compensated; they serve out of a sense of community interest and to ensure that their buildings are responsibly and safely managed. While our primary fiduciary responsibility is to the building and its shareholders, we already do much of what these proposed measures are mandating to expedite the process for prospective buyers and provide them with feedback. But shifting liability to board members will likely “break the camel’s back.” Please do not adopt these measures.

David E Levy, MD

Secretary, Greenwich Mews Board of Directors (622 Greenwich Street Coop) and  
Secretary, 40 East 19 St Owners Coop Board of Directors



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 [www.habitatnycwc.org](http://www.habitatnycwc.org)

November 18, 2025

Dear Members of the New York City Council and Housing Committee,

On behalf of Habitat for Humanity NYC and Westchester, We wish to express our position of support with conditions to the limited amendments to Local Law 18 proposed in Intro 948-A. These amendments would:

1. allow locks for private doors
2. permit up to four guests
3. enable homeowners to be elsewhere during a short-term rental use

These minor and reasonable changes would allow for homeowners to more easily supplement their income and offset rising housing costs by renting out their homes while on vacation, work trips, or otherwise away from home.

Habitat NYC and Westchester knows the importance of affordable homeownership as we've spent the past 40 years building and preserving homes for low- to moderate-income families in all five boroughs. Homeownership as a critical part of the housing continuum. In order to build an equitable city, it is imperative to invest in solutions that build and maintain family and community equity.

We support Local Law 18 and the intended purpose to restrain short term rentals that removed critical housing units from our city's housing stock and exacerbated our housing supply and affordability crises. It is critically important that housing units be used for housing New Yorkers and not removed from the rental or ownership marketplace. In a city with a paltry 31% homeownership rate, it is all the more important that single- and two-family homes be available to families and households seeking to own a piece of New York and not turned into solely an alternative to our city's hotels.

However, we have heard from working-class, single-family homeowners that the law has negatively impacted some of them who depend on supplemental rental income to afford their homes and other expenses and the proposals put forward in this bill are not unreasonable.

We do not oppose the legislation passing in its current form, but believe it is essential to raise several concerns and recommendations to ensure the law's successful and equitable implementation both in the short- and long-terms.

**Enforcement of the Law:**

We urge lawmakers and relevant agencies to prioritize robust enforcement mechanisms to ensure

resident occupied one- to two-family homes are being utilized for their primary purpose as primary residences. Without adequate oversight and enforcement, the law could result in the over-use of these important dwelling units as vacation properties rather than housing New Yorkers. Appropriate oversight and enforcement must be implemented to ensure the expansion of use is not abused.

**Equitable Limitations to Short-Term Use and Primary Residency:**

We would support additional rules and regulations around owner occupancy to limit the number of weeks homes are utilized as short-term rentals to ensure the intended purpose of the law is met and that these properties are utilized as primary residences. For example, the Council and Administration should consider adjustments to the owner occupancy requirements that align with the regulatory agreements for HDFC limited-equity homeownership, including days spent in the dwelling unit and limitations on owning multiple properties in the region.

**Continued Discussion:**

Habitat for Humanity NYC and Westchester does not oppose the bills passage as is and welcomes the opportunity to participate in further discussions to ensure that the law serves all homeowners fairly and effectively and that critical housing stock remains as long-term housing for New Yorkers. We believe that collaborative engagement will help identify and resolve any unintended consequences, and foster a more inclusive approach to affordable housing policy.

Thank you for your attention to these matters. We look forward to working together to advance equitable and affordable homeownership opportunities in our communities.

**Sincerely,**

A handwritten signature in black ink, appearing to read "Matt Dunbar", written in a cursive style.

**Matt Dunbar**  
**Chief of Staff and Executive Vice President**  
**Habitat for Humanity NYC & Westchester County**

**From:** [RHOAR Leadership](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Fwd: Brooklyn Block Associations' Support for Intro Bill 948A – Responsible Home-Sharing for One- and Two-Family Homeowners  
**Date:** Friday, November 14, 2025 2:40:35 PM

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On behalf of the Brooklyn Block Association, We are forwarding to you the below in Support of 948A to add to the testimony for November 20th hearing.

----- Forwarded message -----

**From:** Liz Baiardi <[REDACTED]>  
**Date:** Fri, Nov 14, 2025 at 12:38 PM  
**Subject:** Brooklyn Block Associations' Support for Intro Bill 948A – Responsible Home-Sharing for One- and Two-Family Homeowners  
**To:** <[chudson@council.nyc.gov](mailto:chudson@council.nyc.gov)>, <[asanchez@council.nyc.gov](mailto:asanchez@council.nyc.gov)>  
**Cc:** <[district7@council.nyc.gov](mailto:district7@council.nyc.gov)>, <[Dinowitz@council.nyc.gov](mailto:Dinowitz@council.nyc.gov)>, <[ofeliz@council.nyc.gov](mailto:ofeliz@council.nyc.gov)>, <[lestler@council.nyc.gov](mailto:lestler@council.nyc.gov)>, <[District38@council.nyc.gov](mailto:District38@council.nyc.gov)>, <[leadership@rhoar.org](mailto:leadership@rhoar.org)>

Dear NYC City Council Housing Committee:

Brooklyn's block associations collectively support Intro Bill 948A, which proposes thoughtful and narrowly tailored amendments to Local Law 18 to allow one- and two-family homeowners to engage in responsible home-sharing.

Homeowners are the anchors of Brooklyn's neighborhoods. They maintain properties, foster safety, and uphold the character and vitality of our communities. Yet many are facing rising property taxes, insurance rates, utilities, and repair costs that strain household finances and threaten their stability.

Intro Bill 948A offers a balanced and fair solution. By allowing responsible home-sharing, the bill enables homeowners to earn modest supplemental income—often the difference between keeping and losing a home. This income helps families stay current on mortgages, prevent deed theft, tax liens, and other predatory practices, and preserve the generational wealth that sustains our communities.

Furthermore, responsible home-sharing provides much-needed accommodations for visiting loved ones who wish to stay nearby and drives additional business to local small enterprises—from corner stores to restaurants and service providers. This strengthens local economies while preserving the residential character of our blocks.

Importantly, the bill maintains robust protections against commercial operators and “bad actors” who abuse the system. It offers relief to responsible homeowners without undermining

tenant protections or the city's broader housing goals.

We thank the New York City Council for its continued commitment to preserving homeownership opportunities for middle- and lower-income families across Brooklyn. Supporting Intro 948A will help homeowners remain in their homes, sustain our communities, and advance a fairer, more stable housing future for New York City.

With appreciation for your leadership and dedication,

Liz Bairdi  
Hall Street Block Association Member

[REDACTED]

On behalf of Brooklyn Block Associations in support of Intro Bill 948A

--

Team RHOAR

Gia

Margenett

Jean

Lisa



**From:** [MMR RHOAR](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] FW: Hall Street Block Association's Support for Intro Bill 948A – Responsible Home-Sharing for One- and Two-Family Homeowners  
**Date:** Tuesday, November 18, 2025 10:10:33 AM

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**From:** Mary Chang <hallstreetblockassociation@gmail.com>  
**Date:** Friday, November 14, 2025 at 12:06 PM  
**To:** asanchez@council.nyc.gov <asanchez@council.nyc.gov>, chudson@council.nyc.gov <chudson@council.nyc.gov>  
**Cc:** district7@council.nyc.gov <district7@council.nyc.gov>, Dinowitz@council.nyc.gov <Dinowitz@council.nyc.gov>, ofeliz@council.nyc.gov <ofeliz@council.nyc.gov>, lrestler@council.nyc.gov <lrestler@council.nyc.gov>, District38@council.nyc.gov <District38@council.nyc.gov>  
**Subject:** Hall Street Block Association's Support for Intro Bill 948A – Responsible Home-Sharing for One- and Two-Family Homeowners

Dear Housing Chair Pierina Sanchez, Council Member Crystal Hudson, et. Al

**On behalf of the Hall Street Block Association representing one- and two-family homeowners, we write to express our strong support for Intro Bill 948A.** We believe responsible home-sharing helps families remain in their homes, supports local businesses, and strengthens communities across Brooklyn.

Many one- and two-family homeowners in our community depend on responsible home-sharing so they can afford to stay in their homes. Intro Bill 948A will offer much needed financial relief.

Thank you for your leadership and ongoing commitment to preserving homeownership opportunities for working- and middle-income New Yorkers.

Warm regards,  
Mary Chang  
Vice President, Hall Street Block Association  
[HallStreetBlockAssociation@gmail.com](mailto:HallStreetBlockAssociation@gmail.com)

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Dear NYC City Council Housing Committee:

We urge you to support **Intro Bill 948A**, which proposes thoughtful and narrowly tailored amendments to **Local Law 18** to allow one- and two-family homeowners to engage in **responsible home-sharing**.

Homeowners are the **anchors** of Brooklyn's neighborhoods. They maintain properties, foster safety, and uphold the character and vitality of our communities. Yet many are facing rising property taxes, insurance rates, utilities, and repair costs that strain household finances and threaten their stability.

**Intro Bill 948A** offers a balanced and fair solution. By allowing responsible home-sharing, the bill enables homeowners to earn modest supplemental income—often the difference between keeping and losing a home. This income helps families stay current on mortgages, prevent **deed theft, tax liens, and other predatory practices**, and preserve the generational wealth that sustains our communities.

Furthermore, **responsible home-sharing provides much-needed accommodations for visiting loved ones who wish to stay nearby and drives additional business to local small enterprises**—from corner stores to restaurants and service providers. This strengthens local economies while preserving the residential character of our blocks.

Importantly, the bill maintains robust protections against commercial operators and “bad actors” who abuse the system. It offers relief to responsible homeowners without undermining tenant protections or the city’s broader housing goals.

We thank the New York City Council for its continued commitment to **preserving homeownership opportunities for middle- and lower-income families across Brooklyn**. Supporting Intro 948A will help homeowners remain in their homes, sustain our communities, and advance a fairer, more stable housing future for New York City.

With appreciation for your leadership and dedication,

**Mary Chang**

**Vice President, Hall Street Block Association**

[HallStreetBlockAssociation@gmail.com](mailto:HallStreetBlockAssociation@gmail.com)

\_\_\_\_\_

**On behalf of the Harmony Park Block Association representing 74 one-family homeowners, we write to express our strong support for Intro Bill 948A.** We believe responsible home-sharing helps families remain in their homes, supports local businesses, and strengthens communities across Brooklyn.

Thank you for your leadership and ongoing commitment to preserving homeownership opportunities for working and middle-income New Yorkers.

[harmonyparkha@gmail.com](mailto:harmonyparkha@gmail.com)

We urge you to support **Intro Bill 948A**, which proposes thoughtful and narrowly tailored amendments to **Local Law 18** to allow one- and two-family homeowners to engage in **responsible home-sharing**.

**Intro Bill 948A** offers a balanced and fair solution. By allowing responsible home-sharing, the bill enables homeowners to earn modest supplemental income—often the difference between keeping and losing a home. This income helps families stay current on mortgages, prevent **deed theft, tax liens, and other predatory practices**, and preserve the generational wealth that sustains our communities.

Importantly, the bill maintains robust protections against commercial operators and “bad actors” who abuse the system. It offers relief to responsible homeowners without undermining tenant protections or the city’s broader housing goals.

We thank the New York City Council for its continued commitment to **preserving homeownership opportunities for middle- and lower-income families across Brooklyn**. Supporting Intro 948A will help homeowners remain in their homes, sustain our communities, and advance a fairer, more stable housing future for New York City.

With appreciation for your leadership and dedication,

**Phyllis Corbin**

**President, Harmony Park Block Association**

[harmonyparkha@gmail.com](mailto:harmonyparkha@gmail.com) [REDACTED]

Housing air bnb

Good morning, Chair and members of the Committee. My name is Arlene Schlesinger, and I am the Vice President of the Hollis Hills Civic Association in Eastern Queens.

I am here to express my strong opposition to Intro 948-A.

Our one- and two-family neighborhoods are already under tremendous pressure, and this bill would make everything worse. Local Law 18 finally gave New Yorkers a sense of stability by shutting down illegal short-term rentals and returning real apartments to the long-term market. This bill would undo all of that and open the door to something none of us ever asked for.

Under Intro 948-A, a one-family home could rent out four separate rooms every night to four different groups of people. A two-family home could rent out eight. And the owner would not even have to live there. That is not “home sharing.” That is a hotel operating in the middle of a residential block.

Once you allow this, you are inviting hedge funds, investors, and absentee owners to start buying up homes and running them as commercial businesses. Families will not be able to compete with that. First-time buyers will be pushed out. Long-term renters will feel even more pressure. And neighborhoods like mine, where people know each other and care about each other, will lose the stability that makes them safe and livable.

Airbnb has spent an extraordinary amount of money pushing this bill, but all the lobbying in the world does not change the basic truth: homes in New York City should be for the people who live in them, not for a nightly turnover of strangers.

I am asking you to protect Local Law 18, protect our long-term housing supply, and protect the character of our neighborhoods. Intro 948-A creates far more problems than it claims to solve, and the people who will pay the price are the residents who have built these communities for generations.

Please do not let that happen. I respectfully urge you to reject this bill.

Thank you for your time.



## **MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**

**November 18, 2025**

**Housing Justice for All**

Housing Justice for All is a statewide coalition of grassroots tenants' organizations, advocates, and legal service providers with thousands of members in New York City. We have a long history of fighting for stronger tenants' rights and more affordable housing for New Yorkers. We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.



# Testimony In Opposition to Intros 948 and 1107

Murray Cox, founder of Inside Airbnb

*New York City Council Committee on Housing And Buildings*

*November 20, 2025.*

Good morning/afternoon Committee Chair and Councilmembers.

My name is **Murray Cox**, and I am the founder of **Inside Airbnb**<sup>1</sup>, a data-activist project that provides independent public data on short-term rental impacts in cities around the world. We also research STR policies, regulations, and enforcement. I am here today to testify in **opposition to Intros 948 and 1107**.

When I began Inside Airbnb in 2015, I was living in a **rented apartment in a two-family brownstone in Bedford-Stuyvesant**, where I remained for nine years. I share this because **1- and 2-family homes are not just owner-occupied dwellings**—they are also a major source of rental housing for New Yorkers.

According to the **2023 Housing Vacancy Survey**<sup>2</sup>, approximately **319,000 households**—about **14% of the city’s entire rental stock**—rent apartments located inside **1- and 2-family homes**. Bills that reduce protections for these dwellings directly affect hundreds of thousands of tenants.

**Intros 948 and 1107 would make it easier for homeowners and investors to displace these tenant households** through changes such as:

- Redefining what counts as a *family*
- Making it easier to subdivide homes
- Removing the requirement that a permanent occupant be present during a short-term rental
- Redefining housing as not “exclusively” residential
- Increasing the number of boarders, roomers, or lodgers from **two to four plus unlimited children** (Intro 948)

A particularly concerning change appears in Intro 1107, which would redefine **two-family dwellings** from “**exclusively**” to “**primarily**” residential.

This seemingly small shift could allow a “permanent occupant” to legally short-term rent an entire second unit **without anyone actually living there full-time**, as long as the building remains “primarily” residential.

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<sup>1</sup> <http://insideairbnb.com>

<sup>2</sup> <https://www.nyc.gov/assets/hpd/downloads/pdfs/about/2023-nychvs-selected-initial-findings.pdf>

This is not theoretical—**Airbnb's own lawyers argued precisely this loophole in court** when challenging Local Law 18.

Another affected population is the city's **224,000** (224,364<sup>3</sup>) **roommates**, who rely on shared housing. Making it easier to convert these spaces to tourist rentals directly reduces affordable housing options for roommates who are often seniors, young people, and lower-income New Yorkers.

These bills also appear designed to **obscure their true scope**.

Their titles reference "**1- and 2-family dwellings**," yet the bills propose changes that reach into **multiple-dwelling definitions and apartment buildings**, affecting **all 3.4 million housing units citywide**, including **2.3 million rental units**.

And we cannot ignore the elephant in the room: **Airbnb**, a corporation valued at roughly **\$70 billion**.

Airbnb has **funded host groups testifying today** and has made contributions to nearly **every sponsor** of these bills (8 of 9 sponsors on Intro 948, and all 7 sponsors on Intro 1107<sup>4</sup>).

This level of corporate intervention raises serious concerns that these bills are advancing within an environment shaped by **financial influence rather than community needs or sound policymaking**. It underscores the importance of careful scrutiny by this Committee.

**For these reasons, I urge the Committee to reject Intros 948 and 1107. These bills are anti-housing, anti-tenant, and would worsen the city's housing crisis.**

Included in my written testimony are references, footnotes and further details.

Thank you.

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<sup>3</sup> U.S. Census Bureau. 2023 American Community Survey Public Use Microdata Sample (PUMS): 1-year person file. Variables used: HHT, RELSHIP, PUMA, PWGTP, STATE.

<sup>4</sup> Intro 948: 8 out of 9 sponsors received Airbnb independent expenditure support in 2025 election: Narcisse (\$270k), Louis (\$111k), Banks (\$27k), Riley (\$298k), Feliz (\$74k), Stevens (\$182k), Brooks-Powers (\$91k) and Salamanca (\$163k).

Intro 1107: 7 out of 7 sponsors received Airbnb independent expenditure support in 2025 election: Louis (\$111k), Narcisse (\$270k), Riley (\$298k), Brooks-Powers (\$91k), Salamanca (\$163k), Feliz (\$74k) and Stevens (\$182k).

New York City Campaign Finance Board, 2025 Independent Spender Profile "Affordable New York", Airbnb's PAC retrieved November 19, 2025.

[https://www.nycclf.info/vsapps/IndependentSpenderSummary.aspx?spender\\_id=Z194&as\\_election\\_cycle=2025&cand\\_name=Affordable%20New%20York](https://www.nycclf.info/vsapps/IndependentSpenderSummary.aspx?spender_id=Z194&as_election_cycle=2025&cand_name=Affordable%20New%20York)

November 19, 2025

## Short-Term Rentals and Homeowners Insurance

This report looks at the implications of operating short-term rentals in a residential dwelling. Regular homeowners insurance typically does not cover losses from commercial activities. This includes short-term rentals in single-unit, two-unit, or multi-unit residential properties. If the owner or owners of short-term rentals do not contact their homeowners insurer — and, for multi-unit buildings, the master policy insurer — they may face serious consequences. These can include denied claims for rental-related incidents, reduced or limited liability coverage, higher deductibles, exclusions for certain perils, or even policy cancellation or non-renewal.

Homeowners insurance policies use *short-term rentals* to encompass a wide range of commercial uses of residential dwellings. Different homeowners and master policies may use, for example, terms such as *bed-and-breakfasts*, *inn*, *tourist home*, or *rooming house*. The use of any of these terms qualifies as short-term rentals under homeowners and other types of residential insurance and carry the same implications discussed throughout this report.

The information in this report is for general educational purposes only and is not intended to serve as insurance advice. Coverage needs vary widely, and individual circumstances may require different solutions. Please consult your insurance professional to obtain guidance tailored to your specific situation.

### Short-Term Rentals Insurance Impact: Who and How

Operating short-term rentals in residential units impacts the rental owner(s) and their neighbor(s)' homeowners insurance. For two-unit or multi-unit dwellings, operating short-term rentals impacts the owner(s) and their neighbor(s) shared master insurance policy covering common spaces and shared structures such as roofs, stairwells, elevators, halls, and entrances. This typically leads to higher insurance premiums, complexity, and costs for all involved.

#### Specifically:

- Operating short-term rentals in a residential dwelling impacts the rental owner(s)'s homeowners insurance. The owner(s) must review their existing policy and comply with its terms, conditions, and exclusions to ensure continued coverage. Also, the owner(s) must purchase additional insurance coverage to cover the commercial risks of short-term rentals.
- For two and multi-unit residential dwellings, short-term rentals impact the entire dwelling's master policy covering common spaces and shared structures. All unit owners must comply with the master policy terms, conditions, and exclusions. They must also collectively purchase

additional insurance to cover the commercial risks of operating short-term rental(s) in the dwelling.

- Increased commercial activity, including short-term rentals, in single or multi-unit dwellings and in areas deemed residential, can impact the costs, policy terms, conditions, and exclusions of homeowners, renters, condo, and master policy insurance. Personal and commercial insurance lines carry different types of exposures, with commercial insurance policies typically covering a wider range of exposures with higher corresponding premium and costs.

## Short-Term Rentals: Homeowners Insurance Exclusions

Standard homeowners insurance policies have terms, conditions, and exclusions that modify, and at times limit or even void, existing homeowners or master policy insurance due to commercial use of residential dwellings including short-term rentals. This includes but is not limited to coverage changes that modify and at times limit or even void protection against the following losses:

- Dwelling structure physical loss or damage
- Dwelling content loss or damage including theft
- Dwelling loss of use
- Liability

Homeowners and master policy insurance requires compliance with all local, state, and other applicable laws including permit requirements, zoning restrictions, and operational restrictions. Failure to do so may restrict or even void existing coverages, leaving the short-term rental owner(s) and, in multi-unit dwellings the owner(s) of the other unit(s) in the dwelling, potentially underinsured or uninsured.

## Short-Term Rentals: Homeowners Insurance Requirements

Homeowners planning to operate short-term rentals must follow the steps below to maintain existing coverage and adequately protect themselves against the commercial risks of their short-term rental(s). Not doing may result in serious consequences, including loss of coverage or restrictions under the owner(s)' existing homeowners insurance and, for multi-unit residential dwellings, coverage loss or restrictions under the master policy owned by all unit owners.

*Before starting operations, short-term rental owner(s) must:*

- **Step 1: Notify Current Homeowners Insurance Carrier**

The short-term rental owner(s) must notify their existing homeowners insurance carrier, broker, or agent that they are planning to use their unit for the purpose of short-term rentals. In some cases, this includes getting the carrier's explicit authorization through policy endorsement and paying

additional premium. For multi-unit residential dwellings, the owner(s) must also notify, directly or through their unit association, the master policy insurance carrier.

- **Step 2: Comply With Current Homeowners Policy**

Once they have notified the insurance carriers involved, the short-term rental owner(s) must also comply with the existing insurance terms, conditions, and exclusions pertaining to short-term rentals in their homeowners policy and, for multi-unit dwellings, in the master policy. This includes but is not limited to coverage requirements that may restrict the use of the unit for short-term rentals by:

- Limiting the number of days or nights per year used for short-term rentals
- Limiting the number of guests per short-term rental
- Restricting share of apartment used for short-term-rentals
- Requirements for owner(s)' to remain in dwelling during short-term rentals

- **Step 3: Purchase Commercial Insurance**

Homeowner(s) planning to operate short-term rentals must purchase additional insurance coverage to protect themselves against the commercial risks and losses specific to their short-term rentals. For multi-unit residential dwellings, all unit owners in the dwelling must also collectively purchase commercial insurance. This can be done, for example, through:

- Personal homeowners insurance policy endorsements
- Commercial property insurance
- Small business insurance
- Short-term rentals specialty insurance

## Differences Between Personal and Commercial Insurance

Homeowners insurance is primarily about protecting a residential dwelling and its contents for perils such as fire, theft, wind, and the liability of someone getting hurt in or around the property. Because of that, homeowners, renters, co-op, condo, and master residential policies do not cover the full range of risks associated with operating a business, including the commercial risks associated with short-term rentals. The key cost drivers for homeowners insurance include the dwelling coverage limit (i.e. rebuilding costs), policy deductibles (how much loss exposure is retained by the dwelling owners), the dwelling's construction quality and condition, the dwelling location (and related factors such as weather, crime, and construction costs), and claims history.

The risks of running a business, including short-term rentals, can come from a wider range of causes than those typically covered by residential homeowners, renters, condo, and master policy insurance – for example more severe and frequent liability risk. Commercial multiperil insurance, including business

owner policies (BOPs), are designed to protect business owners against the risks of operating businesses such as short-term rentals. Commercial insurance generally bundles protection against property loss and the liability exposures tied to business operations. It often also includes protection against business interruption, possibly crime, equipment breakdown, and other policy-specific coverages.

## Summary: Questions Answered in this Report:

- *Why does standard homeowners insurance often exclude coverage for short-term rentals?*  
Regular homeowners insurance treats short-term rentals as commercial activity, which is not covered under typical residential policies and may result in claim denials, limited liability, higher deductibles, or policy cancellation if not properly disclosed and insured.
- *What steps must homeowners take before operating a short-term rental to maintain insurance coverage?*  
Homeowners must notify their insurance carrier, comply with policy terms, and purchase commercial insurance to ensure they are protected against both residential and commercial risks associated with short-term rentals.
- *How do short-term rentals affect insurance policies in multi-unit residential dwellings?*  
Short-term rentals in multi-unit dwellings impact not only the owner's individual coverage but also the shared master policy, requiring notification of all carriers and collective purchase of commercial insurance by all affected unit owners to maintain protection.
- *What types of coverage may be limited or voided due to commercial use like short-term rentals?*  
Homeowners policies may exclude or limit coverage for dwelling physical loss, contents theft or damage, loss of use, and liability, with implications for losses before, during, and after rental periods.
- *How do personal and commercial insurance differ in covering risks related to short-term rentals?*  
Personal homeowners insurance covers typical residential perils, but not the broader and more frequent risks from commercial activities; commercial insurance policies, such as business owner policies, are designed to address these expanded exposures.

*The report was prepared by the Insurance Information Institute (the “Triple-I”). The Triple-I is an industry-supported, non-partisan and non-lobbying research and education organizations. For more information about this report or the Triple-I visit [www.iii.org](http://www.iii.org). The Insurance Information Institute reserves the right to change, improve or correct the information, materials, and descriptions in this report. The information contained herein is the work of Triple-I analysts and contains information from third party sources. Triple-I gives no guarantees, undertakings, or warranties concerning the accuracy, completeness, validity, or timeliness of the information provided. Independent confirmation of the accuracy of the information contained herein is recommended. Any dated information is published as of its date only. © 2025 The Insurance Information Institute*





**From:** [Anthony Fotiadis](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Intro. 1456-2025  
**Date:** Monday, November 17, 2025 4:25:50 PM

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To the Chair and Members, of the Committee on Housing & Buildings,

As the President/Business manager of International Association of Sheet Metal, Air, Rail and Transportation Workers Local union 137 our Local represents highly skilled sign-manufacturing and installation workers in New York and New Jersey. We support the intent of Intro. 1456-2025 to promote education and offer a moratorium on penalties for non-hazardous awning/accessory-sign violations.

### **Key Recommendations**

1. We ask the moratorium be extended **only if** accompanied by active tracking of how many small businesses engage in correcting signage/awning issues — not simply receive outreach.
2. We urge that any replacement, repair, or new installation of awnings/accessory signs must be performed by a company **licensed by the New York City Department of Buildings as a sign-hanger**. This helps ensure installations meet code, structural standards and protect the public.
3. We stress the critical importance of public safety — pedestrians walk under these awnings and accessory signs every day. The moratorium must **not** give cover to unsafe conditions.
4. We recommend the moratorium include a clear timeframe (e.g., 12-18 months) during which outreach, inspection and remediation occur — after which standard enforcement resumes. In addition, we remind the committee that the small business owners have had since 2019 to resolve these issues and moratorium shouldn't be used as a method to avoid the fines and much needed safety correction to this awnings/ accessory signage to ensure the public is safe walking underneath the signage.

### **Conclusion**

In supporting this bill's goal of helping small businesses comply, we reiterate our strong conviction that the safety of the public and the structural integrity of signage installations/ Manufacturing must remain a priority. With the tracking, licensing requirement and defined timeline outlined above, we believe Intro. 1456-2025 can achieve the right balance of business support and safety safeguards.

Thank you for the opportunity to submit this testimony. We are available for questions or further input as the Committee moves forward.

Respectfully submitted,  
Anthony Fotiadis  
President/Business Manager  
International Association of Sheet Metal, Air, Rail and Transportation Workers  
Local 137  
50-02 5<sup>th</sup> Street, Suite A  
Long Island City, New York 11101  
Office: (718) 937-4514 Cell: [REDACTED]  
Email: [Anthony@local137.com](mailto:Anthony@local137.com)



November 20, 2025

Good afternoon, members and staff of the City Council Committee on Housing and Buildings, my name is Dottie Mazarella. I am the Vice President of Government Relations for the International Code Council (ICC). The ICC is a member-focused association dedicated to helping the building community provide safe, resilient, and sustainable construction through the development and use of model codes (I-Codes) and standards used in the design, construction, and compliance processes. Most U.S. states and communities, including New York City, federal agencies, and many global markets choose the I-Codes to set the standards for regulating construction, plumbing and sanitation, fire prevention, and energy conservation in the built environment.

I appreciate the opportunity to submit testimony in support of Int. 1321 sponsored by Council Member Sanchez which would amend the administrative code of the city of New York, in relation to the enactment of the existing building code, and to repeal chapter 1 of title 27 of such code comprising the 1968 building code.

As you are aware, the current NYC Construction Codes are based on the International Building, Plumbing, Mechanical, Fuel Gas and Energy Conservation Codes. Int. 1321, the NYC Existing Building Code, is based on the International Existing Building Code (IEBC). The IEBC was first released as an International Code (I-Code) in 2003. The IEBC was originally based on 4 documents: Uniform Code for Building Conservation, NJ Rehab Code, Nationally Applicable Recommended Rehab Provisions (NARRP) and IBC Chapter 34. The IEBC is adopted and enforced in 45 states and 3 U.S. Territories.

The primary advantage of the IEBC as well as the NYC Existing Building Code is to encourage the preservation and reuse of existing buildings through flexible compliance paths which are more cost effective than complying with all requirements found in new construction standards, which will ultimately result in safer buildings.

When NYC first adopted the I-Codes in 2008 as the basis for the NYC Construction Codes, the goal was to also adopt existing building provisions however it was decided to postpone that effort for a future adoption cycle. Accordingly, in 2016, the effort was revived with the creation of a team to focus on this effort. Transparency was a critical component and therefore sought opinions from all interested disciplines. Int. 1231 is the result of

incorporating key code provisions of the IEBC along with NYC's unique requirements and infrastructure.

Several training classes with hundreds of attendees have already been conducted by the Department of Buildings and many more are being scheduled. We cannot stop the momentum of implementing an enforceable, usable existing building code for the City of New York. The International Code Council is honored to partner with the City of New York on this critical code adoption.

Thank you for the opportunity to present testimony in support of Int. 1321, I hope the City Council will pass this bill swiftly.

Sincerely,

Dorothy Mazzarella  
Vice President, Government Relations  
International Code Council  
[dmazzarella@iccsafe.org](mailto:dmazzarella@iccsafe.org)



## WRITTEN COMMENTS TO NEW YORK CITY COUNCIL, COMMITTEE ON HOUSING AND BUILDINGS REGARDING INT. NO. 1217-2025

Hearing Held November 20, 2025

Submitted by Legal Services NYC  
By Jeremiah Schlotman, Director of Litigation - Housing

Legal Services NYC (“LSNYC”) is the largest civil legal services provider in the nation, providing legal representation to tens of thousands of lower-income New Yorkers every year across numerous practice areas. Our robust housing practice litigates on behalf of tenants throughout the five boroughs in a variety of courts and agencies, in both defensive and affirmative actions, continually pushing creative strategies to maximize tenant protections.

In representing lower-income New York tenants, our clients and attorneys frequently interface and depend on agency action to successfully resolve our client’s housing matters, at the center of which you will frequently find issues with repairs and the habitability of our clients’ homes. LSNYC’s perspective working daily in housing litigation on behalf of tenants in both judicial and administrative forums constantly unearths the potential of litigation strategies. However, it also highlights the areas in which there are gaps in the law exploited by unscrupulous landlords and where protections exist in form much more than substance.

Introduction No. 1217-2025 to amend Administrative Code of New York City in relation to building inspections and reporting following complaints related to rats and other pests will likely have a positive and important impact for the communities LSNYC serves as well as for tenants and their families throughout New York City.

Whether viewed through the lens of human rights or fiscal sense, the diligent enforcement of habitability standards and health and safety regulations benefits all New

### **Demand Justice.**

# LEGAL SERVICES NYC

Yorkers by producing better outcomes across the board (i.e., safe and habitable homes make for physically and mentally healthier families, which stability at home, which increases ability to maintain productive employment, which in turn increases children's probability of success in education, which increases career prospects, increasing contributions to society, increasing safety of communities, and so forth).

At LSNYC, we see one case after another in various types of housing where our clients live with hazardous and dangerous conditions, some of them longstanding or recurring and including many cases when rent is being paid. Just as stable and healthy housing is the linchpin of an equitable society, the deprivation of it is the domino that can set off a chain of detrimental consequences for a person and their family that, in turn, creates negative outcomes for society. While the profoundly serious problem of homelessness is increasingly getting the attention it deserves, at LSNYC, we see how housing issues short of that can also have very negative impacts. Our attorneys have represented numerous tenants where – to name but one scenario – persistent rat and mold infestations continue for months or even years despite tenant complaints to the landlord, the placement of housing code violations, medical reports linking the unabated infestations to worsening medical conditions, the landlord's knowledge of these realities, and the tenant's solid rent payment history.

Of course, there are numerous landlords who comply with their obligations to provide habitable housing and correct conditions; however, Int. No. 1217-2025 will increase needed code enforcement against those that do not. This bill could also potentially create increased access to the Department of Health's Healthy Neighborhoods Program, which has produced some very positive outcomes for LSNYC clients. As long as the Council ensures proper levels of funding, staffing, and training to ensure robust enforcement, Int. No. 1217-2025 has the potential to create highly positive outcomes in such a central area to LSNYC's client's (and New Yorkers' generally) health, safety, and success.

## Demand Justice.

**Legal Services NYC** | 40 Worth Street, Suite 606, New York, NY 10013  
Phone: 646-442-3600 | Fax: 646-442-3601 | [www.LegalServicesNYC.org](http://www.LegalServicesNYC.org)  
**Shervon M Small**, Executive Director | **Liza M. Velazquez**, Board Chair

**LSC** | America's Partner  
for Equal Justice  
LEGAL SERVICES CORPORATION



November 19, 2025

**Regarding Proposed Int. No. 948-A**

Chair, Members of the Council, and distinguished staff, thank you for the opportunity to submit testimony on behalf of LISC New York. As a non-profit organization dedicated to advancing economic opportunity and supporting development that strengthens communities across New York, we appreciate the Council's attention to policies that can help New Yorkers remain securely housed, especially those in marginalized communities where the risk of displacement remains high.

We offer our support for the proposed amendments, Proposed Int. No. 948-A, to the City's short-term rental law because they represent a meaningful step toward giving homeowners more tools to sustain their households in the face of rising costs. For many families, these changes can provide a safe and practical means to generate supplemental income that can help them stay in their homes, maintain their properties, and provide stability to their community.

The need for these tools is clear. New York State ranks among the lowest in the nation in overall homeownership, and homeowners from unrealized communities face even greater obstacles due to decades of hindered access to lending, rising housing expenses that strain household budgets, and limited access to intergenerational wealth, a [report](#) from the New York Attorney General's Office found.

That is why the proposed changes are so consequential. Allowing up to four boarders, not including minors, in a registered one- or two-family home provides homeowners with the ability to generate meaningful income to offset rising maintenance costs and insurance premiums, the soaring cost of which has [a growing number](#) of homeowners going without home insurance entirely, putting their investments and housing at risk. According to a 2023 [survey](#) from the Insurance Information Institute, 12% of Americans no longer have homeowner insurance, up from 5% in 2019. That happened as property insurance costs surged nationally by 70% over the last five years, a [study](#) released in September by ICE Mortgage Technology found.

In New York specifically, a recent analysis from LISC NY, Enterprise, and the National Equity Fund shows that operating expenses for affordable housing have surged nearly 40% since 2017. Insurance costs have risen by more than 110%, administrative costs by over 50%, and repairs and maintenance by 35%.

For many working- and middle-class families, this supplemental earning ability can be the difference between preserving a home and being forced to sell it.

The proposal to permit homeowners to host guests without being physically present also reflects the realities of today's economy. Many homeowners work non-traditional hours, hold multiple jobs, travel for caregiving responsibilities, or split time between households. Under the current system, these families may be unable to participate in short-term rental activity at all, even when doing so could provide critical financial stability. Allowing homeowners greater flexibility while still



maintaining accountability through registration acknowledges these real-world circumstances and supports their ability to remain in their homes.

We also support the proposed modernization of the “common household” or “unlocked doors” requirement. Requiring homeowners to provide reasonable access for guests, without forcing homeowners to open private bedrooms, offices, or similar personal spaces, strikes an important balance between the safety and usability of the space for guests and the privacy and security needs of permanent occupants. Clear, practical standards help homeowners operate within the law while reducing confusion and risk, which is essential for encouraging participation and preventing informal or unsafe arrangements.

LISC New York believes strongly that homeownership is a cornerstone of community resilience. Policies that help existing homeowners remain in their homes – particularly in communities where there have long been barriers to home ownership – play a critical role in stabilizing neighborhoods, preserving social networks, and expanding long-term economic opportunities. The proposed amendments to the short-term rental law align with these goals by providing homeowners with additional avenues to strengthen their financial position without compromising safety or neighborhood integrity.

We thank the Council for its leadership on this issue and for the opportunity to provide testimony. We look forward to working collaboratively to ensure that homeowners across New York City have the tools they need to stay in their homes and build generational wealth while providing a strong foundation to their communities.

Respectfully,

A handwritten signature in black ink, appearing to read "Valerie White", with a large, stylized initial "V".

Valerie White  
Senior Executive Director  
LISC NY

**MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**  
**11/17/2025**  
**Make the Road New York**



***Make the Road New York is the largest community based membership organization representing immigrants and working-class people of color in New York with over 28,000 members across the state.*** We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.

For more information please contact:  
**Jennifer Hernandez, Director of Campaigns**  
[Jennifer.Hernandez@maketheroadny.org](mailto:Jennifer.Hernandez@maketheroadny.org)



November 20, 2025

Int. No. 1321- Councilmember Sanchez (by request of the Mayor)

A Local Law to amend the administrative code of the city of New York, in relation to the enactment of the existing building code, and to repeal chapter 1 of title 27 of such code comprising the 1968 building code

Int. No. 1422 - By Council Members Sanchez and Louis (by request of the Mayor)

A Local Law to amend the administrative code of the city of New York and the New York city construction codes, in relation to conforming provisions of such codes with provisions of the New York city existing building code and electrical and elevator inspections; and repealing sections 28-120.1.1, 28-120.1.2, 28-120.1.3, 28-120.2, 28-120.3, 28-316.1 of the administrative code of the city of New York; sections 102.6, 106.10, 901.9.1, 901.9.1.1, 901.9.2, 901.9.3, 901.9.4, 901.9.4.1, 901.9.4.2, 901.9.4.3, 901.9.5, 901.9.5.1, 901.9.5.3, 901.9.5.4, 901.9.6, 1101.3.1, 1101.3.2, 1101.3.3, 1101.3.4, 1101.3.5, 1101.3.5.1, 1101.3.5.2, 1101.4, 1601.2.1, 1601.2.2, 1601.2.3, 1601.2.4, 3001.11.1, 3303.10.3, D102, D103, D104, and D105 of the New York city building code; sections 102.2.1, 102.4.2.1, 102.4.2.2, 102.4.2.3, and 102.4.2.4 of the New York city fuel gas code; sections 102.4.2.1, 102.4.2.2, 102.4.2.3, 102.4.2.4, 102.4.2.5, 102.4.2.6, 1305.9.13 and 1305.16.1 of the New York city mechanical code; and sections 102.2.1, 102.2.2, 102.4.2.1, 102.4.2.2, 102.4.2.3, 601.3, 601.5 and 701.2.5 of the New York city plumbing code, relating to conforming provisions of such codes with provisions of the New York city existing building code

My name is Melissa Barbour, and I am the Assistant Director of the Mechanical Contractors Association of New York. Founded in 1885, we are committed to advancing the interests of the heating, air conditioning, piping, refrigeration, and fire sprinkler industry. We promote the competence, cost-effectiveness, and productivity of union construction and service, through training, education, and labor relations. Our membership consists of contractors employing Steamfitters Local 638 union labor as well as affiliate members who supply goods and services within our industry. Our contractors are responsible for the installation, inspection, testing, maintenance, and repair of heating, ventilation, air conditioning and refrigeration (HVACR) systems and fire sprinkler systems in tens of thousands of high-density residential, commercial, and industrial buildings, including hospitals, universities, power plants and water treatment facilities.

Our Association, both directly and through our members, has actively participated in the 2008, 2014, and 2023 Building Code Revision cycles, as well as in the development of the Existing Building Code and the Waterfront Code. I am thankful to have had the opportunity to serve on the Administrative and Enforcement Code Committee for the Existing Building Code Revision Committee with the NYC Department of Buildings (DOB). The Code Revision Committees are composed of highly respected experts who collectively volunteer thousands of hours for this process. The Department of Buildings team made sure that stakeholder and committee input was thoroughly addressed and considered.

We support the passage of Introductions 1321 and 1422. The Existing Building Code will establish clear, uniform standards for the repair, alteration, addition, maintenance, and change of occupancy of existing buildings, ensuring they remain safe, functional, and code compliant. Thank you.

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NATIONAL ELEVATOR INDUSTRY, INC.

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SETTING STANDARDS IN MOTION

**National Elevator Industry, Inc.**

**Statement for the Record**

**Hearing on Int 1422-2025**

**Concerning construction codes, in relation to conforming provisions of such codes with provisions of the existing building code and electrical and elevator inspections of the city of New York in Relation Thereto**

**Submitted to**

**New York City Council**

**Committee on Housing and Buildings**

**New York, New York**

**November 20, 2025**

Chairperson Sanchez and members of the Committee on Housing and Buildings, I am Savannah Clarkston, Director of Government Affairs for the National Elevator Industry, Inc. (NEII). NEII is the leading trade association for companies that manufacture, install, and maintain elevators, escalators, moving walkways, and other building transportation products. NEII members collectively represent over eighty-five percent of the work hours in the building transportation industry. NEII welcomes the opportunity to comment on Int 1422-2025 concerning the construction codes of the city of New York, in relation to conforming provisions of such codes with provisions of the existing building code and electrical and elevator inspections.

The building transportation industry identified an administrative issue concerning repair procedures following periodic inspections and engaged in substantive discussions with the Department of Buildings to develop an appropriate resolution. The resulting amendment to §28-304.6.6.2 included in Int 1422-2025 establishes the allowance of a single forty-five-day extension request to complete repairs for defects identified during periodic inspections. NEII appreciates the collaboration of the Department of Buildings in working with the industry to develop an agreeable and reasonable proposal to the challenges that result from the current code.

The proposed extension request provides a practical and necessary mechanism to address repairs that often require extended timelines following periodic inspections. Such repairs identified by NEII member companies, may include, but are not limited to, hoist cable replacements, elevator communication systems, hydraulic system repairs, and escalator handrail replacements. These repairs are frequently delayed due to factors beyond the immediate control of the elevator contractor, including any necessary coordination with third-party contractors, the limited availability of specialized labor, and extended material lead times resulting from supply chain constraints. In many instances, repair work may already be scheduled or in progress but cannot be completed within the current limitations of the prescribed timeline.

Allowing for such extension requests enables the industry to more effectively plan and execute necessary repairs identified during periodic inspections, ensuring that the work is completed thoroughly and safely. This approach ultimately supports more consistent compliance outcomes and enhances safety and reliability for both the companies performing the work and the riding public.

Additionally, the building transportation industry relies upon effective codes and standards throughout the regulation of the built environment that reflect the latest technical innovation and safety standards. Int 1321-2025 supports the on-going efforts of the city of New York to continue modernizing its Existing Building Code to better address emerging regulatory matters and improved technologies and trade practices. Regular updates to codes and standards directly enhance safety for both the riding public and the industry workforce. NEII supports the adoption of Int 1321-2025, along with its companion bill, Int 1422-2025.

NEII remains ready to serve as a resource to the department and Council through monitoring any change enacted impacting the elevator industry for effectiveness. The industry appreciates the leadership of Chairperson Sanchez in introducing Int 1422-2025 and Int 1321-2025 and urges the Committee to report the legislation positively to the City Council. NEII staff and member companies are available to provide any additional information as needed.

Submitted by: Savannah Clarkston  
Director Government Affairs  
National Elevator Industry, Inc.  
[sclarkston@neii.org](mailto:sclarkston@neii.org)

The New York Apartment Association (NYAA) is a housing advocacy organization dedicated to improving the quality and affordability of housing through policy changes that benefit both renters and their housing providers. We represent the property owners and managers who provide the vast majority of unsubsidized affordable housing in New York City.

NYAA generally supports Int. 1321 and its companion bill, Int. 1422, which would establish a new, comprehensive Existing Building Code (EBC) that would apply to the alteration, repair and maintenance of existing buildings. This would create a clearer framework and simplified guidelines for existing-building work that was previously governed by multiple prior building codes and other technical codes.

We, however, remain concerned with how the EBC defines “ordinary plumbing work.” As drafted, the definition is overly broad and would require that even routine, low-risk tasks such as the simple replacement of a kitchen stove and other basic kitchen appliances be performed by a licensed master plumber instead of a building super or other trained technician. This far exceeds the level of expertise needed to ensure safety and would result in significant, avoidable delays and quality of life issues for tenants and homeowners who need to replace an existing kitchen appliance. These types of appliance replacements are common and have routinely been performed without issue by building staff and appliance technicians for decades.

When the Council adopted Local Law 142 of 2025 (Intro. 429-A), it recognized the additional burdens placed on tenants and homeowners for kitchen appliance replacements under the bill. We therefore recommend that Int. 1321 (and accompanying language in Int. 1422) be modified to address the overreach of requiring licensed master plumbers for simple kitchen appliance replacements. When the existing shut-off valve is in good working order, the replacement of these appliances is more like an “ordinary repair” in the normal course of property maintenance than “plumbing work” under the code. The EBC should allow such replacements to be performed by a building superintendent or other technician with certain experience or qualifications, or after undergoing training by the department for proper appliance replacement protocols. Limiting the performance of kitchen appliance replacements solely to licensed plumbers makes it cost prohibitive for housing providers to keep appliances up to date and tenants happy, and also impacts coops and condos, as well as one- and two-family homeowners. Reporting requirements could also be added for building superintendents and other appliance technicians to notify DOB when they perform these fairly routine appliance installations. These changes would reduce housing costs, accelerate repairs, and ensure that a high quality of life can be maintained for residents without compromising public safety.

November 20, 2025

**Comments of the New York City Hospitality Alliance to the New York City Council Committee on Housing and Buildings regarding [Int. 1217](#) – A Local Law to amend the administrative code of the City of New York, in relation to building inspections and reporting following complaints related to rats and other pests**

The New York City Hospitality Alliance is a not-for-profit association representing thousands of restaurants, bars, and nightclubs across the five boroughs.

We appreciate the opportunity to submit comments on Int. 1217. While we fully support the City's efforts to reduce rats, mice, and other pests, we must express our concerns and opposition to the bill as currently drafted. Requiring the Department of Health and Mental Hygiene (DOHMH) to perform a building inspection within 10 days of any 311 complaint related to pests or conditions that may attract them will unintentionally harm small businesses and further strain an already overburdened agency—one that is currently struggling to complete many required restaurant reinspections on time. These delays negatively affect small businesses, workers, and consumers.

First, 311 is often misused by individuals who file repeated, unfounded complaints against small businesses. These bogus complaints already result in unnecessary inspections, waste valuable City resources, and effectively serve as a form of harassment of small businesses. The City Council should consider legislation to penalize knowingly false or malicious 311 complaints, similar to the penalties for filing false 911 reports. Any advancement of Int. 1217 should include provisions that deter and penalize frivolous or abusive complaint filings.

Second, under the City's restaurant letter grading system, restaurants that receive a "B" grade must be re-inspected within five to seven months, and those receiving a "C" grade must be re-inspected within three to five months. Because a "B" or "C" grade can significantly impact a business's reputation, customer traffic, and employees' incomes, timely reinspections are essential to give food service establishments a fair opportunity to earn an "A" grade.

However, many restaurants are not receiving their reinspections within the required timeframes. As a result, establishments are being forced to display "B" or "C" grades for longer than the rules state, causing unnecessary reputational and financial harm.

DOHMH is clearly already backlogged. Imposing a new mandate requiring the agency to inspect every location involved in a pest-related 311 complaint within 10 days will divert even more resources away from critical inspection and reinspection responsibilities. This will only worsen existing delays—at the direct expense of small businesses, food safety, and workers.

We fully agree that mitigating and eliminating pests is essential, and we support efforts to ensure an efficient and responsive inspection system. However, the requirements outlined in Int. 1217 would create additional burdens without meaningfully addressing the core issues, and could generate new, unintended problems.

For these reasons, we respectfully oppose the bill as currently drafted. We are, however, eager and willing to work collaboratively with the sponsors of Int. 1217, supporters, and DOHMH to explore more effective approaches to addressing pest-related concerns without harming small businesses or overextending City resources.

Thank you for consideration of our comments. If you have questions, please contact our executive director Andrew Rigie at 212-582-2506 or [arigie@thenycalliance.org](mailto:arigie@thenycalliance.org).





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TESTIMONY TO CITY COUNCIL HOUSING AND BUILDINGS COMMITTEE NOVEMBER 20,  
2025 ON INTRO 948-A // JAMIE SMARR, PRESIDENT AND CEO, NYC HOUSING  
PARTNERSHIP

Good morning, Chair Perez and Council Members, I am Jamie Smarr, President and CEO of the New York City Housing Partnership, a not for profit founded by Mayor Ed Koch and David Rockefeller in 1983 to advance the creation of middle-class housing opportunities in the five boroughs.

In the last four decades the Housing Partnership is proud to have created more than 40,000 Partnership Homes in every borough of the city, which have overwhelmingly helped Black and Latino New Yorkers become first-time homeowners and build wealth and anchors for their families via their home equity. The Housing Partnership knows that middle-class housing works. Middle class housing forms the backbone of New York's prosperity, cultural growth and continued economic success.

Therefore, I am happy to appear on behalf of middle-class New Yorkers, regular people, common sense folks, who simply wish to remain in their homes and properly maintain them during this present severe housing affordability crisis, a crisis that has produced the lowest housing vacancy rate in the city's history, and driven housing costs through the roof.

This morning I must sound the alarm on behalf of middle-class New Yorkers who are being crushed by a tsunami of inflation, sanitation and composting fines, MTA fares, parking violations, user fees, water and Con Ed bills, unexpected assessments and city taxation that have not been looked at in any comprehensive way, as they choke the life out of many of the city's neighborhoods. To try to survive this genuine deluge and remain in their homes instead of leaving the city, some New Yorkers look forward to using their homes host short-term rentals with the responsible guard rails that Intro 948-A, sponsored by Councilwoman Narcisse, has established. Intro 948-A is common sense, welcome legislation.

These homeowners are not looking for a handout from the city. They simply want a workable short-term rental regulatory framework from the City Council and the Mayor that will allow them to remain in the homes they purchased with their genuine sweat and effort. They deserve a government that continues to stand behind middle-class New Yorkers and supports their dreams of responsible homeownership and wealth building. These are things that have been promised to not just New Yorkers, but to every American citizen.

Thank you for your time.



NEW YORK HOMEOWNERS ALLIANCE CORP.

[www.nyhomealliance.org](http://www.nyhomealliance.org)

Email: [tlindsay@nyhomealliance.org](mailto:tlindsay@nyhomealliance.org)

## **INTRO 948-A PRESS PACKET**

Prepared by New York Homeowners Alliance Corp. (NYHOA)

Contact: Tony Lindsay, President [REDACTED]

### **PRESS BRIEF: WHAT INTRO 948-A DOES**

- Applies only to natural persons in their primary residence.
- Aligns city code with existing state allowance of up to four boarders.
- Allows homeowners to secure private rooms while shared areas remain accessible.
- Maintains all fire, building, and safety codes.

### **WHAT INTRO 948-A DOES NOT DO**

- Does not legalize commercial STRs.
- Does not apply to tenants or multi-unit buildings.
- Does not benefit LLCs or corporate operators.
- Does not modify tenant protections or rent laws.

### **MISUSE OF 'HOUSING STOCK' ARGUMENT**

Private dwellings can be used as rentals by choice, but they are not part of the City's regulated long-term rental housing stock under the MDL.

Opposition groups falsely conflate these categories to mislead the public.

### **SPECULATOR & PRESENCE REQUIREMENT MISINFORMATION**

Filing false primary residence is fraud. This risk already exists under LL18.

948-A does not create new exposure for speculation; nor do investors target one- and two-family homes for commercial STRs.



NEW YORK HOMEOWNERS ALLIANCE CORP.

[www.nyhomealliance.org](http://www.nyhomealliance.org)

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### **SAFETY & DOOR-SECURING CLARIFICATION**

948-A does not modify fire, DOB, or egress code. Only private bedrooms or offices may be secured.

Shared/common areas remain accessible, including bathrooms, hallways, kitchens, and exits.

### **NUISANCE COMPLAINT CLARIFICATION**

The City has never disclosed how many complaints originated from ShareBetter/HTC-funded investigators.

No evidence shows homeowner STRs pose nuisance risks, especially since 948-A applies only to primary residences where owners live.

### **SELECTIVE ENFORCEMENT UNDER LL18**

LL18 disproportionately impacted middle-class, Black, Brown, immigrant, and elderly homeowners,

while leaving luxury Class B operations untouched. This created a two-tier enforcement system.

### **THE REAL DRIVERS OF THE HOUSING CRISIS**

- 50,000 warehoused rent-stabilized units.
- Luxury conversions removing multi-family housing.
- Anti-development regulations.
- Legal Class B luxury STRs charging thousands per night.

None are connected to homeowner STRs in private dwellings.

### **RACIST HTC AD & RACE MANIPULATION**

HTC previously funded an ad depicting a Black STR guest as a criminal, weaponizing racial fear to build support for LL18.

Their current messaging postures as “pro-equity” while ignoring this history.

### **ECONOMIC FALLACY IN HTC-SPONSORED STUDIES**

Claims that homeowners earning supplemental income harms affordability are baseless.



NEW YORK HOMEOWNERS ALLIANCE CORP.

[www.nyhomealliance.org](http://www.nyhomealliance.org)

Email: [tlindsay@nyhomealliance.org](mailto:tlindsay@nyhomealliance.org)

Private dwelling income has zero impact on rent-setting mechanisms in multi-unit housing stock.

### **QUOTES FOR PRESS**

"Intro 948-A corrects a misapplied law. It is not a loophole—it is a lifeline."

"Small homeowners are not responsible for New York's affordability crisis."

"Opponents rely on misinformation because facts do not support their argument."

### **REPORTER FAQ**

Q: Does 948-A legalize commercial STRs?

A: No. It applies only to primary-residence homeowners.

Q: Does it weaken safety standards?

A: No changes are made to any safety code.

Q: Does it affect tenants or rental housing?

A: No. Private dwellings are not regulated rental housing stock.

Q: Does it create a loophole for absentee hosts?

A: No more than LL18 already does; fraud remains illegal.

# WRITTEN TESTIMONY OF TONY LINDSAY

President, New York Homeowners Alliance Corp.  
Author of Intro 948 / 948-A  
Submitted to the New York City Council  
Committee on Housing & Buildings  
November 2025

My name is Tony Lindsay, President of New York Homeowners Alliance Corp. and the author of Intro 948 / 948-A. This written testimony supplements my oral remarks from the November 20 hearing, where I was allotted only **90 seconds** to respond to well over an hour of falsehoods, contradictions, and misrepresentations presented in opposition.

Intro 948-A is a narrow, targeted correction to the misclassification of primary-residence homeowners in one- and two-family private dwellings—a population devastated by the unintended consequences of Local Law 18. It does **not** deregulate the short-term rental market. It does **not** legalize commercial operators. It does **not** impact tenants in regulated housing. And it does **not** alter the status of any unit classified as a multiple dwelling under the MDL.

What it does is simple:

It restores the rights of natural-person homeowners in private dwellings to use their homes in a manner consistent with **100 years of New York State law**.

Opposition to this bill is not rooted in fact, law, or public interest. As demonstrated at the hearing, it is rooted in misinformation, fear-based narratives, and the economic agenda of the hotel industry, often delivered through organizations that claim to represent tenants while actively undermining the interests of homeowners, renters, and workers alike.

What follows is a comprehensive, factual rebuttal of the claims presented at the hearing.

## SECTION I — Core Falsehoods Presented at the Hearing

Below are the central claims made by HTC, Tenants Not Tourists, Homes Not Hotels, and aligned advocates—followed by corrections grounded in statute, evidence, and real-world outcomes.

### 1. “Intro 948-A changes the definition of ‘family’ and opens STRs citywide.”

This claim is entirely false. Intro 948-A does **not** alter the definition of “family” in any statute. It simply realigns enforcement with MDL §4(8), which defines permanent occupancy and has long distinguished between **private dwellings** and **multiple dwellings**.

Local Law 18 blurred this statutory distinction by applying hotel-style rules to homes never meant to be regulated as hotels. Intro 948-A restores the correct classification and does not authorize STRs in apartments, regulated housing, or multi-unit buildings.

## 2. “948-A will remove thousands of rental units and raise rents.”

There is no evidence—none—that primary-residence STRs in private dwellings have ever diminished long-term rental supply.

Opponents ignored the following realities:

- More than **50,000 rent-stabilized units** remain warehoused.
- Over **7,300 NYCHA apartments** remain vacant.
- After LL18, long-term rental supply **decreased**, not increased.
- After LL18, rents **increased**, not decreased.

If private-home STRs were responsible for New York’s housing crisis, LL18 would have produced at least some measurable improvement—however small—in long-term rental availability.

It did not.

**In fact, we saw the reverse: less supply and higher rents.**

## 3. “Speculators will buy homes and turn them into Airbnbs.”

Speculators are already prohibited by law. Only **natural persons** residing in their **primary residence** may legally host. Corporations, LLCs, and absentee owners remain banned. Fraudulent filings remain enforceable under Title 28.

Intro 948-A changes none of these requirements.

This argument is a fear tactic unsupported by statute or data.

## 4. “948-A is unsafe — overcrowding, unlimited children, fire hazards.”

Intro 948-A does **not** change any safety standards. It does not alter fire codes, egress rules, occupancy limits, smoke/CO detector requirements, or sanitation rules.

Opponents conflated multiple-dwelling regulations with private-home regulations to mislead the public. These claims were unfounded and knowingly misleading.



## 5. “Enforcement will weaken.”

This is false. OSE retains full enforcement authority over:

- illegal conversions,
- non-primary residents,
- fraudulent registrations,
- absentee owners,
- and commercial STR operators.

Intro 948-A simply prevents enforcement from being weaponized against **law-abiding homeowners who reside in their homes**.

## 6. “Quality of life will deteriorate.”

There is no empirical basis for this claim. There is **zero** evidence that primary-residence STRs create systemic issues with noise, trash, harassment, or unsanitary conditions. Those problems overwhelmingly arise from **illegal conversions**, which remain illegal and enforceable.

## 7. “Local Law 18 is working.”

When pressed with direct questions by Council Member Kevin Riley, OSE’s Christian Klossner admitted:

“That wasn’t the primary reason — we only hoped that would happen.”

This contradicts every public justification used to pass LL18.  
It is a direct admission that LL18 failed to achieve its stated purpose.

## SECTION II — Additional Misrepresentations & Troubling Assertions

## 8. “948-A will cost hotel workers their jobs.”

This is economically baseless. Tourism is at record highs. Hotels remain full. Primary-residence STRs in private dwellings do not impact union hotel employment.

Furthermore, an HTC union worker testified—unwittingly—that she opposed 948-A because she believed it would reduce hotel profits and threaten her job. She seemed unaware that many HTC

members are homeowners themselves and that HTC's own internal rules prohibit them from hosting to supplement their income. This is exploitation disguised as advocacy.

## **9. “The Housing Maintenance Code requires the host to remain on-site.” — Tom Cayler**

This statement is entirely false.

The Housing Maintenance Code, MDL, and Administrative Code contain **no such requirement**.

The only reason HTC and OSE insist on a “host presence” requirement is to create a pretext for **warrantless intrusion** into private homes. During the hearing, OSE's Christian Klossner openly discussed enforcement tactics like questioning guests about where the host “slept,” and even considering photographic confirmation.

This is not safety enforcement — it is surveillance.

Intro 948-A does not weaken primary-residence verification. It protects homeowners from unconstitutional intrusion.

## **10. “948-A creates unequal protections.”**

Private dwellings and multiple dwellings are legally distinct under New York State law. Intro 948-A simply restores the proper legal classification that LL18 distorted.

Treating a one- or two-family home like a multi-unit apartment building is not fairness — it is statutory misapplication.

## **11. “Two years of LL18 data is not enough.” — Deputy Director of HPD**

At the hearing, the Deputy Director of HPD argued that “two years of Local Law 18 data is not enough” to assess the law's impact. That position ignores the lived reality of the homeowners who have already suffered under LL18 and treats their losses as abstract policy experiments.

Two years is not a trivial window. It is enough time for families to fall behind on mortgages, enter default, face foreclosure proceedings, or be forced to sell their homes under financial distress — losing generational assets that took decades to build. It is enough time for elderly homeowners on fixed incomes to exhaust their savings. It is enough time for Black and Brown homeowners—already disproportionately burdened—to experience rapid financial erosion that becomes impossible to recover from once the home is lost.

And while homeowners were being pushed toward foreclosure and displacement, LL18 produced **no positive impact** on rents or long-term housing supply. When Council Members Narcisse and Riley pressed HPD and OSE for evidence that LL18 improved affordability or increased rental availability, **they could not provide a single answer**.

The claim that “two years is not enough” is not a reasoned position. It is an attempt to avoid admitting that LL18 failed on its own terms while inflicting irreversible harm.

## **SECTION III — The Racist, Methodologically Flawed Study Used to Justify LL18**

Before examining the racist and methodologically invalid “study” repeatedly cited to justify Local Law 18, it is essential to understand who Murray Cox is. Cox **was not a neutral researcher**, nor an independent analyst. He was one of the original drafters of Local Law 18 itself, working through the **Coalition Against Illegal Hotels** — a hotel-industry-funded lobbyist organization that has spent years advocating for policies designed to suppress home-sharing and consolidate market advantage for hotels. His work was crafted in service of that agenda, and his “racial disparity” narrative was the political backbone used to push LL18 into law.

What follows is a breakdown of why his research was not merely flawed, but fundamentally racist, unscientific, and unfit to serve as the basis for any public policy — especially one that has disproportionately harmed the very Black and Brown homeowners the law purported to protect.

Even if Murray Cox’s methodology were not racially biased (it was), it would still be **impossible** to validate. At the time his dataset was created, many Airbnb hosts did not use real photos of themselves. Photos ranged from stock images to avatars and scenic pictures, making racial identification wholly unreliable.

Worse still, many Black hosts — including myself — deliberately used **white profile photos** to avoid racist treatment on the platform. Black hosts frequently faced discriminatory booking refusals, biased reviews, and negative treatment tied solely to their appearance. The issue became so widespread that Airbnb publicly acknowledged it and implemented new anti-discrimination policies.

Because of this, Cox’s racial conclusions are not just flawed — they are invalid. His dataset cannot be verified, and his conclusions cannot be trusted.

### **Racial Bias in the Methodology**

Cox’s approach replicated the logic of the historic “**brown paper bag test**” — a racist practice used to determine who was “Black enough” or “white enough,” which fueled redlining, segregation, and systemic exclusion. His model excluded:

- lighter-skinned Black hosts,

- Afro-Latino and Hispanic hosts,
- mixed-race hosts,

and erased the economic benefits experienced by Black homeowners in Bedford-Stuyvesant.

This was **not research**.

It was **policy propaganda dressed in data**, built on racially biased assumptions.

## Procedural Disparity

Despite presenting research that was fundamentally invalid, Cox was allowed to testify twice and given extended time to opine on “racial impacts.” Meanwhile, the author of Intro 948-A — legislation designed specifically to protect Black homeowners — was given only **90 seconds** and no follow-up questions.

That disparity speaks volumes.

## SECTION IV — Who Is Actually Being Harmed

Local Law 18 has not alleviated New York’s housing crisis; it has simply diverted attention away from the real structural failures driving it. During the hearing, Council Member Mercedes Narcisse asked the City a direct and essential question: “How many NYCHA apartments are currently vacant and offline?” The Deputy Director of HPD could not answer. The truth — which should be foundational to any housing policy discussion — is that more than **7,300 NYCHA units** remain vacant, representing **4.5% of the city’s entire public-housing stock**. These are units that could house thousands of families today, yet they are left empty for reasons no agency at the hearing could explain.

And while this critical question went unanswered, another staggering number — although not raised during the hearing — underscores the true scale of our housing supply crisis: more than **50,000 rent-stabilized units** are currently warehoused across New York City. These apartments, deliberately held vacant or stuck in bureaucratic limbo, dwarf any impact that one- or two-family homeowners could possibly have on long-term housing availability.

Yet none of the opponents of Intro 948-A — not HTC, not Tenants Not Tourists, not Homes Not Hotels, not OSE — mentioned **any** of these systemic drivers of housing scarcity. Instead, they focused their energy on opposing a narrow, surgical carve-out for primary-residence homeowners in private dwellings, who have never been the cause of the housing crisis. The result is a policy conversation turned upside down: the largest sources of housing loss are ignored, while the smallest and least harmful actors are vilified.

Meanwhile, the communities most harmed by Local Law 18 — **Black homeowners, Brown homeowners, elderly residents, immigrants, and working-class families** — continue to face shrinking income, rising costs, foreclosure pressure, and displacement. These are the very New

Yorkers that Intro 948-A was designed to protect. And these are the very New Yorkers erased from the “housing crisis narrative” presented by the bill’s opponents.

## SECTION V — Hearing Procedure

The structure of the November 20 hearing made clear that the process was neither balanced nor neutral. Opponents of Intro 948-A were repeatedly given extended time and multiple opportunities to testify, including **Murray Cox**, who was called to the microphone twice, and **Tom Cayler**, who was also invited to testify twice—each time reinforcing the same misinformation without challenge. Meanwhile, the author of the bill was allowed only **90 seconds**, with no follow-up questions and no opportunity to correct or respond to the false narratives that were amplified throughout the hearing.

This imbalance was overt. It created an environment where misleading claims were given a platform and legitimacy simply through repetition, while factual corrections and firsthand expertise were constrained and sidelined. The effect was a hearing shaped by narrative management rather than genuine fact-finding.

This written testimony serves to correct the record that the hearing structure distorted.

## Conclusion

The debate around Intro 948-A has revealed a simple truth: **primary-residence homeowners in private dwellings are not the source of rising rents, declining affordability, or shrinking long-term housing supply**. This testimony has established that fact clearly, and the record from the November 20 hearing only reinforces it. In addition to the documented failures of Local Law 18 to improve housing conditions in any measurable way, not a single representative from OSE, HPD, HTC, Tenants Not Tourists, or any opposing organization was able to substantiate the claim that primary-residence homeowners in private dwellings have contributed to the housing crisis at all. Not one. Every core assertion behind that narrative collapsed under scrutiny, and every data point cited in opposition crumbled when held against the actual evidence.

Intro 948-A corrects this failure. It restores long-standing rights, realigns enforcement with statutory intent, and reestablishes fairness in a system that has treated homeowners as collateral damage in a political conflict between the hotel industry and corporate platforms. It protects those who live in their homes, who pay taxes in their neighborhoods, and who form the cultural and economic backbone of communities across Brooklyn, Queens, the Bronx, and Staten Island.

The facts presented here are not theoretical. They are concrete, verifiable, and grounded in both empirical data and the lived experiences of New Yorkers who have suffered under a policy that was supposedly never intended for them — although at this point, I genuinely do not know; it very well might have been.

Here are the facts:

- No hotel worker loses a job because a homeowner shares a space within their home.
- No renter pays higher rent because a family in Canarsie or the North Bronx supplements their income to keep their mortgage current.
- No home in New York City increases in price because a homeowner hosts a guest inside their own primary residence.

Not a single housing metric is affected by the simple passive income earned by natural-person homeowners in private dwellings, and any claim to the contrary is absurd on its face.

Which means this Council is now presented with a clear choice. After being provided with the facts, the law, the history, the data, and the lived realities reflected in this testimony, any continued opposition to Intro 948-A can be rooted in only one of two things: either an **inherent bias** or disdain toward people who own their homes, particularly working-class Black and Brown homeowners — **or a loyalty**, whether explicit or implicit, to a hotel lobby seeking to crush marginalized homeowners in pursuit of greater profits. There is no third explanation. There is no evidence-based justification.

The harm is real. The record is clear. The need for action is urgent.

Supporting Intro 948-A is not simply the right policy choice — it is the factual choice and the only choice aligned with the responsibilities of public service.



NEW YORK STATE SOCIETY OF  
PROFESSIONAL ENGINEERS

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November 10, 2025

## MEMORANDUM IN SUPPORT ADOPTION OF THE NYC EXISTING BUILDING CODE

I am writing on behalf of the New York State Society of Professional Engineers in support of the adoption of the NYC Existing Building Code (EBC), Intro 1321 (2025). The Society is a professional association representing the interests of all professional engineers (totaling more than 30,000 licensees in New York State) practicing in all disciplines (civil, structural, mechanical, electrical, geological, environmental, etc.) and practicing in all practice settings (private sector consulting, industry, government, and education.) A substantial percentage of the Society's membership live and/or work in the City of New York and enthusiastically welcome the proposed new Code.

Plainly stated New York City has one of the most expansive and dated building stocks in the United States. Unfortunately, to date, projects on existing buildings have been forced into codes largely written with a focus upon new construction, often leading to unnecessary costs, delays, and the need to routinely resort to requests for variances. The proposed EBC addresses this challenge directly. It provides unambiguous, practical, and proportional requirements for repairs, alterations, additions, and changes of occupancy ensuring safety without imposing the full weight of new building codes where it isn't feasible. The benefits are clear:

- **Public safety will be substantially improved** through achievable fire, egress, and structural upgrades.
- **Costs and delays are reduced**, making compliance accessible to owners and encouraging investment.
- **Economic growth is supported**, generating work for contractors, engineers, other design professionals, and trades.
- **Sustainability is advanced**, as rehabilitation of existing buildings is far greener than demolition and new construction.
- And finally, **this Code will align the City with national best practices** while being tailored to its unique needs.



For all of these reasons, the Society urges expeditious approval this code. It is a practical, forward-looking step that will make the City of New York safer, stronger, more affordable and sustainable.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark Kriss", is written over a light gray rectangular background.

Mark C. Kriss, Esq.  
Legislative and Legal Counsel



Good Morning Members of the Committee on Housing and Buildings. Thank you for this opportunity to share testimony on Int. 948A and to share my support for extending a lifeline to homeowners, particularly those in the outer boroughs who have lost an essential source of income for maintaining their homes.

My name is Arva Rice, and I'm the President of the New York Urban League. For over 100 years, the New York Urban League has been a voice advocating for economic opportunities for African Americans.

I'm here as a civil rights leader, but also as a homeowner myself, to acknowledge the pressures many of us face, particularly as Black and Brown New Yorkers who not too long ago were finally able to access the opportunities to own a piece of the city we call home.

Over 20 years ago, my sister and I were able to do something millions of Americans continue dreaming of – buy a home.

We love our home. We lovingly refer to our building as "Brownstone Brown Girls." But it has been a tough love. Over the course of time, the roof started to leak. The bathroom needed work. The sidewalk needed repairs. And we needed additional income to help cover these costs.

We chose not to rely on borrowing from traditional financial institutions and decided instead to rent our home short-term to afford ongoing repairs. It wasn't just helpful, it was essential income.

This is how countless New Yorkers are able to keep their homes, and the reason we can still live in Harlem.

But under Local Law 18, a law introduced with a well-intended goal, we've seen significant unintended consequences. It has gone too far in restricting responsible homeowners, stripping many families of the income they relied on and pushing others to the brink of defaulting on their mortgages or falling behind on tax lien payments.

That's why I'm joining other homeowners in respectfully urging this committee to pass Int. 948A. These amendments would allow homeowners to rent responsibly while continuing to protect housing stock for renters. They offer a balanced, fair approach that supports long-time residents without undermining the city's broader housing goals.

New York City is facing a serious housing affordability crisis, and we need every tool we can to help people stay in the communities they love.

Over the past two decades, the city's Black population has declined by nearly 200,000, or about 9 percent. Now, about one in five residents are non-Hispanic Black, compared with one in four in 2000, according to the latest census data.

We must pursue solutions that protect affordability while also supporting the economic mobility of homeowners who have fought to secure and maintain their place in this city.

Two years after Local Law 18 took effect, New Yorkers are worse off. Now is the time to pass Int. 948A and provide meaningful relief to homeowners like me and to the families we serve at the NYUL.



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**Testimony from Neighborhood Housing Services of New York City  
Regarding Proposed Int. No. 948-A  
11.17.2025**

Good morning, Chair Sanchez and Members of the Committee on Housing and Buildings. Thank you for the opportunity to testify today. My name is Lucy Raimes, Director of Strategic Partnerships and Resource Development at Neighborhood Housing Services of New York City. NHS of New York City is a 43-year-old nonprofit that supports low- and moderate-income homeowners across the five boroughs through housing counseling, financial empowerment, repair assistance, and resiliency services.

I am here today to speak to the proposed Introduction 948-A. While NHS of New York City does not take a position on specific regulatory provisions, we want to underscore the importance of maintaining viable options for small homeowners—many of whom rely on supplemental income to remain stable in their homes.

Every day, our staff works with homeowners who are struggling to keep up with rising property taxes, utility costs, insurance premiums, and repair needs. These are often seniors on fixed incomes, first-generation homeowners, and families who have built their lives and futures around their homes. For many, the ability to rent a room—even occasionally—provides critical income that helps them cover mortgage payments, address essential repairs, or manage unexpected expenses. Without that flexibility, some could face real hardship or even risk displacement.

Short-term rentals, when appropriately regulated and responsibly managed, can serve as a lifeline for homeowners with limited financial margins. The option to host a tenant or guest—particularly in a one- or two-family home where the homeowner is deeply invested in the community—can mean the difference between stability and financial strain.

We encourage the City Council to ensure that any regulatory framework continue to support the needs of primary-residence homeowners, especially low- and moderate-income families who may not have access to other options for income generation. Preserving responsible avenues for supplemental income helps keep long-time New Yorkers in their homes, protects generational wealth, and contributes to neighborhood stability.

Thank you for the opportunity to testify and for your attention to the financial realities faced by small homeowners across New York City. NHS of New York City stands ready to support policies that strengthen homeowner stability and ensure that families are able to remain securely housed.

I welcome any questions you may have.



NHSNYC Provides Resources to Stabilize Neighborhoods





**Northwest Bayside Civic Association**

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To Councilmembers of New York City,

Thank you for the opportunity to submit testimony regarding Intro 948-A (formerly Intro 1107). I am a lifelong resident of a quiet, low-density neighborhood in Bayside, located in Northeast Queens, and **I am writing to express my strong opposition to this bill.**

Intro 948-A would fundamentally and permanently change the character, safety, and stability of single-family and two-family neighborhoods across New York City.

**1. This bill would commercialize residential communities**

Intro 948-A would allow up to four (4) rooms per single-family home and up to eight (8) rooms in a two-family home to be rented for short-term stays—with no requirement that the owner live on the premises.

This transforms ordinary homes into de facto hotels. It invites a revolving door of transient visitors, increased traffic, late-night disruptions, and a loss of the safety and cohesion that stable communities rely on.

These are not “home-sharing” arrangements; they are commercial operations placed directly into the heart of low-density residential blocks that were never designed for hotel-level activity.

## **2. It will incentivize large investors, not families, to buy up homes**

Allowing up to eight separate short-term rental rooms per property creates a clear financial incentive for hedge funds, private equity firms, and other speculative investors to purchase one- and two-family homes solely for Airbnb operations.

This will:

- \* Remove precious housing stock from the long-term market
- \* Increase already-skyrocketing home prices
- \* Erode opportunities for families to buy or stay in their communities
  
- \* Convert stable residential streets into commercial corridors

New York City is already grappling with affordability and displacement. Intro 948-A moves us in the wrong direction.

## **3. The bill undermines Local Law 18**, which protected residents from exactly this problem

Local Law 18 was enacted to address the harmful impacts of unregulated short-term rentals, including disruptions to quality of life, tenant harassment, and the siphoning of homes away from long-term residents.

Intro 948-A would effectively dismantle those protections, reopening the door to the very issues the Council sought to solve.

## **4. Airbnb's aggressive lobbying should not drive policy**

Since early 2024, Airbnb—under its new Chief Legal/Policy Officer—has launched a nationwide effort to roll back local regulations. In New York City, Airbnb has spent over \$700,000 this year lobbying Council Members and has pledged \$5 million more in support of this bill.

To build public pressure, Airbnb has funded “astroturf” organizations, including:

Restore Home Owners Autonomy and Rights (RHOAR) — \$150,000

Homeowners for Financial Empowerment — \$450,000

Mobilizing Preachers and Communities (M-PAC) — which has a long history of Airbnb funding

New York City's housing policy should not be shaped by corporate spending campaigns or manufactured advocacy groups. It should be shaped by residents, by facts, and by a



commitment to protecting neighborhoods.

**5. Northeast Queens and similar low-density communities would bear the brunt**

Our neighborhoods were built around single-family homes, schools, and community institutions. We already face pressure from congestion, unsafe traffic patterns, and quality-of-life concerns. Turning these residential blocks into short-term rental zones would:

- \* Increase noise, traffic, and parking competition
- \* Introduce security concerns from constant turnover
- \* Disrupt the cohesion of longstanding communities
- \* Place additional burdens on sanitation, public safety, and local infrastructure

This is not hypothetical. Neighborhoods across the country that have seen unregulated Airbnb proliferation have experienced all of these harms, and more.

**6. We ask the Council to protect the stability and integrity of our communities**

Intro 948-A is not a modest adjustment. It is a sweeping deregulation that benefits corporate interests at the expense of New York families.

**On behalf of myself and my civic members, I respectfully urge you to:**

**1. Oppose Intro 948-A in its current form; and**

**2. Stand firmly in support of Local Law 18 and the protections it provides for neighborhoods**

**and residents**

**New York City must protect housing for people who live here, not for corporations that want to profit from it.**

Thank you for your time and consideration.

Sincerely,

Jena Lanzetta, President



Good Morning Members of the Committee on Housing and Buildings. Thank you for this opportunity to share testimony on Int. 948A and to share my support for extending a lifeline to homeowners, particularly those in the outer boroughs who have lost an essential source of income for maintaining their homes.

My name is Arva Rice, and I'm the President of the New York Urban League. For over 100 years, the New York Urban League has been a voice advocating for economic opportunities for African Americans.

I'm here as a civil rights leader, but also as a homeowner myself, to acknowledge the pressures many of us face, particularly as Black and Brown New Yorkers who not too long ago were finally able to access the opportunities to own a piece of the city we call home.

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But under Local Law 18, a law introduced with a well-intended goal, we've seen significant unintended consequences. It has gone too far in restricting responsible homeowners, stripping many families of the income they relied on and pushing others to the brink of defaulting on their mortgages or falling behind on tax lien payments.

That's why I'm joining other homeowners in respectfully urging this committee to pass Int. 948A. These amendments would allow homeowners to rent responsibly while continuing to protect housing stock for renters. They offer a balanced, fair approach that supports long-time residents without undermining the city's broader housing goals.

New York City is facing a serious housing affordability crisis, and we need every tool we can to help people stay in the communities they love.

Over the past two decades, the city's Black population has declined by nearly 200,000, or about 9 percent. Now, about one in five residents are non-Hispanic Black, compared with one in four in 2000, according to the latest census data.

We must pursue solutions that protect affordability while also supporting the economic mobility of homeowners who have fought to secure and maintain their place in this city.

Two years after Local Law 18 took effect, New Yorkers are worse off. Now is the time to pass Int. 948A and provide meaningful relief to homeowners like me and to the families we serve at the NYUL.



# **NEW YORK CITY CENTRAL LABOR COUNCIL, AFL-CIO**

President  
**BRENDAN GRIFFITH**  
Secretary-Treasurer  
**JANELLA T. HINDS**

## **TESTIMONY OF THE NEW YORK CITY CENTRAL LABOR COUNCIL, AFL CIO IN OPPOSITION TO INT. 948 A COMMITTEE ON HOUSING AND BUILDINGS NOVEMBER 20, 2025**

Good morning, my name is Alexander Gleason, and I'm here on behalf of the New York City Central Labor Council, AFL CIO, representing more than one million working people and over three hundred affiliated unions in the five boroughs.

We urge the New York City Council to reject Int. 948 A. The bill would remove core protections established by Local Law 18, which created the regulatory framework for short-term rentals. Local Law 18 was enacted to preserve scarce housing during a time of extremely low vacancy and to prevent homes from being converted into unlicensed hotels. Weakening these protections would bring back a problem New Yorkers have already fought to solve: fewer available apartments, higher rents, and greater strain on community health and stability.

At the height of the short-term rental boom, about 67,000 homes were taken off the long-term market, and listed to tourists. A city analysis found from 2009-to-2016, nearly one-tenth of the rise in rents could be tied to short-term rentals. Entire blocks in Brooklyn and Harlem saw rents climb faster than wages, displacing long-term residents, and altering the character of neighborhoods and streets.

The harm has been most acute in Black communities. In predominantly Black neighborhoods, Airbnb hosts were five times more likely to be white, and white hosts earned more income. Gains went to newcomers while long standing residents lost homes and stability. Local Law 18 addresses these inequities by requiring hosts to live in the unit, remain present during rentals, and register with the Office of Special Enforcement. These rules create needed safeguards while still supporting homeowners who rely on supplemental income.

Int. 948 A would undo these protections. Removing the host presence requirement would effectively turn one-and-two-family-houses into full-time, short-term rentals. This law would make it easier for investors to purchase homes for tourism rather than housing, which would drive up prices, reduce availability, and contribute to displacement. One-and-two-family-homes comprise nearly one-third of the city's housing stock. With a vacancy rate near 1.4%, and record homelessness, we cannot afford to lose any portion of that stock to commercial use.

The bill also raises the number of lawful boarders, despite Building Code limits designed to prevent overcrowding and unsafe conditions. Expanding occupancy without on site oversight invites fire hazards, illegal conversions, and quality of life issues that fall on neighbors and the city to resolve.

The New York City Central Labor Council, AFL CIO, respectfully urges a no vote on Int. 948 A. Protecting working families and preserving affordable housing must remain a top priority for New York City. Thank you for the opportunity to speak today.



# NEW YORK CITY CENTRAL LABOR COUNCIL, AFL-CIO

President  
**BRENDAN GRIFFITH**  
Secretary-Treasurer  
**JANELLA T. HINDS**

## MEMORANDUM OF OPPOSITION

*Int. 948-A: A Local Law to amend the administrative code of the city of New York, in relation to authorizing short-term rentals in one- and two-family dwellings and increasing the number of lawful boarders.*

*Int. 1107-2024A: A Local Law to amend the New York city building code and administrative code of the city of New York, in relation to common households for short-term rentals in one- and two-family dwellings.*

The New York City Central Labor Council, AFL-CIO, representing over one million working people and more than 300 affiliated unions, urges the City Council to reject Int. 948-A and Int. No. 1107-2024A. The bill would remove protections enforced by Local Law 18, which creates the regulatory framework for short-term rentals. Enacted to preserve scarce housing in an environment with single digit vacancy rates, the law was meant to stop the conversion of homes into unlicensed hotels. Repealing the core provisions creates a regressive problem New Yorkers already fought to solve: fewer available apartments, higher rents, and exasperated negative social determinants of health for communities.

At the height of the short-term rental boom, roughly 67,000 apartments and houses were taken off the market so they could be listed to tourists. Those units would otherwise have housed families. A city analysis found between 2009-and-2016, nearly one-tenth of the overall rise in rents could be linked to short-term rentals. In the same period, entire blocks in Brooklyn and Harlem saw rents climb faster than wages, and working residents were priced-out; it led to greater displacement of both people and the character of iconic New York City neighborhoods.

The impact has fallen hardest on Black New Yorkers. In predominantly Black neighborhoods, Airbnb hosts were five times more likely to be white, and white hosts earned more income from their listings. Gains have gone primarily to new arrivals in neighborhoods, while long-term residents lost homes and stability. By requiring hosts to live in the unit, remain present during the rental, and to register with the Office of Special Enforcement, Local Law 18 ensures a system of checks-and-balances while still accommodating the practical needs of homeowners looking to supplement their incomes.

Int. 948-A and Int. No. 1107-2024A would strip away the existing structure and appears to create a problem in search of a solution. Removing the host-presence rule would effectively turn one- and two-family houses into full-time short-term rentals. It would, in effect, legalize mini-hotels scattered through residential blocks, making it easier for corporate investors to buy homes for tourism rather than housing, and displacing long-term and heritaged residents. Those purchases drive up prices, crowd-out working families, and erode the character of communities that depend on stable housing.

The City's Building Code limits 'boarders' to two in an effort to deliberately prevent overcrowding, unsafe conditions, and to protect renters and tenants in a perpetually tight housing market. The safeguards exist for good reason: the last time it was ignored, New York faced a tenement crisis, and many needlessly suffered. Expanding occupancy limits while erasing on-site oversight invites fire hazards, illegal conversions, and noise





## NEW YORK CITY CENTRAL LABOR COUNCIL, AFL-CIO

President  
**BRENDAN GRIFFITH**  
Secretary-Treasurer  
**JANELLA T. HINDS**

complaints that fall on the city and neighbors to resolve; it's unsafe and unnecessary. One- and two-family homes comprise nearly one-third of the city's entire housing stock. With a vacancy rate near 1.4 percent and record levels of homelessness, the city cannot afford to lose even a fraction of those homes to commercial use.

It should be noted this proposal mirrors the lobbying agenda and economic interests of large, short-term rental platforms that have spent years seeking mechanisms to weaken local laws, and grow their market-share. We've seen the impact of these platforms on communities across America, and must not allow the same adverse consequences to impact working New Yorkers. Local Law 18 reflects the Council's deliberate balance; it permits true home-sharing, while preventing the return of unregulated hotel operations. We must not allow the law to weaken, and Int. 948-A, along with Int. No. 1107-2024A, would unravel that balance.

The New York City Central Labor Council, AFL-CIO, respectfully urges the City Council to vote no on Int. 948-A and Int. No. 1107-2024A. The measure would revive the same housing and safety problems Local Law 18 successfully reduced. Protecting working families and preserving affordable housing must remain the priority for New York City's future.







## Op-Ed: NYC should allow short-term rentals

By Kathryn Wylde. President and CEO of the Partnership for New York City

New York Daily News, November 10, 2025

<https://www.nydailynews.com/2025/11/10/nyc-should-allow-short-term-rentals/>

For most Americans, homeownership is the key to achieving financial security and their entrée to the middle class. In New York City, fewer than a third of our 8.4 million residents own the place they call home; the vast majority of New Yorkers are renters. Among Black and Brown New Yorkers, the homeownership rate is 26% and 17%, respectively.

The dream of homeownership has become more elusive in the city as purchase prices have climbed above \$1 million in Manhattan and Brooklyn, \$700,000 in Queens and Staten Island, and close to \$600,000 in the Bronx. At the same time, apartment rents throughout the city are averaging more than \$3,500 a month, making it virtually impossible for most renters to save up a down payment.

It is clear why housing affordability emerged as the central theme in this year's city elections and will be a top priority for any incoming mayor.

In 1982, when I went to work for David Rockefeller shortly after he founded the Partnership for New York City, my job was to help realize his vision for the revival of the city and its neighborhoods through creating affordable homeownership opportunities for tens of thousands of New York households. Our homebuyers were union members, often public sector or health care workers who moved out of public housing as they purchased homes that became a ticket to a better future for themselves and their children.

While most of the financing for the homes we produced came through bank loans, the government provided free land, tax abatements, and capital grants to write down the prices to levels that moderate- and middle-income households could afford. First-time homeowners, in turn, stabilized their communities and became a bulwark against the crime, drug abuse, and arson that was raging through our city at the time.

Today, there are virtually no homes or apartments in the city that are available and affordable to working families. Homeownership development is down to a trickle. There are no significant city or state subsidy programs to offset the high cost of construction, meaning that homes that do get built are priced beyond the means of all but the very affluent. Moreover, the cost of maintaining a home — taxes, insurance, water and utility bills — has skyrocketed.

A hopeful solution to restore access and affordability seemed to emerge when Airbnb came to New York offering a potential source of short-term rental income that current and prospective homeowners could use to offset rising costs. Sadly, the company's initial approach to our complicated housing market was overzealous and political opposition killed what could have

been a significant source of relief and expanded opportunities for wealth creation for many New Yorkers.

Legislation to allow some homeowners to utilize Airbnb and other online platforms for short-term rentals finally passed, but it was so restrictive that few could utilize it. As it stands, city law bans many homeowners from renting a spare room or sharing their home while they are away. As a result, families who relied on modest income from short-term rentals have suffered.

Int. 948A, a bill before the City Council, proposes modest and common sense reforms to New York's near ban on short-term rentals. It would allow a homeowner to rent their home, accommodating up to four guests, when they're away or if there is a major event, concert or festival in their community. The chief sponsor of the current law has said their intention was never to make short term rental unavailable to single family owners who are away for a weekend, but to forbid use of the platform by hosts with multiple listings.

The proposed new bill maintains guardrails: it doesn't remove any housing from the market; a homeowner cannot leave a second unit vacant for solely short-term rental use; it doesn't allow conversions to de facto hotels or enable speculator investors to buy up properties and rent them out.

What the bill does is enforce core safety protections while removing unnecessary barriers for responsible homeowners. As an additional benefit, it provides an affordable alternative to high-end hotels for visiting relatives, students, and others who could not otherwise enjoy our city and its diverse neighborhoods.

As a housing advocate, I disagree with those who believe this reform of the current law would reduce the inventory of affordable housing in the city. At a time when public subsidies are limited, short term rentals are a commonsense way to allow moderate income homeowners to survive here. The City Council should enact Int. 948A.



# Community Board 12

## The City of New York

### Borough of Queens

Jamaica, Hollis, St. Albans, South Ozone Park, and Springfield Gardens

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**Donovan Richards**  
BOROUGH PRESIDENT

**Rev. Carlene O. Thorbs**  
CHAIRPERSON

**Michael Carlier**  
DIRECTOR OF COMMUNITY BOARDS

**VACANT**  
DISTRICT MANAGER

**November 20, 2025**

**Dear NYC Council Members,**

Queens Community Board 12, representing the neighborhoods of Jamaica, St. Albans, Hollis, South Jamaica, Rochdale, Springfield Gardens, and surrounding communities, writes to express our **strong opposition to Intro 948-A and Intro 1107-A.**

Southeast Queens has worked for decades to build and preserve **stable, family-oriented communities.** These bills threaten stability. Our neighborhoods are made up of long-time homeowners, multi-generational families, and tree-lined blocks that depend on strong protection to maintain safety and quality of life.

**Key concerns raised across our district include:**

- **Allowing absentee short-term rentals** would remove the accountability that keeps our blocks safe today.
- One- and two-family homes could become targets for **Airbnb-style investors**, shifting housing away from families and toward transient, high-turnover rentals.
- We already face persistent challenges with **illegal conversions and unregulated rental activity**; these bills would make enforcement significantly harder.
- Our proximity to **JFK Airport** makes the district especially vulnerable to a surge in short-term rental demand.
- Long-time homeowners worry about being **priced out or displaced** as speculative investors enter the market.

Our communities need **real support**—such as mortgage assistance, property tax relief, and protections that keep families anchored in their homes—not legislation that makes it easier for residential houses to become short-term rentals or commercial lodging spaces.

For these reasons, **Queens Community Board 12 urges the New York City Council to vote NO on Intro 948-A and Intro 1107-A.**

Respectfully,  
**Queens Community Board 12**

*Rev. Carlen O. Thorbs*

**Rev. Carlen O. Thorbs**



**Donovan Richards**  
Borough President

**Michael Carlier**  
Director of Community Boards

**Queens Community Board 13**

219-41 Jamaica Avenue  
Queens Village, NY 11428  
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qcb13.org



**Bryan J. Block**  
Chair

**Mark McMillan**  
District Manager

November 20, 2025

New York City Council Members,

As Chair of Queens Community Board 13 (QCB13), I am writing to express our strong opposition to Intro 948-A and Intro 1107-A, which we believe pose serious risks to homeownership, stability, and quality of life in communities like ours. These proposals, while presented as support for small homeowners, may instead create openings for speculation and displacement that threaten the very foundation of Southeast and Eastern Queens.

**The following civics: Rosedale Civic Association, Federated Blocks of Laurelton, Spring-Gar Civic Association, Spring-Jam Civic Association, Cambria Heights Civic Association, Wayanda Civic Association and Queens Village Civic Association, all within the confines of QCB13, share this sentiment of opposition to this proposed local law. In addition, Bellerose Commonwealth Civic Association, Bellerose Hillside Civic Association, Creedmoor Civic Association, Lost Community Civic Association, Rocky Hill Civic Association, Queens Colony Civic Association, and Royal Ranch Civic Association do not support this proposal, and some of these communities are not majority minority.**

Historically, Black families in New York City have faced decades of discriminatory lending practices and systemic barriers to homeownership. Despite these challenges, Southeast Queens emerged as one of the most significant centers of Black homeownership in the country - a place where families could invest, build stability, and create generational wealth. Homeownership remains one of the most effective wealth-building tools available to our community, and any legislation that jeopardizes that foundation must be viewed with extreme caution.

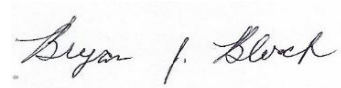
We are increasingly concerned that these bills could unintentionally enable new forms of speculation. Investors and corporate buyers are already approaching homeowners with aggressive purchase offers, often targeting seniors or long-time residents. Many families worry they will be priced out of the very neighborhoods they helped build. When longtime homeowners sell under pressure, they often cannot afford to purchase

another home in the same community, placing the transfer of generational wealth at serious risk.

Our community has endured and overcome the impacts of redlining and predatory lending. Today, we face a new challenge in the form of potential short-term rental expansion encouraged by these bills. Our homes are meant to be places of residence, not commercial enterprises or business opportunities for absentee operators and outside investors. Allowing increased short-term rental activity would destabilize residential blocks, weaken community ties, and undermine the hard-earned progress Southeast Queens has made over generations.

For these reasons, we urge the City Council to stand firmly with homeowners and protect the stability of our neighborhoods. We respectfully ask that you vote NO on both Intro 948-A and Intro 1107-A.

Sincerely

A handwritten signature in black ink that reads "Bryan J. Block". The signature is written in a cursive, flowing style.

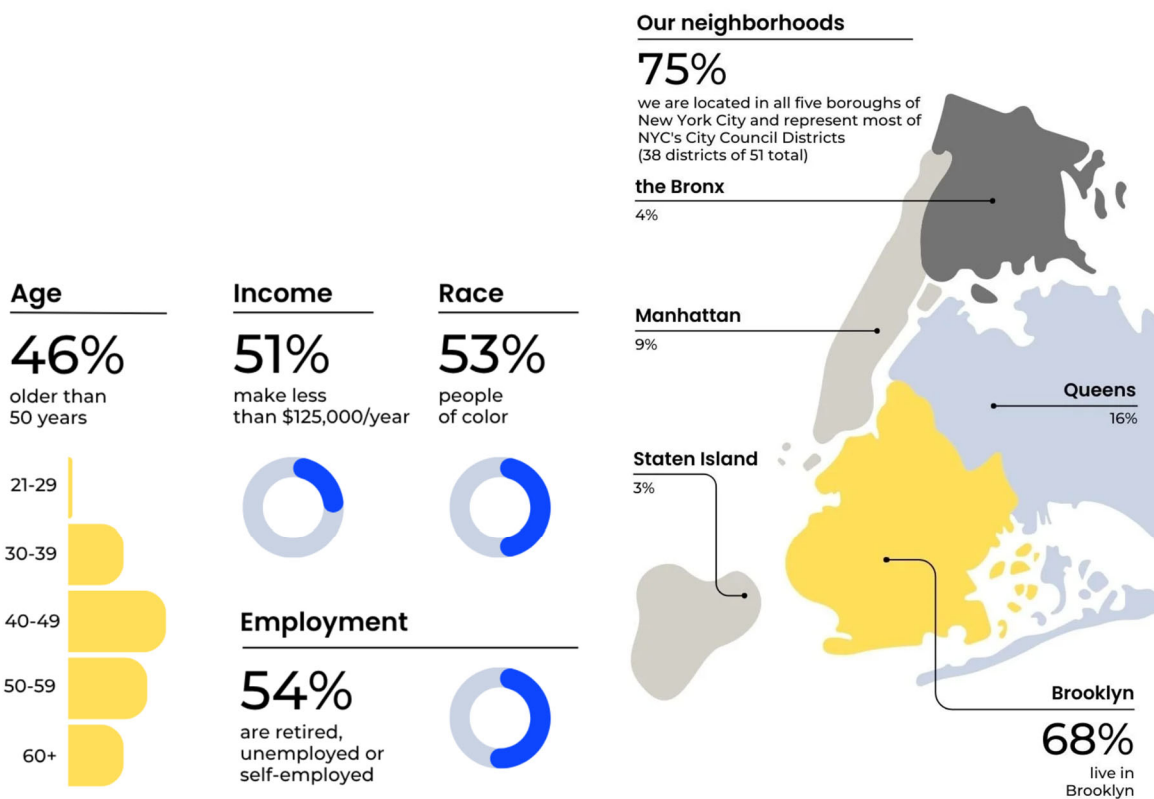
Bryan J. Block  
Chair

Testimony in Support of Intros 948A and 1107A- Gia Sharp, Co-Founder of [RHOAR.org](https://rhoar.org)

My name is Gia Sharp, proud renter of 15 years and homeowner of 12 years in Sunset Park, Brooklyn, in District 38 (Councilmember Alexa Aviles' district).

I represent Restore Homeowner Autonomy and Rights (RHOAR), a group of 700+ verified NYC one- and two-family homeowners who live in our homes. We verify every homeowner member through an application process that confirms names and addresses with the City's publicly available homeowner data. Our organization, which represents homeowners across all five boroughs and across 50 of the 51 City Council Districts, began its life with a simple Facebook post in April 2023 and has exploded in growth because we are the first organization representing NYC's real, small homeowners.

RHOAR was started by four 50+ year old women homeowners who were simply trying to keep agency over our own homes and afford to stay in them. I, with other volunteer leaders, have led the organization from inception through today, dedicating thousands of hours of our time to this important cause. Over the past 2 ½ years, we have experienced the loss of parents, loss of jobs, personal illness, etc; but we persist because we have so many struggling homeowners relying on us. Several members have already lost their homes, and we are fighting to save the rest of them. To be clear, we have always advocated for rights and housing security for owners **who live in their one- and two-family homes**. We are real NYC homeowners and constituents simply looking to retain rights to our property and use home-sharing to afford and stay in our homes. See below for a snapshot of our membership.



**Owner-occupied, one- and two-family homes are not housing stock, and we are not hoarding housing stock.** We live in our homes with our families and it's been that way for generations. These private homes have long been communal and shared among family members pooling resources to support each other and remain housed in one of the most expensive cities in the world.

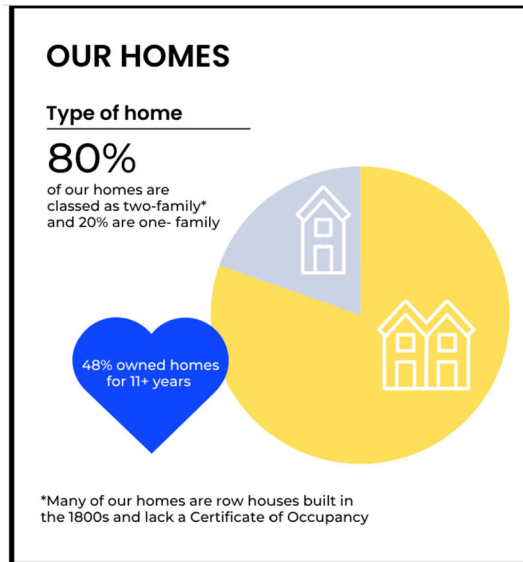
But, even with pooling resources, families still need the survival tool of home sharing to afford their housing expenses and rising cost of living, which is why we support Intro 948A and 1107A and thank Councilmembers Narcisse and Louis for their leadership.

The false narrative to include owner-occupied homes in “housing stock” is partly based on a misuse of Census housing vacancy data. One- and two-family homes are [majority owner-occupied \(99%\)](#). When families living together in private family homes respond to the survey, they report their street address (example: 123 Carroll Street), no matter whether it's a 1-family or 2-family. There is no distinction of a unit because it is their home.

So, when the City and other housing policy organizations interpret the data with a faulty lens of a 2-family home as a “2-unit building,” they mistakenly attribute all the family members to one unit. However, the reality is that the family is sharing the entire home together and there is no empty unit. This misreading of the data results from the disconnect between how New Yorkers live and how policy folks, far removed from our communities, single-handedly change codes and definitions without public input or discourse (Building Code 2008, Chapter 3, Section 310). Basing policy on inaccurate data harms both renters and homeowners alike.

RHOAR's homeowner members reflect this reality. We learned from our December 2023 member survey that a majority of our two-family households share their homes with their families, as you would expect in a private home. Even so, they all also relied on home-sharing to keep their families in their homes. Home-sharing is a tool of survival for whole families experiencing housing insecurity and unaffordability in the city's housing crisis.





## TWO FAMILY HOMEOWNERS

### Support Family

**72%**

of 2-family homeowners have other generations of their family and/or extended family live or stay in second unit



### ...and Always Have

**42%**

provide temporary housing in second unit for family members since purchasing their home



### Rely on STR Income

**98.3%**

of two-family homeowners surveyed depend on STR income to pay mortgage while supporting family

The billionaire hotel industry proponents of LL18 (and detractors of Intro 948A and Intro 1107A) decry the very real housing crisis as reasoning for their position. However, it's not a coincidence that since LL18 took effect the housing crisis has not lessened while NYC's billionaire hotel industry has made an additional \$3 billion in revenues. Meanwhile, [foreclosures are up in the outer boroughs](#) where these one- and two-family homes are located, adding to the city's already extreme housing crisis.

The disingenuous nature of [Tenants Not Tourists](#), the astroturf by the hotel industry, is a ruse and distraction from their greed and their own culpability in the housing crisis. They pay their hard-working union members poverty wages and then parade them to City Hall, instilling fear that they will lose their jobs if homeowners share the home in which they live. It is completely illogical and unconscionable. During the Intro 948A hearing, in the hall outside the chamber doors, we observed union members receiving written statements to recite as their own testimony apparently as part of this ruse. These billionaire bosses use their vulnerable workers as a shield in their greed, rather than sharing their profits and paying real, living wages in our expensive city. They are as much at fault for the housing crisis as the corporate landlords and all the others squeezing regular New Yorkers. The Council should not give equal airtime to falsehoods and fear-mongering that are not at all based in fact or legality around Intros 948A and 1107A.

The tenants groups through Tenants Not Tourists push more fear-mongering and false narratives about Intros 948A and 1107A (whether knowingly or unknowingly), which endangers not just homeowners, but also tenants as well. Some two-family homeowners relied on home-sharing to not only pay their mortgage, but also to keep rent low for their tenant. Legislation that helps homeowners stay in their homes means that they, their family, and their tenants remain housed and don't add to the housing crisis.

[The hotel lobby and moneyed interests for years](#) have conjured a narrative of false competition between homeowners and renters to make us fight for crumbs while they get a legislated monopoly, making life harder for the rest of us. It is not tenants versus homeowners. We are ALL New Yorkers trying to survive and thrive. And, renters/ tenants aren't a class of people; it's a system of being locked out of homeownership and squeezed by corporate greed. **The fight is corporate greed versus the rest of us.** If we really want to take power from these oligarchs and return it to the people, the first thing to do is empower people to own their home to stop the wealth extraction of these corporate landlords of our most basic need, to be housed.

Also, home-sharing is a mutual aid that benefited not only homeowners but also renters and whole communities. Renting New Yorkers benefited from home-sharing and relied on it to remain in the city. Young families need the support of visiting family, and without it, they are forced to leave the city (which is shown by the numbers [over last several years](#)). This transience destabilizes our neighborhoods, schools and whole communities. This is also my personal story:

I grew up in Section 8 and rented for 22 years as an adult before my husband and I were finally able to purchase our home with the help of an FHA loan. However, before when we were still renting and our children were young, we needed the support of visiting family to help care for our children. We relied on our neighbors to share their homes, so our family could stay close. Home-sharing helped us remain in the city during the hardest parts of parenthood and bonded us to our community. And later, as homeowners, we were happy to return the favor that we received: we shared our home with grandparents visiting to care for newborn grandchildren and adult children returning to care for an aging parent. Home-sharing is about community. Our inclusion in LL18 is about taking a community benefit away from the community and monetizing it for the wealthy, not about addressing the housing crisis.

If the billionaire hotel lobby were actually serious about addressing the housing crisis, they wouldn't have [taken thousands of long-term apartments off the market and converted to short-term rentals](#) (Sonder, AKA, condo conversions to class B, etc). They wouldn't have [lobbied against hotel conversions to long-term housing](#).

Meanwhile, there are tens of thousands of apartments the city allows the wealthy to hoard as pied-a-terres. There are also tens of thousands of empty apartments warehoused by corporate landlords as men, women and children languish in shelters.

But, one- and two-family homes? We are not housing stock and not hoarding housing stock. We're already living in our homes and doing our best to keep them and remain housed.

Please vote for Intros 948A and 1107A to help make homeownership sustainable and keep New Yorkers in their homes. Thank you.

Gia Sharp

Co-founder of RHOAR.org

### Intro 948A (Air BnB Bill)

Although Local Law 18 in 2023 prohibited Air BnB short stays, another bill, Intro 1107 was intended to undo it. This bill stayed in committee until recently, when the current Speaker of the House, Adrienne Adams, who is term limited and in office until 12/31/25, and is looking for a job in the private sector. She has convinced another Councilmember to take this over. Intro 948A was submitted by Mercedes Narcisse about 5 weeks ago.

This bill, Intro 948A will allow Air BnB short-term stays in all one and two family homes across New York City. Each of these homes will be permitted to have four rooms to be rented at once to four different individuals at once, without the owner being present, for one family homes and eight rooms rented at once in two family homes.

Not only will this bill be removing housing stock that would be available as homes for individuals to reside in but this opens the opportunity for various entities such as: hedge funds and real estate investors to purchase one and two family homes in residential areas making these homes short stay hotels without supervision in our quiet, residential neighborhoods.

Air BnB has already spent over \$700,000 lobbying Councilmembers and has promised 5 million to get this bill passed. They have created phony organizations to fight this, spending more than \$600,000 to delude people into thinking they are against this.

Councilmembers, I implore you, you must not pass this, it will destroy neighborhoods all over the city with no one held accountable for loud parties and frat houses in quiet residential neighborhoods. Do not vote for this.

Rhonda Kontner, President, Royal Ranch Civic Association, Floral Park, Queens



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502.368.9122

**New England District 615**

617.523.6150

**New Jersey District**

973.824.3225

**Western Pennsylvania  
District**

412.471.0690

[www.seiu32bj.org](http://www.seiu32bj.org)

Testimony of 32BJ SEIU  
in Opposition to Int. No. 948 and Int. No. 1107

November 20, 2025

Thank you for the opportunity to submit this testimony on Intro 948 and Intro 1107. 32BJ opposes these measures, which would erode municipal protections against illegal short-term rentals. The result would be to reduce the City's housing supply and undermine job quality, the tourism sector, community safety, and the cohesiveness of local communities.

32BJ is the largest building service union in the country, representing over 185,000 members up and down the East Coast and 85,000 in the New York City metro area. Our members are primarily immigrants and people of color, and make up the workforce of essential cleaners, door-people, airport workers, and other building service workers who keep our homes, workplaces, schools, and transportation hubs up and running. 32BJ and our members have fought hard to negotiate strong contracts that provide a living wage, family-sustaining benefits, and critical job protections.

Although 32BJ has won historic increases in compensation standards, our members still face challenges securing affordable housing in the city, because housing supply has simply not kept pace with growing demand and rents continue to rise. The tight housing market disproportionately affects working families like our members. This experience informs 32BJ's position on the proposed legislation.

Intros 948 and 1107 would undermine the City's previous efforts to address the negative consequences of the influx of short-term rentals in our communities. Prior to the passage of Local Law 18, the short-term rental crisis had taken thousands of units off the market. Communities of color were disproportionately affected by neighborhood displacement and increased rents. The growth of illegal short-term rentals also threatened hospitality jobs, which, like building service jobs, provide stable employment and fair wages to tens of thousands of workers.

Int. 948 and Int 1107 would effectively reopen the door to commercialized, un-hosted short-term rentals, undoing years of progress in protecting New York City from illegal hotel activity. The amendments would legalize de facto hotels in residential neighborhoods, in conflict with the intent of Local Law 18, to ensure safety, accountability, and community stability.

For these reasons, we urge the City Council to vote no on Intros 948 and 1107.



Dear Chair Sanchez,

My name is Bradford T. Kiefer, and I am a practicing professional engineer in New York City, and Co-Chair of the Structural Engineers Association on New York (SEAoNY)'s Code Advisory Committee. SEAoNY is a 500-plus-member organization representing both large structural engineering firms and small practices. The association is the voice of the New York structural engineering profession. I am writing to you to support the adoption of the NYC Existing Building Code (EBC), Intro 1321.

Members of SEAoNY's Code Advisory Committee and other members of SEAoNY have helped to form the proposed Existing Building Code provisions and are in support of this proposal. As you know, New York City has one of the largest and oldest building stocks in the country and has always been a leader in building design and construction. Until now, projects on existing buildings have been forced into codes written mainly for new construction. This leads to inconsistent application of requirements and can result in inadequate requirements if engineers are not familiar with materials that are no longer used in new construction.

The proposed EBC will set a standard that will help to make the existing building stock more resilient and will create a framework for repairs, alterations, additions, and changes of occupancy to existing buildings, ensuring safety without imposing the full weight of new building codes where it isn't feasible or reasonable. The code can now be part of the Building Department's review cycle, similar to that of the New York City Building Code for new construction and other construction codes. This process will allow how we approach work on existing buildings to be kept up to date with the latest state of the profession.

The benefits are clear:

Public safety is improved through structural upgrades when economically reasonable.

The resiliency of buildings is improved.

Time of Building Department reviews should improve since all Filings have a clear code to file under.

Sustainability is advanced, as rehabilitation of existing buildings is far greener than demolition and new construction.

The proposed code aligns us with national best practices while being tailored to New York City's unique needs.

For all of these reasons, I urge you and the Council to approve this code. It is a practical, forward-looking step that will make our city safer, stronger, and more sustainable.

Thank you very much.

I am available to you and your team to answer any questions you may have.

A handwritten signature in black ink, appearing to read 'Bradford Keifer'.

Bradford Keifer, PE,  
Co-Chair, Code Advisory Committee, Structural Engineers Association of New York

A handwritten signature in black ink, appearing to read 'Anthony J. Piderit'.

Anthony J. Piderit, PE,  
President, Structural Engineers Association of New York,

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1 (866) 290-9036



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November 19, 2025

The Honorable Adrienne Adams  
Speaker, New York City Council  
City Hall  
New York, NY 10007

Dear Speaker Adams:

Stuyvesant Town–Peter Cooper Village is the largest rent stabilized community in Manhattan, and our safety and quality of life have been negatively affected by illegal short-term rentals.

In 2011, the Stuyvesant Town–Peter Cooper Village Tenants Association (the “TA”) became aware of Airbnb’s rentals in our community. We tracked the units that were being advertised and realized just how many tenants were taking advantage of short-term rentals, in one instance going so far as installing 11 beds in the living room.

That winter, John Marsh, who was president of TA at the time, visited Airbnb’s San Francisco’s headquarters, met the CEO, and explained that it was illegal for rent stabilized tenants to have short-term rentals without the leaseholder being on site. While Airbnb refused to stop advertising our apartments, they did agree to have a pop-up message about its being illegal whenever any of the 110 addresses in the complex came up as available. Unfortunately, STPCV tenants wanting short-term rentals learned to list their units—in cooperation with Airbnb—as being on the Lower East Side or in Gramercy Park.

The fact that Airbnb refused to stop advertising our units, knowing that it was an illegal situation, and cooperated with tenants to list the units as belonging in another nearby neighborhood, proved to us that they are ruthless and untrustworthy. Allowing Airbnb or other short-term rental operations in one- and two-family homes is a slippery slope; it will weaken our hard-earned safety protections established under Local Law 18. The change would re-legalize illegal hotels, compromise building and fire safety standards, and put up to 700,000 homes—nearly a third of the city’s housing stock—at risk of conversion to transient use.

We urge the City Council not to pass Intro 948-A.

Sincerely,

A handwritten signature in black ink that reads "Susan Steinberg". The signature is written in a cursive, flowing style.

Susan Steinberg  
President





**Testimony to NYC Council Committee on Land Use  
Submitted by the Supportive Housing Network of NY  
November 21, 2025**

Thank you, Chair Salamanca and members of the committee, for the opportunity to submit testimony regarding the proposed legislation being presented today, Intros 1433, 1437, and 1443. My name is Tierra Labrada and I am the Director of Policy and Advocacy at the Supportive Housing Network of NY, a membership organization representing 200 nonprofit developers, owners, and operators of supportive housing.

The Network appreciates the Council's dedication to ensuring the City's housing production meets the needs of New Yorkers across household types, ages, and incomes. However, we are concerned that the bills put forth restrict HPD from being nimble, flexible, and truly addressing the housing crisis. Just two years ago, City Council passed landmark legislation in the Fair Housing Framework, which would require HPD and DCP to create a citywide fair housing assessment plan every five years, with the first iteration to be submitted to the Council in October of this year. We are concerned this legislation is fundamentally at odds with the in-depth assessment and analysis the City is required to conduct to inform its production goals.

Notably, the proposed legislation does not appear to consider the most recent Housing Vacancy Survey Data which shows that 62% of the city's housing stock has two or more bedrooms, with more than 2.24 million homes falling into the category. The data also suggests that almost half (49%) of units at the lowest rents already have two or more bedrooms, yet households with two or more people are the minority, with only 25% of households having children, which can be used as a proxy for larger families.

What the survey suggests is that the number of larger units already exceeds that of large households. Mandating quotas for larger units at this moment seems unnecessary and expensive, will result in fewer units being produced overall, and is simply not aligned with the current data.

Importantly, NYC is on the cusp of losing over \$170 million from the federal government through dystopic funding cuts and policy changes within the Continuum of Care program (CoC), through which the Department of Housing and Urban Development (HUD) funds ~7,000 units of permanent housing. Also on the horizon is the expiration of close to 7,000 Emergency Housing Vouchers (EHV). Both of these losses are slated to take effect in 2026, with the City inevitably picking up the costs either through expanding rental assistance or providing emergency shelter. **We are particularly concerned that the bills under consideration will reduce the number of supportive housing units produced at the exact moment homelessness in the City is poised to surge.** This is not hyperbole; it is the real impact of these draconian federal cuts and policy changes.

At a time when the federal funding landscape is so uncertain, and the City will be required to grapple with hard budget questions, now is not the time to legislate restrictive, costly mandates that will result in fewer units being developed overall.



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We appreciate your time and consideration of our testimony, and will be happy to answer any questions you may have.

Thank you,  
Tierra Labrada  
Director of Policy and Advocacy  
Supportive Housing Network of NY  
[tlabrada@shnny.org](mailto:tlabrada@shnny.org)



New York City Council  
Committee on Housing and Buildings

Public Hearing

**Intro 948-A and Intro 1107-A**

Thursday, November 20, 2025

**Testimony of Dorca Reynoso, Treasurer**

My name is Dorca Reynoso. I am the Treasurer of Tenants Political Action Committee. We work to build tenant power by helping to elect pro-tenant candidates to office, and we advocate for stronger tenant protection laws and the preservation and creation of affordable housing. Tenants PAC is a proud founding member of the *Tenants Not Tourists* coalition.

Most of the testimony you will hear today will use data to make the case for support or opposition to these bills, but from the vantage point of a tenant, the fact that this hearing is even happening is a disappointing outcome from a governing body that claims to prioritize housing supply and affordability. Your willingness to appease a very small but very well-connected minority of homeowners who demand to be allowed to break the law is frankly shameful.

As is too often the case, you are choosing to sacrifice the most vulnerable residents of this city, further eroding communities and aiding in the displacement of current residents. These bills are going to inflate property values and cause insurance premiums to skyrocket, all but ensuring that homeownership becomes even more out of reach for working class New Yorkers. The message to tenants is clear: we only care about current homeowners, and you're already too late to become one yourself!

These bills all but guarantee the creation of a bubble. If these homeowners' mortgages are dependent on seasonal tourism to be maintained, what happens when tourism suddenly dips because of a pandemic or a superstorm? The only thing more sure than the wave of foreclosures that would follow is the massive private equity land grab that will lock working class New Yorkers out of homeownership forever.

Weakening Local Law 18 is lazy legislating. There are far more efficient ways to provide relief to struggling Black and brown homeowners if you could simply muster the political will to do so. You could finally abolish the tax lien sale which disproportionately targets neighborhoods of color. You could advocate for stronger regulation of the insurance industry at the state level. You could reform our unfair property tax system. And you could create programs like the “one-shot deal” to help keep folks from falling behind on their mortgages. Instead, you are seriously considering throwing hundreds of thousands of tenants under the bus to appease a tiny subset of well-connected homeowners.

Tenants are the majority in this city, and we are calling on you to do your jobs, listen to your most vulnerable constituents, and say no to any rollback of Local Law 18 because it is working as intended.



New York City Council  
Committee on Housing and Buildings

Public Hearing

**Intro 948-A and Intro 1107-A**

Thursday, November 20, 2025

**Testimony of Esteban Girón, Political Director**

My name is Esteban Girón. I am the Political Director of Tenants Political Action Committee. We work to build tenant power by helping to elect pro-tenant candidates to office, and we advocate for stronger tenant protection laws and the preservation and creation of affordable housing. I am also a member of the Crown Heights Tenant Union (CHTU), and both organizations are proud founding members of the *Tenants Not Tourists* coalition.

4 years ago, I testified in this chamber about the growing crisis of illegal short term rentals in Central Brooklyn. I reported the sharp increase in people with suitcases going in and out of rent stabilized buildings, a visible decrease in Black and brown folks, and bodegas being used as key holding counters to let housekeepers into nearby buildings to change linens and clean in between guests. Airbnb had turned my residential block of Crown Heights into a hotel lobby.

The passage and implementation of Local Law 18 was a huge win for tenants across the city. As expected, Airbnb brought a legal challenge which ultimately failed, allowing full implementation of the law a little over 2 years ago. Almost overnight, the growing crisis of illegal short term rentals came to an end. For most legislation that goes before the council, that would be the end of the story. Write the law, pass the law, survive a legal challenge, and move on.

But we are dealing with a corporation notorious for creating and funding astroturf homeowner front groups. We found ourselves facing Intro 1107, a clear threat to tenants living in 1-2 family homes across the city. Tenants mobilized and formed the *Tenants Not Tourists* coalition. We managed to weaken and finally stop Intro 1107 despite the millions of dollars Airbnb funneled into those homeowner front groups for their lobbying efforts.

But Airbnb was not ready to give up yet! **They spent \$1.3 Million dollars getting the co-sponsors of Intro 1107-A and Intro 948-A elected this cycle.** And so here we are, having a hearing 3 weeks before the end of session, because Airbnb knows tenants elected a pro-tenant incoming mayor who has vowed to veto any weakening of Local Law 18. This is a last ditch effort to rush these bills through at the 11th hour with as little oversight and public input as possible. The fact that Intro 1107-A was hastily added to this hearing last week underscores how sloppy this process has been.

The message this council is sending to working class New Yorkers is clear: those with money and power don't have to play by the same rules as the rest of us. You are undermining your credibility and calling into question your legitimacy to appease a small minority of homeowners and one of the richest corporations in history, all at the expense of the majority of the people you represent. It is shameful that we even have to be here after we engaged in the legislative process in good faith.

Tenants and workers **WON!**

Local Law 18 is working!

Don't make us have to come back here next year to undo the mess these bills will create. Trust us when we say we will come after every piece of this law that you steal from us, because tenants always stand ready to defend our homes and our neighbors. Thank you.



Testimony of  
**The Legal Aid Society**  
before the  
New York City Council Committee on Housing and Buildings Regarding  
Intros 948-A and 1107-A of 2024.

The Legal Aid Society strongly urges the City Council to reject Intro. 948-A and Intro. 1107-A. While presented as measure to support homeowners, these bills would in practice reopen the loopholes that Local Law 18 was specifically passed to close. By eliminating the host-presence requirement and expanding occupancy allowances, they would reintroduce unhosted short-term rentals across the city, inviting the return of commercial operators who profit from converting permanent housing into transient lodging. These bills would weaken enforcement, destabilize neighborhoods, erode housing affordability and equity, and upend neighborhood stability.

These bills are also part of a continuing campaign by platform companies to weaken Local Law 18 through incremental revisions. Airbnb first advanced arguments in support of Intro. 1107 last year, claiming it would “fix a law that has failed homeowners.” That measure failed after widespread opposition from housing advocates and the hotel workers’ union. The reappearance of these same provisions in a slightly narrower form shows a deliberate strategy to reintroduce unhosted short-term rentals piece by piece, under the guise of technical relief. This persistence underscores the importance of maintaining clear,





enforceable standards: once the host-presence requirement is compromised, the city’s regulatory framework will quickly unravel. Without the host-presence requirement, the enforcement structure collapses, and New York City reverts to the same pattern of illegal “hotelization” that plagued neighborhoods before Local Law 18.

### **Local Law 18 and the City’s Housing Policy Framework**

Local Law 18 was enacted to protect New York’s scarce housing stock from being converted into short-term lodging. It requires hosts to register with the Office of Special Enforcement, limits occupancy to two guests, and mandated that the hosts live in and be present during any rental under 30 days. This “host presence” rule is the essential guardrail distinguishing genuine home-sharing from commercial hotel use.

Since enforcement began in 2023, the law has been effective. The number of active short-term listings fell by approximately 90 percent, with thousands of units returning to long-term rental use.<sup>1</sup> This outcome aligns with the law’s purpose: to preserve housing for residents while allowing modest, regulated home-sharing by owner-occupants.

### **What Intro. 948-A and 1107-A Would Do**

When read in light of the legislative history of Local Law 18, it is evident Intros. 948-A and 1107-A would dismantle Local Law 18’s protections piece by piece. First, they remove the

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<sup>1</sup> <https://www.nyc.gov/site/specialenforcement/about/data-reports.page>



host presence rule and allow owners of one- and two-family homes to rent to up to four adult guests, plus unlimited children, without living on site. Then, they codify that locked rooms do not break the “common household” definition, making locked-door arrangements fully compliant. This would allow hosts to lock off interior rooms, such as kitchens or living spaces, while renting out only portions of the home. This means a property could be rented to several unrelated adults who have access only to sleeping areas and a bathroom, with no one on site responsible for safety, maintenance, or compliance. It is quite telling that the bill authorizes these practices, while offering no definition of “reasonable access.” Without clear standards, guests could be confined to small, windowless rooms lacking proper light, ventilation, or fire egress, posing serious safety hazards.

Further revealing is the allowance of short term rentals without limiting the days the prime occupant can be away from the residence.

These provisions dismantle the central mechanism that distinguishes lawful home-sharing from commercial short-term rental activity, core safeguards of Local Law 18.

Under current law, the host must live in the home, ensuring accountability and compliance with safety codes; removing that requirement transforms residences into unmonitored transient lodging facilities operating outside of hotel safety standards.

Further, the proposed definition of “family” would expand to allow “one or more living rooms in an apartment” to be rented short-term even when “the family member or



members need not be physically present in the dwelling unit.” This language effectively amends the City Administrative Code to include apartments and other dwelling units, not just one- and two-family homes. Accordingly, every housing unit in the city could function as a short-term rental. That provision directly conflicts with the State Multiple Dwelling Law, which restricts Class A residential buildings to permanent occupancy. That renders this portion of Intro. 948-A legally invalid on its face.

The bill would also redefine the concept of a “primary occupant.” Without the on-premise requirement, a “primary occupant” could exist only on paper. This would invite commercial exploitation, enabling investors and private equity firms to acquire homes, list them under nominal leaseholders, and operate them as full-time short-term rentals. The result would be the permanent removal of housing stock from the long-term market, putting upward pressure on both home prices and rents.

In addition, 948-A’s occupancy rules would allow up to four adult roomers, boarders, or lodgers, and an unlimited number of children per unit. This would make it possible to fill residential apartments with transient guests well beyond what safety or quality-of-life standards contemplate.



### **Arguments Supporting These Bills Are Flawed**

Proponents, including Airbnb and several bill sponsors, claim the legislation would help homeowners cope with rising costs while maintaining primary-residence protections. They argue that one- and two-family homeowners should be free to rent their space without materially affecting housing supply. However, these claims ignore both the structure of the bills and the lessons of recent history. Once unhosted short-term rentals are permitted, the profit potential of transient use exceeds that of long-term tenancy. This dynamic drives speculative acquisition and increases housing costs across neighborhoods. The host-presence requirement was designed precisely to ensure that only genuine residents could share their homes on a short-term basis.

Moreover, the idea that 948-A merely addresses one- and two-family homes is misleading. The actual text of Intro. 948-A, by amending the Administrative Code's definition of "family" and "dwelling unit," would extend to apartments and other multi-unit dwellings. The claim that it "keeps safeguards intact" is therefore incorrect: the removal of the physical presence requirement removes the only safeguard that matters. In reality, they represent a wholesale deregulation of short-term rentals. Because one- and two-family homes make up roughly one-third of New York City's dwellings, and because the bill's language extends to all dwelling units, the measure would open the entire residential market to transient use. The experience prior to Local Law 18 showed that such incentives rapidly attract speculative investors who outbid families for available homes, converting



them into mini hotels. In areas where homeownership is more attainable, such as southeast Queens, eastern Brooklyn, the Bronx, and Staten Island, this could accelerate displacement pressures, especially for working-class homeowners. The promise of short-term rental income often masks a broader pattern in which outside investors purchase multiple homes, convert them into de facto hotels, and thereby bid up prices for residents who simply need a place to live. In sum, Intro. 948-A and Intro. 1107-A are not technical corrections; they are a structural reversal. They remove the on-site host, expand occupancy, undermine safety standards, and redefine the boundaries of residential housing itself.

### **Equity, Neighborhood Stability, and Economic Impacts**

The equity implications of short-term rental deregulation are significant. Studies from McGill University<sup>2</sup> and Inside Airbnb<sup>3</sup> have shown that white hosts in majority-Black neighborhoods tend to capture disproportionate financial benefits, while Black residents experience higher rates of housing loss and rent inflation. In effect, unhosted short-term rentals transfer wealth from communities of color to investors and higher-income owners, undermining local efforts to build intergenerational stability.

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<sup>2</sup> McGill University, Urban Politics & Governance research group, The High Cost of Short Term Rentals In New York City, David Wachsmuth, David Chaney, Danielle Kerrigan, Andrea Shillolo, Robin Basalaev-Binder January 30, 2018 <https://www.mcgill.ca/newsroom/files/newsroom/channels/attach/airbnb-report.pdf>

<sup>3</sup> Inside Airbnb. *The Face of Airbnb, New York City. March 1, 2017.* Available at <https://insideairbnb.com/reports/the-face-of-airbnb-nyc.pdf>



Safety and quality-of-life concerns compound these inequities. Properties that rent to multiple adult guests without a host present often exceed occupancy limits designed for permanent households. When interior rooms are locked or common spaces restricted, guests may lack safe egress in an emergency. Buildings not designed for transient occupancy lack the fire egress, sprinklers, and inspections required for hotel use. Allowing interior rooms to be locked off from guests could leave renters with limited access to exits or essential facilities, heightening risks for both visitors and permanent residents. The city's experience with illegal hotels demonstrates the risks clearly: buildings not built for transient occupancy face higher fire hazards, overcrowding, and maintenance violations.<sup>4</sup>

The Office of Special Enforcement, which currently oversees Local Law 18's registration system, would face an unmanageable enforcement burden if the host-presence requirement were removed. Distinguishing legitimate home-sharing from commercial activity would once again require costly investigations and would return the city to the era of chronic noncompliance. Reintroducing these conditions would again strain city enforcement resources and endanger both guests and residents.

Neighborhood stability is also at stake. The presence of transient guests, particularly in buildings without resident hosts, erodes the social networks that sustain communities.

When residents are replaced by short-term visitors, local institutions—from schools and

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<sup>4</sup> <https://w42st.com/post/airbnb-fight-returns-new-council-bill-sparks-fears-of-back-door-rollback-in-hells-kitchen/>



block associations to small businesses—lose their core customers and participants. The result is a quiet but pervasive form of neighborhood displacement that weakens civic life and alters the economic base of entire districts.

### **Conclusion**

Intro. 948-A and Intro 1107-A represent a major reversal of New York City’s housing policy at a moment when the housing crisis demands greater protection for long-term residents, not less. The bill would erode Local Law 18’s safeguards, legalize unhosted short-term rentals in a vast portion of the city’s housing stock, and reopen the door to commercial exploitation of residential property. The experience of neighborhoods such as Hell’s Kitchen makes clear that once the line between homes and hotels is blurred, the damage to affordability, community stability, and public safety is immediate and difficult to reverse.

For these reasons, we respectfully urge the City Council to reject Intro. 948-A and reaffirm the principle that New York’s housing should first and foremost serve New Yorkers who live and work here year-round. The Council’s responsibility is not only to address affordability in the abstract but to preserve the integrity of neighborhoods and the security of those who call them home.



### **About The Legal Aid Society**

The Legal Aid Society (“LAS”), the nation’s oldest and largest not for profit legal services organization, is more than a law firm for clients who cannot afford to pay for counsel. It is an indispensable component of the legal, social, and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal, and juvenile rights matters, while also fighting for legal reform. This dedication to justice for all New Yorkers continues during the COVID-19 pandemic.

The Legal Aid Society has performed this role in City, State, and federal courts since 1876. It does so by capitalizing on the diverse expertise, experience, and capabilities of more than 2,400 attorneys, social workers, paralegals, and support and administrative staff. Through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City, LAS provides comprehensive legal services in all five boroughs of New York City for clients who cannot afford to pay for private counsel.

LAS’s legal program operates three major practices — Civil, Criminal, and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by LAS’s Pro Bono program. With its annual caseload of more than 200,000 legal matters, The Legal Aid Society takes on more cases for more clients than any other legal services organization in the United States. And it brings a depth and breadth of perspective that is unmatched in the legal profession.

The Legal Aid Society's unique value is an ability to go beyond any one case to create more equitable outcomes for individuals and broader, more powerful systemic change for society as a whole. In addition to the annual caseload of 200,000 individual cases and legal matters, LAS’s law reform representation for clients benefits more than 1.7 million low-income families and individuals in New York City and the landmark rulings in many of these cases have a State-wide and national impact.

The Legal Aid Society is uniquely positioned to speak on issues of law and policy as they relate to homeless New Yorkers and the administration of public benefits. The Legal Aid Society is counsel to the Coalition for the Homeless and for homeless women and men in the *Callahan* and *Eldredge* cases. The Legal Aid Society is also counsel in the *McCain/Boston* litigation in which a final judgment requires the provision of lawful shelter to homeless families. LAS, in collaboration with Hughes Hubbard Reed LLP, settled *Toliver v. New York City Department of Social Services* on behalf of current and past recipients of CityFHEPS and FHEPS rental subsidies.



## MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A

*The Prince George Tenants Union  
14 East 28th Street  
New York, NY 10016*

November 19, 2025

The Prince George Tenants Union is one of the first tenants unions organized in New York City supportive housing.

We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City. While this specific legislation does not immediately impact our situation or change the challenges we face at The Prince George, we are in solidarity with that majority of New Yorkers, median income groups, who face displacement, if not houselessness, due to ever-increasing racial and economic inequality in all five boroughs of NYC.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills

would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.

New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.

Thank you.

*zool Zulkowitz, coordinator for The Prince George Tenants Union*

**ANDREW ANSBRO**  
*President* MAR. 1

**ROBERT C. EUSTACE**  
*Vice President* LAD. 27

**ERIC DIOGUARDI**  
*Recording Secretary* ENG. 72

**CHRISTOPHER VIOLA**  
*Treasurer* ENG. 65

**MICHAEL SCHREIBER**  
*Sergeant-at-Arms*  
*Health & Safety Officer* LAD. 116



## OF GREATER NEW YORK

Local 94, I.A.F.F. AFL-CIO

204 EAST 23<sup>rd</sup> STREET, NEW YORK, N.Y. 10010

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**DOUGLAS CARROLL**  
*Brooklyn Trustee* RETIRED

**DENNIS TVETER**  
*Queens Trustee*  
*Chairman of the Board* LAD. 127

**NOAH MÜELLER**  
*Manhattan Trustee* LAD. 40

**MARC A. DORÉ**  
*Bronx Trustee* ENG. 46

**ROBERT UNGER**  
*Staten Island Trustee* RETIRED

**JOSEPH CONNOLLY**  
*Fire Marshal Representative*

### MEMORANDUM IN OPPOSITION

An local law to amend the New York City building code and the administrative code of the city of New York, in relation to boarders, roomers, or. Lodgers in a private dwelling and short-term rentals in one- and two-family dwellings.

#### **Proposed Int. No. 948-A**

#### **Proposed Int. No. 1107-A**

The Uniformed Firefighters Association of Greater New York, Local 94, *I.A.F.F.*, AFL-CIO (“UFA”) strongly opposes both Proposed Int. No. 948-A and Proposed Int. No. 1107-A, as both proposals seek to deregulate codes in such a way that increases risk to the safety of property and human life, both of civilians and of the first responders tasked with protecting life and property.

Allowing unsupervised rentals of one- and two-family residential units is problematic because such residential units are not required by law to install the same type of fire suppression systems that hotels and larger apartment buildings are required to have by code. In the event of a fire emergency, a lack of sprinklers or fireproof doors can cause a fire to spread more rapidly and, potentially, spread to neighboring residences. Locked and boarded doors and rooms within residences make fire operations more difficult and potentially more hazardous to first responders by creating obstacles within the residential space.

Accordingly, the legislation is opposed because it fails to adequately address issues concerning the ability of first responders to operate in an efficient manner and creates increased risk to property and human life.

For these reasons and many more, the UFA strongly urges the rejection of this legislation.

Respectfully,

Robert C. Eustace  
Vice President  
Uniformed Firefighters Association



## **MEMORANDUM IN OPPOSITION TO INTRO 948-A & INTRO 1107-A**

November 18, 2025

UHAB

For 50 years, UHAB has empowered low- and moderate-income residents to take control of their housing and become homeowners in the buildings where they already live. We turn distressed rental housing into lasting affordable co-ops, and provide comprehensive training and technical assistance to keep these homes healthy and stable for the long term. UHAB has created over 25,000 cooperative homes across the five boroughs, predominantly in formerly redlined neighborhoods where rates of homeownership continue to lag behind the rest of the city. We oppose Intro 948-A and Intro 1107-A because it would roll back key protections created under Local Law 18, weaken enforcement of state housing law, and increase racial and economic inequality across New York City.

These bills will expand the number of boarders allowed in one-and-two family homes and remove the requirement that a permanent resident be present during short-term rentals. This conflicts with New York State's Multiple Dwelling Law, which prohibits unhosted rentals under 30 days. If passed, it would re-legalize illegal hotels, worsen overcrowding, and create new safety risks for tenants, neighbors, and first responders.

The bills would also make the housing crisis worse. One- and two-family homes make up nearly a third of the city's housing stock, around 700,000 units. Allowing these homes to be used for short-term rentals instead of long-term housing would reduce supply, push up rents, and accelerate displacement in working-class and immigrant communities.

Intro 1107-A in particular would allow hosts to rent rooms where guests can lock doors and separate spaces within a single unit. This is not a small change. It creates serious life-safety hazards for both residents and firefighters. FDNY has long warned that illegal conversions and interior locks can turn apartments into "mazes" during emergencies. Allowing these configurations through short-term rentals will make homes more dangerous, not safer, especially in older buildings that were never designed for transient use.

These harms would not be felt equally. During Airbnb's peak, white hosts in predominantly Black neighborhoods earned more than five times what Black hosts earned, while Black renters were six times more likely to lose housing because of short-term rental conversions. Both bills would reopen the door to that same pattern of speculation and displacement, taking wealth out of communities of color and putting it in the hands of large real estate interests.



New York is in a housing emergency that requires real solutions: deeply affordable housing, fair property taxes, and support for tenants and small homeowners. Weakening Local Law 18 does none of this. It puts profit ahead of people and safety.

Intro 948-A and Intro 1107-A is not reform. It is a step backward. We urge the City Council to reject this bill and defend Local Law 18 to keep housing safe, affordable, and equitable for everyone who calls this city home.



**Safety. Science. Transformation.™**

**November 20, 2025**

**Chairperson Pierina Ana Sanchez  
Committee on Housing and Buildings  
The New York City Council  
City Hall  
New York, NY 10007**

**RE: Intro. 1321-2025, Local Law to amend the administrative code of the city of New York, in relation to the enactment of the existing building code, and to repeal chapter 1 of title 27 of such code comprising the 1968 building code**

Dear Chairperson Sanchez:

UL Solutions appreciates the opportunity to voice support to the New York City Council on the proposed adoption of the International Existing Building Code (IEBC) with New York City amendments to replace chapter 1 of title 27 of the 1968 building code.

UL Solutions is a leading safety science company providing testing, inspection, certification, and related services to help our customers demonstrate compliance with standards for safety, security, and sustainability. Together with UL Standards and Engagement (ULSE) and UL Research Institutes (ULRI), we support the 131-year-old UL mission of working for a safer world. ULSE develops safety standards that impact public safety around the world. ULRI conducts independent research into ongoing and emerging human safety risks.<sup>1</sup>

UL Solutions strongly supports this update to the New York City Building Code requirements for the repair, alteration, change of occupancy, additions to and relocation of existing buildings. This legislation, based on provisions in the International Existing Building Code (IEBC), provides coordination with the other New York City construction, fire, mechanical, plumbing and fuel-gas codes (based on the respective model International Codes, or “I-Codes”) and recognizes established approaches for the safe rehabilitation of existing buildings. Our comments here offer several minor technical changes in support of safety for Committee’s consideration.

Importantly, we would like to recognize and commend the work of the technical staff at the Department of Buildings (DOB) and the many volunteer technical experts who have

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<sup>1</sup> ULSE and ULRI are independent affiliates of UL Solutions. ULSE is the majority shareholder of outstanding UL Solutions common stock.

diligently worked on this initiative over several years. They have produced a comprehensive set of code requirements that will foster the safe rehabilitation of existing buildings in New York City. These requirements will support safety without imposing undue burden on the building owners who provide useful buildings for the ever-changing needs of New Yorkers.

We would also like to recognize and fully support the references within the draft New York City Existing Building Code (NYCEBC) to key UL standards, including UL 1479 *Fire Tests of Penetration Firestops*; UL 1369 *Aboveground Piping for Flammable and Combustible Liquids*; and UL 2085 *Standard for Protected Aboveground Tanks for Flammable and Combustible Liquids*. With the requirement that these products and systems be listed and labeled to these standards, the NYCEBC will establish a minimum level of safety for critical fire protection within buildings being renovated.

In addition, we also offer several safety-focused recommendations for consideration by the New York City Council. These comments reflect a detailed technical review of Int. 1321-2025 by UL Solutions subject matter experts.

#### Recommendation 1)

- For additional clarity, we suggest referencing the specific UL standards for flammable liquid tanks found in the New York City Mechanical Code (see underlined language below):

**503.2 Categories of work.** Limited oil-burning appliance alterations shall be limited to the types of work set forth in Sections 503.2.1 and 503.2.2.

**503.2.1 Category 1.** An addition to an existing oil-burning appliance meeting the following conditions:

1. The total cost of the proposed category 1 work in the building does not exceed fifty thousand dollars in any 12-month period; and
2. The proposed work is limited to the installation of:
  1. Oil equipment;
  2. Oil-fired appliances, located within the same enclosure or room as the existing oil-burning appliance;
  3. Unit heaters; or
  4. Oil piping including no more than two above-ground oil tanks each with a capacity of no more than 330 gallons (1249 L), provided such oil tanks also comply with the capacity limits established in Section 1305.11 of the New York City Mechanical Code. The newly installed tanks shall have a UL listing, be labeled ~~be listed and labeled in accordance with UL 80 or UL 142,~~ or meet the alternative tank design and construction standards contained in Section 1305.14 of the New York City Mechanical Code.

Recommendation 2)

- In Chapter 16 (Referenced Standards), the section correlation for UL 2085 should be changed to **809.14 Fuel oil piping and storage**, Exception 6

2085—97 (R2010)	Standard for Protected Aboveground Tanks for Flammable and Combustible Liquids (with Revisions through 2010)	<del>809.2.13</del> <u>808.14</u> (exception 6)
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Recommendation 3)

- In Chapter 16 (Referenced Standards), add UL 1369-2018 (with Revisions through 2020), *Aboveground Piping for Flammable and Combustible Liquids* to the list; section correlation:

<u>1369-18</u>	<u>Aboveground Piping for Flammable and Combustible Liquids</u>	<u>809.14.2</u> (exception 11)
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**809.14.2(11), Outdoor fuel oil piping in existing buildings**

Recommendation 4)

- Consider revising the date of standard reference for UL 1479 to a more current edition. The 4<sup>th</sup> edition was published on June 10, 2015 and UL 1479 now contains revisions through April 30, 2025.

1479— <b>03</b>	Standard for Protected Aboveground Tanks for Flammable and Combustible Liquids <b>(with Revisions through 2010)</b>	502.7.3
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We can provide additional details explaining the revisions since 2010, if requested.

If you have any questions regarding these comments, please do not hesitate to contact us at the phone or emails provided below.



Sincerely,

Bruce E. Johnson

**Bruce E. Johnson**

Regulatory Services Manager  
Codes and Regulatory Services  
UL Solutions

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240 Sundale Road  
Accord, NY 12404

  
[Bruce.Johnson@ul.com](mailto:Bruce.Johnson@ul.com)

Meghan Housewright

**Meghan Housewright**

Government Affairs Lead  
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**Testimony of Urban Green Council  
Before the New York City Council Committee on Housing and Buildings**

**Re: Comments in support of T2025-4492 to amend NYC's Energy  
Conservation Construction Code**

November 20, 2025

Dear Chair Pierina Ana Sanchez and members of the Committee:

My name is Danielle Manley and I am Associate Director of Policy at Urban Green Council, a New York City-based nonprofit with a mission to decarbonize buildings for healthy and resilient communities. Thank you for the opportunity to provide comment in support of the Preconsidered Proposed Introduction T2025-4492 to amend NYC's Energy Conservation Construction Code.

Urban Green has an extensive member network of building practitioners, experts and stakeholders. We have a long history of supporting code development at the city and state level. We are a leading provider of Energy Code training in New York reaching over 17,000 design and building professionals statewide since 2010. And two senior members of our staff were honored to be appointed to the Residential and Commercial code committees this year.

Urban Green applauds and thanks this Committee, the dedicated team at the Department of Buildings and the many volunteers on the technical code committees for their diligent work to update New York City's Energy Conservation Construction Code ("NYC Energy Code"). **We commend the City's swift and timely effort to adopt code changes that will help ensure efficient and affordable construction across the city.**

The updates put forth in this new NYC Energy Code drive further energy savings than the New York State Energy Conservation Construction Code, and the committees took steps to include additional improvements from the draft Stretch energy code. These changes will make buildings across New York City cleaner and more efficient in line with our climate goals. We'd like to highlight two major benefits that will come from the adoption of this proposed code.

## **1. The proposed NYC Energy Code will strengthen the Residential and Commercial codes in ways that boost energy efficiency and save New Yorkers money.**

The proposed new NYC Energy Code will reduce energy waste, cut utility bills, and improve comfort and indoor air quality. This is thanks in part to provisions of the forthcoming statewide energy code and the proposed preconsidered NYC Energy Code code that:

- Improve building envelope performance through stronger insulation, tighter air sealing, lower U-factors for windows, new provisions for thermal bridges and inspections of insulation and windows;
- Upgrade air sealing and air-tightness testing; and
- Enhance lighting and appliance efficiency, as well as additional controls.

We support their inclusion and appreciate the diligence in their consideration from the many energy and design professionals that participated in the process, as these measures will lead to lower operating costs for residents and businesses.

## **2. The proposed NYC Energy Code will support smart electrification and minimize grid demand from NYC's all-electric new buildings.**

New York City's [Local Law 154 of 2021](#) requires most new buildings to be all-electric. This new energy code will further support those buildings with measures that ensure they are designed with *efficient* electrification in mind, which has the dual benefit of limiting grid strain and lowering utility bills.

Along with New York State's new energy code, this new NYC Energy Code will limit the use of electric resistance space heating and supplementary backup systems. Electric resistance heating is inefficient and costlier to operate than electric heat pumps. The measures included in the proposed code to limit their use will reduce emissions and avoid costly grid impacts.

We also support the inclusion of measures that go even further beyond what the new State code will require to ensure smart electrification and minimize grid demand. This includes credits for highly efficient space heating, cooling and domestic hot water, and new demand response requirements for water heating and lighting. It also includes new heat and energy recovery ventilation (HRV and ERV) requirements in some residential units in NYC. Pairing HRVs and ERVs with heat pumps crucially lowers heating loads, enables smaller and cheaper systems, reduces energy use, and cuts utility bills—yielding savings and efficiency in buildings that utilize them.

**Finally, we look forward to additional improvements that will come in 2026 in the development performance-based pathways as required by Local Law 32 of 2018.**

On or after 2025, [Local Law 32](#) requires that DOB propose “predicted energy use targets” for larger buildings to meet NYC Energy Code standards by designing to a performance target. This performance-based energy target framework promises greater simplicity, flexibility and ease of administration. It will also reduce the time and cost of modeling both a baseline and proposed building. We look forward to engaging in that process in the coming months.

We reiterate Urban Green’s strong support for the proposed changes to the NYC Energy Code and commend the work of the Department of Buildings, Code Committees and City Council for their diligent efforts to put them forward.

**CONTACT:**

Danielle Manley  
Associate Director, Policy  
Urban Green Council  
[dm@urbangreencouncil.org](mailto:dm@urbangreencouncil.org)



## **Memorandum in Opposition to Proposed Int. No. 948-A**

VOCAL-NY strongly opposes Intro 948-A, which **is an overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods

VOCAL-NY is a statewide grassroots membership organization that builds power among low-income people affected by HIV/AIDS, the drug war, mass incarceration, and homelessness in order to create healthy and just communities.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

New York City is experiencing a worsening mass homelessness crisis exacerbated by decades of inaction, prioritization of failed approaches, and advancement of harmful, ineffective, and wasteful policies. Our inability to curb the short-term rental crisis made it difficult for the thousands of homeless New Yorkers languishing in shelters to access permanent housing. As of August 2025, more than 100,000 people slept in a New York City shelter on any given night. 35,405 of those New Yorkers were children. We cannot afford to take thousands of units off the market when so many New Yorkers are desperately in need of housing right now.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, we urge the City Council to vote no on Proposed Int. No. 948-A**

**Testimony of Walter Mugdan, President, Westmoreland Association,<sup>1</sup>  
at the N.Y City Council Committee hearing regarding Intro 948-A  
November 20, 2025**

My name is Walter Mugdan. I serve as president of the Westmoreland Association, a civic association representing the Westmoreland section of Little Neck in northeast Queens. Our community is primarily residential, with mostly single-family homes and a number of multi-family homes.

We are strongly opposed to Intro 948A. It is targeted directly at areas zoned for one- and two-family homes, such as hours. It would permit short-term rentals of as little as one night. It would allow up to 4 rooms in a 1-family house, and up to 8 rooms in a 2-family house, to be rented out for as little as one night. The rentals could be to unrelated individuals.

Perhaps most concerning of all is the provision of the bill that the owner of the house need not be a present during rentals and, in fact, need not even use the house as a primary residence at all.

The impact of these proposed overly permissive rules on the peaceful enjoyment of our homes in low-density areas will be dramatic and deeply undesirable. Homes anywhere in our communities may become *de facto* hotels. Houses will be purchased by investors whose only objective will be to maximize rental occupancy and income, rather than by individuals and families who intend to make the community their home.

This bill also stands in direct opposition to the strongly stated objectives of the current and future City administration to increase the amount of housing -- and particularly affordable housing -- available in the City. This bill would have the opposite effect: it would take housing stock *OUT OF* the market for actual residential use and instead convert it to hotel space. And by specifically making such houses attractive and lucrative for use as hotel space instead of residential space, it will further drive up the prices of the remaining homes in the community, thus further undermining efforts to retain and expand affordable housing.

Finally, while this bill focuses on one- and two-family homes, there is every reason to assume that if this bill passes, the proponents will be back soon with efforts to expand these overly permissive rules to apply to higher-density zones.

We urge the Committee to reject Intro 948A.

Thank you.

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<sup>1</sup> For information about the organization, see: [www.westmorelandassn.org](http://www.westmorelandassn.org)



## Young Invincibles

### Memorandum in Opposition to Proposed Int. No. 948-A

Young Invincibles (YI) opposes Intro 948-A, which **is an overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods

YI is a national nonpartisan organization. Our mission is to amplify the voices of young adults (18-34) in the political process and expand economic opportunity for our generations. Our New York Team and network of Young Advocates and volunteers conduct research, grassroots advocacy, and issue-based campaigns on issues impacting affordability, equity, and access. Rent/housing costs are the biggest expense impacting young adults' economic security in NYC.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because it will hurt young folks' access to long-term rentals during an unprecedented housing crisis. The overall residential rental vacancy rate was reported to be [1.4%](#) in early 2025, a historic low. The availability for most affordable units is half that, [0.7%](#). The vast majority of working-class and low-income students and families in New York City do not own their homes and therefore cannot benefit from or provide a short-term rental. This would largely benefit large corporations, foreign real estate investors, and wealthy to upper-middle-class homeowners at the expense of everyday New Yorkers. Increasing the supply of short-term rentals will decrease the supply of long-term rentals, increasing demand and costs. This would also spur gentrification - pushing working-class, Black, and brown young adults, especially, out of neighborhoods they grew up in. We need more long-term rentals and truly affordable housing that young adults can rent or buy, not more short-term units for tourists and foreign corporations.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, we urge the City Council to vote no on Proposed Int. No. 948-A**

**Dr. Abdo Zandani**

Good morning City Council Members,

My name is Dr. Abdo Zandani. I worked for the NYC School System and retired after 31 years of service. I am the embodiment of the American dream, the belief that anyone regardless of their background can achieve success. I raised my four children in our home, only Leila still lives with us.

But here is the thing. That American dream to own a house and keeping it, is slipping away. I and other New Yorkers, who own one and two family homes cannot afford to keep our homes. Affordability is the number one issue for most New Yorkers.

Local Law 18 restricted my ability to share my home with other families visiting New York for short term rental. The rationale was that it will free up more housing. Almost three years into this, affordable housing is still plaguing this city and the hotel industry is cashing in, thus the reason they are here to lobby you.

It is not lack of apartments as it is the lack of affordable apartments. You could build all you want, but if they are not affordable, people, would just simply pick up and go, across the river and elsewhere.

I am asking that you allow us to stay in our homes, by passing Bill 948A and let us use available space (for short term rentals) to subsidize the maintenance, and the real estate cost that continues to increase.

In the larger scheme of things, one and two family homes who use their homes for short term rentals, are not a threat to the rental market, it is the hotel industry greed to muffle small home owners and take away our American dream of owning a home by making it no longer affordable to own a home in this city that we help build.

Thank you.



## **WRITTEN TESTIMONY OPPOSING INTRO 948-A**

**Submitted to the New York City Council on November 19, 2025**

**Adrienne E. Nagy — Resident, Bayside, Queens, NY**

Dear Chair, Members of the Committee, and Council Members:

Thank you for the opportunity to submit testimony regarding Intro 948-A (formerly Intro 1107). I am a lifelong resident of a quiet, low-density neighborhood in Bayside, located in Northeast Queens, and I am writing to express my strong opposition to this bill.

**Intro 948-A would fundamentally and permanently change the character, safety, and stability of single-family and two-family neighborhoods across New York City.**

### **1. This bill would commercialize residential communities**

Intro 948-A would allow up to **four (4) rooms per single-family home** and **up to eight (8) rooms in a two-family home** to be rented for short-term stays—**with no requirement that the owner live on the premises.**

This transforms ordinary homes into de facto hotels. It invites a revolving door of transient visitors, increased traffic, late-night disruptions, and a loss of the safety and cohesion that stable communities rely on.

These are not “home-sharing” arrangements; they are commercial operations placed directly into the heart of low-density residential blocks that were never designed for hotel-level activity.

### **2. It will incentivize large investors, not families, to buy up homes**

Allowing up to eight separate short-term rental rooms per property creates a clear financial incentive for hedge funds, private equity firms, and other speculative investors to purchase one- and two-family homes solely for Airbnb operations.

This will:

- \* Remove precious housing stock from the long-term market
- \* Increase already-skyrocketing home prices
- \* Erode opportunities for families to buy or stay in their communities

- \* Convert stable residential streets into commercial corridors

New York City is already grappling with affordability and displacement. Intro 948-A moves us in the wrong direction.

### **3. The bill undermines Local Law 18, which protected residents from exactly this problem**

Local Law 18 was enacted to address the harmful impacts of unregulated short-term rentals, including disruptions to quality of life, tenant harassment, and the siphoning of homes away from long-term residents.

Intro 948-A would effectively dismantle those protections, reopening the door to the very issues the Council sought to solve.

### **4. Airbnb's aggressive lobbying should not drive policy**

Since early 2024, Airbnb—under its new Chief Legal/Policy Officer—has launched a nationwide effort to roll back local regulations. In New York City, Airbnb has spent over **\$700,000** this year lobbying Council Members and has pledged **\$5 million more** in support of this bill.

To build public pressure, Airbnb has funded “astroturf” organizations, including:

**Restore Home Owners Autonomy and Rights (RHOAR)** — \$150,000

**Homeowners for Financial Empowerment** — \$450,000

**Mobilizing Preachers and Communities (M-PAC)** — which has a long history of Airbnb funding

New York City's housing policy should not be shaped by corporate spending campaigns or manufactured advocacy groups. It should be shaped by residents, by facts, and by a commitment to protecting neighborhoods.

### **5. Northeast Queens and similar low-density communities would bear the brunt**

Our neighborhoods were built around single-family homes, schools, and community institutions. We already face pressure from congestion, unsafe traffic patterns, and quality-of-life concerns. Turning these residential blocks into short-term rental zones would:

- \* Increase noise, traffic, and parking competition
- \* Introduce security concerns from constant turnover
- \* Disrupt the cohesion of longstanding communities
- \* Place additional burdens on sanitation, public safety, and local infrastructure

This is not hypothetical. Neighborhoods across the country that have seen unregulated Airbnb proliferation have experienced all of these harms, and more.

**6. We ask the Council to protect the stability and integrity of our communities**

Intro 948-A is not a modest adjustment. It is a sweeping deregulation that benefits corporate interests at the expense of New York families.

On behalf of myself and my neighbors, I respectfully urge you to:

**1. Oppose Intro 948-A in its current form; and**

**2. Stand firmly in support of Local Law 18 and the protections it provides for neighborhoods and residents**

New York City must protect housing for people who live here, not for corporations that want to profit from it.

Thank you for your time and consideration.

Sincerely,

Adrienne E. Nagy

Resident, Bayside, Queens, NY

Email: [REDACTED]

**ALIA MCKEE MARTINEZ**  
**948A TESTIMONY**

Hello and good morning. I'm really grateful to be here speaking with you. My name is Alia McKee Martinez from Clinton Hill, Brooklyn. I'm a second-generation New Yorker, a first-generation American, and a real NYC homeowner.

After leaving Cuba, my grandparents made their home in Jackson Heights, Queens, and they dreamed that one day their granddaughter would be able to buy a home in New York City. I'm proud to stand here today as the fulfillment of that dream. I own a two-family home, and I'm here in support of Intro 948A. I was not paid to be here.

I support this bill because homesharing is what helps me afford to stay in my home. It's a practical and community-building way that helps me manage the real costs of owning property in this city – taxes, insurance, maintenance and rising expenses across the board.

In our household, we've recently experienced a health crisis that has directly impacted our income. Homesharing could keep us afloat. It's not a luxury. It's what can help us navigate a difficult period while staying rooted in the community we love and cherish.

I'm asking the Council to support Intro 948a. Please don't push homeowners out. Homesharing is part of affordability and stability for real New Yorkers like me.

Thank you for your leadership in our city and for the work you do guiding the Housing and Buildings Committee.

Alia McKee Martinez



Brooklyn, NY 11205

**From:** [althea eugene](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] 948A Hearing  
**Date:** Tuesday, November 18, 2025 12:21:45 AM

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[REDACTED]

My name is Althea Eugene. I am a real NYC homeowner in Brooklyn, District 45. I live in a single-family home. I am asking the committee to vote YES on bill 948 A.

I bought my home as a single parent, and I have lived in the same house for more than 25 years. I would like to continue living here after I retire. I am 64 years old and still have many more years of first and second mortgage payments combined to cover. Home sharing will help me to supplement my income and retire in place.

I am an immigrant, and I don't have many family members who live in NYC. I get to reunite with family when they visit and share my home. Visits from my siblings, my daughter, and 2 grandchildren are increasingly important to me as a senior citizen. Home-sharing provides me with the flexibility to provide space for my family members when they visit.

I thank all the council members for their time, their support and consideration for all New Yorkers. I am in support of 948A and I would like the council to vote "YES"

Yours sincerely,  
Althea Eugene.

I am a resident of Belle Harbor, New York and I want to weigh in on the Bill 948-A that is before the city council. If the following is accurate, I wholeheartedly object.

Homeowners can:

- **Have four (4) short-term renters in their building simultaneously. Eight (8) in a two-family house**
- **Rent out their houses while not being present.**

I have seen the negative impact on neighbors living next to an airBand B in Park Slope Brooklyn.

There were loud late night parties, people going in and out at all hours, trash being set out on any day regardless of the collection schedule. There were renters who showed absolutely no respect for the residential neighborhood they were intruding upon.

There must be strict and clear guidelines for a homeowner who decides to monetize their home.

The number of short term renters in one home should be limited

The homeowner or landlord should be required to be present and responsible for their tenants behavior.

This is a community of families raising children, going to work, supporting local business, and respecting their neighbors.

I encourage the council to modify this bill so there are clear regulations in place that must be followed by any homeowner or corporation that does short term rentals through Air BandB.

This is important to this entire community.

[REDACTED]

Belle Harbor, NY 11694



**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Angela Sinclair

Address:

[REDACTED]

Cambria Heights ny 11411

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- ## Our Concerns:

- For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Name:

Address:

[illegible]

South Ozone Park NY 11420



**Barbara Olszewski**

[REDACTED]  
Middle Village, NY 11379  
[REDACTED]

April, 26, 2025

Dear Hiring Manager,

I am writing to express my strong interest in the Lead, Business Process Improvement position at Airbnb. With extensive experience in leading cross-functional teams and driving operational excellence, I am excited about the opportunity to contribute to Airbnb's mission of creating a world where anyone can belong anywhere.

Throughout my career, I have successfully led large-scale process improvement initiatives, consistently delivering measurable results in efficiency, quality, and customer satisfaction. My leadership approach combines strategic thinking with a hands-on commitment to empowering teams, fostering collaboration, and embedding a culture of continuous improvement. By leveraging methodologies such as Lean and Six Sigma, I have transformed complex operational challenges into streamlined, scalable solutions — aligning business processes with organizational goals.

Airbnb's dynamic environment and dedication to innovation deeply resonate with me. I am particularly inspired by the company's commitment to building trust within its community, and I am confident that my background in leading transformational change will add value to Airbnb's ongoing efforts to enhance operational excellence globally.

I am enthusiastic about the prospect of bringing my expertise to Airbnb and would welcome the opportunity to further discuss how my leadership experience and passion for process improvement can support your objectives. Thank you for considering my application.

Sincerely,  
Barbara Olszewski

Barbara S. Larkin

[REDACTED]  
Belle Harbor, NY. 11694

[REDACTED]  
November 20, 2025

New York City Committee on Housing & Buildings

Re: 948-A & 1107-A

Testimony

Dear Madame Chair & NYC Councilmembers,

As a NYC homeowner & taxpayer of record for decades I am adamantly opposed to the aforementioned bills being considered by the committee for a variety of reasons.

Experts considering the pros & cons of renting rooms in one & two family homes have already successfully offers reasonable mandates resulting in the existing NYC's Local Law 18 which provides regulatory oversight & enforcement mechanisms to address the issues these bills purport to solve. Rather than expanding regulation, the City needs to focus on ensuring existing laws are properly implemented.

Secondly, these bills which do not require owners to be present will serve to encourage speculators to scoop up one & two family homes and turn them into mini hotels where 4, and as many as 8 individuals in two family homes in quiet residential communities (not including those under the age of 18), would be allowed to stay each day! Hard working homeowners who have lived in their communities for decades would witness the erosion of their once beautiful neighborhoods and sell to corporate entities. This spiraling effect would destroy the communities you so desperately want to protect! Additionally, other cities in the United States have scaled back/eliminated similarly passed legislation to restore neighborhoods where children can once again feel safe walking to school, and homeowners can cease contacting law enforcement on a daily basis to quell boisterous, at times, unsavory behavior.

Lastly, it is my understanding that in one Queens community 123 homes have recently been put up on the market ... not because the homeowners wish to move

or cannot afford to live there, but fearful these bills, if passed, will result in the demise of their lovely quiet neighborhood and converted into a 'mini-hotel town.'

As a retired elementary teacher in NYC since 1970 and Community Activist having served as President of the Belle Harbor Property Owners Association for 8 years and presently a Vice President of Queens Civic Congress, I have spent a lifetime volunteering to improve the quality of life in the city I love to call home where I wish to spend my remaining years of my life with my 80-year old husband who is unwell.

I respectfully request that you seriously consider all the testimony given from me, those who have researched the negative ramifications of similar enacted legislation, concerned firefighters, and homeowners hardworking many of whom are immigrants who can foresee the numerous harmful effects of the passage of these bills.

Thank you, in advance, for your considering all the facts and deciding how you wish your legacy to be remembered:

...As a representative of the people who truly wishes our neighborhoods remain the safe & secure communities in which residents comfortably come & go without wondering who their new neighbors are when they wake up each morning .....OR

...As a council member who put the interests of AirB&B as well as corporate entities before the hardworking homeowners who understand that having the owner reside at his primary residence and following the other regulations of Local Law 18 is a MUST if our neighborhoods are to remain the safe havens that presently exist.

Knowing you to be someone who truly cares about his/her constituents, I am hopeful you, as their representative, shall choose the former scenario.

Respectfully submitted,

Barbara S. Larkin

## Basirah

My name is Basirah and I am a resident of New York. Let's be clear. The only reason we are all here today is because Airbnb has spent millions of dollars on elections and lobbyists to push these bills. It doesn't matter how much money they throw at organizations to make it seem like they care about New Yorkers like me. They don't. They care about making money ahead of the World Cup when millions of tourists come to New York. Just like tourists though, Airbnb will come and go without giving a second thought to the damage they leave behind. We already saw what happens when Airbnbs flood the city. Out-of-town investors buy up our homes to make mini-hotels, landlords realize they make more money with tourists than renters, and people who grew up here have to move. If you wanted to help homeowners, you could help connect people to mortgage support programs, or work to lower costs of groceries, or keep home prices down. Instead, any Council Member that supports this bill is sacrificing the workers, renters, and homeowners that elected you in the first place, and you should be ashamed. This is just about making sure a company worth \$85 billion gets to make more money, and no amount of advertising is going to justify the actions of you or Airbnb. Please, stand up to this transparent and shameless power grab. Vote no on Intros 948 and 1107.

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

**Beatrice Aladin**

Address:

 NY 11411

**To the Members of the New York City Council:**

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Sincerely,

Name:

*Beverley McDonough*

Address:



Cambria Heights

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Bishop Boyde Singletary opposes Intro 948-A, which **is a overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods As the Pastor of The Alpha & Omega Church Of Our Lord Jesus Christ Inc. serving the New York City community I must stand against this proposed Int. #948A.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

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**Our Concerns:**

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For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Carole Haute

Address:

[REDACTED]

Cambria Heights, NY 11411



**To the Members of the New York City Council:**

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For all of these reasons, I urge the City Council to reject Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

*Anne Louise Loutens*

Address:

*[REDACTED] F. Davies Blvd  
CAMBRIA HTS, N.Y. 11411*

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For all of these reasons, I urge the City Council to reject Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:



Address:



Barbara Heights NY 11411

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Sincerely,

Name:

JOSEPH LAUTURE 

Address:

[REDACTED ADDRESS]

CANABRIA HEIGHTS NY 11411

**From:** [Carmia Marshall](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Correction to Testimony of Carmia Marshall-David Please Co-Sponser Intro 948A  
**Date:** Wednesday, November 19, 2025 1:50:18 PM

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## **Small Homeowner & Gig Worker in Film and Television**

Regarding Local Law 18 & Intro 948A

Thank you for the opportunity to submit testimony regarding Local Law 18 and the related bills, Intro 948a. My name is Carmia Marshall-David. My husband and I are small, owner-occupied homeowners in Brooklyn, and we are also gig workers in the television and film industry.

I am here to share how Local Law 18 has deeply affected our lives, our home, and our ability to remain stable in New York City.

### **Who We Are: Small, Owner-Occupied Homeowners**

We are not corporate landlords.  
We are not investors with multiple properties.

Our home is a primary residence where we live. The limited short-term rental income we earned from a portion of our home helped us cover our mortgage, property taxes, rising utility costs, and ongoing maintenance. For us, this was not “extra” income or a luxury—it was a vital part of how we stayed afloat.

Since enforcement of Local Law 18 began in September 2023, many small homeowners like myself have lost a critical source of income and face the very real possibility of falling behind on payments. For families like ours, the difference between being allowed to host carefully regulated short-term rentals in our primary home and being barred from doing so can be the difference between stability and foreclosure.

### **Our Work & the Financial Reality We Didn’t See Coming**

My husband and I are gig workers in the television and film industry. Over the last five years, our industry has become extremely volatile due to:

- COVID-19 shutdowns,
- the WGA and SAG-AFTRA strikes, and

- the post-strike contraction and extraction of film and television work from New York.

None of this was predictable, and we have experienced a tremendous amount of financial loss as a result. In that context, the income from short-term rentals in our primary home was not speculation—it was survival.

During these years, finding a suitable long-term tenant was incredibly challenging. There was often a lack of commitment, a reluctance to sign fair agreements, and very little willingness to create an even playing field between us as small homeowners and tenants—especially around protections that would help prevent squatting and other abuses.

We need protection as well.

## **We Are Not Slumlords. We Are Community.**

We are not slumlords who leave tenants without basic necessities. Our home has:

- Provided a safe, clean, and supportive environment for family and friends.
- Offered temporary, affordable housing for other gig workers on jobs, visiting artists, and family members traveling from long distances who cannot afford New York’s extremely expensive hotels and have very few options in the outer boroughs.
- Functioned as a pillar on our block—a place people loved, felt welcomed in, and felt part of.

Losing the ability to responsibly host and rent in our own primary residence undermines not just our financial security, but also the community we’ve built and supported.

## **The Human Side: Homeownership and Generational Stability**

I understand that rents are high and people want decent, safe housing. Inflation is relentless, and good jobs can feel scarce. I care deeply about renters and their right to stability. At the same time, homeownership has long been one of the most reliable ways for working families—especially Black and brown families—to build and pass on generational wealth.

A home is not just an asset on paper. It is something you can pass down to your children and your grandchildren. It is a foundation that can change the trajectory of an entire family line. That possibility is now being put at risk. Small homeowners like myself are being pushed into impossible choices: sell our homes, go into foreclosure, or carry the crushing burden of being regulated as if we were billion-dollar corporate entities.

We are begging to be heard.

Our housing stock is private, small-scale, and owner-occupied. We are talking about one- and two-family homes, not luxury towers or large investor portfolios. We understand that our homes sit in a broader conversation about housing, but the small percentage of properties like ours does not drive or worsen the city’s housing crisis. Yet policies like Local Law 18 are treating us as if we are part of the problem, instead of part of the community that is trying to

survive alongside everyone else.

## What We Are Asking For

I am asking that the Council:

1. **Acknowledge the hardship Local Law 18 has created** for small, owner-occupied one- and two-family homes where the homeowner actually lives in the property.
2. **Recognize that regulated short-term rentals in primary residences** are not the same as corporate “ghost hotels” or large-scale investor operations.
3. **Support thoughtful carve-outs and guardrails** for owner-occupied one- and two-family homes so that renters and small homeowners can coexist without the overreach of harmful legislation.
4. **Ensure that legislation like Intro 948a** reflect the nuance between corporate landlords and families like mine who are simply trying to keep our homes, not build an empire.

Our concern is that we’ve been placed in the same category as large corporate actors, when in fact, we are precisely the type of New Yorkers who should be protected from displacement and foreclosure.

## Closing

Local Law 18, as currently enforced, has unintentionally created a crisis for small, owner-occupied homeowners like me. It has stripped away a key source of income at a time when our industries are unstable and our costs are rising. It has categorized us alongside corporate actors we have nothing in common with.

I am asking you to see us clearly:

- As primary-residence homeowners.
- As gig workers who power New York’s cultural and creative economy.
- As people who have used our home to support others, not exploit them.

Please review **Intro 948a** and the related bills with an open heart and mind. Please consider amendments or new approaches that protect renters **and** small homeowners, so that both can remain secure in this city we all love.

Thank you for your time and consideration.

Respectfully submitted,  
**Carmia Marshall-David**

Small Homeowner & Television/Film Gig Worker  
Brooklyn, New York

**From:** [Carmia Marshall](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony in Support of Intro 948 as a Viable Solution for Small Homeowners  
**Date:** Wednesday, December 3, 2025 9:16:03 PM

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Dear Council Members,

Thank you for the opportunity to submit this testimony in support of Intro 948 as a viable and necessary solution for small homeowners like me.

My name is Carmia Marshall, and I am a small homeowner in Bushwick, Brooklyn. I live in my home. I am not a corporate operator, a large developer, or an outside investor. Like many other Black and Brown homeowners, I am trying to stay afloat in a very difficult economic climate.

I am offering this testimony to share two main concerns:

1. The way the recent hearing on Intro 948 was conducted, and
2. Why Intro 948 (and 948A) provides a fair, regulated path that can help keep families like mine in our homes.

First, for legislation as important as Intro 948, the lack of council members present at the hearing was deeply troubling. This should have been a moment where council members heard from both sides objectively. Instead, the small number of members present sent a message that our experiences and our survival as homeowners were not being treated as a priority.

In addition, the way the the hearing was led felt noticeably biased. Rather than facilitating a balanced and open dialogue, the tone and structure suggested that a decision had already been made. For those of us who came in good faith to testify in support of Intro 948, it felt less like a true hearing and more like a formality. That is painful when so much is at stake for our families.

I want to be very clear: this is not simply an “Airbnb issue.”

This is about a population of small homeowners—many of us Black and Brown, many of us not part of any corporate entity—who are at risk of losing our homes under the current enforcement climate.

We live in our homes. We are financially swamped, and we are seeking a lawful, regulated way to generate income to stay in our homes. For many of us, short-term rental income is not extra money; it is how we pay our mortgages, our taxes, our medical bills, and our basic living expenses.

Right now, existing policies and enforcement are effectively wiping out Black and Brown homeowners who are trying to follow the rules and take the proper protocol to be heard.

In this context, Intro 948—and its companion 948A—offers a viable, balanced solution:

- It creates a clear, regulated path for small, owner-occupied hosts to operate.
- It distinguishes us from corporate entities and large-scale operators.
- It allows the City to maintain oversight and neighborhood protections while still giving homeowners a legal way to generate the income we need just to keep our homes.

We are not asking for special treatment. We are asking for fair treatment, a



truly objective process, and a real opportunity to share our experiences and shape a solution that directly affects whether we can remain in our homes.

I am respectfully asking the Council to:

1. Acknowledge on the record that small, owner-occupied homeowners—especially Black and Brown residents—are distinct from corporate operators and must be considered separately in discussions about short-term rental policy.
2. Hold a follow-up hearing on Intro 948 where:
  - More council members are present and engaged; and
  - The hearing is conducted in a way that is neutral, respectful, and allows equal time for supporters and opponents of the bill.
3. Publicly support Intro 948 (and 948A) as a viable solution that:
  - Provides a regulated path for small homeowners to remain in their homes;
  - Protects neighborhoods from irresponsible actors; and
  - Prevents further financial harm to Black and Brown homeowners who are not part of corporate entities and who actually live in the homes they rent.

I would also like to respectfully request the opportunity to meet with interested council members or staff to discuss this further. Hearing directly from small homeowners who are living this reality can offer insight that is hard to capture in a single hearing. I would welcome the chance to share my experience and to talk through how Intro 948 can be implemented in a way that truly supports the communities most at risk.

Thank you for your time, your consideration, and your service to our community. I look forward to the possibility of continuing this conversation.

Sincerely,

Carmia Marshall

Small Homeowner / Bushwick, Brooklyn

Sent from my iPhone

Testimony

RE: Air BnB Bill-Intro 948-A

Thursday: November 20, 2025

Written Testimony:

Those who are promoting and facilitating the implementation of the above bill are in no way concerned about or supportive of the owners of one and two family dwellings in the City of New York. This bill will only profit the pimps, pushers, predatory realtors and corrupt self-serving politicians who are supporting it for financial gain. It will further de-stabilize our neighborhoods, put our children and property at risk by permitting this agenda to move forward. Many of my neighbors have been homeowners for over 50 years and have witnessed the compromised agendas of self serving political apparatchiks who are only concerned about their own financial gain. We the people will not stand for this invasive and dangerous agenda. We pay an inordinate amount of taxes and the salaries of those who are supporting this bill. We are entitled to the quiet enjoyment of our homes , safety within the parameters of our property and on our streets. The passing of this bill will result in immeasurable negative impact on the citizens of the city of New York and is based entirely on a false premise and has no real legal veritas.

Respectfully submitted,  
Carol A. McCarthy

## **Memorandum in Opposition to Proposed Int. No. 948-A and Int. 1107A**

I, Rev. Celeste Browne, opposes Intro 948-A and Int 1107-A, which **is an overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods. As the Pastor of The Outreach International Christian Fellowship serving the New York City community I must stand against this proposed Int. 948A and Int 1107A.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because this legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection to this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A and Int 1107-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A and Int.1107-A.**

**From:** [Charles Kern](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Yes for Bill 948A  
**Date:** Monday, November 24, 2025 3:46:23 PM

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[REDACTED]

My name is Charles Kern, and I am writing you today to ask you to please vote YES on Bill 948A.

I am a real New York homeowner who lives in Brooklyn with my family in a multi-generational two-family home. My wife and I have lived in this house with our family for eleven years.

SF Our situation is one that many of our neighbors share and understand. We would like to share our home part-time, so that we can pay our mortgage and also have the opportunity to use it for ourselves and our caregivers. Life around us is getting harder and more expensive all the time. And we need to be able to resist financial pressure to sell, or things like tax liens etc. We have already lost a home in the past because we just couldn't keep up with rising costs and taxes.

When we do have guests here in BedStuy, they use businesses here in our neighborhood. Our restaurants, our stores and markets. We always recommend our local places to them. We have been able to help our neighbors and be a resource for them when they need help keeping visiting family members in the neighborhood.

Thank you for your time and attention to this matter. We hope that you and your fellow Council members will vote yes in support of Bill 948A.

This is vitally important to us!

Thank you,

Sandrine and **Charles Kern**

[REDACTED], Brooklyn 11233

Christine Berthet

[REDACTED]  
New York, NY, 10018

November 17, 2025

### **Testimony in opposition to Intro 948 and 1107**

I am a resident of Hell's Kitchen, and I have seen our community decimated by the displacement of neighbors due to the landlords' aggressive use of Airbnb.

These two laws go against the mandate that was given by NYC to the new mayor: affordability first when we have a severe housing crisis.

The language allowing short-term rental of apartments **without a permanent occupant present** directly contradicts the NYS MDL, which requires Class A units to be occupied for permanent residence. Redefining "family" to facilitate STR use also conflicts with state law.

Here are detailed concerns: The laws would allow

**Entire homes are to be STRs year-round**, and "primary occupants" are **on paper only**, making enforcement impossible.

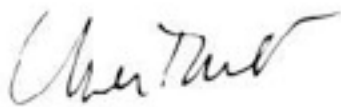
In practice, large investors could designate a nominal "primary occupant" who "travels 365 days a year," leaving units permanently available as STRs. The city would have no reliable means to prove actual primary occupancy.

### **Creates a Pathway for Private Equity and Commercial Operators**

If entire residential units can operate as permanent STRs: Private equity firms can outbid NYC families for housing the housing supply decreases Prices for both rentals and home purchases rise Neighborhood stability declines

This bill invites commercial STR conversion at a citywide scale.

I urge you to oppose these two bills.



[REDACTED] | [REDACTED]

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Rev. Craig Jones opposes Intro 948-A, which is a **overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods. As the Pastor of The Garden Eden Baptist Church serving the New York City community I must stand against this proposed Int. #948A.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

### Testimony regarding Bill 948A and Bill 1107A from Daniel Raleigh

My name is Daniel Raleigh. I am a resident of District 50 in Staten Island. I attended the Housing and Building Committee hearing on Thursday, November 20, 2025 at City Hall with CM Sanchez. I am in support of passing Bill 948A and Bill 1107A.

I am appalled by all the false and negative testimony that took place on Thursday by members of the HTL union, as well as city officials. It was clear to me that the majority of these individuals:

- Did not read either bill, therefore, were not familiar with the facts of the bills;
- Used fear mongering to fuel their testimony;
- Repeated the same two or three lies each time:
  - They would be without a job if Bill 948A or Bill 1107A were passed;
  - Their neighborhood would be overrun with private equity firms that would buy up available housing and convert to Airbnbs;
  - The availability of apartments would be substantially reduced;
  - Their rents would be raised astronomically;

In addition, the testimony of the FDNY fire official indicated that if a fire started on the first floor, it would spread to the second floor, due to the staircase that leads to the second floor. This scenario can happen to any one or two family home, as they are designed this way based on when they were constructed, some being 100 years old or more. Home sharing would not lead to more fires or the spread of fire from one floor to another in one and two family homes. In addition, this official could not give any data about one or two family homes that home share and have experienced this scenario.

The official from OSE, Mr. Klossner and the official from NYC Housing spoke about what could happen if Bill 948A or Bill 1107A were approved. No one has a crystal ball. Also, there is no reason to bring in California or Barcelona regarding home sharing in these places. NYC should be blazing the trail on home sharing, massaging LL 18 to meet the needs of 2,230 one and two family homeowners who rely on home sharing to meet their family needs and expenses.

Something else about the fear mongering regarding private equity firms and Airbnb! Private equity firms have no interest in trying to earn income from home sharing properties. Money is their major concern and most of them are scooping up one and two family homes to convert to section 8 housing. That is guaranteed money, every single month. Just look at the Port Richmond area in Staten Island.

Bill 948A and Bill 1107A applies to one and two family homeowners, folks that are the lifeline to our communities. We have worked here our whole lives, raised families here and support our city.

THIS IS NOT ABOUT HTL OR AIRBNB. THIS IS ABOUT THE SMALL HOMEOWNER. PLEASE DON'T FREEZE US OUT!

In closing, CM Narcisse is correct in saying we have to work together to resolve any concerns.

I am in support of Bill 948A and Bill 1107A because home sharing helps me meet my daily expenses. Without it, I have to forgo necessary home repairs and monthly bills that arise.

Submitted by Daniel Raleigh 11/22/25



**From:** [D.schlachet DD D.schlachet](#)  
**To:** [Testimony](#); [District31](#); [Ratner@council.nyc.gov](#); [Brooks-Powers, Selvena](#)  
**Subject:** [EXTERNAL] Support Intro 948A  
**Date:** Sunday, November 23, 2025 5:57:14 PM

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Dear Council Members:

I am a homeowner of a single family beach bungalow at 162 Beach 25th Street in Far Rockaway, a respected member of my community and a board member of the Beachside Bungalow Preservation Association protecting the community of Bungalow owners in Far Rockaway.

I am writing to you because we owners need the right to be able to rent our homes to help alleviate the increasingly expensive costs of rising taxes, insurance, heating, repairs, water, sewer and the multitude of other expenses. Without that ability, for a few weeks each summer season, many of us would be unable to afford the upkeep and maintenance of our historic home and be unable to live in our community.

We know better about our homes and community than the Hotel Lobby, trying to prevent short term rentals just so that their hotel rates will rise.

We live in our homes. We are not real estate professionals. And we need help affording our homes.

Please help us.

Please support Intro 948A.

Sincerely,

David Schlachet  
[REDACTED], Far Rockaway NY 11691

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Apostle Delores Copeland opposes Intro 948-A, which is **an overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods

As the Pastor of The New Birth Deliverance Christian center we have to stand up in times like these. My church mission is to serve with kindness and treat every one with respect. We have programs that we offer to those in need. We move with the power and direction of God.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

**From:** [Donna Cirillo](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Intro 948-a  
**Date:** Thursday, November 20, 2025 9:29:43 AM

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I am writing in opposition to the proposed legislation to allow AirBnB to operate in residential neighborhoods in NYC.

After relentless campaign housing affordability promises of all the candidates in the recent mayoral race, I am dumbfounded that this ridiculous legislation is even being considered. As a homeowner, I personally would gain because when I sell my home I'm sure the value will increase greatly. And I will sell my house and relocate like every sensible overtaxed New Yorker.

However, I am greatly concerned about the New Yorkers who cannot leave - the elderly who rent apartments and can't afford to any longer and the working class. By allowing units to be AirBnB, you are taking them off the rental market and the rents now are subject to the laws of supply and demand. Economics 101 in action that no one seems to understand.

So please side with the very people you claim to represent - the renters - and not the greedy investors.

Thank you ,

Donna Cirillo

[Sent from Yahoo Mail for iPhone](#)



Committee on Housing and Buildings,  
250 Broadway  
New York, NY  
10007

RE: T2025-4492 Conforming the New York city energy conservation code to the New York state energy code with amendments unique to construction in the city.

Greetings Chairperson Sanchez, members of the Committee, and staff,

Electrify America submits these comments related to T2025-4492, Conforming the New York city energy conservation code to the New York state energy code with amendments unique to construction in the city, specifically on the proposed new section R408.8, requiring electric vehicle service equipment in residential buildings. In short, Electrify America recommends that, if and when the city were to expand such a requirement to commercial or mixed-used properties, if not now, policymakers consider the [Power Allocation Method](#) as an additional compliance pathway to meet charging infrastructure requirements.

The Power Allocation Method, pioneered by California, measures adequate charging infrastructure by the amount of power delivered across the property's chargers versus measuring by the number of parking spaces with chargers. The Power Allocation Method is better-suited for commercial and mixed-use properties, than a percent-based requirement, because their accompanying parking facilities can be much larger than those of a residential building and the parking sessions can be much shorter.

Shorter parking sessions mean that Direct Current Fast Chargers (DCFCs) better complement the parking session because they can provide a meaningful amount of range in just 20 minutes. But, if the 5% requirement were applied to commercial parking facilities, oftentimes comprising over 1,000 spaces, that could necessitate 50-100 chargers which is not currently possible to meet with DCFCs. So the percent-based requirement creates an unintended bias for Level 2 chargers because they are less expensive and easier to build in large numbers. But, using power as the common denominator, the Power Allocation Method is charger-agnostic and accounts for the big differences between the services that different chargers provide, thus, crediting DCFCs appropriately. In turn, it also future-proofs the regulations by allowing the property owner to install the types of chargers that make the most sense for how the parking spaces are used.

In the case of large retail parking lots, a percent-based requirement and the bias it creates toward Level 2 chargers runs contrary to the state's electrification goals. Level 2 chargers need hours to provide a meaningful amount of range, but the parking sessions at a shopping center are typically shorter. At retail parking lots, DCFCs much better complement the parking session, but determining compliance by the sheer quantity of chargers discourages their application. Using power as the measurement for charging accounts for the differences



between Level 2 and fast charging stations with respect to installation costs, necessary resources, and services provided. So, by adopting the power-allocation method as a compliance pathway, NYC will match the state's intent to realize a network of charging infrastructure that supports EV adoption.

This power-based requirement is not a novel idea; California adopted the power allocation method for measuring charging infrastructure in 2023 and already it has produced efficiencies in the permitting process.<sup>1</sup> The result has been more DCFC stations, new retail establishments opening sooner, and partnerships forged between retailers and charging providers to build chargers at future locations.<sup>2</sup> Commercial property owners want to host fast chargers and charging providers want to build them. The power allocation method helps align the state's textual requirements to the intent by removing unintended barriers to building fast chargers where they make the most sense.

Respectfully submitted,

/s/ Anthony Willingham  
Anthony Willingham, AICP  
Gov't Affairs & Public Policy Lead – State Government  
Electrify America, LLC  
anthony.willingham@electrifyamerica.com

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<sup>1</sup> [CHAPTER 5 NONRESIDENTIAL MANDATORY MEASURES - 2022 CALIFORNIA GREEN BUILDING STANDARDS CODE, TITLE 24, PART 11 \(CALGREEN\) WITH JULY](#)

<sup>2</sup> <https://media.electrifyamerica.com/releases/260>

## WRITTEN TESTIMONY OF ELENA DE JESUS

Before the New York City Council, Committee on Housing and Buildings

Regarding Proposed Amendment to Local Law 18 / Intro 948-A

20 November 2025

Chair and Members of the Committee:

My name is Elena De Jesus, and I am the owner of a two-family home in the South Bronx. I am also a single parent. I am writing in strong support of Intro 948-A, which would exempt owner-occupied one- and two-family homes from Local Law 18.

Local Law 18 was designed to address commercial short-term rental operators, yet it has disproportionately affected small homeowners like me who live in and depend on our homes. Short-term hosting is not a business empire. It is part of how I afford to stay in my home and continue raising my child in a stable environment.

Before Local Law 18, I regularly welcomed families from abroad - often European families traveling with children - who wanted to explore New York City without paying hotel prices. They appreciated having a kitchen, a quiet place to rest, and a real neighborhood experience. These are not guests who would have stayed in Midtown hotels; they are families seeking something different and more personal.

My home is in the South Bronx, an underserved community that does not typically benefit from tourism. Hosting brought visitors into a borough many had never set foot in. They spent money at local businesses, shared how pleasantly surprised they were by the neighborhood, and left with a better understanding of the Bronx. That kind of organic economic activity and positive exposure should be welcomed, not discouraged.

I am a five-star host who lives on-site and manages everything directly. There is no comparison between what I do and the large-scale, non-owner-occupied operations that Local Law 18 was intended to regulate. Applying the same restrictions to a single parent in a two-family home simply doesn't reflect the realities of how these properties function.

Short-term rentals in owner-occupied one- and two-family homes do not reduce housing supply, but they do help homeowners like me remain financially stable. Intro 948-A recognizes this distinction and restores balance and fairness to the law.

I respectfully urge the Committee to adopt this amendment.

Thank you for your consideration,

~Elena De Jesus

**From:** [Eli Elysee](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Single family homeowner testimony asking for your support of 948A  
**Date:** Tuesday, November 18, 2025 11:07:31 PM

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Testimonial:

I am a Fine Artist currently residing in Bushwick, Brooklyn, District 34.

When I moved to this neighborhood in 2004, drug gangs were still in the neighborhood. A potential sign of such reality were sneakers tied to the electric lines on my block and other blocks in the immediate area. I've seen newcomers getting chased down the street by some of the less friendly young elements in the neighborhood on a few occasions back in the days.

By the end of 2005, I took a temporary loan from my older brother and his wife to help complete a down payment for a single family home that at the time was barely affordable for someone like myself who had a small savings left in my account.

At the time, the only way I could have afforded the only available home loan was if I accepted a massive interest rate via a lower income friendly program via loans that no longer exist for my income demographic at the time.

As an artist, the only way I could have afforded the mortgage and other bills after I closed, was to fill all the rooms in the house with roommates. Knowing that I really had no other choice to keep this home, I endured some serious misadventures with varying roommates. Despite barely paying the mortgage, I felt that I was imprisoned in my own home with the only choice besides freelancing as an artist/Designer when the income options were scarce.

In 2018, I accepted this woman as a housemate. She apparently understood the housing law benefits that favored tenants in NYC; she paid the security deposit; then after one month, she refused to pay the rent; at the time, I had no extra income to make up for this legalized housing thievery; sure enough, this woman was a professional squatter; so in a time when I had no extra income, I had to borrow money from friends to survive the duration allowed by New York City's housing laws and snail's pace eviction litigations to remove her from my property. It took almost 6 months of free rent while she supposedly was working remotely in my home earning money, until I was able to get her out right before the City Marshall was scheduled to arrive.

Fast forward to around the time when Covid-19 was under control, I had four roommates that turned on me in the house in a drama filled situation when I did them absolutely no wrong. I felt betrayed as I never disrespected these roommates. I had what amounted to a nervous breakdown; as bad as the situation was, luckily these roommates did move out after I gave them 3 months to do so.

Airbnb, an innovative opportunity platform, which gives lower income homeowners an option



to pay their bills via Short Term Rentals, was there to give me some relief after so many years of not having had a second option besides living full time in long term rentals with roommates.

948A is about middle to lower income struggling homeowners in New York City having basic options to pay our bills and keep our homes; otherwise, we're shackled by options to either lose our homes to investors seeking profits, or capitulate to NYC policies that benefits the behemoth corporate interests of the Hotel Industry via their lobbyists.

The homeowners in the 1 and 2 family demographic would be the only ones providing affordable tourism to travelers within our own financial demographic of lower and middle class travelers across the world to actually bridge our cultural divides, something that's always been central to the international hub that NYC represents. By punishing our demographic with no evidential reasons tied to the city's housing woes, only benefits the wealthy hotel lobby. And benefitting the hotel lobby, makes affordable tourism that would spread the wealth throughout less explored neighborhoods with restaurants, bars and concerts throughout NYC would become a thing of the past.

948A is for the forgotten little guys who ought to have a right to keep a home in NYC instead of being driven out of town to benefit the wealthier conglomerates, while keeping simpler folks with less money from visiting New York city. Not endorsing 948A simply means kicking the little guys out of the competition pool to benefit the rich.

We're not Hotels, nor do we host rowdy tourists. My guests follow a very strict house protocol that they're asked to carefully review before agreeing to stay here. So only top quality and morally grounded and respectful guests end up in my home for STRs. The difference between them and the hotel guests is largely traveling affordability.

City government forcing very small home owners with financial difficulties into dictating to them how to live and how to earn has an authoritarian feel to it. 948B alleviates some of that specter. Once again, after a couple of years of trials, there's no statistic that shows that the 1 and 2 family homeowner demographic doing STRs made a dent to solve the housing crisis. <https://www.msn.com/en-us/travel/news/nyc-s-airbnb-ban-failed-to-lower-rents-or-boost-vacancies-report-finds/ar-AA1M4oeF> So what's this all about? It's about greed perpetrated by the Hotel Industry via propaganda against us.

Tenants not tourists? The two have absolutely zero to do with one another as a choice versus another choice if critical thinking is applied. That slogan might as well be carbohydrates not protein, two nutrients that's essential to existing in a culturally rich and welcoming city.

I am kindly asking all of our Council Members to please side with us and do the right thing in your support of 948A. We're on the right side of this debate.

Thank you in advance for your support!

Sincerely,  
Eli Elysée, Artist

**From:** [elsa ortiz](#)  
**To:** [Testimony; elsa ortiz](#)  
**Subject:** [EXTERNAL] 948 A  
**Date:** Sunday, November 23, 2025 7:42:26 AM

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Good morning.

My name is Elsa Ortiz, I am a 1 family homeowner impacted by 1118.

I am retired and with all the high expenses it has been very difficult. Please help us.

Elsa Ortiz

[Yahoo Mail: Search, Organize, Conquer](#)

**From:** [Emily Fischer](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] testimony in support of Bill 948A  
**Date:** Tuesday, November 18, 2025 10:03:32 PM

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To the Committee on Housing and Buildings:

My name is Emily Fischer and I live in District 36. I am an artist, an activist, a mother, and a homeowner. My home is a two-family townhouse in Stuyvesant Heights, Brooklyn that I share with my husband and our nine-year-old daughter. For more than a decade, home-sharing has helped my family keep up with our rising mortgage and property taxes, while also giving us the flexibility to use our home to care for aging parents and support extended family when they need us. I'm asking you to vote YES on Bill 948A, so families like mine can remain in the homes we've worked so hard for.

My husband and I sit on the lower rungs of the middle class. He works for CUNY; I'm a working artist. We recently learned that we qualify for SNAP benefits. When we first tried to buy a home in New York City more than ten years ago, banks literally laughed at us. Eventually, we found a way using a 203k loan for first-time homebuyers, and we purchased an unoccupied, uninhabitable building that no one else wanted. It was our dream then, and it still is today. We have poured years of labor and love into restoring our home ourselves. This is where we are raising our child. This is where we hope to stay for the rest of our lives.

But let me be clear: my husband and I are not landlords. We do not profit from rental income. At best, we break even. Home-sharing is the only model that allows us to responsibly cover our costs. Our house, like many older homes in Brooklyn, is not suited for a full-time tenant. It is technically classified as a two-family based on century-old tax records, but it functions entirely as a single-family home. We share our appliances, not just our space, with the guests we host.

And the people who stay with us? They are almost never tourists. They are new grandparents visiting a newborn a block away. They are parents helping their children settle into college at Pratt. They are former neighborhood residents returning for graduations or to mourn loved ones. They are patients receiving specialized medical care at local hospitals, or women traveling to New York because they can no longer receive the health services they require in their home states. They are neighbors in transition who want to keep their children enrolled in the same schools. These are people for whom hotels are either unaffordable, too far away, or simply do not meet their needs.

I understand the concerns that have been raised about home-sharing in New York City. But my lived experience tells a different story. In my neighborhood, responsible home-sharing strengthens community ties, provides essential flexibility for multigenerational families, and meets real housing needs that hotels cannot fill. It helps people like us, the people in the

middle, maintain a foothold in the city we love.

New York City cannot become a place that only the wealthy can afford to visit, or to live. It must remain a place where working families can survive—and where community networks can thrive. Please vote YES on Bill 948A to help ensure that New York City remains a home for its middle class, not just the people at the very top.

Many thanks for your consideration,  
Emily Fischer



Brooklyn, NY 11221

**From:** [Eric Lundt](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony as a homeowner on the hearing for 948A of Thursday November 20th, 2025  
**Date:** Thursday, November 20, 2025 7:55:35 PM

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Chairmembers and distinguished members of the committee, thank you for the opportunity to speak today.

My name is Eric Lundt, and I have been a homeowner in Bedford-Stuyvesant, borough of Brooklyn, in district 36 for twenty years. I appear before you on my own accord to share my experience and to respectfully urge this committee to vote **YES on Bill 948A**.

Two decades ago, I became the owner of my home after working and saving my whole adult life to achieve this dream. That home has been the center of my life. However, after losing my job and later facing substantially reduced opportunities due to a changing economy—particularly challenging for someone in their mid-50s—I was confronted with difficult financial realities. Home sharing became the means by which I could remain in my home and maintain stability.

I share part of my residence with visitors to the city—individuals and families who choose my neighborhood for many reasons. Some come to see loved ones nearby, others are budget-conscious travelers who simply could not visit New York City if forced to rely solely on hotel prices, and many seek the authentic experience of Brooklyn after previously staying in Manhattan. Over the years, I have met countless guests, some of whom have become close friends. They consistently express how meaningful it is to return not to a hotel room but to a real home after long days exploring the city.

Home sharing also brings direct economic benefits to my neighborhood. Local cafés, restaurants along Lewis Avenue, and nearby markets all see increased business from visitors who would otherwise never venture into our community. In a neighborhood like Bedford-Stuyvesant—where I have witnessed numerous small businesses struggle or close over the past twenty years—this additional economic activity matters immensely.

Local Law 18 was necessary due to bad actors like LLCs and investors taking away apartment stock for illegal hotel spaces. Unfortunately, some constraints imposed by LL18 have made responsible hosting increasingly difficult for real home sharers like me. The lack of privacy for both hosts and guests under the current framework is uncomfortable. The absence of door locks, required under current rules, has alarmed many guests, some of whom have cancelled their stays as a result. Families, in particular, are discouraged by the restriction limiting occupancy to two people. I have had to turn away good, responsible visitors simply because the law forces me to do so.

The space that I share cannot realistically be converted into a traditional rental unit. Doing so would require reclassifying the home as a multiple dwelling, securing a new Certificate of Occupancy, and installing an additional kitchen—an extensive and costly process. The city does not provide free legal guidance, expedited approvals, or funding for the required renovations. For homeowners like myself, this regulatory burden makes such a conversion effectively impossible.

My home is also integral to my family's well-being. I care for my mother, who stays with me for weeks at a time. My nieces, nephews, and close friends also visit regularly. A long-term tenant could not reasonably be asked to vacate every few months to accommodate family needs. Without the ability to share my home with visitors when it is otherwise unoccupied, the space would simply sit unused, an unnecessary waste.

Home sharing has allowed me to maintain my home, remain financially stable, and contribute to the cultural and economic vibrancy of my neighborhood. It provides visitors with opportunities they would otherwise not be able to afford and supports the small businesses that keep our community thriving.

For these reasons, I respectfully ask this committee to vote **YES on Bill 948A**. As a long-standing, tax-paying, and responsible homeowner, I believe this legislation is essential to preserving both the character of our community and the ability of homeowners like myself to remain rooted in the homes we have worked so hard to secure.

Thank you for your time and consideration.

**From:** [Erica Hutchinson](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Please vote Yes on Bill 948A  
**Date:** Thursday, November 20, 2025 6:31:55 PM

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[REDACTED]

Hello City Council Member,

I hope that this message finds you well. My name is Erica Hutchinson and I live in a two family home in district 35 of Brooklyn that I purchased with my dad in 1998.

I am writing to you as a real homeowner speaking to my lived experience and advocating for my rights. I was not paid for my testimony nor was this testimony written for me.

I'm asking the committee to please vote yes on bill 948A.

I am a single mom to an active and curious 10 year old who I'm able to provide for both financially and in terms of my time, with supplemental income from home sharing, which also affords me the flexibility of working for myself.

That supplemental income allows my son to enjoy extracurricular activities while also allowing me to be more present and active at his school and in our community. We have both benefited greatly from home sharing as have our guests. Every home sharing experience has the potential to make the world smaller one experience and connection at a time. It brings travelers to the outer boroughs which benefits the local small businesses greatly.

Home sharing also provides more reasonably priced accommodation options than hotels which allow for families or students with smaller travel budgets to visit and enjoy our city without having to spend hundreds a dollars a night for a hotel room.

I've lost 30-40% of my home sharing income since restrictions have been put in place eliminating my ability to rent my place for less than 30 days. That lost revenue has directly impacted my ability to provide for my son, pay bills and maintain my 126 year old home which is often need of repair.

Real homeowners are suffering while the greedy hotel owners are only motivated by profits and their desire to eliminate any possible competition as evidenced by the 30%+ increase in hotel room rates in the two years that home sharing has been limited.

I thank you for your attention to this matter and I hope that you will vote to support bill 948A.

Warmly,

Erica Hutchinson

**From:** [Erika Tullberg](#)  
**To:** [Testimony](#)  
**Cc:** [Hudson, Crystal](#); [Wright, Andrew](#)  
**Subject:** [EXTERNAL] Support for Intro 948A  
**Date:** Wednesday, November 19, 2025 8:44:54 AM

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Good morning - I am reaching out to ask for your support for Intro 948A, the subject of a City Council hearing tomorrow morning, which would provide small homeowners like myself a needed financial lifeline.

I have lived in Brooklyn for over 30 years and owned my two-family home in Crown Heights for 16 years. I am a single mother and an adoptive parent, and work part-time to maintain flexibility needed for my daughter, who has special needs, and have depended on rental income to pay my mortgage. I used to do home-sharing, but since the changes in city law following Local Law 18 I am losing money every month, which is challenging given the costs of maintaining a 126-year-old home, including maintenance/repairs, remediation related to increasing climate change-related flooding, and rising insurance costs.

I am urging you to support this legislation, which data show would not have any significant impact on the rental housing stock in the city. Based on my own experience as a former home sharer, I believe the city is also losing critical tourism dollars to places like Jersey City, where people like my former guests - largely students, people visiting nearby family and others who could not afford hotel prices - are now staying, which is why this legislation also has the support of local business groups like the Brooklyn Chamber of Commerce.

I get phone calls weekly from investors who are interested in buying homes like mine and flipping them for a quick profit. I know other former home sharers have had to sell their homes because of the income they have lost following LL18's implementation - those houses are largely becoming luxury one-family properties, doing nothing to increase the city's available housing, and simultaneously changing the character and decreasing the affordability of our communities for long-time residents.

The hotel industry has put *millions* of dollars into lobbying against this tweak to the city's laws, and encourage you to stand up to them! It is putting out misinformation in an effort to distract from the focus of this legislation, which is small homeowners who are at risk of losing their homes - it would not apply to apartment buildings and it would not allow "bad actors" to run their own scatter-site hotels while taking rentals off the market. New York City's hotels are making record profits, and would not be negatively impacted by expanding the options for people who want to visit New York to be there for their grandchild's birth, to provide short-term child care, or to see the city on a student's budget - we are talking about two different "tourist" populations, there is enough room to accommodate both while supporting working and middle class homeowners!



Thank you for your consideration,

Erika Tullberg



# **Testimony in Support of Adopting the New York City Existing Building Code**

Submitted by: Fatma Amer, PE

## **Introduction**

Good morning, Chair Sanchez, members, and staff of the NYC City Council, thank you for the opportunity to provide testimony in support of the adoption of the New York City Existing Building Code (EBC). My name is Fatma Amer and I am a practicing engineer in NYC and former first deputy commissioner of the Department of Buildings

New York City has one of the largest inventories of aging buildings in the United States. As these buildings undergo repair, alteration, or modernization, the current reliance on codes designed for new construction has proven to be costly, inefficient, and in many cases, impractical. The EBC fills this gap by creating a framework tailored to the unique realities of existing buildings.

## **Why the EBC is Essential**

### **1. Public Safety First**

The EBC provides incremental, achievable compliance options that encourage owners to make safety improvements such as fire protection, egress, and structural upgrades that might otherwise be deferred or avoided. This results in a safer built environment for residents, workers, and visitors alike.

### **2. Proportional and Practical Compliance**

Unlike the current scheme of building upgrades, the EBC recognizes the limitations of existing buildings and establishes a measurable tool (Work Area) for such upgrades. This balances the need for safety with feasibility, reducing the reliance on costly variance processes and appeals.

### **3. Economic Benefits and Job Creation**

Streamlined and predictable compliance pathways encourage owners and developers to invest in building rehabilitation. This investment creates demand for architects, engineers, contractors, and skilled trades fueling local job growth and economic activity.

### **4. Sustainability and Housing Preservation**

Modernizing existing buildings is inherently more sustainable than demolition and reconstruction. The EBC helps preserve our historic and affordable housing stock while advancing energy efficiency and climate goals.

### **5. Consistency with National Best Practices**

The EBC is modeled on the International Existing Building Code (IEBC), which has been widely adopted across the nation. By aligning with these national standards while tailoring provisions to New York City's unique needs, the EBC provides both familiarity and innovation.

## **Conclusion**

Adopting the New York City Existing Building Code represents a critical step forward. It will:

- Enhance public safety,
- Reduce unnecessary costs and delays,

- Stimulate investment and create jobs,
- Advance sustainability and preserve housing, and
- Modernize our regulatory framework in alignment with national standards.

For these reasons, I strongly urge the City Council to approve this code. It is a balanced, forward-looking solution that will benefit all New Yorkers by making our built environment safer, stronger, and more sustainable.

Thank you for your time and leadership on this important issue.

I, Flagumy Valcourt, am submitting this testimony to explain how operating a Homesharing arrangement on my property has become an essential part of my economic stability and has directly allowed me to support my long-term tenant living on the first floor of the same property. As the owner, I carry the full responsibility for the mortgage, maintenance, insurance, and rising property-related costs. In recent years, these expenses have increased significantly, and without an additional income source, it would have been extremely difficult for me to keep the existing rent at an affordable rate for my long-term tenant.

Homesharing has provided a critical financial cushion by generating supplemental income that bridges the gap between my property expenses and the rent I collect from my full-time tenant. This “surplus of funds” is not profit in the luxurious sense, but rather the margin that ensures I can consistently meet the monthly financial obligations tied to the property. Without this additional income, I would have little choice but to raise the rent on my downstairs tenant simply to keep the property afloat.

My goal has never been to displace or financially burden the tenant who resides on the first floor. In fact, maintaining their stability and affordability has been a priority for me. The income produced through Homesharing allows me to achieve this by offsetting the growing costs of property ownership. It gives me the financial flexibility to absorb increases in utilities, repairs, taxes, and mortgage rates without passing those costs on to the tenant. As a result, they are able to remain in the home they have lived in and rely on, without facing a rent hike that could potentially force them out.

Homesharing has essentially become a tool that allows me to act responsibly as a property owner and as a member of my community. It gives me the means to support stable housing for someone else while responsibly managing my financial obligations. For these reasons, Homesharing is not just beneficial to me personally—it plays an important role in helping me preserve affordable housing within my own property. The supplementary income is what allows me to maintain balance, remain current on all property-related costs, and uphold my commitment to keeping the rent fair and manageable for my downstairs tenant.

Sincerely,

Flagumy Valcourt

As a resident of NYC, I testify against landlords using Airbnb to rent out rooms from both single and multi-family homes. This is dangerous on many levels for residential neighborhoods, but it's turning homes into motels and hotels. Members of a community need to feel safe at their homes in a city that has enough crime. There are plenty of motels and hotels in NYC that can be used by Airbnb.

Thank you,  
Francesca Roman

**From:** [GABRIEL BRUNISKI](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Pass Intr948A and protect outer borough communities  
**Date:** Wednesday, November 26, 2025 1:52:21 PM

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Dear Official NYC Council Testimony Submission,

While I am thankful to live in the greatest city in the world, I have to string together multiple streams of income to be able to afford the monthly mortgage and housing expenses, repair costs that come with owning a hundred-year-old home, and provide for my family. Local Law 18 stripped away an essential source of income for me and my family. I have several neighbors who have been forced to leave our community because they can no longer make ends meet.

Until Local Law 18, it was possible for lower- and middle-income New Yorkers to own a home, particularly in the outer boroughs. Regular New Yorkers like me could make ends meet by renting out a spare room, renting out our homes while traveling, or renting an in-law's space for the holidays while they're away visiting family.

I don't own multiple units that could be long-term rentals, and I am not taking housing off the market. I own the home I live in. Throughout the year, my family and I use our whole home to welcome family and community members in need of temporary housing. In between, we rely on home-sharing to help make ends meet. I have not contributed to the disruption and safety concerns associated with short-term rentals in apartment buildings, nor am I the cause of NYC's housing crisis. Punishing homeowners like me is only making communities more vulnerable, making homeownership unsustainable, and pushing regular New Yorkers out of the city, ceding our neighborhoods to wealthy speculators.

Keeping the strongest protections in place to prevent party homes and keep our communities safe, 948A will make small, common-sense updates so that New Yorkers like us who own and live in our homes full-time can:

- host up to 4 guests, not including children (current law only allows 2 guests including children)
- rent out their property without being physically present, like while traveling
- put locks on private spaces

These simple changes will mean the difference between low- and middle-income New Yorkers being able to stay in the city we love or not. Please pass Intro 948A.

GABRIEL BRUNISKI

[REDACTED], BROOKLYN, NY, US, 11207

**From:** [George Schneiderman](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [District9](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 12:37:09 AM

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I am submitting this testimony to express my support for Intro 948A as a first step in helping New York City homeowners by relaxing onerous restrictions on short-term rentals in owner-occupied multi-family homes. I am a District 9 resident testifying on my own behalf. I wrote my own testimony and I am not being paid or otherwise compensated for this.

More than 20 years ago, my wife and I purchased a two-family house in Harlem. We have lived in it ever since, raising our three children here. Now, we find ourselves at a point in our lives when we want more flexibility in how we use our garden-level unit, which we have furnished for the purpose of hosting family members and friends. Our parents are getting older, and experiencing the usual challenges of aging. All of our children are now adults. While none of them is yet in need of a longer-term apartment near us, we want the flexibility to be able to accommodate that when the time comes, without first having to force out a tenant. And we also want to be able to accommodate them for short- to medium- term visits—as well as other friends and family members, and the family members of our many friends in the neighborhood who have expressed interest in such an arrangement, especially when they have family visiting for religious holidays and major life cycle events. New York City's current restrictions on short-term rentals in two-family homes make that effectively impossible, since we depend on rental income to help pay the mortgage and other building expenses, and cannot afford to keep the apartment empty most of the time. The apartment is part of our family's home, and it isn't right that we cannot use it in the way that would best accommodate our family's needs.

In addition to the statement above, which I submitted to the hearing by video teleconference, I also wish to respond to misinformation that was delivered during the hearing by a city official (I believe Christian Klossner). He repeatedly asserted that the short-term rental of 1- and 2- family homes in NYC has "always" been illegal, claiming that Local Law 18 merely provided a mechanism whereby that pre-existing law could be enforced. This is not true. Until some time after about 2014, it was accepted that the law did **not** prohibit short-term rentals of 1- and 2- family homes in NYC. A 2016 WNYC news story quotes multiple sources to that effect, including both a state senator being interviewed by a

journalist in 2014, and the general counsel for the Mayor's Office of Criminal Justice in 2015 testimony before the city council (<https://www.wnyc.org/story/think-private-homes-are-safe-list-airbnb-think-again/>; emphasis added):

On the Leonard Lopate Show in 2014, **State Senator Liz Krueger, a well-known critic of Airbnb said**, "If they own a single- or double-family home **it is not illegal.**"

In a 2015 City Council Hearing, Councilman Jumaane Williams asked **Alex Crohn, General Counsel for the Mayor's Office of Criminal Justice**, how many violations have been issued to one- and two-family homeowners.

**Crohn responded somewhat incredulously**: "I mean, I think, as the Council Member noted, **the one- and two-families are exempt from the multiple dwelling law, so those violations should not be issued.**"

In 2020, as reported in *The Real Deal*, when Brooklyn homeowner Stanley Karol disputed the fines that had been assessed for ostensibly "illegal" short-term rentals, the trial judge concluded that there was no such prohibition, and threw out the fines. (<https://therealdeal.com/new-york/2020/05/12/judge-backs-airbnb-host-over-city-leave-the-poor-guy-alone/>) Only on appeal was the city able to secure a legal ruling that such a prohibition existed. The city's position is grounded in the fact that in the building code, occupancy group R-3 refers to "buildings ... containing no more than 2 dwelling units, occupied, as a rule, for shelter and sleeping accommodations on a long term basis for a month or more at a time". "As a rule" is an idiomatic phrase that means "usually, but not always", so reading that provision as constituting a *prohibition* seems strained. But not only was that terminology not interpreted as constituting a restriction on short-term rentals until 2014 or later—it wasn't even part of the code until 2008! The prior building code, from 1968, had three main residential occupancy groups. J-1 (which became R-1) was specifically for transient occupation "on a day-to-day or week-to-week basis". J-2 (which became R-2) was expressly for buildings with "three or more dwelling units that are occupied for **permanent** residence purposes" (emphasis added). But J-3 (which became R-3), for 1- and 2- family homes, was silent on the question of duration.

From this history, it is clearly **not true** that short-term rentals in 1- and 2- family homes in NYC have "always" been illegal. Rather, the city declared such rentals illegal circa 2014 on the basis of an ambiguous administrative code provision that had not previously been interpreted that way and wasn't even *in* the administrative code until 2008. I am not a lawyer, but that sounds to me like gross administrative overreach that amounts to an unconstitutional and unjust taking in violation of city residents' property rights.

Respectfully,

George Schneiderman

[REDACTED]



**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

GHANA STEWART

Address:

[REDACTED]

CAMBRIA HEIGHTS, N.Y. 11411

**From:** [grant harder](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Intro 948 testimony  
**Date:** Sunday, November 23, 2025 9:24:21 AM

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Dear NYC CITY COUNCIL,

Stop the paternalistic and gaslighting nonsense. Listening to the hearing on November 20, I couldn't believe my ears. City agencies and tenant groups appeared before you to claim they were looking to protect the meek and incapable homeowners. Homeowners like me are not incapable. The fact that we managed to buy a home despite this City's cost and bureaucracy shows tenacity and smarts.

Can't the City Council just understand that this City's owner occupied one- and two-family homes represent some of the hardest working New Yorkers that there are. The very people you want in your neighborhoods and to be your neighbors because we are capable do-ers.

This is why we don't want to be one of the 2900 phone calls to try to get help from the Homeowner Help Line to try to avoid foreclosure. Listen to me. **I want to do everything within my power to stay in my homes that I love, with the neighbors I love and in the community I love.** Short-term rentals simply help me and many others to do that. As a homeowner, I want to have a level of agency over my home.

Help us help ourselves. Any other discussion or opinion on this topic is simply covering for monied interests that are more powerful than NYC homeowners. That doesn't make those interests more right or more strong. It just gives them a bigger pot of money. Don't let them persuade you.

Please listen to the homeowners that you heard on November 20th and in written testimony. Give us a leg up, not a beat down. And stop letting those who appear before you to define us and talk down to us. We are your neighbors. We are your communities. Let us take care of ourselves.

Grant Harder  
Homeowner

### **Hazel Hazzard Testimony:**

My name is Hazel Hazzard. I am a proud member of the Hotel Trades Council, who moved to this country from Trinidad when I was 18, and with a union job, have worked my way up from being a room attendant to now serving as the Vice President of the Hotel Trades Council and Local 6.

I am here today because it's up to union members like me to tell you what's at stake.

I first got involved with the union when I started working as a nonunion room attendant at the Four Seasons in 1993. Soon after starting there, I worked with Local 6 reps to organize my co-workers. We overwhelmingly won the card check and became a union

After about a year, I became a delegate and dedicated all of my weekends to organizing other hotels. In 1997, I joined the union full time as a business agent and I have loved every moment of my job since.

So much of my job is telling workers about what we can get done as part of a union. HTC is a voice for those who cannot be heard, and the benefits that we offer—the benefits that we fought for—are truly life changing. The wages, the benefits, and the respect and dignity. All of these things I take pride in being able to provide to workers. With a job like this, a room attendant like me *can* buy a home. They *can* afford to raise a family. They *can* build a life for themselves.

That ability to empower working people starting out just like me is the best part of my job. At HTC, we like to say, “when we fight, we win” because it's true. From their first day, I make sure that new members know that we get our wages because of the battles members took on before them. When they hear that, it motivates them and lets them know that they can have a stable life if they're willing to fight for it. Airbnb is another fight.

This is not a complicated issue, there's a right side and a wrong side to be on. Airbnb doesn't care about New Yorkers, they care about profits. If we allow Airbnb to get away with passing Intros 948 and 1107—especially before the World Cup—hotels will lose out on tens of thousands of guests per year and the industry will start cutting jobs. Our livelihoods are at stake. We are fighting so we can continue paying our mortgages, sending our kids to college and living our lives with the dignity we deserve.

At a time when New York is increasingly affordable, we need to protect good paying jobs like ours—not cut away at them. Please, do not put the interests of corporations ahead of the interests of thousands of working people like me. Vote no on Intros 948 and 1107.



Written Testimony Opposing Intro 948-A....Hearing Held Nov. 20, 2025, NYC Council

On Thursday, Nov. 20, 2025, the Housing and Buildings Committee (CM Pierina Ana Sanchez, Chair) held a City Council hearing to gather testimony regarding Intro 948-A. I did testify via Zoom teleconference that day around 5:30 PM after waiting 7 hours to speak. Since we were only allowed 90 seconds to speak, because of the huge amount of people wishing to comment, I was unable to finish my statement in the time allotment. So I told Chair Sanchez that I would submit written testimony within the allowable 72 hour time period after adjournment.

My name is Henry Euler, and I am the President of the Auburndale Improvement Association, a civic organization covering the Auburndale section of Flushing, and Western Bayside, in Queens. I am opposed to Intro 948-A, which would effect one and two family districts. It would allow AirBnb style short-term rentals of up to 4 rooms in one family homes, and up to 8 rooms in two family homes. I feel that many of the members of my civic would oppose this Intro as well.

This Intro will negatively impact on the stability, security, and safety of my diverse community. In particular, since the owner/host does not have to live in the dwelling where the short-term rentals would be occurring, this would open a Pandora's Box of problems and issues for those residents who do not participate in such activity. Who would supervise the rooms being rented, who would enforce the regulations for such units, and what would happen in case of fire, use by squatters of such units, and other illegal activity?

There is also the infrastructure issues of the one and two family districts where these rentals would occur, as well as the impact on parking. If all four rooms in a one family home were rented under this proposal, that would bring at least four unrelated extra persons into the community. Multiply that by the number of homes that this could affect. Some people are talking about speculators who might want to buy homes just to rent the rooms out under this Intro. The speculator would not have to live in the home, just basically collect the rent. Since the rentals would be short-term, there would be a continuous turnover of people who would rent these rooms.

We all hear about the affordability problems these days. It is sad that so many people have trouble keeping up with payments on their homes as well as deal with the issues of affording food, energy and other basic needs for themselves and their families. However, this scheme being proposed is likely to cause many problems for our neighborhoods. It is up to our elected officials to offer more realistic strategies to deal with these problems and to work with all stakeholders to seek solutions.

Henry Euler



*Henry Euler*

11/22/25



To the Members of the New York City Council:

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

HILDEGARDE PAYNE

Address:

[REDACTED]

CAMBRIA HC, NY 1141

# PETITION OPPOSING THE LEGALIZATION OF AIRBNBS IN HOWARD BEACH AND THROUGHOUT NEW YORK CITY

We, the undersigned residents of Howard Beach and communities across New York City, firmly oppose the legalization and expansion of Airbnb and other short-term rental operations in our neighborhoods.

Our community is already struggling with traffic congestion, limited parking availability, and overcrowded streets. Legalizing Airbnbs would further strain these conditions by bringing a constant rotation of short-term visitors who often arrive with multiple vehicles and have no regard for local parking rules or neighborhood limitations. Howard Beach, like many parts of NYC, simply cannot support additional parking pressure without compromising residents' daily quality of life.

In addition, allowing Airbnbs in residential neighborhoods raises serious safety concerns. Short-term guests are not vetted, monitored, or connected to the community. This steady flow of unfamiliar individuals threatens neighborhood stability, makes it more difficult for law enforcement and residents to identify who belongs in the area, and increases the risk of crime, disturbances, and unauthorized gatherings.

Our neighborhoods were built on long-term residency, community trust, and residential zoning—not transient rentals. We believe that the legalization of Airbnbs undermines the safety, security, and character of Howard Beach and all New York City communities.

For these reasons, we respectfully urge city officials and lawmakers to reject any measure that legalizes or expands Airbnb operations within residential areas.

Signature:  Printed Name: Marina BATTAGLIA

Address:  Date: 11/20/25

Signature:  Printed Name: Joseph Passarella

Address:  Date: 11/20/2025

Signature:  Printed Name: Giuseppa Battaglia

Address:  Date: 11/20/2025

Signature:  Printed Name: Gondolfa Mangialino

Address:  Date: 11/20/25



Signature: Marie Passarella

Printed Name: Marie Passarella

Address: [REDACTED]

Date: 11/20/25

Signature: John Pasarella

Printed Name: John Pasarella

Address: [REDACTED]

Date: 11/20/2025

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Rev.Iris Bonifacio opposes Intro 948-A, which **is a overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods As the Pastor of The Evangelical Garifuna council churches serving the New York City community I must stand against this proposed Int. #948A.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

**From:** [Ivana Ameigeiras](#)  
**To:** [Testimony; Ivana Ameigeiras](#)  
**Subject:** [EXTERNAL] Written Testimony in support of Intro 948-A for the hearing on 11/20/25  
**Date:** Sunday, November 23, 2025 11:53:51 AM

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## Testimony Before the New York City Council

Written Testimony in support of Intro 948-A for the hearing on 11/20/25

Good afternoon Chair Sanchez, members of the Council, and fellow New Yorkers.

Thank you for the opportunity to speak today.

Thank you for the opportunity to submit testimony regarding Intro 948-A. My name Ivana Ameigeiras, and I am a white Latin immigrant and a homeowner in Bed-Stuy. I am a single mother who, in 2006, was able to buy a house in a neighborhood that was, at the time, economically depressed. I did so through hard work, as the daughter of farmworkers, cleaning staff, and an administrative clerk, and as the first in my family to graduate from college.

I am writing to urge you to vote **YES** on Intro 948-A. This bill is not about gentrification, which in my experience happened because Brooklyn became expensive, pushing homebuyers into more affordable areas like Bed-Stuy was at the time. This bill is about providing a lifeline for middle-class homeowners who are struggling to make ends meet in an increasingly expensive city. The income from renting out available space in our homes through short-term rentals (STRs) is crucial for us to afford rising taxes, insurance, and maintenance costs.

Thank you, Ms. Chair Sanchez, for candidly express your serious concerns about intro 948-A. I have to admit that I thought we were open to equally hearing both sides of the argument. Instead, follow up questions to further explain arguments against intro 948-A were made.

I would also like to address some misconceptions and express my disappointment with aspects of the recent hearing.

- **STRs and Gentrification:** The narrative that STRs drive gentrification is flawed. In many cases, it is the other way around. Gentrification makes neighborhoods expensive, and STR income helps longtime residents afford to stay in their homes as costs rise, preventing displacement.
- **Income for Middle-Class Homeowners:** The assumption that all homeowners are wealthy is incorrect. Many of us depend on rental income to pay our mortgages, maintain our properties, and afford utilities. Wealthy owners do not need to rent out parts of their property; this is an essential tool for the middle-class New Yorker.

**Accuracy of the Hearing Record:** I was disheartened by the allowance of a study based on racial profiling during the hearing. I formally request that this study, which is likely inaccurate, racist, and discriminatory, be removed from the official record. Intro 948-A should be evaluated on its merits, not on prejudiced and offensive arguments.

- **Addressing STR Objections:**

- **Vacant Houses:** Small, middle-class homeowners cannot afford to hold vacant units. It is wealthy speculators, not the target of this bill, who are able to do so. This bill targets owner-occupied properties, preventing the "buy and evict" scenario described by opponents.
- **Owner-Occupied Requirement:** The claim that it is impossible to establish if a host is the owner is false. The Office of Special Enforcement (OSE) registration process requires extensive documentation, including bank statements, driver's licenses, and utility bills, to prove residency.
- **Low STR Application Numbers:** The low number of applications is not defiance, but a result of homeowners feeling intimidated and afraid, and a lack of proper pathways for owner-occupied rentals that are present-in-home. Intro 948-A can help resolve this.
- **Safety Concerns:** Bringing up general Department of Buildings (DOB) issues, like fires and illegal conversions, as being specifically STR-related is misleading. The leading causes of fires are not specific to the type of tenancy, and there is no evidence to suggest a higher risk with STRs. The DOB is already tasked with ensuring housing safety for all residents, regardless of the tenancy type.

During the hearing, it was troubling that the discourse seemed to rely on harmful and inaccurate stereotypes rather than on the diverse reality of New York City homeowners. The implication that all white people are rich and privileged, and conversely that only Black and brown people need economic assistance, erases the lived experience of people like me—a white Latin immigrant from a working-class background who came to this country with nothing. This reductive framing also incorrectly portrays all homeowners as wealthy. The truth is, genuinely rich homeowners do not depend on STRs or long-term rentals for income; they use their entire property for themselves. The middle-class homeowners fighting for Intro 948-A rely on this supplemental income to cover the exorbitant costs of taxes, insurance, and maintenance in a city that has become excruciatingly expensive. It is essential that we move beyond these simplistic and prejudiced narratives and focus on how this bill provides a crucial economic lifeline for middle-class homeowners of all backgrounds.

I appreciate your time and consideration of my testimony. Intro 948-A is a crucial piece of legislation that will support middle-class homeowners and help ensure a diverse and vibrant city for all New Yorkers.

Sincerely,  
Ivana Ameigeiras

## **In Support of Intro 948a - Jason Mondesir-Caesar**

Good afternoon everyone, members of the city council. My name is Jason Mondesir Caesar, I'm a native New Yorker and homeowner from Bedford-Stuyvesant, Brooklyn and I'm here in support of Intro 948a. My story is similar to many others you'll hear today, I homeshare in my unit of my two family home which allows me to keep my tenant's rent affordable and help keep up with the rising cost of living in NYC.

Opponents of this bill will tell you that every unit on a homesharing platform is a unit taken from the affordable housing market. This is demonstrably false. Local law 18 allows you to participate in homesharing in your unit only. Intro 948a does not change that. Therefore, there is zero change to any count of unit availability, as we are using the units we live in.

Homesharing and leased tenancy are not mutually exclusive and they should be able to work hand in hand to ensure small homeowners are able to employ what works best for them and their household. After a long-term tenant departs you shouldn't have to choose between rushing into accepting an unvetted tenant, just to secure income, or foregoing said income in order to do your due diligence finding the best fit for your home. Homesharing should allow you to earn income in the interim so you can take the time needed to make an informed decision for a long term tenant.

Tax liens and deed theft threaten your constituents ability to remain in their homes. Solutions provide one time emergency grants or legal aid for those already in financial distress. Homesharing is another resource that can provide ongoing support to mitigate or avoid these risks altogether.

Lastly I urge the city council to end the cycle of scapegoating that allows the affordable housing crisis to continue. Last time, homesharing, short term rental was supposedly the cause. This year, the misleading language in ballot proposals 2-4 suggested that you, city councilmembers, were the cause, blocking the affordable projects in your districts. We know we're not the cause. But you can be the cure. Vote yes on 948a so small homeowners like myself can afford to remain in our homes and remain in this city.

Thank you.

November 23, 2025

From: Jean Lamb

To: New York City Council Housing Committee and Council Member Salaam

Topic: Please Support Intro 948A, Intro 1107

Thank you to Council Member Narcisse for so eloquently explaining the situation facing NYC's one- and two- family homeowners. Thank you to Council Member Louis for your long-term support of one- and two-family homeowners across NYC.

Like the constituents you mentioned, My husband and I achieved our dream of homeownership in **2007** when we were able to scrape every nickel we had together to buy a two-family home with a Sesame Street stoop in Harlem. It's where we house our extended family and where we would like to stay in a community that we love. Short-term rentals quite literally kept this roof over our head when my husband, a member of a film industry union, was out of work during Covid and the important strikes that followed. That security blanket is no longer available to us.

In testimony on November 20, Office of Special Enforcement's Christian Klossner spoke at length about the amendments to the **2008** building codes that changed the rights to one- and two-family homeowners' property.

Having done much research, I wanted to share a timeline and some of the information that I have collected since the passing of Local Law 18 trying to understand how my husband and I seemed to lose our rights to the very property that we struggled to buy – and now to keep and maintain. Even Mayor Adams supported this notion at a Town Hall in Sunset Park in July 2023 when he said “I think a lot of stuff has been done with small property owners. And all of a sudden you woke up and realized it was done.”

When one looks at the timeline, I believe it exposes that the changes made to NYC Building Code in 2008 actually pre-date the very existence of the name “Airbnb” and therefore could not have been intended to limit rights to home sharing, which was a key to small home ownership for generations in this City. Rather, the interpretation of the language changes limiting home sharing for one- and two-family homeowners only came via lawsuits and other enforcement efforts – often supported by well-funded special interests affiliated with the hotel industry – and years after 2008 building code updates.

This interpretation has resulted in punitive actions against one- and two-family homeowners and the taking of the rights to our homes. Simply put, an occupied home cannot logically be considered the City's available “housing stock.” Further, loopholes allow the city's temporary condo owners to participate – and richly profit off of – a short-term rental market not available to this City's taxpaying homeowners.

All while the NYC hotel industry has become an even stronger monopoly enriching itself with record tourism profits all while pushing the guise of being for tenants via their astroturf efforts of “Share better” and “Tenants not tourists.” Caught in the crosshairs – NYC’s small home owners – your constituents.

### December 2006 – Office of Special Enforcement is announced by Mayor Bloomberg focused on quality of life issues

- [Rockaway Wave December 22, 2006](#)
- "Mayor Michael R. Bloomberg has announced the creation of the Mayor’s Office of Special Enforcement (OSE), which replaces the former Office of Midtown Enforcement and expands its activities to all five boroughs. **OSE is responsible for coordinating enforcement efforts across City agencies to address quality of life issues related to notorious adult use locations, lawless clubs, trademark counterfeiting bazaars and illegal conversions of apartment buildings into hotels...**"

### July 2008 – New York City Building Codes are updated

- This included the following updates:

Source	Change	1968 Language	2008 Language
NYC Building Code, Chapter 3, Use and Occupancy Classification	1968 J3 to R3	J3: Shall include buildings occupied as one-family or two-family dwellings, or as convents or rectories.	This occupancy shall include buildings or portions thereof containing no more than 2 dwelling units, occupied, as a rule, for shelter and sleeping accommodation on a long-term basis for a month or more at a time, and are not classified in Group R-1, R-2 or I...
NYC Building Code, Chapter 2, Definitions	Dwelling	DWELLING. Any building occupied in whole or in part as the temporary or permanent home or residence of one or more families.	DWELLING. A building or structure which is occupied in whole or in part as the home, residence or sleeping place of one or more families. See Section 310.2.
NYC Building Code, Chapter 2, Definitions	Dwelling Unit	DWELLING UNIT. One or more rooms in a dwelling or building that are arranged, designed, used or intended for use by one or more families.	DWELLING UNIT. A single unit consisting of one or more habitable rooms and occupied or arranged to be occupied as a unit separate

			from all other units within a dwelling. See Section 310.2.
NYC Building Code, Chapter 2, Definitions	NEW Dwelling, One-Family		"DWELLING, ONE-FAMILY. Any building or structure designed and occupied exclusively for residence purposes on a long-term basis for more than a month at a time by not more than one family. One-family dwellings shall also be deemed to include a dwelling located in a series of one-family dwellings each of which faces or is accessible to a legal street or public thoroughfare, provided that each such dwelling unit is equipped as a separate dwelling unit with all essential services, and also provided that each such unit is arranged so that it may be approved as a legal one-family dwelling. See Sections 310.2 and M102.1."
NYC Building Code, Chapter 2, Definitions	NEW Dwelling, Two-Family		"DWELLING, TWO-FAMILY. Any building or structure designed and occupied exclusively for residence purposes on a long-term basis for more than a month at a time by not more than two families. Two-family dwellings shall also be deemed to include a dwelling located in a series of two-family dwellings each of which faces or is accessible to a legal street or public thoroughfare, provided that each such dwelling is equipped as a separate



				dwelling with all essential services, and also provided that each such dwelling is arranged so that it may be approved as a legal two-family dwelling. See Sections 310.2 and M102.1."
--	--	--	--	--

- Please note: my home remains identified as a J-3 on the Department of Buildings Website more than a decade and a half after this change and in DoB's own documents provided years after 2008. This is a critical point because if a homeowner is looking to understand their building type and their rights to that building, they are still told by the City that their property is defined as it is in the 1968 code.

**March 2009** [Airbnb name launched](#)

**October 2015** [Klossner joins OSE](#)

- "The city has hired a former narcotics prosecutor to **go after illegal hotels that advertise on home-sharing sites like Airbnb**, part of its more aggressive approach to cracking down on the apartment-hogging operators."
- "State law prohibits New Yorkers from renting out their homes for less than 30 days. **Single and two-family homes are exempt from the law.**"

**2017** – The hotel industry created astroturf organization [Share Better](#) (Daily News) and reporting uncovered that [Hotel Money is Funding Airbnb Sting Operations](#) (Bloomberg)

- "The union, and an advocacy group largely funded by the union called ShareBetter..." [Daily News](#)
- "'We are bringing them, wrapped in a bow, a bunch of leads to make their enforcement efforts that much more efficient,' says Kwatra [his consulting firm, Metropolitan Public Strategies, has been hired to run Share Better's daily operations]...Share Better has given files on dozens of listings to the city this year and set up a hotline that guides New Yorkers through reporting their own complaints." [Bloomberg](#)
- "Christian Klossner says he welcomes assistance from outside groups." [Bloomberg](#)
- "Fear of competition from Airbnb has united hotel industry and union leaders in a campaign to purge suspicious rental listings from the service." [Bloomberg](#)

**April 2019** – "Small Homeowners Pay Big Fines for Short-Term Airbnb-style Rentals"

[The City](#) reports on the targeting of one- and two-family homeowners at the OSE under Director Klossner.

- **Council Intent:** "'We were clear **our intent is not to go after one- and two-family homeowners,**' Williams, the Council's former Housing Committee chair, told THE CITY. 'We thought we had a partnership with the city. But the administration looks like they've opened up a can of wild, wild west whoop-ass on them.' **Williams also pointed to widespread confusion over the legality of short-term rentals in one- and two-family homes because of differences between city and state law... 'Because of that confusion, government has lied to these homeowners — to the tune of millions of dollars. And I'm very upset. And the administration should be ashamed of themselves,**' said Williams. 'The mayor needs to do something about it right now. He should come back from wherever he is and fix this.'"
- **Punitive Fines:** "Owners of one- and two-family homes in Brooklyn have been hit with more than \$2.1 million in fines related to short-term rentals under the de Blasio administration — comprising 27% of the total \$7.8 million in fines issued in the borough during that period. Queens homeowners paid an even larger share of the \$4.3 million in short-term rental penalties levied in that borough: 39% of the total, or \$1.7 million. And while the overall fines were much lower in The Bronx and Staten Island, small homeowners were slapped with 53.6% and 56.2% of the total in each borough, respectively, amassing \$400,000 in fines."
- **OSE transition under DiBlasio from closing illegal hotels to the city claiming all housing units as City's property...** "Illegal short-term rentals are proliferating at alarming rates throughout the city in buildings of every size," said Christian Klossner, director of the Office of Special Enforcement. **"Each home is critical to preserving affordability,** and every neighborhood deserves to have its housing protected."
  - Please note: The now proven extension of this position is that NYC now claims that a home – even if the home is occupied by owners – is actually considered the “housing stock” and “protected” by the City.

**July 2022** – Showing their close collaboration, Mayor Adams and Executive Director Klossner appear at a [short-term rental press conference](#) with the president of the Hotel Trades Council.

**September 2022** – Ironically, while propelling LL18 forward and pushing a pro-LL18 narrative that it would solve the housing crisis, the [Hotel Association of NYC and Hotel Trades Council block efforts to convert hotels into permanent housing](#).

- "But after a year and \$200 million committed, New York hasn't created a single apartment — thanks in part to a piecemeal implementation and lawmakers' deference to the politically powerful Hotel Trades Council union."

**December 2022** – Intent of Local Law 18

- Bill's main sponsor, former Council Member Ben Kallos says on [Fox 5](#) "'This is really going after people who have more than one place,' said former City Council Member Ben Kallos, who wrote the legislation requiring registration."

## April 2023 – [While NYC homeowners are barred from short-term rentals, hotels and pied a terre owners fill their deep pockets with short-term rental money](#)

- According to the [Real Deal](#), condo owners in the Ritz-Carlton in Nomad are allowed to rent short term with more than 16 available to the tune of \$9K / night.
- Almost a year later, February 2024 sales of apartments in this The Ritz-Carlton boast circumventing short-term rental laws “The building has legally circumvented local AirBnB laws and expertly markets and advertises the home to achieve some of the highest nightly rental rates in the city.” (See image below and attached. Saved February 2024)
- It’s worth noting that [part-time pied-a-terre residents in NYC don’t pay personal income taxes](#), so...

**As a result of this unfair short-term rental system**, your constituents who live, work, vote, pay City income taxes and own a home here **have fewer rights than rich temporary residents**. Is that the City you envisioned when you took your oaths of office?

### 25 W 28th Street Unit: PH42A \$10,995,000

2 BEDROOMS   2 FULL BATHS   1 HALF BATH   1,750 SQ.FT.

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## Property Description

25 West 28th Street, #PH42A

Introducing Penthouse 42A at the acclaimed Ritz-Carlton Residences designed by legendary architect Rafael Vinoly. Exclusive benefits and panoramic helicopter views of the Lower Manhattan skyline, the Statue of Liberty, the Empire State Building, and the East River make this lavish 2-bedroom, 2.5-bathroom offering unlike any other in the city.

#### Exclusive Ritz-Carlton Benefits

Ideal as a pied-a-terre property or an investment opportunity, owners have access to the penthouse for up to 120 nights a year and can appoint The Ritz-Carlton to rent and manage the home and generate income when they are away. The building has legally circumvented local AirBnB laws and expertly markets and advertises the home to achieve some of the highest nightly rental rates in the city.

## July 2023 Executive Director Klossner response to Airbnb case

- City [response](#) to the Airbnb case against the City details the interpretation of one- and two-family homes in the code closer to multiple dwellings to limit the rights of use of one- and two-family homeowners to be exclusively over 30 days. **This is not how these “family” homes were ever intended to be inhabited. Further, these 2008 changes were made before Airbnb was even named Airbnb.**

- “19. **The 2008 Code updated the categories of residential buildings that were created in 1968, albeit with key language changes**, including: 1) R-1 (previously J-1) described as “Residential buildings or spaces occupied, as a rule, transiently, for a period less than one month, as the more or less temporary abode of individuals or families who are lodged with or without meals”; 2) R-2 (previously J-2) defined as “buildings or portions thereof containing sleeping units or more than two dwelling units that are occupied, as a rule, for shelter and sleeping accommodation on a long-term basis for a month or more at a time” and also expanded to include convents and monasteries with more than 20 occupants, which had previously fallen under J-3; and 3) R-3 (previously J-3) specifically identified as “buildings or portions thereof containing no more than 2 dwelling units, occupied, as a rule, for shelter and sleeping accommodation on a long-term basis for a month or more at a time” and expanded to include group homes but also contracted by limiting convents and monasteries to those with fewer than 20 occupants.
- “20. The inclusion of the phrase “as a rule” harmonized the BC with the definitions of building types in the MDL, as R-1 and R-2 occupancies were also explicitly linked, respectively, to the MDL definitions of Class B and class A multiple dwellings.<sup>3</sup> [3 Prior to 2008, MDL § 4(8) defined a Class A Multiple dwelling as “a multiple dwelling which is occupied, as a rule, for permanent residence purposes, and MDL § 4(9) defined a Class B multiple dwelling as “a multiple dwelling which is occupied, as a rule transiently, as the more or less temporary abode of individuals or families who are lodged with or without meals”.
- “21. The R-3 definition continued the 1968 Code’s J-3 application to “one- and two- family dwellings.” The 2008 code also clarified that R-3 was “as a rule” for occupancies of a month or more, but defined one- and two-family dwellings “exclusively for residence purposes on a long-term basis for more than a month at a time”.

**September 2023** – Local Law 18 goes into effect.

**February 2024** – JLL reports that NYC hotels expected to make \$3.3B in transaction volume in 2023 (up 56% from prior year) and \$380M in new revenue thanks to LL18. ([HotelDive](#))

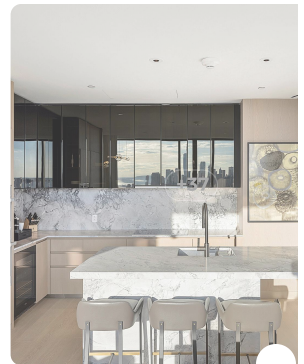
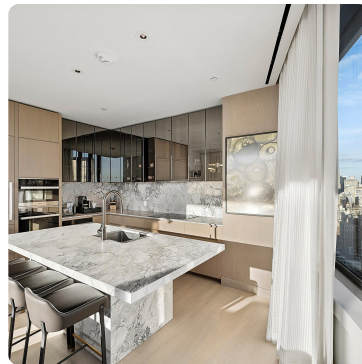
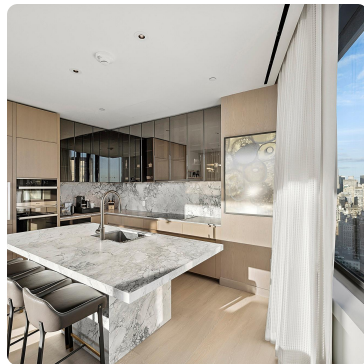
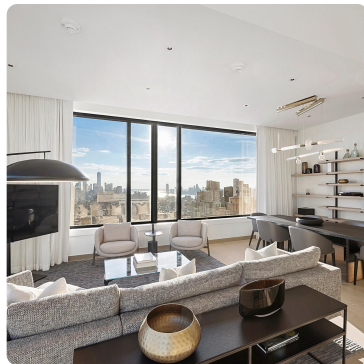
**April 2024** – NY1 investigation shows that the hotel industry paid \$2M lobbying the City for LL18. ([NY1](#) at 10:50)

**December 2024** – Tenants Not Tourists “campaign” comes to life via Hotel Trades Council and Hotel Association of NYC. Of course hotels are not anti “tourist,” with their exclusive access to tourist dollars being the very basis of their record profits. Rather, it shows the very intent is not to share small drops of tourists with NYC homeowners.

- Funded by Hotel Trades Council as cited on their [website](#) “Paid for by the Hotel Trades Council, AFL-CIO and Hotel Association of New York City, Inc. Labor Management Cooperation Trust Fund” and in HANYC’s 2024 [Annual Letter](#).

In conclusion, as a small homeowner, I was never notified that the rights to my property were taken AFTER we purchased our home. We all know that the City knows how to get in touch with its small homeowners. We are alerted by the Department of Finance when our taxes are going up. We are notified by the Department of Sanitation when we need to change the time and the receptacles to put out our garbage. But my husband and I – and every one of the now hundreds of one- and two-family homeowners I’ve had the pleasure of meeting over the past three years – **were NEVER notified that rights to our family homes were taken.** Not in 2008 when the code was changed because Airbnb didn’t even exist. Not in 2023 when LL18 came into effect. Not today.

For years, and by Council Members who have preceded you, one- and two-family homeowners were told repeatedly that we were not the focus of short-term regulation and Local Law 18, yet that is not what came to pass. **We call on the City Council Members to honor your highest responsibilities to legislate.** It is your exclusive power to create the laws you intend and the Mayor’s Offices’ responsibilities to enforce those laws, not to interpret them. It’s within your power to preserve NYC’s one- and two- family homeowners – before we all are forced out because we don’t have the agency and flexibility to manage our own homes. I urge you to support the small corrections provided by 1107 and 948a to return some rights to one- and two-family homeowners that were taken without notification.



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**\$10,995,000**

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2 FULL BATHS

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### Exclusive Ritz-Carlton Benefits

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Residents also have access to all the amenities and services of the famed Ritz-Carlton Hotel. These include renowned wellness and spa services, a state-of-the-art gym, event and lounge spaces, a rooftop bar, two restaurants, and in-room dining run by Michelin-starred chef Jose Andres. Additionally, all the best restaurants, bars, cafes, and shops that NoMad has to offer are moments away.



**From:** [Jeanne Raleigh](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony regarding Bill 948A  
**Date:** Sunday, November 23, 2025 12:38:37 AM  
**Attachments:** [Testimony regarding Bill 948A.pdf](#)

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Good evening,

Attached please find testimony I am submitting in support of Bill 948A and Bill 1107A.

As CM Narcisse so eloquently noted during the Housing and Building committee meeting this past Thursday, let's work together to devise a palliative Bill that will benefit one and two family homeowners as well as NYC, as a whole.

Warm regards,  
Jeanne Raleigh

OFFICE: (718) 257-0600

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## Setting the Record Straight: Exposing HTC's Misinformation Campaign on NYC's Short-Term Rental Law

November 17, 2025

Vol. 105 No. 47

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**By Tony Lindsay, President, New York  
Homeowners Alliance Corp.**

Intro 948A has nothing to do with tenants or housing stock — it's a targeted reform to protect private-dwelling homeowners who actually live in their homes from politically driven attacks disguised as "tenant protection."

New Yorkers deserve facts — not fear-mongering — when it comes to housing policy.

ADVERTISING



Over the past few months, a handful of well-funded tenant-advocacy groups, including the Hotel and Trades Council (HTC) and their political allies, have launched a misinformation campaign against Intro 948A, the bill that would finally correct New York City's disastrous ban on short-term rentals in owner-occupied homes.

Their talking points are as predictable as they are false: that the bill would "take housing off the market," "hurt tenants" and "raise rents."

None of that is true — and they know it.

### **What Intro 948A Actually Does**

Intro 948A is not a tenant-rights bill. It has nothing to do with housing stock.

It is a narrow, common-sense measure designed to give private dwelling

homeowners who actually live in their homes limited flexibility to rent their space on a short-term basis when they are present or temporarily away.

It preserves every tenant protection already in law. It does not allow the conversion of rental buildings into hotels. It does not touch rent-stabilized or rent-controlled units.

It simply acknowledges that small homeowners — many of whom are Black, Brown, immigrant and middle-class New Yorkers — should not be criminalized for using their property responsibly to offset rising taxes, utilities and insurance.

These are the everyday families who have invested everything into their homes: the nurse in Canarsie, the sanitation worker in Queens, the immigrant couple in the Bronx — all struggling to stay afloat in a city that seems determined to push them out.

## **The Manufactured “Tenant” Narrative**

HTC and its partners have tried to conflate Intro 948A with large-scale commercial operators who once abused online platforms.

That's a deliberate tactic to confuse the public.

The current short-term rental law already bans those abuses — what it now bans in addition are everyday New Yorkers trying to survive in their own homes.

As Kathryn Wylde correctly wrote in the *Daily News*, short-term rental income is a “common-sense way to allow moderate-income homeowners to survive here.”

Yet the same activists who claim to champion affordability are opposing the very tool that helps prevent foreclosure and displacement.

If anything, Local Law 18 — the legislation that Intro 948A seeks to fix — has shrunk the city's housing options by forcing families to remove rooms and accessory units from use, eliminating

thousands of safe, regulated, taxpaying accommodations.

That's not protection — that's policy sabotage.

## **The Economic Irony**

There's also a staggering irony that often goes unmentioned.

Short-term rentals in private homes don't just help homeowners — they help the city's economy. They expand tourism capacity in the outer boroughs, bringing more visitors into neighborhoods that typically see little tourism revenue, while the spending from those stays still flows into Manhattan, where most tourism dollars are ultimately spent.

Families and middle-income travelers — the kinds of tourists who can't afford two or three hotel rooms in Midtown — often rely on home-style stays to experience New York affordably. By restricting those options, the city has cut off a major revenue stream and made New York less

accessible to family travelers at a time when tourism revenue has already declined.

In short, opposing reform to Local Law 18 doesn't protect affordability. It undermines one of the few sources of sustainable economic growth for the city — including the local economies of the outer boroughs, where visiting families spend their money in neighborhood restaurants, shops and small businesses.

### **Follow the Money and the Motives**

Let's be clear: HTC doesn't speak for tenants; it speaks for itself.

Its financial interest lies in protecting the hotel industry, not affordable housing.

By choking off home-based short-term rentals, they eliminate competition for hotel rooms — keeping nightly rates high and union revenue flowing.

The political class enabling this — from self-styled “socialists” to opportunistic council members — are not protecting

tenants either.

They're weaponizing the tenant narrative to consolidate power, vilify homeowners and justify ever-greater government control over private property.

## **The Disconnect in City Hall**

Many constituents of City Council members, particularly small homeowners and property owners of color, have voiced growing frustration over their elected representatives' unwillingness to acknowledge the facts about Intro 948A and, in some cases, to even meet to discuss it.

No matter how clearly they explain that the bill has nothing to do with tenants' rights, housing stock or long-term rentals, several council members continue to ignore these realities and instead double down on the false narrative promoted by HTC.

This is a troubling sign of how disconnected City Hall has become from

the people it claims to serve.

This persistent refusal to engage in good faith raises serious questions about the motives behind such opposition.

If council members are willing to disregard the testimony of the very homeowners who live in their districts — the working- and middle-class New Yorkers they were elected to represent — it suggests that their loyalties may lie more with political donors and special-interest groups than with their own constituents.

### **Homeowners Are Not the Enemy**

Intro 948A protects the smallest, most vulnerable property owners — the people who actually live in their homes.

These are not real-estate speculators or corporate landlords.

They are working-class New Yorkers, many of them Black, Latino, Caribbean, African and immigrant families who poured their life savings into their homes



Enforcement.

That's not deregulation; that's balance.

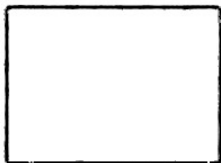
That's how you keep communities stable,  
taxes paid and roofs over real New  
Yorkers' heads.

## Conclusion

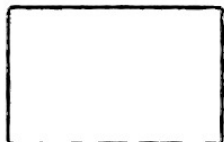
The smear campaign against Intro 948A  
reveals more about its opponents than  
the bill itself. Their fear isn't that it will  
"hurt tenants" — it's that it will prove the  
city can protect both tenants and  
homeowners without expanding  
government power or special-interest  
influence.

The truth is simple: Intro 948A protects  
people, not profits.

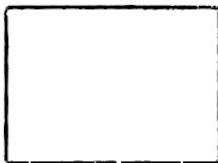
And no amount of political theater should  
be allowed to bury that fact.



A child holds a sign



HTC rally at City Hall  
to protest against



Private dwelling

Good afternoon, Council Members, and thank you for the opportunity to speak.

My name is Jeff Damisse and I am a Native New Yorker, first-generation Haitian American. Like many other immigrants in New York City, my family came here with hope, determination, and a belief that if I worked hard enough, I could build a stable future for myself and my family and live out the American dream of one day owning a piece of my city and allowing others like me to live affordably.

Housing has always been expensive for me — painfully expensive — and owning a home in this city often felt like an impossible dream. But I worked nonstop for decades, step by step, to finally become the proud owner of a two-family home in the beautiful borough of The Bronx, a place where I hoped to raise a family one day. In one unit, I also provide a home to a single mother and her son who has Down Syndrome. Their stability is tied to my own.

But soon after I bought the home, I lost my job. Overnight, I went from the proud owner of a home to someone staring down the threat of foreclosure and the terrifying thought of displacing a vulnerable family who relies on me for housing. Unemployment benefits were nowhere near enough to carry a mortgage in New York City. I spent eight months searching for work, and when I finally found a job, it came with an almost 50% pay cut.

In that moment, home sharing became the only thing that kept us afloat. It allowed me to make ends meet, keep the rent affordable for my tenant, and save my home. I never displaced my tenant — in fact, I displaced myself. Every time I had a Home Sharing guest, I packed my things and slept on couches at nearby family members' homes so that my tenant and her son could stay securely in their apartment. I was doing everything in my power to hold on.

But then Local Law 18 was introduced, and it drastically limited my ability to earn enough through responsible home sharing to pay my bills and avoid financial collapse. Now, I'm being forced to raise my tenant's rent just to stay above water — and even with that, it still isn't enough to cover my expenses. My partner and I are facing heartbreaking conversations about whether we can even afford to have children in the future if this continues.

That is why **Intro 948** is so important. It restores balance. It protects communities while also protecting homeowners who are simply trying to survive. We need your help — truly — to remain in our homes. I respectfully ask you to sign on to **Intro 948** and stand with families like mine who are fighting every day not to be pushed out of the city we love.

Thank you for listening.

Jeff Damisse



**From:** [Jennifer MacFarlane](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Pass Intr948A and protect outer borough communities  
**Date:** Wednesday, November 26, 2025 2:54:53 PM

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Dear Official NYC Council Testimony Submission,

While I am thankful to live in the greatest city in the world, I have to string together multiple streams of income to be able to afford the monthly mortgage and housing expenses, repair costs that come with owning a hundred-year-old home, and provide for my family. Local Law 18 stripped away an essential source of income for me and my family. I have several neighbors who have been forced to leave our community because they can no longer make ends meet.

Until Local Law 18, it was possible for lower- and middle-income New Yorkers to own a home, particularly in the outer boroughs. Regular New Yorkers like me could make ends meet by renting out a spare room, renting out our homes while traveling, or renting an in-law's space for the holidays while they're away visiting family.

I don't own multiple units that could be long-term rentals, and I am not taking housing off the market. I own the home I live in. Throughout the year, my family and I use our whole home to welcome family and community members in need of temporary housing. In between, we rely on home-sharing to help make ends meet. I have not contributed to the disruption and safety concerns associated with short-term rentals in apartment buildings, nor am I the cause of NYC's housing crisis. Punishing homeowners like me is only making communities more vulnerable, making homeownership unsustainable, and pushing regular New Yorkers out of the city, ceding our neighborhoods to wealthy speculators.

Keeping the strongest protections in place to prevent party homes and keep our communities safe, 948A will make small, common-sense updates so that New Yorkers like us who own and live in our homes full-time can:

- host up to 4 guests, not including children (current law only allows 2 guests including children)
- rent out their property without being physically present, like while traveling
- put locks on private spaces

These simple changes will mean the difference between low- and middle-income New Yorkers being able to stay in the city we love or not. Please pass Intro 948A.

Jennifer MacFarlane

, New York City, NY, US, 11207

**From:** [Jeanne Raleigh](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony regarding Bill 948A  
**Date:** Sunday, November 23, 2025 12:38:37 AM  
**Attachments:** [Testimony regarding Bill 948A.pdf](#)

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Good evening,

Attached please find testimony I am submitting in support of Bill 948A and Bill 1107A.

As CM Narcisse so eloquently noted during the Housing and Building committee meeting this past Thursday, let's work together to devise a palliative Bill that will benefit one and two family homeowners as well as NYC, as a whole.

Warm regards,  
Jeanne Raleigh

My name is Jeanne Raleigh, resident of District 50 in Staten Island. We purchased our legal two family home in 1987, when we first married. We had no children and rented our 2nd floor apartment, long term, for 15 years, until our growing family needed more room. Well, in 2022, we found ourselves empty nesters. The rest, as they say, is history! I am here to ask this committee to vote YES on Bill 948A.

Our three children are young adults, now, returning for holidays, vacations, and family events. It is imperative to keep this space available for these family visits, sharing our home vs. renting a hotel, of which there are few and far between. Also, home sharing allows other former residents to return for similar events. All these different scenarios include 3-5 individuals, who patronize our local restaurants and ride our mass transit.

Also, single and two family homeowners, like myself, rely on home sharing for additional income. The cost of owning a home continues to rise. However, our NYC pensions, while I am grateful, do not increase, except for an occasional COLA increase of \$1.10! My husband, a NYC mechanic with the Sanitation Department, retired 17 years ago, taking a reduced monthly pension in the event he passed away, ensuring the mortgage for his young family could be covered. Without homesharing, it is nearly impossible to meet all of our expenses.

I am a native New Yorker, born and raised in the Kingsbridge section of the Bronx. In the words of Alicia Keys, I'm embedded in this concrete jungle, where dreams are made of, there's nothing I can't do —except remain in my owner occupied two family home without homesharing. I'll be forced to sell my home, move down south and become pickled by the sun!

Please vote YES on Bill 948A. Thank you for your time and interest.

Dear New York City Council Members:

My name is Joan Gilbert, and I am a poor homeowner!

I have lived in my house since 1996. The day that I closed on the property I was filled with an onslaught of emotions. But what I remember most was being overwhelmed with pride and joy, and the excited look on my son's face when he saw his bedroom! This was a couple of steps up from the match-boxed sized bedroom he was used to. It uncomfortably accommodated a twin-size bed!

I urge you to please pass Intro 948-A. Approving this bill will throw a lifeline to one- and two-family homeowners like me, who live in their homes and rely on income from responsible home-sharing. What does home-sharing mean to me? It is my "bread and butter." It helps me with fundamental everyday concerns: from medical co-payments, utilities, property taxes, home insurance, mortgage payments, attending to costly repairs, right now I need a new roof! Without this income it is impossible to meet those obligations especially as costs continue to rise! This income, as noted earlier, is a lifeline—my lifeline. It keeps my head above water.

Home-sharing is also beneficial to our communities. When visitors come to town, they patronize local restaurants, bars, grocery stores, laundromats, and other businesses ;their support offers stability and provide jobs for locals. Let me cite an example, the long-standing laundromat in my neighborhood which has been serving the community for almost 30 years, still has in its employment the same two men from since its inception.

Contrary to the narrative home-sharing takes away from the housing stock and as a result, creates availability issues, could not be further from the truth. Every article I have read on the issue of housing stock pointed to private investors and private equity firms buying thousands of properties and engaging mainly in short-term rentals, contributed in part to the housing availability issue—It was ne

ver one-and two-family owner-occupied homes. Home-sharing allows me to house my out-of-town family, saving them from having to pay very costly nightly hotel rates.

Sadly, if this does not pass, I will be "forced to sell my house" those are difficult words to pen! And chances are, my replacement would not be folks looking to raise families, but rather private equity landlords looking to buy and flip houses for profit. As I conclude my testimony, I ask you to please think of that little boy seeing his bedroom for the first time! I urge you to please pass Intro-948-A.

Thank you for your work!

Joan Gilbert, Brooklyn, NY

# WRITTEN TESTIMONY IN SUPPORT OF INTRO 948A

**Submitted to the New York City Council**

**By: Joanna Vu, District 37 Homeowner and Parent**

Dear Council Members,

My name is **Joanna Vu**, and I live in **District 37** in a two-family home that my family occupies. I am submitting this testimony as a mother, a homeowner, and a lifelong New Yorker who is deeply invested in the well-being of my community. I receive no compensation to be here — I am participating because this issue directly impacts the stability, safety, and future of my family and our neighborhood.

I urge you to **vote YES on Intro 948A**, a bill that provides a narrow, balanced, and urgently needed fix for owner-occupied one- and two-family homes like mine. This legislation is essential to address the unintended harms created by Local Law 18, while maintaining strong protections against commercial operators and preserving the city’s rental housing stock.

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## I. My Family’s Story: When LL18 Hurt Us Most

When my daughter was born, family flew in from across the country to help us during those first exhausting and emotional weeks. But because we live deep in the outer boroughs, far from Manhattan’s tourist districts, there were **no nearby hotels** for them to stay in. My neighbors had a two-bedroom unit available and were eager to help — but under Local Law 18, they were legally allowed to host **only two** of my relatives. Meanwhile, Manhattan hotels are permitted to pack **four adults** into a single room with two beds.

That contrast — a spacious two-bedroom apartment limited to two people, while tiny hotel rooms can house four — made a vulnerable time significantly harder for our family.

This is not just my experience. I am in several parent group chats in Bushwick, Ridgewood, and Bed-Stuy, and **almost every single day** someone is desperately looking for a place where visiting grandparents or relatives can stay nearby. When a baby is born, when a parent is sick, when there is a funeral, a graduation, or a celebration, families need each other.

**Right now, LL18 makes that nearly impossible.**

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## II. Facts About Owner-Occupied Homes: We Are Not Rental Stock

Much of the opposition to 948A is based on the mistaken belief that it affects rental housing. It does not. The numbers speak clearly:

- **225,000** two-family homes exist in New York City.
- **216,000 — 96% — are owner-occupied.**
- In total, **594,800 owner-occupied 1–2 family homes** exist across NYC.
- These homes make up only **16% of the city's housing stock.**
- **None** of these homes are part of the long-term rental market.

These are **family homes**, not rental units.

Accordingly:

**Intro 948A cannot remove long-term rental housing** because it applies *only* to **owner-occupied one- and two-family homes — homes like mine that have never been, and will never be, part of the rental stock.**

Opponents who claim this bill would reduce rental supply are simply mistaken. The population this bill addresses is structurally outside the rental market.

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## III. Why Investor Fears Are Not Realistic

Some have raised concerns that investors will buy up homes if 948A passes. This scenario is not supported by the data or basic market logic.

Here is the reality:

### 1. 948A requires the owner to live in the home.

Investors cannot run STR businesses if they must physically live in the property as their primary residence.



2. There is no scalable business model for investor STR in owner-occupied homes.

Investors do not — and will not — buy two-family homes to move into them just to share a room occasionally. There is **zero scale** in this model.

3. The pool of non-owner-occupied two-family homes is tiny.

Only **0.2%** of New York City's total housing stock consists of two-family homes not occupied by their owners.

4. Investors already overwhelmingly choose multi-unit buildings, not family homes.

**Therefore, 948A protects neighborhoods from investor takeover — it does not encourage it.**

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## IV. Why 948A Does *Not* Threaten Hotel Jobs

The Hotel Trades Council has claimed that 948A will reduce hotel occupancy and threaten hotel worker jobs. With respect, this does not reflect the realities of where families live.

- **80% of all NYC hotel rooms are in Manhattan.**
- Only **20%** exist in the outer boroughs.

Families in District 37, Bed-Stuy, Bushwick, Brownsville, Ridgewood, East New York, the Bronx, Staten Island, and Queens are **not choosing between a hotel and a home** — because **there are almost no hotels in our neighborhoods to choose from.**

When grandparents visit a newborn in East New York, they are not taking a hotel worker's job. When relatives come for a funeral or to assist with childcare, they are not displacing tourists from Midtown.

**948A does not compete with hotel workers — it fills a gap in neighborhoods that hotel workers do not serve.**

Hotels and homeowner home-sharing serve entirely different populations, needs, and geographies.

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## V. The Lock Rule: LL18 Is Invasive, Unsafe, and Unreasonable

Under LL18:

- **All interior doors** must remain unlocked.
- This includes **bedrooms, children's rooms, home offices, and storage areas**.

This is unsafe and impractical.

No parent should be required to unlock their children's bedroom doors.

No professional should be forced to expose private documents or valuables.

No homeowner should be compelled to remove locks from their own home.

[Intro 948A fixes this.](#)

It replaces the “common household” requirement with a normal standard of **reasonable access** — allowing private rooms to remain private.

This respects family safety, privacy, and common sense.

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## VI. LL18 Has Failed to Improve Affordability

Opponents frame 948A as a threat to affordability. The data shows otherwise.

Since LL18 enforcement began:

- The rental vacancy rate remains at **1.4%**.
- Rents have continued rising.
- Neighborhood-level hotel scarcity remains unchanged.
- Families, especially working- and middle-class ones, have not experienced improved affordability.

**LL18 did not deliver on affordability — it only hurt families who live in and rely on their homes.**

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## VII. Home-Sharing Already Exists — 948A Regulates What Families Are Already Doing

Regardless of LL18, families are already sharing their homes out of necessity:

- In parent group chats, people constantly post their homes when they travel.
- Families rely on supplemental income to offset *exploding* property taxes, insurance premiums, utilities, and repair costs — especially in 100-year-old homes like mine.
- Families need nearby spaces for loved ones during births, deaths, caregiving, medical crises, and celebrations.

**948A does not create home-sharing; it simply creates a legal, safe, regulated way to do it.**

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## VIII. Community Need: Outer-Borough Families Depend on Home-Sharing

Outer-borough families face structural barriers:

- Very few hotels
- Multi-generational living
- Childcare needs
- Caregiving pressures
- Large families visiting small apartments
- Community-based schooling networks
- Cultural and religious events that require family proximity

948A supports:

- New parents
- Elder care
- Family caregiving
- Multi-generational households
- Immigrant families with large extended networks
- Parents juggling jobs, children, and rising costs
- Homeowners trying to stay rooted in their neighborhoods

This is not tourism.

**This is community survival.**

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## Conclusion: 948A Protects Families, Affordability, and Neighborhood Stability

Council Members, I ask you to look not at the fears that do not apply to owner-occupied homes, but at the families and communities who will be harmed if 948A does not pass.

- 948A does **not** reduce rental stock.
- 948A does **not** empower investors.
- 948A does **not** threaten hotel jobs.
- 948A does **not** weaken affordability.
- 948A does **not** invite commercial operators.

**948A protects homeowners.**

**948A protects families.**

**948A protects multi-generational living.**

**948A protects neighborhood stability.**

And without 948A, families like mine will continue to bear the unintended harm of LL18 — without any measurable benefit to rental affordability or hotel employment.

For all of these reasons, I respectfully urge you to **vote YES on Intro 948A**.

Thank you for your time and your service to all New Yorkers.

— **Joanna Vu**

District 37 Homeowner and Parent

**From:** [Joanna Vu](#)  
**To:** [Testimony](#)  
**Cc:** [Nurse, Sandy](#); [District37](#)  
**Subject:** [EXTERNAL] INTRO 948A and 1107  
**Date:** Sunday, November 23, 2025 10:57:48 AM

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Testimony Before the New York City Council

In Support of Intros 948A and 1107

Rebutting the Opposition's Arguments With Facts and Lived Reality

My name is Joanna Vu, an homeowner in District 37 and I am here to support Intros 948A and 1107, and to address—in good faith—the concerns that have been raised. Many of these concerns reflect real issues in our housing market, but they do not reflect what these bills actually do.

These bills restore fairness for owner-occupied 1- and 2-family homeowners who were never the source of the “illegal hotel” problem. The unintended harm of Local Law 18 has pushed seniors, immigrants, middle-class families, and Black and Brown homeowners toward foreclosure and financial crisis—and these bills provide a lifeline without threatening tenants or our housing stock.

Let me respond respectfully, point-by-point, to the issues that have been raised.

—

1. “These bills weaken Local Law 18 and reopen the floodgates to illegal hotels.”

Local Law 18 was designed to stop large-scale commercial operators in multi-unit buildings—and it did. But in the process, it swept up thousands of law-abiding owner-occupants renting a single room or part of their home.

No one is arguing for unlimited unhosted rentals or corporate-run STRs.  
And these bills do not create that.

Owner-occupancy is still required.  
Commercial operators are still banned.  
Full-apartment STRs in 2-family homes remain illegal.

These bills simply ensure the law reflects the lived reality of responsible homeowners—not the abuses of commercial landlords in large buildings.

—

2. “It will convert 27% of NYC’s housing stock into Airbnbs.”

With respect, that assumption has no basis in evidence or logic.

- 1- and 2-family homeowners are not going to convert their homes into hotels—they live there.
- These homes rarely have “extra apartments” to take off the market.
- The bills do not allow a second unit in a two-family home to become a full-time Airbnb.
- Most homeowners rent a room, an attic, a basement suite, or a spare floor, not a full unit already occupied by a tenant.

Before Local Law 18, these homes had decades of hosting history—and NYC did not lose 27% of its housing stock.

The fear is hypothetical; the hardship homeowners face is real.

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3. “It will increase speculation and drive up home prices.”

STR income from a spare room—maybe \$1,000 to \$1,500 a month—cannot and does not drive speculative buying.

Banks do not underwrite mortgages based on Airbnb income.

Buyers do not spend \$900,000 on a home because they might rent out a guest room 8 weekends a year.

What STR income does do:

- Keeps families afloat during economic shocks.
- Prevents missed mortgage payments.
- Helps seniors remain in the homes they raised their families in.

If we truly care about preventing foreclosures—which are rising fastest in Black neighborhoods—then allowing responsible homeowners flexibility is part of the solution, not the problem.

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4. “This will incentivize evictions.”

It cannot—because the bills do not allow landlords to STR a tenant’s apartment.

Only owner-occupied spaces qualify.

A homeowner cannot evict a tenant to STR the unit—the law still forbids that.

And tenant protections remain fully in place.

The only thing these bills do is allow a homeowner to legally rent part of their own home—not someone else’s home.

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5. “This creates unacceptable fire and safety risks.”

The safety concerns cited relate to:

- Illegal conversions
- Partitioned basements
- Attics turned into apartments
- Overcrowded multi-family buildings

None of this is what responsible homeowners do.

Hosted STRs are safer than long-term rentals because:

- The owner is physically present.
- The owner knows the exits and the layout.
- There is direct oversight of guests and behavior.

If FDNY desires clearer safety standards—such as smoke alarms, extinguishers, or egress signage—those can be codified.

Safety is solvable without banning responsible homeowners from renting a room.

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6. “Host presence is the only enforceable standard.”

This is contradicted by the experience of every other global city:

- London
- Paris
- Vancouver
- Toronto
- Los Angeles

All enforce STR regulations using:

- Annual night limits
- Owner-occupancy requirements
- Platform data sharing
- Registration systems

New York already receives data under Local Law 18.

Removing an unnecessary host-presence rule does not break enforcement—it modernizes it.

And again:

Owner occupancy remains required.

These bills do not create anonymous, unhosted mini-hotels.

—

7. “Complaints in 1–2 family STR homes are rising.”

Complaints rose because Local Law 18 pushed formerly legal STR activity underground.

When you remove legal paths, you get:

- Illegal listings
- Frustrated guests
- Confusion
- Neighbors unsure what is allowed
- More calls to OSE

You do NOT reduce demand—you simply reduce compliance.

Creating a clear, legal path for 1- and 2-family homeowners will reduce complaints, not increase them.

People comply with rules when the rules make sense.

—

8. “These bills dangerously redefine the term ‘family.’”

The bills make a narrow, targeted update to accommodate modern household structures and temporary guests.

They do not:

- Redefine family across all zoning codes.
- Affect permanent occupancy standards citywide.
- Alter rent laws or housing maintenance code protections.

Any narrower language the Council prefers can be added.

This is a drafting issue—not a valid reason to block relief to struggling homeowners.

—

9. “Unlimited minors will violate occupancy and safety codes.”



This is an easily correctable technical detail.

But more importantly:

- Building and fire codes already govern occupancy.
- STR rules do not override those codes.
- A family visiting with three children is not a safety hazard.

If the Council prefers a numeric cap, homeowners will support that.

This is not a structural flaw—it's an editorial note.

—

10. "STRs might violate insurance or mortgage policies."

Many everyday activities do:

- Subletting
- Running a home business
- Renovations
- Renting out a basement or ADU

We do not ban those activities—we provide guidance.

Homeowners should have the right and responsibility to manage their own insurance and mortgage compliance.

The City can add simple disclosure language during registration.

There is no justification for using insurance contracts as a reason to restrict income for those most at risk of foreclosure.

—

Council Members:

These bills do not weaken tenant protections.

They do not remove housing from the long-term market.

They do not create commercial hotels in residential neighborhoods.

What they do is simple:

They keep families—especially Black, Brown, immigrant, and senior homeowners—in their homes.

They support small businesses still recovering from the pandemic.

They provide a safe, regulated path for responsible homeowners who were never the problem in the first place.

New York City is strongest when we protect both renters and homeowners.

And right now, thousands of small homeowners need this Council to restore the balance Local Law 18 unintentionally disrupted.

I urge you to pass Intros 948A and 1107—not as a step backward, but as a step toward fairness, stability, and equity for the communities that built this city.

Thank you for your time and for your service to New Yorkers.

Best,

Joanna Vu



**From:** [Joe D](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 4:54:18 PM

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Dear Chair and Members of the Committee on Housing & Buildings, and Council Members:

I'm a lifelong New Yorker and the owner-occupant of a two-family home in Brooklyn. I live on the property and occasionally rent out my second unit through Airbnb to help offset rising costs—property taxes, maintenance, and utilities.

For me and many other small homeowners, short-term rentals aren't a business empire — they're a lifeline. This income keeps us from falling behind, selling our homes, or leaving the city we love. Eliminating this option punishes responsible, tax-paying residents who *live* in their homes and care deeply about their neighborhoods.

Intro 948-A creates a fair, transparent path forward — allowing primary-residence homeowners limited flexibility while maintaining oversight and accountability. It targets real abuses without destroying honest livelihoods.

Please stand with working-class New Yorkers and vote **YES** on Intro 948-A. Protect the right for homeowners to responsibly share the homes they live in.

Sincerely,  
Joe Rivera

John Iltis

Testimonial Letter to the New York City Council Committee on  
Housing and Buildings,  
Hon. Pierina Ana Sanchez, Chair  
November 20, 2025

Thank you to Chair Pierina Ana Sanchez and the City Council for your support of small homeownership across New York City. I'm writing to support the **Intro 948a** amendment to Local Law 18 — calling on our city to exempt small 1-2 family homeowners from Local Law 18. My name is John Iltis and I am a homeowner in the Hunts Point neighborhood of the Bronx.

Local Law 18 has been very challenging for me because my father was diagnosed with pancreatic cancer on April 15, 2021, and I spent the last 4.5 years trying to spend as much time as possible helping him in San Antonio, Texas. At the same time of my father's diagnosis, I had multiple long-term tenants who fell on hard times in the pandemic/post-pandemic world and stopped paying rent. Prior to Local Law 18 I was able to also rent out some rooms in my house to a few short-term tenants to help compensate the loss of income from the long-term tenants who were not paying anymore. Although I called an attorney for help, I was told I would not be able to evict the non-paying tenants.

In my neighborhood I am one of the only homeowners who lives in my home. It was built in 1899 and as you can imagine is a money pit and takes constant time and upkeep. One of the benefits of short-term tenants is that we are constantly able to be cleaning to get it ready for the next guest. If there is a ceiling leak or any flooding, etc., we can block the dates on the calendar and work on the house without getting in the way of residents. And when my family and friends come to visit from out of state/abroad, I have the space to host them. Local Law 18 made it impossible for me to host in this way because my bedroom is not on the

same floor as the rooms in my home that I rent out, and also because I could not always be there because of my father needing help and care in Texas. It is perplexing to me that although I am the owner of this house, my usage of my own home is restricted.

There are no hotels in my Bronx neighborhood, and honestly unless you have family there, you would never visit it as a tourist unless you're in the food or fish market business. And yet through short-term rentals we were able to bring people from all over the city, state, country and world to our little piece of the world known for burning buildings and illicit affairs decades ago. It is nice to change hearts and minds about the Bronx of course, but even better is the money that our visitors spend at all the small businesses in our neighborhood. Our guests are students studying English, college students, teachers and other workers moving to NYC while looking for their own place, academics doing research or on sabbatical, relatives visiting our neighbors who don't have room for them in their own homes, elderly guests seeking cancer treatment at our hospitals nearby, and New Yorkers who don't have their own place. As tourism expands into outer-borough neighborhoods like mine, it increases the overall tourism revenue flowing into Manhattan and the city as a whole. Having a cheaper place to stay (such as my house in Hunts Point) keeps visitors here longer, spending more, and experiencing more of the city.

Data shows that short-term rentals in NYC were roughly 1% of total housing stock at peak and had an approximately 1% citywide effect on rents, which is a negligible impact relative to macro drivers (construction costs, taxes, interest rates, warehousing, institutional purchases). With approximately 90% of short-term listings gone, any residual impact is insignificant. Local Law 18 sent our guests to New Jersey or to big professional buildings who had an exemption to the law. My rooms in my house are still

my rooms, I didn't start renting them out to long-term tenants because I need them when I am there, and, I absolutely cannot afford to support any additional non-paying tenants. When I did try to rent out rooms for months (30-days+) at a time while I was gone, I would come back into the city and have to stay with friends or neighbors or at a hotel because I didn't have a place to stay. This was too difficult and expensive and did not make sense.

My father passed away on October 8, 2025. I'm still splitting time in Texas trying to take care of his affairs. But when I am back in NYC full time, I would still not qualify for the current short-term permit because my bedroom is not on the same floor as my extra rooms. Make it make sense. I recently read that the city has lost \$1.6 billion in visitor spending. Why are we making it so hard and so expensive for visitors to come and stay in NYC? I can't blame people who decide to go to Charleston or Denver for a weekend trip instead of NYC when we are making the cost of entry so extraordinarily high.

Small 1-2 family homeowners were never meant to be included in Local Law 18. Since enforcement began for Local Law 18, New York has lost long-term rental supply and seen record-high rents. I implore you to support Intro 948a to give us back the freedom and flexibility host short-term visitors. This will help us to maintain our homes for the long term and bring visitors back to NYC and some of their tourist dollars back to Hunts Point. Intro 948a restores fairness and autonomy for homeowners in private dwellings, keeping tenant protections and safety codes untouched.

Thank you for your attention and consideration,

John Ittis

**From:** [Jonathan Wahl](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [ratner@council.nyc.gov](mailto:ratner@council.nyc.gov); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 10:48:09 AM

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[REDACTED]

Dear City Council,

I wanted to urge you to support the introduction of 948A to help homeowners.

I have lived in my Brooklyn home since January 1, 1996.

Three years ago when my financial situation changed and I had to partially relocate to Philadelphia while still keeping my job in NYC my plan was to air bnb my apartment which is one of two in my home. This would have given me the flexibility to keep my job in the city and to rent my apartment when I could not be in town.

The law disallowing short term rentals came into effect the month I had planned to start listing my apartment. For the past three years it has been a struggle to find accommodations with friends, sleep on couches or ironically try to find a hotel room to stay because I had to rent my apartment for income full time. A monthly rent that is no way an 'affordable' rate because of my home's location.

The irony that I need to find a hotel room because I cannot rent my home as I need to is galling when hotels on my street charge upwards of \$400 a night. As New York becomes less affordable you are forcing homeowners to make really tough decisions as to how to stay in their homes.

I urge you to introduce 948A to help your fellow new yorkers and homeowners.

Sincerely  
Jonathan Wahl  
[REDACTED], Btooklyn, NY 11249

[www.jonathanwahl.com](http://www.jonathanwahl.com)



**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

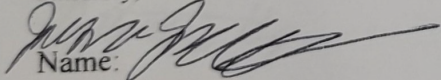
- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the "common household" or "unlocked doors" requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

  
Name:

JOSEPH TRASSANTE

Address:

[REDACTED]

Cambria Heights, NY 11411

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**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

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Sincerely,

Name:

**Joyce Denny**

Address:

[REDACTED]

**Jamaica, New York 11434**

**From:** [Julian Ehrhardt](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [District36](#)  
**Subject:** [EXTERNAL] Intro 948A Testimony  
**Date:** Sunday, November 23, 2025 4:26:23 PM

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Dear City Council Members,

I am a US citizen, and a former resident and homeowner in District 36. I love my city, and loved my block deeply. My family and I had to leave the city due to LL18 due to making our particular living arrangements impossible and due to city and OSE overreach, and their harassment of hard-working homeowners.

- Your actions in LL18 regarding New York City homeowner's property rights are a violation of our constitutional rights
- The City Council's and The Mayor's collusion with the hotel lobby is monopolistic and a matter of record.
- The City Council and the HPD operated in a clandestine fashion in changing building code language to drag 1&2 family homeowners into the multi-family dwelling code.
- The OSE and Christian Klossner perjured themselves in the recent hearings in stating that short term rental for 1&2 family homes was "always illegal" (clue in the above). That's a matter of record also.

You have inflicted immeasurable financial harm and emotional damage upon my family and upon my fellow 1&2 resident family homeowners who are just trying to get by.

Maybe not today, maybe not tomorrow, but justice will be done. We will see you in court.

Yours sincerely,

Julian Ehrhardt

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
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For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

June L. Gastón

June L. Gastón



Cambria Heights NY 11411

Dear Honorable Councilmembers Sanchez, Abreu, Dinowitz, Feliz, Restler, Hudson and Aviles,

Thank you for reviewing my written testimony in support of 1107A and 948A. My name is Karl Apelgren and I am a 2-family homeowner in East New York, Brooklyn. I attended the Housing and Buildings Committee hearing on Thursday 11/20/2025 at City Hall at 10am, but was unable to stay well into the evening. That same evening, I was being honored at a UFT tenure celebration for making 4 years as a guidance counselor in NYC Public Schools. The following is what I wanted to say in my public testimony:

I am a person of color, an immigrant to the United States, proud UFT union member, new husband, and just trying to make it here in New York City. I say just, as if it is simple, but living in New York City is a very difficult thing to do financially. I am a new homeowner as of October 2023 and appreciate both this new privilege as well as the tremendous sacrifices my family have made to give me a shot at the American Dream. We all know how expensive and unforgiving the costs of living are in a place like New York City. Even as a homeowner, I am not immune to these pressures.

I work full time as a guidance counselor for NYC Public Schools and have a second part time job as an executive function coach. I took the day off from my students to attend Thursday's hearing because I am trying to make ends meet. It took all 17 years of my working life to save for a downpayment, several career moves and navigating obstacles like the Great Financial Recession in 2008 and a global pandemic in 2020, to arrive at homeownership in 2023. As I have quickly realized, homeownership is just the beginning of the struggle and maintaining a home in a place like New York City is a daunting task. Making ends meet is the goal, so when an opportunity to engage in homesharing presented itself, it was a true blessing. Now, homesharing is critical to my survival. Between my full time and part time jobs, I clean my home to prepare it for my next guests. Homesharing helps me pay the mortgage and make repairs to my 100+ year old East New York home.

I read stories often about families who fall victim to deed theft or tax liens because they can't afford to stay in their own home and it keeps me up at night. Those people could be my uncles and aunties, my mom or my dad. As I shopped for homes, I met sellers who were selling the family home because upkeep was just too much to bear. I receive speculative calls each evening asking me if I want to sell my new home for cash. As a New York City homeowner I know I am a dying species. As an immigrant to the United States, I want to make this city my home. I want to pay my taxes and contribute to my community. As a public servant and a city employee, I want to continue enriching the lives of my students and their families. And I want to focus on my students

and their families and not worry if I one day will succumb to similar economic stressors that cause people to leave NYC in droves. When my family visits me, I want them to stay in the family home - my home. I don't want them to stay in a far away hotel in Manhattan. I want to pass my home on to my future children and continue the family legacy. Homesharing allows me to do just that. Homesharing allows me the autonomy to choose how and when I responsibly share my space and be able to afford to be a homeowner.

Attending Thursday's hearing made me feel proud to participate in democracy, but I also felt incredibly dismayed by the way the hearing was structured. Like you all saw, I too saw the HTC union and their membership and I heard all the anti-AirBnB talk. I took the day off work and arrived at 8:30am to secure my spot in line. After waiting until 10am in the cold, security allowed us to enter. I signed up to share my testimony and patiently listened and waited more than 5 hours for my turn. My turn never came. Although the words "Government for the people, by the people" are inscribed on the ceiling of the room where the hearing was held, it should have read "Government for the special interests and conspiracists". What should have been a thoughtful conversation about how struggling homeowners can be empowered through a lifeline like responsible homesharing in 1107A and 948A, it devolved into an anti-AirBnB lynching.

I want you to know all this about me because I also want you to know who I am not. I am not a corporate landlord with a portfolio of buildings, running schemes to frankenstein smaller apartment buildings and run afoul of NYC Department of Building regulations. I am not a hotelier trying to move into New York City and take from the likes of Marriott and Hilton or run pseudo-brothels trafficking hapless women as the Office of Special Enforcement's original mission was set to eliminate. I am not here to contribute to decades of lack of investment in New York City housing. I am not here, in New York City, to take away from anyone else's opportunity or block their blessings. My home is not New York City's housing stock. My home is my home. I am here to simply assert my autonomy and call out the special interests who have co-opted and conspired to make being a homeowner in New York City impossible.

At Thursday's hearing, I actively saw how housing activists turned on homeowners and denied them the opportunity for self-determination. I listened to Commissioner Klossner and his assistants lie about building code changes and interpretations that directly conflict with New York State laws. I heard FDNY representatives share absurd statements about how having locks on doors prevent fire rescues in 1 and 2 family homes, yet locks are present in all homes and buildings of all shapes and sizes across the five boroughs. I heard Union leaders misunderstand the purpose of these bills to somehow eliminate the livelihoods of their members and how

the billion-dollar hotel industry is somehow threatened by me sharing my home, 2 guests at a time. I also heard that when questioned to back up their data, all of these officials could not substantiate these claims or needed to get back to the Housing and Buildings Committee with more information.

Like many of my brothers and sisters from HTC, I am a person of color too, and well aware of the history of our country and how groups of people have been historically and systematically oppressed. It does not escape me that history will continue to repeat itself unless we are truly aware and make conscious effort to do better. I, too, was a renter in 2023 and recognize the home affordability crisis that renters are facing is similar to that as a homeowner. I don't want to hurt anyone with legislation that could potentially help me, so it is a false narrative to pit HTC union-member renter against union-member homeowner, person of color against person of color and immigrant against immigrant. Sitting next to some of the HTC union members was like sitting next to my relatives in church. There are opportunities available to all of us in a place as big, as wealthy and as great as New York City. We can all have a slice of the proverbial pie. On Thursday, however, I felt like Marie Antoinette was telling me: "*Let them eat cake*". The hearing was callous, insincere, out of touch and beneath what I believe the New York City Council and democracy is all about. My issues are no more important than any other New Yorker's issues, but I would expect that my issues would be given the same respect and attention that they deserve.

I implore you to see Thursday's hearing as a struggle for homeowners to correct a well-intentioned by poorly executed law, LL18. Give me and my fellow homeowners a reasonable lifeline so that we can stand on both feet and keep our communities and our families stable. I am not a threat nor a danger to the livelihoods of HTC members or their families. I am not a representative nor an agent for AirBnB. I am a homeowner in New York City. I welcome sensible, responsible reforms that safely manage the laws, and 948A and 1107A do that for me. I support 948A and 1107A because these laws support me. I won't be able to make it in a place like New York City without it. I was not paid to be at Thursday's hearing, but I could not afford not to be there either. I need the New York City Council to recognize how LL18 went too far and how critical 948A and 1107A are to righting a wrong. My home is my home. My home is not public property.

Thank you for your time.

Karl Apelgren



November 20 2025

SUBJECT AIR B&B

I HEREBY REJECT THE PROPOSAL OF USING OUR RESIDENTIAL HOUSES FOR THIS TYPE OF BUSINESS.

It has promoted criminal acts and illegal activity in our neighborhood of Bayside and Douglaston District 19.

Kathleen DeRienzo

[REDACTED]

District 19 Resident



To the Members of the New York City Council:

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
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For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Kenny

Address:

[REDACTED]

CAMBRIA HEIGHTS, NY 11411

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Rev. Kevin McCall opposes Intro 948-A, which **is a overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods

As the Pastor of the Kingdom Justice Church, we are dedicated to proclaiming the Gospel while actively pursuing justice, mercy, and righteousness. Grounded in biblical truth, we strive to be a voice for the voiceless, serve the marginalized, and build a community where faith and action unite. Through worship, advocacy, and service, we seek to reflect God's love and bring His justice to the world. Our vision is to see a world transformed by the power of the Gospel and the pursuit of justice. We envision a community where faith is not only preached but lived—where love, equity, and righteousness shape society. Through discipleship, advocacy, and service, we seek to bridge the gap between spiritual renewal and social change, bringing God's Kingdom on earth as it is in heaven.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

# Intros 948 and 1107 Opposition Testimony

Reverend Kirsten John Foy

## **Maintaining The Right balance**

Current law establishes the right balance between homeowners rights and the city's housing needs. I fought to establish that balance and remain proud that I did so. That balance we established has allowed for the responsible and accountable growth of home sharing and expanded the market for homeowners in a reasonable, profitable and quantifiable manner.

These proposed laws Intros 948 and 1107 would upset that proper balance and harm one large group of working class New Yorkers to help a small group of working class New Yorkers. This Regressive change to the law incentivizes removal of housing stock and repurposes it for commercial enterprise that erodes both housing stock and unionized jobs.

## **Protecting Workers, Renters & Homesharers**

These regressive changes asks the most vulnerable workers in our city to bear the brunt of the convergence of unaffordable housing costs and shrinkage of good paying unionized hospitality jobs. Women, primarily, women of color, single mothers, immigrant workers and those already on the precipice of food and housing insecurity will now have to work longer and harder to stay in the city they love and serve and cannot currently afford.

We are asking our loyal capable and dedicated unionized workforce to compete with leisure travelers and tourists for beds and baths. This is immoral and economical unsustainable. We can have it all. We can have a vibrant and affordable city, record tourism and a strong working and middle class of homeowners if we maintain an appropriate balance of the three. But MAGA TECH and MAGA LANDLORDS want us to believe that we must choose and are willing to let us fight it out while they reap the profits off our pain.

These Changes would inadvertently hurt the growth of home sharing by giving legacy home sharers a competitive advantage over new home sharers by concentrating supply. Under current local law 18 legal home sharing is growing at a healthy and responsible rate.

## **Defending The Sanctity of Tenant Protections**

This law would incentivize an end run around the strongest tenant protection laws in the country by trading long term housing for short term hospitality.

## **NYC's Affordability Mandate**

This most recent election proved that New Yorkers have established a mandate around affordability. Housing and otherwise. This regressive change would fly in the face of that mandate. New Yorkers want more affordable housing not more hotel capacity.

Affordability is not just about availability of housing but also a strong, vibrant and dynamic unionized workforce that has the ability to afford to rent in this city.

## **Divide and Conquer**

While there is certainly merit to the argument that homeowners of color need relief. That relief should not come at the expense of tens of thousands of workers and millions of New Yorkers who have been priced out of the NYC ownership and rental marketplace. The scarcity paradigm that juxtaposes working class homeowners against working class renters is emblematic of the MO of the billionaire class and mega landlords. Let them fight among each other.

## **Protecting Progressive Housing Laws against a MAGA incursion**

Finally as a social justice activist who fought for homeowners rights and fought to make the city respect them I am incensed at the reversal of values of Airbnb. Once a progressive tech giants who believed in supporting our immigrant communities and the democratization of hospitality is now is MAGA tech company pushing and financing the values of a tyrannical regime that wishes to destabilize communities of color and immigrant communities through nefarious and insidious family separation and deportations and now looks to infuse those fascist values into our housing laws further destabilizing our communities. This time by appropriating the pain of middle and working class homeowners and weaponizing it against renters and unionized labor.

We cannot afford to allow a MAGA tech company to rewrite our housing laws to their narrow commercial benefit.

We cannot harm the many in the name of helping the few. That is the very definition of the fascism we currently resist here in New York City and indeed around the country.

Don't let Donald trumps tech minions inflict further economic violence upon our people through death by a thousand little affordability cuts.

**From:** [Kristian Breton](#)  
**To:** [Testimony](#)  
**Cc:** [Organize RHOAR NYC](#)  
**Subject:** [EXTERNAL] Support for Intro948A  
**Date:** Wednesday, November 19, 2025 5:40:54 PM

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[REDACTED]

My name is Kristian Breton and I've lived on the same block in Bed-Stuy since 2007. My wife, son, and I live in a two family home. We are kindly asking the Council to vote yes on Bill 948A.

We had our son at the beginning of the pandemic and having our unit upstairs available for both sets of grandparents to help support us during the time was invaluable. Neither of our families live nearby so having grandparents and other family members be able to stay with us has been very beneficial.

In between weeks long stays of family we have opened our place to our professional network of people working in NYC for short term stays. These people have included nurses, and people looking to move to NYC but need time to find longer term units. These people end up frequenting the neighborhood restaurants and shops we are proud to support.

Just recently my elderly parents came for over a week to support us while my wife worked 14 hour days to support the NYC Marathon. Now we are looking forward to Christmas when her parents will come for holidays.

In between visits by family it would be great if we could legally use our extra unit for the income we need to support our family and maintain our 100+ year old home that we love.

Sincerely,

Kristian

**From:** [Kristina Gritzman](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony Opposing Intro 948A  
**Date:** Thursday, November 20, 2025 8:42:46 AM

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[REDACTED]

My name is Kristina Gritzman, and I am a Howard Beach resident speaking in strong opposition to Intro 948A. This bill, which would allow short-term Airbnb rentals in all one- and two-family homes across New York City, poses a serious threat to the safety, stability, and overall quality of life in neighborhoods like mine.

Howard Beach is a quiet, family-oriented community. We value knowing our neighbors, looking out for one another, and maintaining a peaceful environment for our children. Allowing short-term rentals in every residential home jeopardizes all of that by introducing a constant influx of transient guests who have no ties to our community and no responsibility for maintaining its safety or character.

I am not speaking based on assumptions. My concerns come from firsthand experience. A few years ago, we had neighbors who rented out their home on Airbnb, and the impact on our block was immediate and disruptive. We dealt with ongoing partying late into the night, drunk individuals wandering up and down what is normally a very quiet street, and repeated noise disturbances that made it difficult for families to rest.

There was even a fight that broke out right in front of our home late at night. We witnessed property damage. At times, vehicles were abandoned at the property by short-term renters who treated our neighborhood like a temporary crash pad and party spot rather than a community. These situations made us feel unsafe and disrespected in the very place we're raising our families.

As a mother of a young child, safety is my number one priority. I want my child to grow up in a neighborhood where we know our neighbors, where we can trust the people living around us, and where we aren't constantly concerned about who might be staying next door for the weekend. Intro 948A threatens that sense of security for countless families across the city.

I urge you to reject this bill. Protect the long-term residents who have built these communities, who care about them, and who will continue to raise their families here. Please prioritize the safety and well-being of our neighborhoods over the demands of the short-term rental industry.

Thank you for your time and consideration.

**From:** [Kristina Kozak](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Intro 948-A Written Testimony  
**Date:** Tuesday, November 18, 2025 5:49:57 PM

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[REDACTED]

Dear City Council Members,

I am writing to respectfully urge you to support and vote Yes on Intro 948-A.

Sharing my private residence has been critical to my financial stability over the past decade. It allowed me to responsibly pay down a large business loan without resorting to bankruptcy, at a time when I had very few alternatives. I was not in a position to take on a full-time roommate for a variety of personal and practical reasons, but the ability to occasionally host visiting parents, tourists, medical residents, and other short-term guests made all the difference. This flexibility has truly been a lifesaver.

In addition, New York City needs more accommodation options beyond hotels. I have hosted many medical residents completing short rotations in the city—often just three weeks. They frequently tell me that securing housing is the most stressful part of their program. Hotels are far too costly for these temporary stays, and there are limited realistic alternatives. Responsible, occasional home-sharing fills this gap in a way that benefits both visitors and homeowners.

The current broad, one-size-fits-all regulations on short-term stays in New York City do not reflect the diversity of circumstances residents face. Intro 948-A is a step toward creating a fairer, more nuanced approach. Homeowners of one- and two-family properties should be permitted to share our homes occasionally in order to make ends meet, maintain our properties, and remain financially secure.

Thank you for your time and consideration, and for supporting policies that allow responsible homeowners to remain in their communities.

Sincerely,  
Kristina Kozak

Sent from my iPhone



**From:** [Krystle Clark](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Support for Intro 948A  
**Date:** Friday, November 21, 2025 8:07:00 PM

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Local Law 18 has harmed my family so badly that we are being forced to sell our home.

Our home has NEVER been a part of the New York City housing stock. We bought a new construction home and have successfully short term rented it for many, many years. We have never had an issue with our guests. They bring revenue to the Rockaways when it's especially needed in the colder months. And, because we are always on the premises (because we live here) we have always been able to maintain the space.

We have always left our second unit open for our visiting family. My husbands family lives in Poland and mine lives all over the U.S. Including my 108 year old grandma, who needs her own separate space when she comes to visit. If we had renters, we would not be able to host our families.

It is unconstitutional for the city to tell me who I should have to rent to and for how long. We will not be renting out our second unit because we cannot afford the liability a renter brings. NYC laws do not protect homeowners.

We live near JFK airport and have hosted many international travelers (usually families of six) who cannot afford a hotel room, let alone two. When LL18 went into place, these tourists did not go rent hotel rooms, they simply never came back to the city. Because they couldn't afford it.

Intro [948A](#) solves all these problems. It keeps me in my home while not affecting the housing stock in any way whatsoever and brings back the tourist dollars that our area has lost.

Please support this bill!

Thank you,  
Krystle Mundzik and her family

Sent from my iPhone

To: Councilmembers

Hello, my name is Kurt Thometz and I am writing to ask the Councilmembers to consider voting YES to the amendment to LL18, 948A, as being introduced by Mercedes Narcisse towards making our city affordable to working people.

For those of us qualified by the Mayor's Office of Special Enforcement for short term rentals, allowing us to rent our 2-bedroom mother-in-law apartment to 4 people would be a lifesaver, assisting us in paying our two mortgages, our property taxes, the repairs to our 130 year house, Con-ed bill, groceries, the all the expenses associated with our sixth-year of elder care for my mother-in-law suffering Alzheimer/Dementia and our thirty-fifth year of being a sanctuary for my neurodiverse son, both of whom are dependent on periodic stays and make long term rentals impossible.

My wife, Camilla Huey, and I are self-employed twenty-one-year residents of our home in the Jumel Terrace Historic District of Washington Heights. For ten of those years my bookstore, Jumel Terrace Books, "Local history, African and American," complimented my neighbors - Marjorie Eliot's Parlor Jazz, the Morris-Jumel Mansion and George Nelson Preston's Museum of Art and Origins - in making our neighborhood a destination. Camilla's 2013 exhibition *The Loves of Aaron Burr* infamously quadrupled the Mansion's attendance.

My wife and I are senior citizens with no desire to leave the neighborhood, our home, or the City. Besides the rental, we run four entrepreneurial businesses out of the house: Camilla's artist/couturier atelier, my reference library/bookshop specializing in local history, *Jumel Terrace Books*, and my consulting business, *The Private Library*, half of which are so geography specific as to defy a move from our neighborhood.

In a zip code with one small hotel, our legal STR (OSE STRAPP 0011566) has served as a place for our neighbor's visiting relatives to stay, residents undergoing renovations, and both domestic and international guests looking to see NYC from an Uptown point of view. One needs only read this review by our last to realize the impression that the neighborhood, not known for being a tourist destination, makes:

*"Just do it! I guess that's a Nike advert but it should be the slogan of Kurt's short-term rental. Just book it already! This place is fantastic, situated in such a coooool neighbourhood. This place evokes a real sense of community. No, it IS a real community. The neighbourhood is full of history and great names of former big eras, people, and changes in American society. It is also quiet and beautiful, and full of character. Great connections to the rest of NYC, great eats, and a great stay. I'll be back."*

We've had over 200 glowing five-star reviews like this by guests who spend money in our local restaurants and patronize our merchants, then spread the good word about the Jumel Terrace Historic District and Washington Heights internationally.

I do not exaggerate in saying that amending LL18 will make the difference between us being able to keep our house or foreclosure and bankruptcy. As is, the apartment, constrained to rent for half its value by LL 18, has consistently brought us up short, dwindling a once healthy retirement account to a pittance. The simple changes Amendment 948A will make would be sufficient to us recapturing a future we've spent all our lives working toward.

Your every effort on our behalf is deeply appreciated.

All amities,

Kurt Thometz & Camilla Huey, [REDACTED], NYC, NY 10032. [REDACTED]  
[REDACTED]

## **In Support of Intro 948A**

**Laurie K., Brooklyn NY 11215**

**My name is Laurie and I'm a Brooklyn 2 family homeowner who supports 948A. I worked 47 years helping low income workers and progressive causes, working for unions ... and supporting progressive politicians. I support taxes, I support Council initiatives to help disadvantaged New Yorkers .... But I certainly never thought I'd be so betrayed by you now.**

**SURPRISE! I didn't get rich. My Social Security is low — Not enough to pay my bills. After a divorce, I struggled to afford my home of 33 years. Sharing extra space in my home was a lifeline. And a fantastic experience for me and guests. I'm New York's greatest ambassador. They spent many tens of thousands of dollars in Brooklyn.**

**I USE my extra space for family. Should my elderly or young relatives have to stay in a costly Manhattan hotel?**

**I can't house my sibling, a VET, who is periodically homeless, and comes and goes? Should he be another person abandoned on the streets? NO. It's my business to decide to use my space periodically to help him.**

**But when my family is NOT here, I share my home to pay skyrocketing taxes, insurance, utilities, mortgage, repairs, etc. This issue is not about Airbnb, I vehemently oppose people who are NOT OWNER OCCUPIED IN A 1 OR 2 FAMILY HOME being able to "Short term rent". But if we're now controlling uses of the property of small homeowners ... should we march into your homes and tell you to permanently rent your "study" or den or office or extra rooms to a family or individual?**

**I don't even have a locked door in the house. But with no family left at home, why is it the city's business to deprive me of a chance to survive... or to deprive**

me of access to my own laundry machines which are hooked up in my extra space?

**So ..... Who have I helped?**

School teachers from Oklahoma and Chile. Students staying a week to find an apartment to begin their future's in NYC.

Japanese tsunami rescue workers. COVID nurses. Marathoners. Low income dancers, musicians & artists from around the world enriching our art scene.

European trade unionists fighting climate change. 20 year old Italian honeymooners. WHERE DO YOU EXPECT THESE FOLKS TO STAY???

**And my NEIGHBORS --- displaced by construction, hurricanes or COVID.**

**ALL AT A SLIDING SCALE. Not a one could have paid for a hotel. I house low income people and am NO THREAT to a single hotel worker job. Stop buying into that ridiculous propaganda. Do the hotels have a program to house students for \$30 a night, like I do? Didn't think so.**

But mostly, I help families of neighbors -- **INCLUDING SOME OF YOUR FAMILIES, CITY COUNCILORS** -- attending weddings, graduations, etc.

After a severe health crisis, my neighbor's parents came to care for Mom and get the kids to school. **Could they DO --- or AFFORD THAT from a Manhattan HOTEL?** Many grandparents stay for weeks to help with grandchildren because of our **CHILDCARE CRISIS, WHICH I HELP TO ALLEVIATE.**

**And -- I had to MOVE INTO MY OWN DOWNSTAIRS** when I couldn't walk, after surgeries! **ISN'T THAT A FAIR USE OF MY OWN HOME?** Not according to the insulting testimonies and lies I heard at the hearing.

For all these reasons I use my space -- but when it's available I need some extra income to get by. And I'm helping lots of people.

Now.... From one 50 year UNION activist to another ..... It's lies and nonsense that small home sharing will take a single job from a union hotel worker.... I am helping people who couldn't afford a BATHROOM in a Manhattan HOTEL !! THEY JUST WOULDN'T COME. WHICH HURTS NYC.

And .... local small businesses . They THRIVED from the thousands of meals my visitors ate and money they spent.

How does NYC gain from hurting an active community member like me? Should I be displaced because after 33 years, expenses are just too high now? If I'm forced out of my neighborhood some greedy LLC will snatch up my home. The city has had so many opportunities over the past 60 years to fill vacant apartments, build new affordable housing, you should not be going after those of us who are poor enough to NEED to fill occasional vacant spaces. After all, rich people don't NEED to do STR, it's low to moderate income folks who LIVE IN THEIR OWN HOMES who do.

City Council should HELP small homeowners to survive and thrive. We're key to healthy neighborhoods. 948 A is a first step to reforming Local Law 18 – which, we were promised, would exclude owner-occupied 1 – 2 family homes, as it should!

Thank you for your support of 948A.

## TESTIMONY OPPOSING Intro. 948 and Intro. 1107

By Layla Law-Gisiko, Democratic District leader AD75/A

My name is Layla Law-Gisiko. I am a duly elected District Leader (AD75/A) on the West Side and a longtime community organizer. I'm here today to urge you in the strongest possible terms to oppose Intro. 948 and Intro. 1107. to legalize short-term rentals and expand Airbnb-style operations in New York City.

We are living through the direst housing crisis in our city's modern history. Families are doubled and tripled up. Seniors are hanging on by a thread. Shelters are full. We all know this. In that context, every single apartment matters.

Short-term rentals have a devastating impact on our housing stock. When an apartment is turned into a de facto hotel room, it is taken out of circulation as a home. That is not theoretical: we see entire lines in buildings where the lights are off except on weekends, where neighbors are replaced by rolling suitcases and key-lock boxes. Those are units that could and should be housing New Yorkers long term.

It is critical that we keep apartments available for the people who need to live here, to house their families, raise their children, care for aging parents, and participate in the life of this city. Our housing stock is not an inexhaustible commodity.

We simply cannot afford to create any new pathway that converts scarce housing into a stream of temporary lodging for tourists. Hotels should house tourists. Apartments should house people. The market has made that distinction blurry; it is your job, through law, to make it sharp again.

At a time when New Yorkers are desperate for stability, this bill moves us in exactly the wrong direction. I urge you to reject it and to focus instead on policies that protect and expand permanent, affordable housing for the people who call this city home.

Thank you.



**From:** [Lea](#)  
**To:** [Testimony](#)  
**Cc:** [Correa, Melissa](#); [Birch, Jonah](#); [District22](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 11:50:34 AM

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Good Morning,

We are Lea Kim and Luis Roman, who live in our two family home in **Astoria, NY 11105, 14th District**, which we bought in 2024.

We are homeowners and we do not get paid any money for requesting you to please vote **"YES" on Bill 948A**.

One of us is retired and the other one soon to be, we moved out of Long Island into New York City to live closer to everything, better public transportation and lower property/school taxes, but we have a very high mortgage and utility bills which are getting harder and harder to afford with one of us receiving the retiree benefits and the other one a salary for not too long.

Home-sharing helps neighbors in smaller spaces/apartments to receive family members to stay nearby and most importantly helps homeowners remain housed. Also we help the local economy with additional patronage for local businesses, besides providing work to others that do repairs, cleaning, etc.

We thank our Council Members for your dedication to New Yorkers, we want you to know that **we support 948A and we would like you as our Council Member to vote "YES" on the bill.**

Thank you very much in advance,

Lea Kim and Luis Roman

Leana Divine

Testimonial Letter to the New York City Council Committee on  
Housing and Buildings,  
Hon. Pierina Ana Sanchez, Chair  
November 20, 2025

Thank you to Chair Pierina Ana Sanchez and the City Council for your support of small homeownership across New York City. I'm writing to support the **Intro 948a** amendment to Local Law 18 — calling on our city to exempt small 1-2 family homeowners from Local Law 18. My name is Leana Divine, and I am a homeowner in the Hunts Point neighborhood of the Bronx.

I remember when Local Law 18 was originally being discussed and debated in 2022 that my city councilmember, the Honorable R. Salamanca, said that it would not target small 1-2 family homeowners, small homeowners would not be included in the rules, the idea was to go after bad actors, people turning buildings into illegal hotels, renting out their apartments, etc. Thankfully I understand he is looking out for his Hunts Point constituents and is supporting Intro 948a and I'm grateful for that.

Yet small homeowners were not exempted from Local Law 18, and now three years later I see my neighbors and friends struggling, and local businesses in our neighborhood struggling and even closing. At the same time, I have friends in New Jersey who are suddenly getting rich because of this decision by NY City Council. Why should homeowners in New Jersey be profiting from their homes while across the Hudson River homeowners struggle?

Meanwhile the housing affordability crisis has only gotten worse since 2022, and the housing stock didn't increase in NYC. That's because our personal homes are not part of the housing stock. I cannot rent out my personal space and need space for my visiting

friends and relatives. Big buildings got approved by NYC for legal short-term occupancies (Class B), its units are exempt from the short-term rental registration requirement. So, is it okay if you are rich and can afford to buy your way into doing short-term rentals, but not if you are a small homeowner living paycheck to paycheck trying to maintain your house built in 1901?

I listened to a housekeeper who works at the Mandarin Oriental Hotel give her testimony that she is worried about losing her job if Intro 948a passes. I'm confused how someone who is looking to rent a room in my home for \$35/night in Hunts Point, in the Bronx, where the image that still prevails is of prostitutes and drugs and buildings being burned down, (but people are still willing to come and stay in our nice house at that affordable price point), is suddenly going to turn around and drop their AMEX for a room at the Mandarin Oriental Hotel where the average cost per night is \$1,577?

My husband and I turned to Airbnb for the first time during the pandemic, when most of our tenants were unable to pay rent. We never did one-night stays, even avoiding week-long stays, as that was too much cleaning and laundry and time orienting people on NYC recycling rules, etc. Most of our guests in the beginning were moving to NYC and looking for permanent housing, doing medical or nursing rotations at Lincoln Hospital, or visiting on vacation and would stay 2-6 weeks. What was great though is that we could accept all the requests in the future and then fill in shorter stays between bookings.

Now with Local Law 18 and our 30 days plus guests, we must reject all bookings in the future and try to book from the 1<sup>st</sup> to the end of the month or if not by the month, as close to it as possible. We are forced to book one month at a time. When we get off schedule, then we have nobody there for weeks at a time. We can't even extend our 30 days plus guests on Airbnb if they want

to extend their stay for 2 weeks, because it is less than 30 days (even though they have already stayed 30 days and the next guest isn't arriving for 3 weeks in the future). It has caused infinite headaches and angered endless potential guests and even current guests who cannot extend. I frequently must reject bookings, saying "due to Local Law 18, I won't be able to fill the dates between bookings, so I am unable to accommodate your stay." These are professors coming to do research, teachers moving to NYC from Wyoming, medical students coming to do a rotation, or working but presently unhoused people already in NYC for the long-term trying to survive the gig economy. Again, these guests of ours are not people who can afford to go to hotels in Manhattan.

My husband and I started dating soon after he posted on Facebook that he was looking for people to feed the unhoused on Christmas Day in 2010, and I contacted him to volunteer with him. Since the unhoused brought us together, on a higher level we feel called to house people in our home. It almost feels selfish to have empty rooms in our house when there are people on the streets.

Since we bought our house in the South Bronx, we feel also like ambassadors for the South Bronx, plagued with its complicated history and battered image since the 1970s. Having lived in Queens, Brooklyn and Manhattan previously, we get so many questions about "why the Bronx?" People on Airbnb will ask if we are constantly worried about getting carjacked or shot when we leave our house. Meanwhile we are welcoming Americans from dozens of states, and even more incredibly receiving people from all over the world, from China to South Africa, Russia to Argentina, Germany to Iran. We also get people from the Bronx who cannot afford a deposit on a place of their own and want to stay with us and pay month to month through the app.

Yes, unfortunately, this ultimately means that we always at some point end up with people living with us who stop paying rent, and as you know it is next to impossible to get non-paying tenants/roommates out of your home in this city. So being able to home share and get paid through a reliable method/website and have recourse/assistance in getting payment relieves a lot of pressure and stress.

Think about how beautiful it is (was) to bring more people to Hunts Point in the Bronx and to support our local community with income from not only other parts of the Bronx and NYC, but the state, country and the world. Prior to recent redistricting (and I am not sure if it still is it or not), we lived in the poorest congressional district in the United States. Our neighborhood is so low income it cannot even support a sit-down restaurant. There is no debate about whether buses should be free; it is just a fact that nobody pays. I've never seen anyone except me and my husband pay for the bus in our neighborhood in the nearly ten years that we have lived there.

Please tell me how families who own their homes and want to host short-term guests are a threat to hotels and their double-digit profit growth? With reasonable accommodation to Local Law 18 homeowners can easily earn extra money and keep their homes and hotels can continue to profit from people who can afford them. I could finally host my neighbor's grandma again when she comes to visit on the weekends.

I am the only white female homeowner in my neighborhood, but I am one of the 7% of homeowners in my neighborhood that lives in my home. I nearly get a call a day of someone who wants to buy my house. These home prospectors that call people to buy houses, whether they are part of the private equity home buying wave or not, are not going to live in my house in Hunts Point. They are not going to pick up trash in front of the churches or call

311 to report needles in the weeds growing across the street, report abandoned vehicles and dumping, call 911 when there is someone passed out on the street in the cold, or work to get trees planted in every box where they died, or get street lights or stop signs or stop lights installed. This is the work that my husband and I do to make our neighborhood a better place. When you lose people like me and my neighbors, you won't get us back with private equity owners, you just get more absent landlords who are out to make a buck. I'm just trying to break even and help people while helping ourselves. It is mutually beneficial for everyone. It was nice while it lasted, especially during the global pandemic, to build a community feeling in our home and neighborhood, and to welcome outsiders to spend their money in our South Bronx neighborhood. Personally, I appreciated having the financial balance of paying tenants to counteract the void of income of the non-paying ones. Not to mention the pain this has caused to tourism citywide. How is a law that hurts minority families, hurts small business, hurts poor neighborhoods and hurts tourism a good thing? I don't understand.

Chair Pierina seemed fully-supportive of all of the people who were opposed to this law (who mostly seemed to be union employees reading prepared statements about how they would lose their jobs—which I'm pretty sure is not the case considering the fact that my guests (most recently Dutch interns who stayed a year despite only making minimum wage and being taken advantage of by their employers under the J-1 visa program)) could never afford to stay in a fancy Manhattan hotel. She asked the opposers questions and was very engaged in what they had to say. Why did it feel like the city council didn't care at all about us homeowners there to speak (without being paid) for ourselves and other homeowners?

Everyone who says that a homeowner must be "on site" to justify permanent residence is 100% incorrect—this is false. The NYC

Administrative Code's Housing Maintenance Code permits a family to rent rooms up to two boarders in their primary residence apartment, requiring a common household but not mandating the leaseholder's physical presence during every stay—temporary absences align with permanent occupancy rules.

Since the passage of Local Law 18 I have been scrimping and saving to help pay for a lawyer with other homeowners (NYHOA) to write this amendment to the law. We did not take any money from Airbnb and we cannot compete with all the money spent by the HTC (Hotel and Gaming Trades Council). We have tried to get as many homeowners as possible to support this fight with us, but literally everyone is pinching pennies and fighting to survive, so it is hard to pool our money. We felt strongly that taking corporate money would compromise our fight, but at the hearing the other day it felt very David vs. Goliath. I was horrified to see the union members doing “thumbs down” while pro-948a homeowners and Chamber of Commerce representatives were speaking. It is frustrating to feel like NYC doesn't care about those of us that own the old houses and are trying our best to take care of them and afford them. There is so much we would love to do to improve our home and our neighborhood, but we don't have the money to do it. I truly hope and pray that NYHOA and other NYC small homeowners banded together despite not having a lot of money to spend like the HTC and big corporations do to lobby city council and persuade people to speak against Intro 948a, does not permanently imperil regular people from keeping their homes in NYC.

I implore you to please support reinstating short-term rental rights for small homeowners who are not using their properties as commercial rentals. Intro 948a would be a lifeline for so many people in this city and truly make a difference in our neighborhoods.



Thank you for your attention and consideration,

Leana Divine

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Lennox McKoy

Address:

[REDACTED]

Laurelton, NY 11413

**To the Members of the New York City Council:**

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Sincerely,

Name:

**Lennox Taylor**

Address:

[REDACTED]

Jamaica NY 11434

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Sincerely,

Name:

LEROY MANUEL

Address:

[REDACTED]

Cambria Heights, NY 11411

*Leroy Manuel*

November 19, 2025

Committee on Housing and Buildings  
New York City Council  
New York, NY 10007

Subject: Letter of Support for Int. No. 948-A, Addressing Short-Term Rentals in Private Dwellings

Dear Chair Sanchez and Distinguished Members of the Committee,

I am writing today as a young woman, a homeowner and Airbnb host, and a deeply committed New Yorker, to express my unequivocal support for Int. No. 948-A. This legislation is a critical, common-sense reform that will help preserve the affordability of homeownership for countless middle-class residents like myself, ensuring that people with deep family ties to this city can continue to call it home.

My connection to New York City is generational. My father was born Brooklyn, and I grew up with the understanding that New York is a place where working families build lives. I went on to earn my Master's degree from Columbia University and now have the great privilege of working at the Robin Hood Foundation, fighting to move the needle on poverty citywide. However, maintaining a foothold here today (especially as a young person) requires extraordinary creativity. For me, responsible, short-term home-sharing is not a commercial enterprise; it is a lifeline that offsets the rising costs of living.

Int. No. 948-A directly addresses the unintended consequences of prior legislation, which unfairly targeted owner-occupants who rely on home-sharing to survive. I strongly support the provisions that:

1. **Allow me to be temporarily away so I can visit family members, show up for important moments in my loved ones' lives, and take short vacations without losing vital income.** This city is my home. I firmly believe I should not have to limit or cancel my own travel related to elder care, funerals, weddings, and even personal vacation just to be present for hosting.
2. **Clarify that I can protect private spaces, namely my bedroom and office, particularly as a young single female host.** The requirement to maintain a "common household" should never force a host to provide guests with access to their private bedrooms or offices. To me, this is a necessary security and privacy measure. This is particularly important to me, as a young female host who lives alone.
3. **Increase my maximum occupancy limit to four adults, so that I might occasionally accommodate reasonably larger groups.** While I myself will likely not need to take advantage of this, I strongly believe this is a reasonable number that recognizes the reality of families and small travel groups, allowing my fellow New Yorkers to maximize their space responsibly.

Please support the financial health of the New Yorkers who are fighting to maintain their homes and contribute to the vibrancy of their neighborhoods. Thank you for your time, consideration, and leadership on this crucial matter.

Sincerely,

Lianne Remen



Good afternoon, Council Members. My name is Linda Ortiz, I am a homeowner in District 8 in the Bronx. I am here to implore you to vote YES on Bill 984A. I am not paid to be here. Thank you for the opportunity to speak.

For me, home sharing in my space is not merely an option, it is a necessity. I have seen and heard online comments suggesting, “You shouldn’t bite off more than you can chew,” as if I were living beyond my means. But that is simply not the case. I did everything right. I was born and raised in the Bronx. Raised in NYCHA in Soundview, I am educated by the NYC public school system, I am a Hunter graduate and City College Alum. I dedicated over 20 years to federal service, worked hard, and bought my house in the Bronx with the stability that my job provided. I lived responsibly and planned for the future. Yet after two decades as a civil servant, my federal agency at the US Department of Justice was eliminated, leaving me unemployed through no fault of my own.

20,900 dollars - That was the amount that was required to keep the lights on (property taxes, insurance, and utilities) in 2024. By the close of the 2025 calendar year the cost will be higher. This number does not include emergency fixes and it does not include a mortgage. How much did the hotel industry profit since LL18?

“What about that second unit?”- I have a long-term tenant. For the last four years, I rent the second unit to a wonderful Latina who works in a small garment factory in the neighborhood. Through home sharing, I was able to subsidize her rent. This year, I had no choice but to raise her rent. A clear and unintended consequence of LL18.

Home sharing is a way I can continue to afford living in the Bronx and hopefully find another job. The Bronx is my home, and I do not plan to sell it! And I need your help.

I’d like to think I am more than just a resident—I am deeply committed to my community. I participate in neighborhood clean-up projects (of which Deputy Speaker D. Ayala has sponsored), community meetings, BID and local Merchant Association initiatives, coordinated the South Bronx Farmers Market and in other advocacy efforts, I helped bring attention to the issues at St. Mary’s Park. As a direct result, the park was awarded a multimillion-dollar infrastructure overhaul. This was not the work of an outside organization, but of me—a community resident and homeowner—dedicated to helping the Bronx.

And today, I am asking for your help to ensure I remain in my home and continue advocating for our community in the Bronx.

Responsible home sharing offers not only a lifeline for people like me but also help sustain others and the vibrancy of our city. These are artists, dancers, actors, who come

to NYC to audition or are holding an exhibit in the neighborhood, some are muralists and graffiti artists who have been commissioned locally to paint over abandoned walls.

This is about affordability, home sharing helps me afford to stay and maintain my home, as well as providing an affordable place for families and artists to stay. Bill 948A is only a small necessary tweak to LL18 that helps owner occupied homes.

I am begging the City Council, Deputy Speaker Ayala to please vote YES and help Bronxites like myself to stay engaged and active in our communities. Your support will help keep New York City an open, welcoming place for all. I truly thank you for your time.



My name is Lisa Grossman, I am 62 years old and was born and raised in NYC. I am a life long New Yorker nad I have seen NYC at its best and I have seen it at its worst.

I am here to talk about the future of NYC and what the people made perfectly clear two weeks ago at the polls. Our incoming Mayor was elected because he believes NYC should be a place for everyone, not just a place where the rich and big corporations rule the city.

In 2021, Local Law 18 was funded by the multi-million dollar hotel lobby. The HTC sought to obtain 100% control of where visitors to NYC could sleep and, more importantly, in whose pocket those dollars would go.

Local Law 18 created a monopoly for the well-healed and, quite frankly, greedy hoteliers. By literally BANNING anyone who visits NYC from having an option other than an overpriced hotel room, the HTC literally took money from our pockets and lined their own deep pockets. Isn't this precisely what New Yorkers called out when they voted 2 weeks ago?

The tenant groups you are hearing from are an arm of the hotel lobby. Their claims, are two-fold:

#1) that by voting YES on Intro 948A thousands of apartments will be taken off the market from needy New Yorkers; and,

#2) that 948A is a loophole for speculators and investors.

They are wrong, dead wrong and almost Trumpian. 948A will have the opposite effect as our homes will provide additional and much needed reasonably priced options.

Secondly, speculators and investors WONT benefit, rather, regular, hard-working, outer borough New Yorkers will benefit along with their communities..

I urge each of you, Councilmember Sanchez, Dinowitz, Abreu, Feliz, Resler, Hudson, and Aviles to go home this evening and log onto the OSE website and attempt to register your home to homeshare. You will then see that the system in place makes it impossible for an investor with multiple homes to register.

948A is easy. It simple:

#1 it increases the number of guests from 2 to 4

#2 it allows locks on our doors

#3 it reasonably does not require homeowners to be present 100% of the stay.

That's it. Simple, smart, straightforward. That is what I call progressive. Don't you?

PLEASE VOTE YES to 948A

**From:** [Lovelynn](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Home Sharing Bill 948A  
**Date:** Saturday, November 15, 2025 12:05:15 PM

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[REDACTED]

Dear Members of the Committee,

I am writing to express my strong support for Home Sharing Bill 948A.

As a homeowner in District 7-Shaun Abreu district, I face rising costs that put significant strain on my ability to maintain my property and manage my living expenses. This bill offers a crucial solution by allowing responsible home sharing, which can help homeowners like myself offset these growing financial burdens.

Over the past few years, I have seen my utility bills, insurance premiums, and maintenance costs skyrocket. The cost of heating, cooling, and general electricity has risen steadily, and as much as I try to be mindful of my consumption, there are unavoidable price hikes that make it increasingly difficult to stay afloat. On top of this, property insurance costs have continued to climb, driven by factors like extreme weather events and rising claims, making it harder to afford adequate coverage. I have put my home on the market for sale as I can no longer meet these rising expenses.

In addition to these ongoing costs, regular property maintenance—whether for repairs, landscaping, or routine upkeep—has also become more expensive. As a homeowner, I am responsible for these costs, and while I take pride in maintaining my property, the financial burden is becoming overwhelming. I have considered selling my home, but like many others, I would prefer to stay where I am, especially considering the personal and financial investment I've made.

Home sharing has allowed me to generate much-needed income by renting out a portion of my home, helping me to offset the rising costs of utilities, insurance, and maintenance. The ability to rent out a room for short-term stays has provided financial flexibility and made it possible for me to continue living in my home without the constant worry of how I will cover these ever-increasing expenses.

Home Sharing Bill 948A provides a thoughtful framework that ensures home sharing remains a responsible and sustainable option. It balances the needs of homeowners with the concerns of the broader community by introducing reasonable regulations, such as limits on rental days and safety requirements. These provisions ensure that home sharing is done in a way that benefits both homeowners and neighborhoods while preventing potential negative impacts.

In conclusion, Home Sharing Bill 948A is a vital piece of legislation that will allow homeowners like me to manage rising costs while contributing to our local economy. I urge you to pass this bill and support homeowners who are working hard to stay in their homes and maintain their properties.

Thank you for your time and consideration.

Lovelynn Gwinn

[REDACTED]  
New York, NY 10031

Sent from my iPhone

Please excuse any typos, it's a part of my charm.

My name is Lynn Englum and I was not paid to be here today. I've owned my two-family home in Queens for over 10 years. Before owning, I was a renter for over a decade. In many ways, I achieved a minor miracle – owning a home in America's most expensive city as a middle class American. However, doing so in this city means taking on considerable debt. I'm proud that despite job loss, life changes and unexpected hardships, I've still managed to keep and maintain my home even though it's over 100 years old. There is always something breaking.

One of the ways I've managed this is through sharing the home that I live in. It allowed me extra income when my boiler failed, my hot water heater flooded my basement, and my roof leaked so badly it needed a replacement. During the pandemic, home sharing was my lifeline to keeping my home.

The cost of my home insurance has risen 70% since 2020. Many other house bills have also increased. Affordability as a homeowner is only getting worse and now, because of LL18, I no longer have one of the most effective tools – home sharing – to offset these increases.

But it's not just me that has been hurt by this. It's also my community. There are no hotels where I live. There are no accommodations for families with limited means. 60-70% of the people that stayed at my home were family and friends of people in my community. They were visiting for weddings, graduations, and the arrival of a new baby. Unlike in many places around the country, most New Yorkers don't have extra rooms waiting vacant for family and friends. We simply can't afford it. My home was a place for grandparents to stay and help with the new birth of their grandchild. They could stay down the street and not 30 minutes away at the closest hotel.

This is an issue of affordability for not just small homeowners like me but also the communities we live in and the support systems we rely on. Please vote YES on 948A. Thank you for allowing me to speak today and tell my story.

My name is Margaret Smith, a 2-family homeowner living in Brooklyn (District 39). I am a recent homeowner who lives in my home with my husband and three young children - I am asking this committee to vote YES on Bill 948.

As many New Yorkers do, I have a large extended family out of state, including several close relatives who stay with me for long stretches of time **to provide much needed childcare.**

When we bought our home a few years ago, we had planned to use the **flexibility** provided by home sharing to carve out months for **family to stay & take care of our kids during school breaks**, while sharing our home to help make ends meet when family is not staying with us.

The loss of our ability to home-share has put my family in difficult circumstances. Our cost for childcare has **increased dramatically**. We also have much needed repairs we need to make to our home. We bought our home from an **absentee landlord who had left in disrepair**. We want our home to be a wonderful environment to raise our children, and make sure it will be in good condition for another 124 years. But without homesharing, we will not be able to properly care for our home.

We love our neighborhood. We love being a public school family. We were so happy to put down roots in the city we love - this was our American dream. Without the ability to share our home, I fear we will no longer be able to afford to raise our family in Brooklyn, and be forced to sell. If we sell our home, it will not become part of the city's rental housing stock. It will certainly be **gut renovated into a single family home** by a new owner of greater financial means, as is happening currently in three multifamily homes on our block.

Without the relief provided by bill 948, my family and other owner occupied homeowners will soon disappear from Brooklyn, replaced by those **wealthy enough to not need to share their home** to make ends meet.

Thank you for your time and for your dedication to helping all New Yorkers, I ask you to **please vote yes** on bill 948 to help our family and many more like us.

# Bill 948A will make history and impact generations

Thank you to Chair Sanchez and other members of the Housing and Buildings Committee for putting Bill 948A on today's agenda.

My name is Margenett Moore-Roberts. I live in Brooklyn, District 36 and I am not being paid for this testimony. I am here today to urge this body to approve Bill 948A so the bill can be FULLY considered by the entire Council.

Yes the rent is too damned high, but so are property taxes and insurance, gas and electricity, and the other costs of maintaining a 100 year old home. So my testimony today is not a matter of politics, it is a matter of holding on to the home it took me 15 years and a whole lot of luck to buy!

Whether or not Bill 948A passes or is blocked by this committee today, this bill will make history. The question is what kind of history? My parents worked hard to buy the house I grew up in and even though there were times when the gas, lights, and water were turned off for non-payment, owning our home allowed my father to be able to say "at least we still have a roof over our heads". Having a roof over our head meant more than just having shelter, it meant we still had each other and as long as our family was together everything else would be OK - and it was.

Homeownership is the primary source of economic stability for US Families. But! Government regulations have long been a key determinant in who can afford to buy and stay in a house long enough to own it - too often government regulations had a disproportionately negative impact on middle- and lower-income home buyers, even more so if you were Black or Brown. The impact of these government regulations have lasted for generations and can be definitely tied to the persistent racial wealth gap we've tried to close for the last 60 years. In the 1850s, it was the destruction of Seneca Village. Then came redlining, racial covenants, overly stringent rental regulations, predatory lending practices, and holistic displacement.

Now, in a city where buying a home takes a small miracle, and keeping a home almost always requires multiple income streams, the overly-restrictive regulations of Local Law 18 have picked up this mantle. While Local Law 18 had a big problem to address, as currently enforced the regulations throw out owner-occupied homeowners with the proverbial bath water.

As members of the communities we live in we oppose the gross exploitation of our rental markets. At the same time, as real NYers trying to hold on to our homes and take care of our

families, we don't want to be political roadkill. 948A provides amendments that will protect neighborhoods from being exploited by outside speculators while also preserving the precious homeownership in our community.

One way or another, Bill 948A will make history, either by honoring the homeownership dreams and sacrifices of the generations that came before us or by devastating hope for housing security and economic stability for the generations coming after us.

Our hope is that today, we will all land on the right side of history, the side of history that keeps our local economies strong, our families sheltered, and our communities sacred. With my full chest, I respectfully ask this Committee to approve bill 948A and help keep real NYC Homeowners in NYC Neighborhoods. Thank you for your time.

To: New York City Council Housing and Buildings Committee

Re: Testimony Nov. 20, 2025, on New York City Existing Building Code, Intro 1321.

From: Margery Perlmutter, R.A., Esq. (Tel [REDACTED]; mp@urban-factors.com)

NYC has tens of thousands of 3-6 story occupied walk-up apartment buildings that are without elevators. This poses many hardships and dangers for the disabled, the elderly, E.M.T.s who must carry patients down the stairs to the ambulance, and for any person who becomes temporarily disabled or simply has too much to carry. Such buildings, most built before WWII, comprise a significant proportion of the city's actual affordable housing stock.

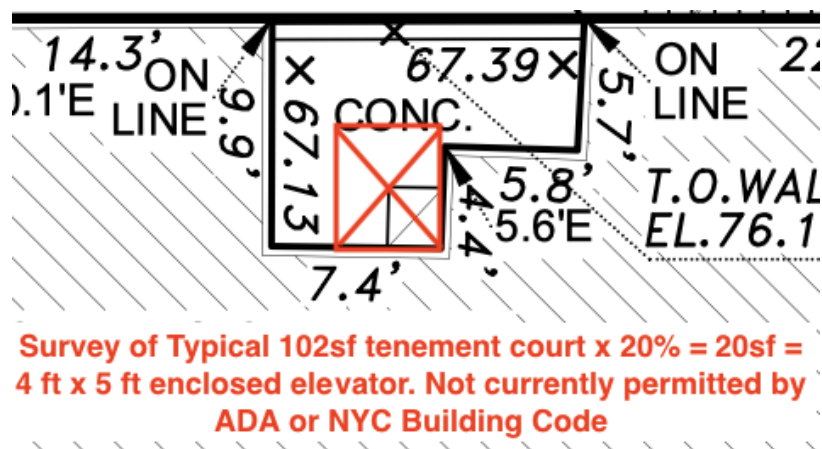
The absence of elevators prevents everyone from aging or disabling in place, creates isolated shut-ins, and forces others out of their affordable homes into compromised living conditions in unaffordable apartments located outside of their original neighborhoods (and away from longtime neighbors and friends), or into nursing homes with limited to no availability. Hence the absence of elevators represents both a health emergency and an affordability emergency.

In NYC, elevator regulations in the NYC Building Code and International Building Code, prohibit the installation of elevators in 5+ story multiple dwellings that do not accommodate a stretcher. While installing such an elevator is an option in existing buildings that are being gut-renovated, these enormous elevator shafts and cars generally cannot be installed as retrofits.

In shorter buildings, the minimum clear dimension of the cab is very large; too large to fit it in a retrofit of an occupied tenement building where the areaways and yards would be the most practicable location for an elevator.

This means that an elevator installation would require a major renovation of a 3- to 4-story occupied building, resulting in loss of space in apartments on every floor and major disruption, if not removal, of tenants.

The NYC Zoning Resolution was amended in 2024 to permit elevators to be constructed in yards and courts, but limited the size to 20% of the area of the yard or court. This image illustrates how a typical tenement courtyard could not accommodate an elevator that complies with current building codes:





Appendix K<sup>1</sup> of the NYC Building Code and EBC § 312 Elevators and Conveying Systems should be modified to authorize DOB to allow the installation of a smaller elevator in the areaway, court or yard of an existing occupied building where a standard retrofit would not otherwise be possible.

Allowing for smaller elevators in areaways, side yards, front and rear yards of existing occupied walk-up buildings, as is common in Europe, will permit elevators to be installed with minimal disruption to the tenants and fulfill essential accessibility needs.



A typical installation of a small elevator in an existing building in Rome, Italy.

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<sup>1</sup> See: App. K, Chapter K1: Modifications To ASME A17.1, 2013, Safety Code For Elevators And Escalators

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Rev. Margo Fields opposes Intro 948-A, which **is a overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods As the Pastor of Universal Church of God serving the New York City community since 1965 I must stand against this proposed bill.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**

**My name is Maria Cates, and I'm here today to ask the committee to support Bill 948A.**

I live in my home — a two-family house in Bed-Stuy, Brooklyn — with my daughter. I am an immigrant and a single mother, and we have no other family. I am elderly and hard of hearing, with 80% hearing loss. Five years ago, I suffered a debilitating stroke and have never fully recovered. I live every day with limited mobility, extreme fatigue, and other complications that prevent me from holding a traditional job.

My home is not an investment property. It is literally our lifeline — not only a roof over our heads, but our sole means of financial stability and our only way to remain in the community we love. The ability to rent a small space in our own home has been the difference between survival and collapse. Without sufficient short-term rental income, I will have to apply for government assistance. And since Local Law 18 went into effect, I can no longer pay my bills.

Our home is not suitable for long-term rentals — it houses our family. It's not the city's housing stock, it's my private residence. Treating small homeowners like wealthy landlords is deeply unfair. We are being subjected to enforcement that was designed for large apartment buildings with actual long-term tenants, not for families simply trying to survive. Illegal hotels remain illegal. This bill does **not** change that. Yet right now, small homeowners like me are being treated like criminals, as though we are the bad actors threatening this city.

Because of Local Law 18, we are now being forced to sell our beloved home, and we may have to leave New York City entirely. We are real people — not commercial operators — and this law has caused us real, measurable harm. We are not hypothetical examples. Families like mine are facing foreclosure and displacement right now. Foreclosure rates are way up in Brooklyn this year — and it is no coincidence.

I am begging you: please vote **YES** on Bill 948A. This bill fixes contradictions in the law that were never meant to punish owner-occupied one- and two-family homes. I implore every council member to **actually read Bill 948A** and understand it. There is far too much disinformation surrounding this bill, driven largely by people who have not read it and do not understand it.

Let me be absolutely clear:

- This bill **does not** deregulate multifamily housing.
- It **does not** weaken tenant protections.
- It **does not** create loopholes for commercial operators or illegal hotels.

- **It does not** affect long-term rental laws — and evidence shows short-term rentals have had no impact on long-term rental availability. In fact, housing supply has decreased since enforcement began, proving small homeowners are not the cause of the affordability crisis.

It is a precise, careful correction designed only to protect homeowners who live in their own homes. It is impossible to have more than one primary residence — and this bill only applies to people who truly live where they host.

Hotel unions are fighting for a hypothetical threat to profits. **We are fighting for survival.** Affordability is just as real for small homeowners as it is for renters. We are all struggling in this city we love, and none of us benefit when families are pushed into foreclosure and displacement.

So I ask again: **please read Bill 948A.** Look beyond the fear-mongering and misinformation. Listen to the voices of the elderly, immigrants, working people, and families who are constituents just as much as anyone else. We are your neighbors. We are your community. And we deserve a chance to stay in the city we love.

**Please vote YES on Bill 948A. Do not let powerful institutions drown us out. Help us survive.**

Thank you.

**Maria Cates**

Hello my name is Maria Eftimiades and I am a two family homeowner from Jamaica Queens. I am also a member of RHOAR, a group of 700 verified one- and two-family homeowners from all five boroughs of NYC.

Founded as a grassroots advocacy group in 2023, we have advocated for amendments to Local Law 18 since enforcement began. RHOAR is deeply grateful to Councilmember Mercedes Narcisse for her commitment to keeping NYC Homeowners in NYC Neighborhoods. We are also grateful to the Housing and Building Committee for hosting this hearing to fully understand the unique impact Local Law 18 has had on private homeowners across the city.

Over the past two weeks we have met with and received support and/or endorsements from Block and Community Associations across Brooklyn including:

- Bridge Street Development Corp
  - Hosted informational meeting with steering committees
  - shared information with 70+ Block Associations across Brooklyn through the Bed Stuy Works Alliance
- Harmony Park Association (represents 74 households in Brooklyn)
  - Hosted Info session with Board, sent letter of strong support for Bill 948A to City Council
- Boerum Hill Association (BHA) - represents 10K - 12K members
  - President sent letter of endorsement to Councilmembers Lincoln Restler and Shahana Hanif
- Park Slope Parents - represents 10K constituents in Brooklyn
  - Shared post asking for support and rally attendees
- Community Board 16 (represents more than 100K constituents in Brooklyn)
  - Sent letter of strong support to City Council
- Hall Street Block Association - CM Hudson's District - 66 one- and two-family household
  - Sent letter of strong support to City Council
- Decatur Street Block Association - 66 one—four family households.
  - Sent letter of strong support to City Council
- Henry Butler, District Manager for Community Board 3
  - Fully supports Bill 948A

Please vote YES on 948A!

Maria R. Becce

[REDACTED]  
Broadway-Flushing, New York 11358

November 20, 2025

New York City Council  
Committee on Housing and Buildings

Subject: INTRO 948-A

Ladies and Gentlemen,

I submit the following written testimony to the Committee on Housing and Buildings regarding proposed legislation: INTRO 948-A.

I am a homeowner for more than four decades in the beautiful and historic single family zoned community in northeast Queens called Broadway-Flushing. It is a community of century old, architecturally significant single-family homes, recognized and listed on the National and New York State Register of Historic Places. Through our homeowners' association, we have worked tirelessly to preserve the historic significance of Broadway-Flushing for generations to come. Although we faced many challenges over the decades, I have never seen such a blatant disregard and lack of respect for the homes, people, and planned communities that New York City should be celebrating and protecting. Instead, you strip away single-family ownership with the ill-advised City of Yes, then the power is taken away from elected City Council Members, and now INTRO 948-A wants to allow Airbnb to rent out rooms in our single and two-family homes. Why all the destruction?

Is there anyone who understands what a single family home is all about? It is a lifestyle choice of quiet, privacy, and green space that requires sacrifices to maintain in order to raise families. Real estate development should be aided and assisted in communities throughout the five boroughs that NEED and WANT improvement. Destroying the city's well maintained and thoughtfully zoned single family and low-density communities by allowing unsupervised short term rentals will not solve the affordable housing crisis and do great harm.

I am against INTRO 948-A as it is not needed and will add another layer to the destruction of a particular lifestyle choice. Please vote NO to allow Airbnb to further destroy our communities.

Very truly yours,



**From:** [Marie C SBH](#)  
**To:** [Testimony](#)  
**Cc:** [District9](#); [Herrera, Shanny](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [District7](#); [Dinowitz](#); [Ratner, Benjamin](#)  
**Subject:** [EXTERNAL] Testimony intro 1107 and intro 948-a support  
**Date:** Sunday, November 23, 2025 11:04:55 AM

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Good morning,

Thank you for the opportunity to write today.

My family and I are long-time New Yorkers leaving in Harlem. We are open-minded, respectful people who simply want to remain in the home we worked so hard to secure. The reality for many of us is simple: if we were wealthy enough to stay in our homes without assistance, we would not be here today asking for your help. We are here because staying in our homes has become increasingly difficult, sometimes impossible without the tools and protections that laws like intro 1107 and 948-a provide.

### **Why We Bought Our Home**

My spouse and I were young post-doctoral researchers at Columbia University from abroad, when we decided to buy a home. Renting in New York City was more expensive than taking on a mortgage, so buying seemed like the only financially responsible choice. Our monthly mortgage payment was cheaper than a two-bedroom apartment in Harlem, and we could host our family and friends coming from Europe. We saved carefully for years and bought the only house we could afford, a house no one wanted, one that had even been featured in newspapers for how unattractive it was. It was



new, built on a tiny land where a previous house had burnt. We did not buy a dream home. We bought a home we could always afford, from cheap developers who were in a hurry to sell after a few long months on the market.

## **The True Cost of Homeownership in NYC**

Once we moved in, we quickly uncovered the real costs of owning a home in this city:

- The plumbing did not work.
- The heat did not work.
- There was a leak that rotted the sheetrocks but I could not find it.
- The house was only partially insulated—we could not reach more than 50°F in our bedrooms in the middle of your 1st winter.
- Our electricity bills soared to \$1,500 per month.
- We had to begin construction immediately while caring for a one-month-old and a two-year-old.
  
- We must pay to maintain the property, pay for outside lighting, pay for video surveillance pay to keep the street clean to avoid tickets (yes the street since it is a mess everywhere), pay for official NYC bins that non stop get stolen, pay rapidly rising energy bills, pay for extermination and face constant increases in insurance property taxes and maintenance costs.

Despite all of these challenges, we have always tried to do things the right way. But the truth is that homeownership in NYC carries a cost far larger than most families can realistically manage. It also cost you a lots of your own time!! Nobody pays us for that. Keeping our property clean and up

and running for our tenants should be praised by the city.

## **Why Sharing Our Home Became a Necessity**

Let me be very clear:

If we did not have to share part of our home to afford staying in it, we would not do it.

People often assume homeowners are choosing to rent space casually or casually running rentals. That is not our reality.

New Yorkers are doing this because:

- We cannot take on 4–7 jobs just to afford our homes.
- We cannot absorb sudden \$1,500 utility bills.
- We cannot keep up with rising taxes, maintenance, compliance costs, and penalties.

Opening our home part of the year, to short or long-term tenants became the only way to remain in our home. Not out of greed, not out of desire, but out of necessity.

Without that supplemental income, we would have had to sell our home within the first year.

If I had money I would live in a condo with a dorman, that is for sure !

## **Why into 948-A and 1107 Matters**

If the city wants to keep people in their homes, real, everyday New Yorkers, then you must give us the tools to do so.

948-A gives homeowners a lawful pathway to remain in their homes instead of being pushed out of the city.

We are not asking for special treatment.

We are asking for fairness, clarity, and the ability to stay in the homes we invested in, improved, and built our lives around.

## **Closing**

New Yorkers like us are not trying to take advantage of the system. We are trying to survive within it. We are simply asking you to understand the reality we face—and to support legislation that helps ordinary homeowners remain part of the communities they love.

I get it that you want to keep our units for New York, fine, but what is wrong with renting our own apartment when we are out of time ??

To end, we ultimately already know that in THiS WORLD always the same rule apply: WHO PAYS, WINS» !!!

We know who pays for LLI8

BUT TODAY, I hope that the life of New Yorkers, families, single mom's, widows, and many others win over the hotel money. I want to show the world that here in NY we care about people, our constituents issues!

Thank you for taking the time to reading.

Please Support into 1107 and 948-a.

Best regards.

Charlotte

**From:** [Marie Garnier](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Support for Intro 948A  
**Date:** Tuesday, November 18, 2025 10:49:51 AM

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Dear Council,

I support the right of 1-2 family homeowners who live in their homes to be able to rent short term private locked spaces for up to 4 guests, even in the event we are away.

I understand statistics show we are 1000-2000 homeowners in this situation demanding an exception. Seems like a drop in the NYC real estate market bucket.

I want to take a few moments to talk about our "grandparents suite".

We own a 2 family home in Greenpoint Brooklyn and we live here year round.

We both work full time and have 2 small children. We struggle with the significant price of daycare and aftercare in our neighborhood (up to \$3000 a month for daycare per child or \$2000 a month for afterschool programs).

To mitigate this we have created a "guest suite" on our ground floor where my parents can come stay from France for months at a time and help us with Childcare.

When they are not here we have been renting the suite short term to help cover childcare expenses. It has come to be known in our family and friends circles as the "grandparents suite" because we mainly rent to visiting family members.

In our neighborhood, the average hotel night has skyrocketed to over \$500 a night, making it simply impossible to afford for anyone but the very wealthy.

We host grandparents coming to meet or visit their grandchildren or family members coming to support a sick relative. People tend to stay between a week and a month.

This is not us partaking in the tourism industry, we are providing a service to our community.

Intro 948A would allow us to close an entire floor off and create a safe and comfortable place for family to visit. Where they can feel at home and cook for themselves and their families.

I hope you consider our position.

--

Marie

MARIE GENTINE

As a Harlem resident and small homeowner, I cannot emphasize enough how vital this bill is for families like mine who are fighting to remain in our homes. Our properties are not part of speculative housing supply, we live in our homes. We are not corporate landlords, investors, or developers. We are long-time members of this community, deeply rooted here, and our homes represent stability, generational security, and community continuity.

Due to the rising cost of living in New York City, many small homeowners have had to rely on renting part of our homes simply to afford to stay. This is not a luxury, it is a necessity for survival in the neighborhoods we helped build and care for. Without supplemental income, many of us will be forced out, contributing to the displacement and erasure of long-standing Harlem residents, but also new and young residents.

Intro 948-A is not a threat to housing stability, it strengthens it. It protects the ability of homeowners to remain in the communities they love. It does not harm Harlem; in fact, it helps prevent displacement and keeps our neighborhoods diverse, stable, and thriving. Opposing this bill essentially leaves small homeowners with no path to stay in their homes.

I respectfully request the Council Members public support for Intro 948-A. This bill represents fairness, housing stability, and the protection of Harlem families and legacy homeowners, values I know all our Council Members also stand for.

**From:** [Marie Scooter](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Intro 948-a  
**Date:** Sunday, November 23, 2025 11:59:51 AM

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NYC need to find a solution to host people in full units for less than 30 days because:

- Family who come live in NY need temporary housing to find their long term apartment/house
- In case of an emergency or in consequences of emergency (flooding, construction, medical etc) people need to find short term accommodation
- Interns and students need to find cheap accommodation and need a STR to look for it safely
- Artists in residency, professional, in laws, care givers

All those people need temporary accommodation that hotels does not solve.

Hotels are great for couple on vacation for up to 7 days but what about all of the above who need a 7 day plus ?!

Marie

Marie S.



Max Barton

Southeast Queens, Homeowner

[REDACTED], Laurelton NY 11413

Written Testimony

Committee on Housing and Buildings

Thursday, November 20<sup>th</sup>, 2025 – 10am

Thank you for taking the time to read my testimony and giving me a voice in this process. The two Airbnb backed bills, Intro 948 and 1107, seem to be a hotly contested issue. It seems like one side is saying this will help affordability and the other is saying it will hurt the affordability. Affordable housing is a very real issue in New York City, that makes this Committee Hearing a very important hearing. I oppose these bills.

Earlier this month I voted in the mayoral election, along with over 2 million other New York City Residents. The majority of New York City Voters decided to elect a candidate that made his campaign about affordability. The current mayor did not solve the affordability issue during his term, in fact he did even feel the need to run for a 2<sup>nd</sup> term to fix it down the line.

I think it would be a better idea to let the incoming Mayor lay down and implement his vision. New York City Residents decided earlier this month that they wanted him to take his best shot at this. The incoming Mayor has made it clear that he will not sign off on these bills. I do not think it is a good idea to rush these bills through when we have a new mayor coming in that would like to tackle this issue in a different way.

New York City voters made their voice clear earlier this month. If Airbnb would like to lobby the new mayor and make tweaks that fit his vision for the City then that is fine. Thank you for your time and consideration of my thoughts on this subject.

- Max Barton

Good morning Chair Sanchez and Members of the committee, thank you for the opportunity to speak today. My name is McArthur Damis and I am a homeowner in Brooklyn. I live in a two-family home where I reside on the first floor, and I have long-term tenants who live on the second floor.

I am here today to strongly support Intro 948, because it directly protects homeowners like me who are trying to remain stable in an increasingly expensive city.

For several years, I 've responsibly shared my home with guests in my own apartment as part of home-sharing. This supplemental income has been essential — not for profit, not for speculation, but to help me cover rising costs while keeping my long-term tenants ' rent stable and below market rate.

In fact, before Local Law 18 took effect, my tenants requested a rent reduction due to financial strain. Because home-sharing helped me offset part of my mortgage and expenses, I was able to grant them that lower rent and maintain affordability for them. This stability benefited not only my household, but theirs as well.

However, under Local Law 18 as currently enacted — with the strict two-guest limit and the requirement that I be physically present during each stay — it has become impossible for me to share my home. Bookings have dropped, my supplemental income has gone down, and it is now much harder to sustain the affordability I 've been providing to my tenants.

Intro 948 fixes this imbalance in a responsible way. It allows homeowners of one- and two-family houses — actual residents who live in their buildings — to host short-term guests without being physically present, while still requiring registration, safety standards, and a maximum of four adult guests. It protects against bad actors, but it also ensures that homeowners like me are not punished for sharing our homes responsibly.

Home-sharing is what allows me to maintain my property, keep my tenants ' rent affordable, and stay rooted in my community. Without the flexibility that this bill restores, many homeowners will not be able to remain in their homes — and tenants like mine will face rent increases or displacement.

Intro 948 strikes the balance we need. It protects neighborhoods, preserves affordability, and supports the homeowners and tenants who make our communities strong.

I respectfully urge the Council to pass this bill.

Thank you for your time.

My name is Michael Shalev. My wife and I own a one-family brownstone in Clinton. Before the city banned short-term rentals, we were able to supplement our income by renting out part of our home. That extra income helped us cover our mortgage, insurance, and maintenance costs. Losing this income has been a real financial blow. We are in our early 70s and now find ourselves working more than we would like just to keep our home. Creating an exemption for one- and two-family homeowners who live in their homes would ease the financial strain for many of us and allow long-time residents to stay in their neighborhoods. It would also welcome more tourists into the diverse communities of our city, supporting local businesses and strengthening our economy.

## My Testimony

My name is Michal Golan. I am an artist living with my husband in a one-family home in Hell's Kitchen. We purchased the building many years ago when the area was not so nice and safe. My studio is in a commercial space on the ground floor.

After our kids left the nest, we started hosting short-term visitors. The extra income helped us pay our mortgage, property taxes, maintenance, and costs. Without this extra income, it is a struggle for us to stay in the home that we love.

Furthermore, when the city does not allow any short-term rentals, we are excluding a whole class of tourists that prefer a home or can't afford a hotel.

Changing the law to allow one- and two-family homeowners is not going to affect the housing stock (despite hotel lobby misinformation). It will simply help middle-class people stay in their homes and offer tourists more options.

**From:** [Michelle Hunter](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner, Benjamin](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [Joseph, Rita](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 12:01:03 PM

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## **Testimony Regarding Short-Term Rentals and the Impact on Our Ability to Remain in Our Home**

I am writing to provide testimony about the circumstances that have made short-term rental income essential for my family's ability to pay our housing expenses and remain in our home. We know that New York City has prohibited rentals of fewer than 30 days in one and two family homes, for the last couple years. This change has put a substantial strain on our immediate and extended family, and in jeopardy of being able to stay in our home.

My husband and I purchased our two-family home at the end of 2019 with the explicit intention of renting the second unit as a short-term rental. The income from these rentals offset our mortgage and allowed us to meet our basic expenses. Over the last several years, both of us have faced significant employment hardships that have reduced our household income far more than we ever anticipated. As a result, the supplemental income from short-term rentals was no longer optional—it was critical.

Short-term rentals also gave us the flexibility to use the second unit to host elderly family members who travel long distances to visit us. We are not interested in becoming full-time landlords. Doing so would cut our income by more than half, eliminate this flexibility for our family, and expose us to the real and growing risk of squatters. We personally know multiple homeowners who have experienced this, and with the lack of strong protections for homeowners, we simply cannot take on that level of risk.

We have explored mid-term rentals of 30 days or more, but these present the same risk of squatters and still reduce our income to a level that makes our housing costs unsustainable. We've tried to utilize this path but rentals

are extremely inconsistent and rely on dates of multiple month-long renters aligning in order to work. This has not proven successful.

We have also used our home to help others in need. In the past, we opened our second unit for months—at no cost—to a family of Ukrainian refugees. We were only able to do this because short-term rental income from other months covered our expenses. If we lose the ability to rent short-term, we will not be able to provide this kind of community support in the future.

Short-term rental income allowed us to pay our mortgage, property taxes, and the constantly rising costs of maintaining a home in New York City. Without this flexibility, we have not been able to keep up with these obligations. We are also terrified by the possibility of large fines from the City. A penalty of thousands of dollars could push us into foreclosure, especially when all we are trying to do is pay our bills and keep our family afloat.

My understanding was that the purpose of these laws was to stop corporate investors and large landlords from converting rental buildings into illegal hotels. We are not investors. We are not commercial landlords. We are simply homeowners trying to remain in our home.

We urgently need a path that reflects the reality faced by families like ours.

Thank you for your time and consideration.

Michelle & Mike Pesca



Good morning.

My name is Muzzy Rosenblatt, and I am the President and CEO of the Bowery Resident's Committee, more commonly known as BRC.

I am here today to speak in support of Intro 948-A.

At BRC, our mission is rooted in helping New Yorkers achieve stability, dignity, and a place to call home. We are among New York City's largest and most effective nonprofit providers of services, shelter, and housing, to New Yorkers experiencing homelessness. We operate homeless outreach services, shelters and safe havens, residential and outpatient treatment for people with health and substance use challenges, and we build and operate permanent supportive housing and housing for low-income households. We provide a hand up and a path home for New Yorkers who are experiencing homelessness.

In FY25, we assisted over 12,000 individuals, and most of the people we assist successfully graduated from our programs, including over 1,300 who found more stable housing, and nearly 400 who found more stable employment.

Denying homeowners of one- and two-family homes the ability to rent out their rooms and their homes for short periods does not help house the homeless. What the people we serve want, and need, is a home of their own, not a room in someone else's. That is why thoughtful housing policy, which dramatically increases the supply of rental housing – affordable to those experiencing homelessness – is the answer, not making homeowners out to be bogeymen.

In fact, denying homeowners the ability to generate additional income from their homes is more likely to cause homelessness than solve it, as we saw during the Great Recession when homeowners lost their homes. Those who would oppose Intro 948-A by suggesting it would cause homelessness are not being honest, nor are they proposing to provide the funding and cost saving solutions to end homelessness.

So, let's not make this about homelessness when it isn't and allow our great city to catch up and compete with other cities. And if you really want to solve homelessness, make it easier, cheaper, and faster for nonprofits like BRC to build the affordable housing we build.

Thank you.



Testimony to NYC Council on LL18 and Support for Intro 948A  
Testimony of Naomi Lucas  
Before the New York City Council  
Committee on Housing and Buildings  
Regarding Local Law 18 and Support for Intro 948A

Thank you for the opportunity to submit testimony.

My name is Naomi Lucas. I live in Rockaway, Queens, with my retired mother in our two-family home. I am a teacher, and like many working families in this city, I rely on every possible source of income to keep our home stable and safe. My apartment is on the first floor and entirely separate, and when my child left for college, we decided to use the extra space for short-term rental. That supplemental income helped us manage rising expenses, including tuition, mortgage payments, property taxes, insurance, and basic home maintenance.

Local Law 18 has changed our household's financial reality overnight. We lost the income that kept us afloat, and now we struggle to cover expenses that have only gone up. My mother is a senior citizen living on a fixed income, and I carry the responsibility of keeping our home secure for both of us. Without the ability to rent our additional space responsibly and legally, we are under pressure that feels unsustainable. Families like ours should not be pushed toward selling the homes we have worked so hard to keep.

LL18 also removed a category of accommodations that the city needs. We regularly hosted multigenerational families who wanted to stay together, something hotels cannot offer without booking several expensive rooms. These visitors supported local restaurants, museums, small businesses, and our beaches. When we shut out these travelers, we limit our tourism economy to only the wealthiest families, and that hurts neighborhoods like mine.

I support Intro 948A because it recognizes the difference between large-scale operators and small homeowners. It gives families like mine a path to continue hosting in a regulated, responsible way. It protects housing while also protecting the stability of the homeowners who have built their lives here. Most importantly, it allows us to stay in our communities instead of being pushed out by rising costs we cannot meet on a single income.

I urge the Council to move Intro 948A forward. The current law is harming small homeowners, seniors, and working families who need this flexibility to remain in their homes. Amending LL18 is not only fair, it is necessary.

Thank you for considering my testimony.

*"The secret of making progress is to get started," Mark Twain*

[www.lavenderprogress.com](http://www.lavenderprogress.com)

**NLucasAnthony, EdD**

Educator, Author, Superhost

To the Members of the New York City Council:

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Narissa Morris

Address:

[REDACTED]

Cambria Hgts NY 11411

# Written Testimony in Support of Intro 948A

*Submitted to the New York City Council*

*By: District 37 Homeowner, Public High School Teacher & Young Mother*

Dear Council Members,

My name is **Ni**, and I am a homeowner, a public high school teacher in Ridgewood, and the mother of a toddler living in **Bushwick**. I am writing to express my strong support for Intro 948A.

I want to begin by saying clearly:

**I am a real homeowner, a real New Yorker, and I live full-time in the home I am speaking about.**

I am not being paid to testify. I am here because this bill directly affects my family's ability to remain stable and housed in New York City.

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## Our Family Story & Why the Second Unit Matters

My husband and I purchased our two-family home in **Bushwick** a little over three years ago, hoping to create a stable foundation for our growing family. As new parents, the second unit in our home has become essential.

It has **never** been used as a long-term rental.

It is **not** part of the city's rental housing stock.

Instead, it is where my parents or my husband's parents stay for weeks or months at a time to help take care of our toddler. Their support allows us to manage childcare, work responsibilities, and the realities of life while my husband attends dental school.

And when our family is not visiting, being able to responsibly share our home gives us the supplemental income we need to cover rising costs. For us, home-sharing is not a business — **it is a lifeline.**

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## Why This Bill Especially Matters for Me as a Public High School Teacher in Ridgewood

I teach at a public high school in **Ridgewood**, and I know from firsthand experience how much stability matters — not only for families, but for the educators who serve them. I feel incredibly fortunate that I am able to live nearby in Bushwick, close enough to my school to be truly present for my students.

Many of my colleagues cannot afford to live anywhere near the communities they teach in. They commute long distances from Long Island, New Jersey, or upstate because of New York City's high housing costs.

Living in Bushwick allows me to:

- Arrive at school early
- Stay after school to help students
- Communicate with families
- Participate in the community
- And still be present for my toddler at home

But every year, it becomes harder to stay. Property taxes have risen, electricity costs have grown significantly, childcare is expensive, and teacher salaries have not kept pace with inflation.

For me, Intro 948A is not about profit — it is about **being able to continue teaching in Ridgewood while living in Bushwick**, the neighborhood I love and call home.

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## Our Financial Reality as Young Parents

I work full-time as a public school teacher, and my husband is a full-time dental student carrying significant loan burdens. We are raising a toddler, paying ever-higher household bills, and trying to stay afloat in a city where every essential cost — food, utilities, childcare — continues to rise.

When our parents visit and help with childcare, we save money and maintain stability. When the space is empty, responsible home-sharing is one of the only tools available to bridge the financial gaps.

Without this flexibility, remaining housed in Bushwick — and remaining close to my school community — would be extremely difficult.

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## Unexpected Hardships: Flooding & Repair Costs

Despite being a newer construction home, we endured repeated flooding during recent storms and hurricanes. We spent **over \$20,000** on repairs — a devastating financial hit for a young family already managing loans, childcare, and rising expenses.

Home-sharing is one of the few viable ways for us to recover and stay stable.

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## Intro 948A Supports Real Families, Not Speculators

Owner-occupied one- and two-family homes like ours are not contributing to the city's housing shortage. We live in our home, we work in our community, and we are simply trying to hold on.

Intro 948A:

- Helps families, teachers, and caregivers stay housed
- Supports multigenerational living arrangements
- Prevents foreclosures and forced sales
- Keeps middle-class homeowners in neighborhoods like Bushwick
- Recognizes that small homeowners are not illegal hotels or corporate landlords

This bill is balanced, fair, and rooted in community needs.

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## Our Commitment to New York City

I am committed to my students and my school community in Ridgewood. My husband is committed to becoming a dentist who will serve local families and seniors. We want to continue raising our child here in **Bushwick**, staying connected to both our neighborhood and the community I teach in.

But to do that, we need stability.

We need the ability to responsibly share the home we live in — the home we are working so hard to keep.

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## Closing

Thank you for your time and your commitment to supporting New York families. I respectfully urge the Council to listen to the realities of working educators, young parents, and first-generation homeowners who want nothing more than to remain in the neighborhoods they love and serve.

I am in full support of Intro 948A and respectfully ask the Council to vote **YES**.

Sincerely,

Ni Zheng

District 37 Homeowner  
Public High School Teacher in Ridgewood  
Young Mother

Hi My name is Pat O'Leary, I'm a two-family homeowner in Carroll Gardens, Brooklyn. I'm asking this committee to vote YES on Bill 948A. Passage of this bill will help me use my home in a way that benefits everyone.

We bought our home in 2023 in a state of disrepair from absentee landlords who had long left the neighborhood. Our down payment came from our own earned money. We don't have a pool of money on hand to pay for a full renovation. Home-sharing has given us the flexibility to make much needed repairs and improvements as we can afford them.

One of the first things we did after moving in was replace an electrical panel that had been recalled and was a fire hazard. We replaced gas stoves with new electric ones. We'd like to replace our very old boiler with a heat pump, repair the stairs at the entry, safer roof access, plumbing, electrical, I could go on. Homesharing gives us the flexibility to make repairs that having a full time tenant would not.

Eventually we'd like a full time tenant. Homesharing gets us closer to that. It's either going to be us, or someone with more money who likely will just keep the second apartment off the market.

Thank you! Please vote YES on bill 948A.



My name is Peter Walter, the owner of a 2-family home living in Brooklyn (District 41). My wife and I, along with our two children, moved into our home in 2012. We have raised our kids, who are now both college age, in this home and it is our dream to pass it down to them and the families they may one day have. To keep this family dream alive, I am asking this committee to vote **YES** on Bill 948A.

As many New Yorkers do, my wife and I work very hard to provide for our kids as well as for our extended family and to maintain one of the greatest investments we were fortunate enough to ever make, owning a home. In the New York area it has become increasingly difficult financially to not only buy a home, but to successfully raise a family and maintain that home all at the same time.

We both knew that we would need to find a way to supplement our income if we wanted to keep our dream alive. With a 2-family home that provided a space that could generate extra income for us as well as giving us the ability to care for our elderly family members should the need arise, being able to offer a short-term rental was the perfect solution.

From 2014 through 2019, we successfully offered our space for short-term stays when it suited our family dynamics. Our space offered the perfect solution for folks coming home to visit family who still live in the neighborhood and wanted to be close to them, for families coming to visit children in college and for families whose dream it was to visit New York and stay in a comfortable, family environment and enjoy the unique local offerings of our neighborhood. In 2019 my aunt became ill and required full-time family care. With our extra space being a short-term rental, we were able to move her in with us immediately and provide her with a comfortable, private space during this difficult time. If we were locked into a long-term tenant we would never have been able to give her the care that only family can provide.

Short-term renting is an option that provides flexibility for many 2-family homeowners to make ends meet as well as to care for family whenever necessary. With the current law as it stands stripping us of the choice to offer our home on a short-term basis my family has been put in a very difficult position financially and morally. For our personal circumstances we rely on the extra income to put our children through college, to keep up with rising costs of living in New York, and to maintain a 120+ year old home. We rely on the flexibility of the extra space to put our extended family's needs first, without hesitation.

No law should ever force a homeowner to choose between financial stability and caring for family. Without the relief provided by Bill 948A, this balance and flexibility will be stripped from my family and many others. The result will be devastating to us and we know that we are not alone.

Thank you for your time and for your dedication to helping all New Yorkers, I ask you to **please vote yes** on Bill 948A to help our family and many more like us.

**From:** [philip sommer](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony in favor of intro 948 Nov 20th 25  
**Date:** Thursday, November 20, 2025 1:41:08 PM

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[REDACTED]

My name is Phillip, I am a proud home owner of a small townhouse in Brooklyn park slope where I live with my wife antje, our two daughters mina and elsa and two cats. we are u.s. citizens and immigrants from Germany, we're spending a month a year abroad in summer so our girls stay connected with German culture.

We used to airbnb our home for about 4 weeks a year. We'd typically rent out to families of 4 from Europe that want a more personal experience to explore this great city and we point them to local attractions, restaurants and bodegas.

This has been a wonderful experience, they feed our cats, take care of the garden, and the income that generates helps us pay for maintenance of our home. Let me tell you there should be absolutely nothing wrong with this.

We had to stop doing this because of Local Law 18. But let me clear, while I support regulation to prevent true excess, I think it's wrong and unlawful for the city to reign in what homeowners that live in their properties like I do. can do with their property. And frankly i doubt that anybody in the room can explain to me why Airbnbing my own home that I live in for some weeks in the year is seen unlawful or creates any other problems. To the contrary it supports home owners, tourism, the local economy, in short New York City the place we all love.

That's why I support intro 948 A and you should do too ....

Name and adress: philip sommer

[REDACTED]

Sent from my iPhone

**From:** [philip sommer](#)  
**To:** [Testimony](#)  
**Cc:** [Aviles, Alexa](#)  
**Subject:** [EXTERNAL] Intro 948a  
**Date:** Saturday, November 22, 2025 5:47:26 PM

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[REDACTED]

My name is Phillip sommer, I am a proud home owner of a small townhouse in Brooklyn park slope where I live with my wife, our two daughters and two cats.

We used to airbnb our home for about 4 weeks a year. We'd typically rent out to families of 4 from Europe that cannot afford hotels and want a more personal experience to explore this great city, we point them to local attractions, restaurants and bodegas. This type of tourism adds to the local economy and not subtract anything not from hotels and not from the housing stock.

This has been an all around wonderful experience, the guests feed our cats, take care of the garden, and the income that generates helps us pay for maintenance of our home. Let me tell you there should be absolutely nothing wrong with this.

But we had to stop doing this because of the hotel lobby got city council to enact Local Law 18. let me clear, I support regulation to prevent true excess, but I think it's completely wrong and unlawful for the city to reign into what homeowners that live in their properties like i do, can do with their property. And frankly i doubt that anybody in the room can explain to me why Airbnbing my own home that I live in for some weeks in the year is seen unlawful or creates any other problems for New Yorkers. That's false information, spread and sponsored by the hotel lobby.

I hope this city coucil can see through that and sees that intros 948 and 1107 support affordable home ownership, tourism, the local economy, in short New York City the place we all love.

That's why I support intro 948 A and you should too ....

And let me comment on the hearing — this was extremely biased. Most of the “pro panels” got multiple questions. Most of the “con panels” got nothing. The chair obviously had an opinion which side she was on. The intro 948 got tied to 1107 at short notice so our homeowner bill got tied to “the Airbnb bill”. The guy that provided research did it based on people's photos which is profiling and not scientific at all.

Philip sommer  
[REDACTED]  
Brooklyn, New York

Sent from my iPhone

**From:** [Phoebe Douglas](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#)  
**Subject:** [EXTERNAL] INTRO 948A  
**Date:** Sunday, November 23, 2025 3:12:01 PM

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*WRITTEN TESTIMONY OF PHOEBE DOUGLAS*

Good Evening,

My name is **Phoebe Douglas**, and I live in the Bronx. I am a **licensed professional civil engineer**, and I have worked on major public infrastructure projects across New York City, including ADA circulation improvements, flood resiliency initiatives, and work for agencies such as the MTA and the Port Authority. I live in my home. I work in my home. I am submitting this testimony in strong support of **Intro 948A**.

**I want to make something very clear: I was not paid to be here, and I was not paid to write this testimony. No one is funding my voice. No one is sponsoring my perspective. I wrote this because the people who are actually living through these policies deserve to be heard, and because the consequences of these decisions fall hardest on homeowners like me who are simply trying to stay housed.**

I want to speak from lived reality, because people like me are often erased in policy discussions about housing.

I grew up poor. I experienced homelessness as a child, including being kicked out of hotels with my family. For most of my life, housing never felt secure. When I finally became a homeowner in the city I have served professionally, it meant stability and safety for the first time. My home is where I cared for my father while he battled cancer, and now that he is gone, it is where I care for my mother. My home is not a business. It is my family's anchor.

Last year, I was one of five female engineers laid off from my job. Before that happened, home sharing helped me build an emergency fund for the first time in my life. That fund is what kept me housed during that difficult period and it is still supporting me now as I work to build an inclusive engineering firm with those same four women. I no longer short-term rent. I now only offer mid-term stays of 30 days or more, which the city allows. But the reality is that mid-term rental income is not enough to make ends meet. It is simply the least risky option available to me after what I experienced with a long-term tenant, including significant property damage, harassment, and absolutely no support from the city when I needed help. These are the real conditions small homeowners are navigating.

Short-term rental platforms once gave ordinary one- and two-family homeowners a legal and responsible way to stabilize our own homes without having to take on dangerous long-term tenants or unsustainable debt. They gave us autonomy, something that is increasingly rare for

working and middle-class New Yorkers.

This autonomy is exactly what the hotel industry has been trying to take away.

I also want to make something clear about my own hosting history, because the hotel industry loves to create a false narrative about competition. I did not compete with hotels. Not once. I live in the outer boroughs, in a neighborhood where there are no major hotels. My guests were doctors and nurses completing residencies, interns working at the United Nations, families visiting relatives, educators, cousins, and friends. These were not tourists booking expensive rooms in Midtown. They were never part of the hotel industry's market to begin with.

My home sharing caused no issues, no complaints, and my neighbors were in full support because they understood exactly who I was hosting and why.

Now, I want to address the FDNY fire hazard narrative that has been used to criminalize primary-residence homeowners.

A one- or two-family home that is perfectly safe when a cousin or friend stays overnight does not suddenly become unsafe when a guest lawfully stays for a few days. As an engineer, I can say with confidence that owner-occupied homes are not what drives New York City's fire risk profile. The fire hazard language is not science. It is fear. Hotels, dorms, shelters, and long-term rentals are not held to this standard. Only small homeowners are. This is not about safety. It is about enforcement politics.

Now I want to talk about what is actually driving these restrictions: **greed**.

If hotel industry groups genuinely cared about housing, they would use even **one percent** of the millions of square feet they control across New York City for affordable homes. They have never done so.

To my knowledge, the hotel industry has made no meaningful contribution to homeownership programs, down-payment assistance, affordable housing development, or nonprofits that help New Yorkers stay housed. They do not convert their space to housing. They do not partner with housing organizations. They do not support pathways to ownership. Their entire involvement in this issue has been lobbying to eliminate competition.

They do not contribute to these real solutions because their economic model does not benefit from increasing home ownership and affordable housing.

This debate is not about solving a housing crisis. It is about protecting hotel profits.

Meanwhile, small homeowners like me who live in our whole homes are being treated as if we are the housing stock. We are not.

The middle class is central to the stability of this city. When small homeowners collapse, neighborhoods collapse with us.

Right now, lower and middle class New Yorkers are struggling to become homeowners while investors purchase properties that families cannot compete for. I see it on my own block. Every time a homeowner is forced out, an investor with more capital and more power steps in. This is displacement. This is destabilization. This is the real threat to housing supply.

Removing small homeowners from the market did not create affordable housing. It did not help renters. It did not lower rents. It made everything worse.

And it disproportionately harms the communities this city claims to uplift. The people most affected are working and middle class New Yorkers, especially Black and Brown homeowners, seniors, and immigrant residents. People like me bear the consequences.

We must also confront what the city has effectively been doing: forcing small homeowners into becoming landlords. This is not a solution. It is a financial and legal risk that many of us cannot absorb. Landlording should be left to those with the capital, legal support, and financial cushion to withstand that risk.

Home sharing, when I did it, is the reason I remained housed during one of the hardest periods of my life. It was my safety net. It is helping me now as I build a woman-led engineering firm in a male-dominated field. It was my chance at stability in a city where stability is increasingly inaccessible.

Protecting and stabilizing lower and middle-class homeowners is part of solving the housing crisis. Real affordability will never come from forcing out the people who live in their homes. And it will never come from siding with an industry that has contributed nothing to housing solutions while benefiting from the displacement of ordinary New Yorkers.

**Intro 948A starts the conversation of restoring fairness, correcting an unintended harm, and protecting homeowners who live in their homes.  
Considering this bill or an iteration of it gives working and middle-class New Yorkers a fighting chance at stability.**

I urge the Council to pass it, or at the very least, to consider a fair and reasonable middle-ground solution instead of pushing our concerns aside simply because we do not have the financial power of the Hotel Trades Council. What I witnessed at the hearing last Thursday was deeply disheartening. People throwing thumbs down at the struggles of small homeowners because they were being paid by the hotel industry to do so. People reading testimonies they clearly did not write and protesting a bill they clearly did not read. Watching working New Yorkers dismiss the hardship of other working New Yorkers because they were financially incentivized to do so was painful. I am urging the Council to take a stance toward fairness and to stand with the residents who live in their homes and are fighting to stay housed.

Thank you for your time and consideration.

**Phoebe Douglas, PE, ENVSP, WEDG**

**From:** [Pierre Gentine](#)  
**To:** [Testimony](#)  
**Cc:** [District9](#); [District7](#); [Dinowitz](#); [Ratner, Benjamin](#); [District33](#); [Aviles, Alexa](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Sunday, November 23, 2025 11:50:32 AM

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Dear Council Member,

I'm writing as a New Yorker and small homeowner to urge you to **support Intro 948-A**, a modest reform that would allow owner-occupants of one- and two-family homes to host short-term rentals under clear rules. This homeowner-scale activity does not harm the hotel industry, nor does it drive NYC rents—and it delivers meaningful neighborhood benefits.

Why 948-A makes sense?

- **Hotels are already running near full capacity—and at high rates.** NYC hotel occupancy has been among the highest in the U.S. (~82–84% recently), with ADR around \$300+ (e.g., \$301 in 2023; \$313 in 2024 Q3): pricing that **excludes middle-class families**.

- **Homeowner Short-term rentals (STRs) are a [tiny](#) fraction of NYC's housing landscape.** NYC has ~3.7 million housing units, and the stock is overwhelmingly multi-family; small homes account for a minority share citywide (heavily concentrated in Staten Island/outer boroughs). **Allowing tightly regulated, owner-occupied STRs in these homes cannot move citywide rent levels.**

- **[Best](#) evidence does not show NYC-wide rent relief from banning STRs.** After Local Law 18 slashed sub-30-day listings, multiple reports (across outlets) note **uncertain or no clear impact on affordability** so far **while visitor costs rose**. **Hotels and home-sharing serve different trips.** Families visiting families often need kitchens and multi-bedroom layouts in residential areas—options hotels rarely provide, especially outside Manhattan. Airbnb's pre-LL18 footprint was far more dispersed across the outer boroughs than hotels, channeling guest spending to local small businesses.

- **948-A targets the right scale.** Analyses and testimony around 948-A focus on one- and two-family homeowners (not commercial multi-listing operators) and would keep core safety/registration requirements in place.

There are multiple community benefits of 948A:

- **Keeps family travel in neighborhoods.** Families coming to NYC to see relatives can stay nearby, spend at local shops and restaurants, and avoid high hotel rates that push them out of the city altogether. (Typical NYC Airbnb guests spent ~\$260/day in 2023, much of it near the listing.)

- **Stabilizes homeowner finances without removing apartments.** By definition, 948-A applies to 1–2 family homes—not large rental buildings—so it doesn’t cannibalize the multi-family long-term rental supply that dominates NYC.

Safeguards already exist and can be strengthened as NYC’s Local Law 18 created a registration regime and platform accountability; 948-A refines it for owner-occupied small homes, not a return to the pre-rule free-for-all. If desired, Council can add caps (nights/year), primary-residence proofs, and strict enforcement against multi-listing operators.

Please support Intro 948-A so responsibly regulated, homeowner-scale short-term rentals can coexist with a thriving hotel sector, keep family travel affordable, and sustain neighborhood businesses—without undermining NYC’s housing goals.

Thank you for your consideration.

Sincerely,

Pierre Gentine



November 17, 2025

**To Whom It May Concern:**

I recently became aware of INTRO 948A, a measure that would allow Airbnb to operate short-term rentals in two-family homes throughout New York City. At first glance, this may seem like a helpful opportunity for everyday New Yorkers trying to stay afloat in an already expensive city. We all understand the reality: living here requires hustle, grit, and resourcefulness. We are proud of that. We are New Yorkers.

However, beneath the surface, this legislation opens the door for major corporate entities to purchase and dominate our residential housing stock. Companies like Blackstone and Vanguard stand to benefit far more than any individual homeowner or tenant. Instead of empowering New Yorkers to earn supplemental income, we risk funneling wealth and control to global corporations that have no stake in our communities and no commitment to the people who make this city extraordinary.

If Airbnb and short-term rentals are to be expanded, then **these opportunities must be reserved exclusively for personal homeowners—not corporations, LLCs, or investment firms.** Only individuals who actually live in our communities, contribute to our neighborhoods, and care about the future of our city should be allowed to participate. Allowing corporate ownership of these properties would accelerate the erosion of our housing supply, drive up costs, and push out the very people this law is supposed to help.

The next generation is already struggling to imagine a stable future in New York. Housing costs are skyrocketing, opportunities are uncertain, and the ability to put down roots grows harder each year. Opening the market to corporate operators would only make this worse. These companies act quietly and strategically, acquiring neighborhoods piece by piece, removing homes from the long-term rental market, and reshaping communities without any accountability.

New York City has always stood proudly on the belief that *“if you can make it here, you can make it anywhere.”* But what becomes of that promise when the very soul of our city is at risk? What happens to our culture—admired around the world—if we allow corporate expansion to displace the people who built that culture?

I ask our elected officials, whose duty it is to safeguard the well-being of New Yorkers: **Who is New York for?** And **where do we go** if policies like this contribute to the slow dismantling of the city we love?

I urge you to consider the long-term consequences of INTRO 948A and ensure that any short-term rental opportunities are reserved for personal homeowners—not corporations. New York’s future depends on protecting the people who call this city home.

Warm Regards,

Rachael Connolly



November 4, 2025

New York City Council Committee on Housing and Buildings  
Attn: Hon. Pierina Ana Sanchez, Chair

**Re: Written Testimony in Support of Intro 1321-2025, Enactment of the Existing Building Code**

Dear Chair Sanchez:

I am writing in strong support of the adoption of the NYC Existing Building Code (EBC) Intro 1321.

My name is Ramon Gilsanz, and I have been a practicing structural engineer in New York City since 1984. In 1992, I co-founded Gilsanz Murray Steficek, a structural engineering and building envelope consulting firm. I am also the Chair of the NYC Department of Buildings' Structural Technical Committee for the proposed NYC Existing Building Code.

Over the course of my career, I have worked on hundreds of projects gaining an in-depth understanding of the structural challenges of working in NYC, which has the largest and one of the oldest building stocks in the nation. The renovation of existing buildings in NYC is currently governed largely by the 1968 Building Code, which directs engineers to use the codes that were in effect when the buildings were originally constructed. As a practicing engineer, I can attest that this approach often leads to confusion, inconsistent standards, and unnecessary hardships.

In contrast, the proposed Existing Building Code offers clear, practical, and proportional requirements for repairs, alterations, additions, and changes of occupancy. It ensures safety while avoiding the overly stringent provisions of new-building codes that can be impractical when applied to older structures.

The structural benefits of adopting the EBC are numerous and include:

- **Improving public and building safety** through reasonable structural upgrades.
- **Reducing costs and delays** by providing a single standard that makes compliance easier for industry and owners.
- **Supporting sustainability**, as rehabilitation of existing buildings is greener than new construction, which in NYC often requires demolition.
- **Helping to increase the availability of affordable housing in NYC.** Our city's housing needs cannot rely solely on new construction—it must also come from reusing and adapting existing buildings.

I urge the adoption of Intro 1321, as it represents a necessary and forward-thinking update that will

enhance safety, clarity, and the sustainable reuse of New York City's existing buildings.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'R' followed by a series of loops and a long horizontal stroke.

Ramon Gilsanz, PE, SE, Hon. AIA NYS

Founding Partner

Gilsanz Murray Steficek LLP Engineers and Architects

**From:** [Chauncey Street Homeowner's Association](#)  
**To:** [Testimony](#)  
**Cc:** [leadership@rhoar.org](mailto:leadership@rhoar.org)  
**Subject:** [EXTERNAL] Support For Intro 948A  
**Date:** Saturday, November 29, 2025 3:37:39 PM

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[REDACTED]

Dear Housing Chair Pierina Sanchez, NYC Council Housing and Building Committee, et al.

On behalf of the Chauncey Street Block Association representing more than 20 one- and two-family homeowners in Brooklyn, we write to express our strong support for Intro Bill 948A. We believe responsible home-sharing helps families remain in their homes, supports local businesses, and strengthens communities across Brooklyn.

Many one- and two-family homeowners in our community depend on responsible home-sharing so they can afford to stay in their homes. Intro Bill 948A will offer much needed financial relief. Homeowners are the anchors of Brooklyn's neighborhoods. They maintain properties, foster safety, and uphold the character and vitality of our communities. Yet many are facing rising property taxes, insurance rates, utilities, and repair costs that strain household finances and threaten their stability. Therefore, we urge you to support Intro Bill 948A, which proposes thoughtful and narrowly tailored amendments to Local Law 18 to allow one- and two-family homeowners to engage in responsible home-sharing.

Intro Bill 948A offers a balanced and fair solution. By allowing responsible home-sharing, the bill enables homeowners to earn modest supplemental income—often the difference between keeping and losing a home. This income helps families stay current on mortgages, prevent deed theft, tax liens, and other predatory practices, and preserve the generational wealth that sustains our communities.

Furthermore, responsible home-sharing provides much-needed accommodations for visiting loved ones who wish to stay nearby and drives additional business to local small enterprises—from corner stores to restaurants and service providers. This strengthens local economies while preserving the residential character of our blocks.

Importantly, the bill maintains robust protections against commercial operators and “bad actors” who abuse the system. It offers relief to responsible homeowners without undermining tenant protections or the city’s broader housing goals.

We thank the New York City Council for its continued commitment to preserving homeownership opportunities for middle- and lower-income families across

Brooklyn. Supporting Intro 948A will help homeowners remain in their homes, sustain our communities, and advance a fairer, more stable housing future for New York City.

With appreciation for your leadership and dedication to preserving homeownership for real NYC homeowners,

Renée Sheffey

President, Chauncey Street Homeowner's and Block Associations



**From:** [Robin Lester Kenton](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Testimony: Committee on Housing and Buildings, November 20, 2025  
**Date:** Thursday, November 20, 2025 6:39:46 PM

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Good afternoon,

I am writing in **strong support of Bill 948A**. My husband and I have owned a two-family home in Bedford-Stuyvesant since 2010. When we purchased the property, we chose a two-family home because we knew we would want to live in it long-term and provide housing to our aging parents in the future. This setup provided us with the flexibility to supplement our income while still keeping the property as our permanent family home.

As full-time working professionals, we never intended to become "professional landlords." While we did begin renting our extra unit long-term initially, we informed our tenant in 2018 that we would need to make major structural repairs in 2020, and that we would not be renewing their lease. Despite giving **two years' notice**, our tenant refused to vacate on the agreed-upon date. We found ourselves trapped—unable to complete urgent repairs to our home because of a tenant who had more rights to our property than we did. In the meantime, we had to refinance and take on additional debt to pay for the renovation, all while subsidizing someone else's living situation. Situations like these are untenable and extremely risky for small homeowners.

While I was unable to attend the hearing in person, I watched the livestream. What I found most frustrating was how much of the opposition's testimony was completely irrelevant to Bill 948A. Specifically, I fail to see how hotel union workers' jobs are connected to allowing home-sharing in 1-2 family private homes. In my neighborhood, the only hotel nearby is an hourly establishment—definitely not a place I would allow my family or friends to stay. **This bill only applies to homes that are private residences by state law, and it would require the owner to reside in the home.**

At this point in our lives, we **cannot afford** the risk of taking on a long-term tenant. We have two young sons, aging parents, and a home that is meant to be our children's inheritance.

I want to emphasize that **Local Law 18 has had no impact on rent prices or vacancy rates**—in fact, both have worsened. My home is not the property of the City or a tenant; it is our family's livelihood and security. Bill 948A would allow us home share as needed short-term, ensure we are able to stay in our home, and be able to provide living space for both our growing children and their grandparents as needed.

I strongly urge you to pass this bill. It is a reasonable, fair solution that would help homeowners like us maintain control over our property while still maintaining multi-unit buildings and non-owner-occupied housing for renters.

Thank you for your time and consideration.

Sincerely,  
Robin Kenton

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the "common household" or "unlocked doors" requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

Rosemaie Williams



Cambria Hgts. Ny 11411



**From:** [slgsuperior@mindspring.com](mailto:slgsuperior@mindspring.com)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Suggestions submitted prior but are now revised to replace it 11-19-25 SG  
**Date:** Wednesday, November 19, 2025 2:35:22 PM

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Greetings,

I submitted suggestions prior and will testify tomorrow but just in case I am providing them below as well so it for some reason it does not work out here to do so include them as well since they have great merit, thank you./Mr. Gilbert

**Existing Building Code suggested changes, corrections, and additions to the fire alarm system section.**

1. 804.4.2 Control Units in line # 41 replace the word “reset” with “operation.”
2. 804.4.3.3 Smoke detector in elevator lobbies and elevator landing of Group R-2 occupancies, clarify elevator recall as it applies to the operation smoke detector floor and alternative floor if it applies.
3. 804.4.7 Fire alarm system alterations and replacements in existing buildings, clarifying the intent of the statement “have not been signed off shall be cumulatively considered.”
4. 804.4.7.3 System Technology upgrade, clarify if the requirement for elevator lobby temperature applies here or not with Fireman’s Service Access Elevators.
5. 804.4.7.3.2 Circuits, why should an existing building with an approved fire alarm system that has some work done as so stated have to meet this requirement and be rewired to some degree? The requirement for survivability should not be required at this point.
6. 804.4.7.3.5 Operation sequence and 804.4.7.4 System replacement, refer to the new building code, but that does not take into consideration that the existing building construction and the current infrastructure may and or will not align to do so. It should clearly explain, require, and allow current operations as per the Buildings Code at the time of installation based upon the occupancy. An example of this is that in elevator machine rooms the fresh air louver is required to be open one third and upon the operation of the smoke detector in that room, open the other two thirds. The new code deleted that whole section, since now elevator machine rooms are temperatures controlled with HVAC unit. So, based upon things like this, the new code should not apply in certain cases with specific existing building systems in place and in use due to

existing conditions and the code at that time did. There are many more examples and situations that this applies to. Very clear wording is necessary to ensure factors like this are included and allowed for so that a past requirement is no longer complied with and should be. Changing out the fire alarm system should not require upgrading of the existing and working building systems.

7. The EBC should be an option that can be applied initially it goes officially into effect as was done with the Electrical Code. This way there is a dry run and if necessary, things can be modified and adjusted out as well as applied if it is a better option based upon the conditions. Two years is a long time to wait and then have to make changes and adjustments after the fact.

From: S. Gilbert Superior Protection Services 11/19/25 Updated

[REDACTED]

**From:** [Sadio Jonas](#)  
**To:** [Testimony](#)  
**Cc:** [AI Vantage](#); [RHOAR Leadership](#)  
**Subject:** [EXTERNAL] Sadio Jonas Testimony in support of Intro 948A  
**Date:** Thursday, November 20, 2025 11:06:23 AM

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**Good afternoon, Council Members. My name is Sadio Jonas, and I'm here to speak in support of allowing one- and two-family homeowners like me to continue sharing our homes so that we can stay afloat.**

I am not paid to provide this testimony. I came to New York City as a 12-year-old immigrant with my mother. For years, we lived with the consequences of wage theft — her employer exploited her immigration status and withheld her pay. She paid rent with credit cards just to keep us housed. When she finally secured a fair job, we bought a modest home together, but rising mortgage payments, utilities, and basic maintenance costs were more than we could handle on her income and mine as a new college grad.

So long before commercial platforms existed, we opened our home to international students who were here for internships or language programs. They came because they needed to stay in the city for longer than would be affordable and practical to stay at hotels. Staying with a family helped them understand New York's culture and participate in our communities. Our home sharing wasn't a business, it was survival. **It is the only reason we were able to hold on to our home.**

Years later, when I married and had children, we moved to a small one family home in the Bronx, we continued home sharing because we had to. By this time both my parents were now elderly baby boomers and with two young kids, me and my husband became part of the sandwich generation and part of the **1.3 million unpaid caregivers** of aging adults who rely on family support in NYC. At least twice a year, one of my parents has to be cared for extensively in our home following medical procedures. Home sharing is what allows me to keep them close and let them age in place.

In immigrant communities like ours, caring for our elders isn't optional; it's cultural responsibility. We also provide temporary shelter for newly arriving relatives who need a place to land, which directly reduces the burden on city services. These collective realities are why removing the ability for us to do home sharing has not increased the amount of places in 1 or 2 family homes available for long term rent. Our homes were never part of available housing.

Another aspect of my personal story is that **small homeowners like me and my husband cannot afford to operate as long-term landlords in this city.**

Being a landlord here requires bringing homes up to compliance, maintain reserve funds — often **20% of annual rent** — just to meet legal responsibilities, cover repairs, and stay compliant. Utilities for one- and two-family homes in our area routinely reach **\$15,000 a year**, and basic maintenance for older homes is **constant**. For many of us like my father (when he was able), the income from long-term rent simply cannot cover these expenses. Without substantial reserves, we risk **foreclosure** or becoming **unintentional slumlords due to not having the money to maintain a home** — a situation nobody wants.

Short-term home sharing is the tool that keeps us afloat. It lets us pay our bills, maintain our homes, care for our elders, support new arrivals, and remain part of the neighborhoods we love. And importantly — **our units were never part of the long-term rental market to begin with.**

I ask you to protect this path for families like mine. Thank you.

Sadio Jonas

## STATEMENT IN OPPOSITION TO INTRO 948 — THE “AIR BnB REVIVAL” BILL

To Brooklyn Council Members Narcisse, Louis and Banks and Bronx Councilmembers Riley Feliz and Stevens, I'm writing in the strongest possible terms to oppose Intro 948, a bill that represents nothing less than a back-door reversal of Local Law 18 and a direct threat to the stability, safety, and affordability of New York City's residential neighborhoods.

City officials have long described illegal hotel conversions as “**displacement in slow motion.**” Every apartment diverted into short-term occupancy erodes the residential housing stock, drives up rents, and destabilizes entire blocks. Local Law 18 finally stopped that pipeline. Intro 948 would reopen it.

The bill allows **up to four adult guests in a one-family home with *no limit* on the number of children under 18**, and—most dangerously—**no requirement that any adult renter or host be physically present on-site**. This means that homes could again operate as unmanned, high-occupancy, transient lodging facilities.

The amended definitions even allow **interior rooms like kitchens or living rooms to be locked off**, permitting rentals where guests have access only to a bathroom and sleeping area. This raises obvious and severe concerns about **fire safety, egress, and overcrowding**, and directly contradicts the spirit of New York's multiple dwelling laws.

Taken together, these provisions would enable exactly what Local Law 18 prohibited: **full-time, commercialized short-term rentals masquerading as “home-sharing.”**

Without an on-site host requirement, **private equity firms, LLCs, and commercial operators will once again have the financial incentive to buy up smaller homes**—especially in high-demand neighborhoods—removing them from the residential market and converting them into de-facto hotel units. This is not speculation; this is precisely what occurred in the years before Local Law 18.

Intro 948 is **not** a narrow homeowner relief bill. It is a structural weakening of the city's residential protections. It would **undermine every stated housing goal** of this administration—from its so-called “City of Yes” rezonings to its claims about producing affordability—by allowing Wall Street investors to extract enormous profits through transient rentals far above any local market rent.

Meanwhile, everyday New Yorkers—especially first-time buyers who must rely on mortgages—are already losing bidding wars to cash-rich investment entities. This bill further tilts the playing field by increasing the profitability of speculative home purchases. It accelerates displacement. It accelerates inequality. And it hollows out communities block by block.

Residential neighborhoods are not investment vehicles. Homes are not hotel rooms. The Council must not allow the city to slide back into the destructive era where residential buildings functioned as transient lodging facilities at the expense of tenants, families, and long-term community members.

**Intro 948 moves New York City in the wrong direction. It threatens housing stability, public safety, and the future of our communities. It should be rejected unequivocally.**

**Vote no!**

**Respectfully,**

**Sandy Reiburn    Fort Greene, Brooklyn**

## Testimony in Support of Intro 948a | Community Member, Shanti Jimenez

Good morning, Chair Sanchez and members of the Housing Committee. My name is Shanti Jimenez, and I am a **lifelong, native New Yorker** and a homeowner in Brooklyn. I am not being paid to be here; I am testifying in support of **Intro 948a** because this bill is the key to allowing my family to remain in the city we have always called home.

My sister and I poured our lifelong savings into buying our dream house—a modest two-family home. This wasn't just an investment; it was the foundation of our family's future, our shot at **generational stability**. We envisioned a home where our children and grandchildren could grow up near us, securing our roots in the city we love.

But New York City is increasingly hostile to working families. The cost of everything—from property taxes and insurance to groceries and utilities—has **skyrocketed**. We are barely scraping by, and that dream is constantly at risk.


When we first purchased the house, we relied heavily on home-sharing the second unit, until my sister could financially move in. That income helped us meet the crushing expenses that came with being homeowners. However, after the Intro 1107 crackdown took effect, we lost that flexibility. Now, my sister and her family are settled in that unit, yet **the cost of ownership remains unbearable**. Even united, we are struggling to make ends meet.

Intro 948a is our lifeline, allowing minor protections that respect our safety and autonomy. These small changes will not turn our homes into hotels; they will give families like mine the modest, necessary income to pay the property taxes and utilities that keep the lights on.

Homes are meant to be shared, and homeowners deserve to utilize their greatest asset to afford living here. Without this, we will be forced to sell our home and flee New York, increasing the chances of it being purchased by private equity firms and rented unaffordably.

Intro 948a is not about profit for corporations; it's about **preservation**—preserving our dream, preserving generational stability, and preserving the very New Yorkers who built this city. Please pass Intro 948a. Thank you.

**Ambassador Sharon Jones**  
**An indigenous WOMB man.**  
**In support of the Intro 948A**



**Testimony for Housing Committee Hearing on Intro 948A**

*"When we think about the story of Jesus and Mary in Bethlehem, we are reminded that even the most sacred moments in history unfolded in the homes of strangers. They found shelter where there was room, and that act of hospitality became the foundation for a story that has inspired billions. Housing is not just about property, it is about community, compassion, and the freedom to open our doors to others. Intro 948A honors that tradition by allowing New Yorkers to welcome boarders and guests in ways that reflect both our economic realities and our shared humanity. To restrict this is to forget that the very origins of our faith and culture were built on the generosity of households willing to share space. And let us be clear: our homes are not merely units in a regulatory system; they are extensions of our liberty. When government overreaches into the private domain, it risks eroding the very alienable rights that define ownership and sovereignty. This bill is not just about housing—it is about protecting the freedom to decide how we use our own homes."*

**From:** [Sherri Culpepper](#)  
**To:** [Testimony](#); [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](mailto:Ratner@council.nyc.gov); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [yusef@yusefspeaks.com](mailto:yusef@yusefspeaks.com); [Salaam, Yusef](#)  
**Subject:** [EXTERNAL] Testimony in Support of Amendment 928-A to Local Law 18  
**Date:** Sunday, November 23, 2025 11:51:34 AM

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Full unedited Testimony;

Testimony in Support of Amendment 928-A to Local Law 18

Date: November 20, 2025

Hearing: Housing Committee

Speaker: Sherri Gretta Phyllis Culpepper

Title: Fourth-Generation Harlem Homeowner

Introduction

To the esteemed Chair and Members of the Housing Committee , my name is Sherri Gretta Phyllis Culpepper. I am a proud, fourth-generation Harlemit, and my purpose here today is singular: to ensure that my fifth, sixth, and seventh generations can continue to live and thrive in the home that has defined our family for nearly a century.

I stand before you to urge your support for Amendment 928-A. This amendment is crucial to ending what has become a systemic, coordinated assault on small, owner-occupied homes in previously disenfranchised communities across this city.

A History of Disenfranchisement

In 1929, my family of nine moved into an entire single-family dwelling as renters. After 45 years of tenancy, we were finally allowed to purchase the property in 1974. This house is not an asset; it is our legacy, bought with the sweat and sacrifice of generations.

However, despite being a single-family dwelling, our home was unceremoniously and wrongfully identified circa 1938 as a Single Room Occupancy (SRO). There is no doubt in my mind that this designation was a direct result of decades of redlining and institutional discrimination, aimed at destabilizing Black homeownership.

The Assault of the Alternate Enforcement Program (AEP)

This historical injustice became a weapon in the modern era.



In 2014, HPD's Alternate Enforcement Program (AEP) was weaponized against my family. Despite our property being owner-occupied and clearly not fitting the criteria for a "slumlord" program, the AEP forced my home into their punitive system.

This program, voted on in this very Chamber; created a family crisis and allowed a Single Parent to take care of twelve fourth- and fifth-generation cousins to live "legally free," due to the confusing and discriminatory SRO classification.

This is not what homeownership looks like. No homeowner should be forced to endure such hardship. For the last thirteen years, I have worked seven days a week to:

- Care for twelve freeloaders.
- Pay off eight tax liens.
- Stop five foreclosures.
- Retain thirty-five attorneys who achieved nothing.

This experience is proof that the system is broken and actively hostile to small, multi-generational owners like me.

### Correcting the Narrative

There is an ongoing, damaging narrative in the media that frames all property owners as one monolithic group of wealthy, moguls taking advantage of renters. This narrative is profoundly wrong.

Small homeowners are the backbone of our communities. We are the ones who retain the history, stability, and character of places like Harlem. We are not predatory investors; we are grandparents, mothers and fathers fighting every day to keep a roof over our children's heads.

### Call to Action

The current legislative environment continues this assault. Local Law 18, without appropriate amendments like 928-A, will perpetuate the cycle of confusion and punitive enforcement that has already cost me and countless others their financial stability and peace of mind.

I urge you, the Council, to look beyond the generalized narratives, misinformation, and the wrongful enforcement by HPD and see the reality of owner-occupied homes in this city.

See me.

See my home.

See my legacy.

I strongly support Amendment 928-A. Do not continue the assault on small homeownership in previously disenfranchised communities. Support 928-A and protect the families who have built and defended this city, generation after generation.

Thank you.

Respectfully Submitted

Sherri Culpepper

[REDACTED]

NY NY 10027

[REDACTED]

Testimony Prepared

By

Stanley McIntosh

I, Stanley McIntosh, my wife and formerly my son, live on West 132<sup>nd</sup> Street in Harlem, Community Planning Board 10. I have lived in my home for 78 years. I am President of the block association, Neighbors United of West 132<sup>nd</sup> Street Block Association (NUW), and our predecessor organization, Central Harlem Association of Small Homeowners and Small Businessmen (CHASH-SB), was founded in 1954. The Late Judge, Constance Baker Motley, helped residents, especially the late Evelyn Thomas (the street is co-named after her), to set up that organization to fight urban renewal which attempted (and thankfully failed) to destroy all of the brownstones on my block and those on the north side of West 131 Street. We have a long history in our community and have every intention to remain in place for as long as we can.

My father bought our home in 1938. My parents rented rooms in the upper floors to neighbors, and we lived on the bottom floors. This was common for most of the homes on our block, which was made up largely of immigrants from the Caribbean. The City of New York demeaned this rental set-up by referring to the tenants as “roomers” (rather than community members they were) and claiming it was unsafe housing accommodations. In truth, it provided lodging for the working class people and a stopgap to homelessness, as well as making it possible for us to keep our home.

Later, NYC enacted rental regulations that were so stringent that they were difficult to impossible for many small landlords to keep their homes. These policies claimed to help but actually harmed whole communities that were already taking care of each other, while at the same time, giving rise to the greed of corporate landlords. This began difficult times for my family, as we weren’t allowed to rent without major upgrades that we couldn’t afford. This quagmire was by design and only benefited moneyed interests who scooped up family homes from distressed homeowners and actually hurt the housing security for tenants and homeowners alike.

While we struggled, we were determined to hold onto the home that my father toiled to buy all those years ago. As I started my own family in the family home and got the title, I applied and received a Sec. 312 loan from HUD and created a legal 2 family dwelling. We rented part of our home, still trying to catch up with the high costs of deferred repairs and expenses. Even after a major renovation, repair and replacement is a fact of life and never ends.

In 2017, we returned to our family’s legacy of home sharing, allowing us the space to support

our relatives when they needed housing. This also helped us afford repairs, keep emergency savings, and afford our rising medical expenses as senior citizens. We finally felt that we were catching up. New York is a high maintenance place, and home repairs were quite expensive since our home was built around 1884.

The enactment of Local Law 18 destroyed our plan to age in place, so we are scrambling for solutions to keep our home and afford our medical bills once again. It seems once again that the City of New York institutes laws almost surgically negatively affect small homeowners, especially Black and Brown homeowners. The consequences of Local Law 18 are as cruel as earlier policies claiming to help but will only result in more lost homes in Black and Brown communities and lost generational stability and wealth for those families. It is hard to believe that my family will again face the same nightmare that my parents faced all those years ago, endangering our ability to remain in our home and keep it in our family.

INTRO 948A is a small, first step in the right direction in righting these wrongs, even though it has yet to address home sharing for private 2 family homes. Please vote yes on Intro 948A.

I'd also like to share this speech that I gave at a City Hall rally in February 2025 about home-sharing and our need to survive. It is an impassioned truth that gets to the heart of this issue

When they leveled our community of Seneca Village to make Central Park for the wealthy to enjoy, we were forced out. When large apartment buildings where Tom Cayler of Tenants PAC found housing decades ago, we thought we'd have a place there... but were turned away because of our skin color or our religion. When the only option left was to go to the outer reaches of the city to rebuild, government-sanctioned, surgically precise redlining made owning a home almost impossible. So, we got inventive and turned to our communities for survival through home-sharing. And now they want to take that away from us, too.

This is about the squeezing of every little drop of wealth from the 99% by the predatory 1%.

This is about the erasure of Black and Brown communities.

This is about the thievery by the bloated hotel industry manipulating our government as a

This is what the oligarchy looks like at City Hall: big business roaming around the hallways, demanding "trojan horse" policies, and threatening elected officials to do their bidding at the

expense of the tax-paying, hard-working New Yorkers who actually built this city and still live in it.

The oligarchy is not welcome here! With their bogus Tenants Not Tourists, they are spitting in the faces of the Council. They're spitting in the faces of real tenants and real tenants' rights organizations that they have no intention of helping. And they're spitting in the faces of their own hard-working union members who never see a fraction of the profits they're hoarding.

They have the hubris to believe that we're all going to fall for their bold-faced lies. They claim to be for tenants, but behind all of our backs, they take entire apartment buildings and turn them into hotels. They create giant loopholes so thousands of apartments can be taken off the market for wealthy investors. If they really cared about the housing crisis, they could end it tomorrow, by giving back the thousands of apartments they stole and paying their fair share of taxes!

Including one- and two-family homes in LL18 has nothing to do with solving the housing crisis. It's a strategy of long-term deed theft by the moneyed interests. It is eminent domain by the powerful. And now the fix for that harm, Bill 1107, is in peril, thanks once again to the greed of big business and the powerful.

We IMPLORE our elected officials to listen to the voices of their constituents in the crafting of this law – not the voices of those un-elected but somehow occupying shadow thrones of power, casting down their wishes on the government. Our government, our City is meant to be BY, FOR and OF the people. We're counting on our elected officials to have the courage to make it so.

Thank you for your time and attention, and again, please vote YES on Intro 948A.

**From:** stephanie fable [REDACTED]  
**Subject:** Opposed to Intro 948  
**Date:** November 20, 2025 at 3:45 PM  
**To:** testimony@council.nyc.gov  
**Cc:** District 19@council.nyc.gov

SF

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DATE: NOV.20, 2025  
TIME: 10 AM  
COMMITTEE: HOUSING AND BUILDINGS (INTRO. 948)

Dear Council Members,

My name is Stephanie Fable and I'm a homeowner in Whitestone, Queens. I am opposed to having Air B&B's in a residential area and don't want that type of business taken place. The Air B&B's would have strangers not neighbors walking in our neighborhood. Strangers don't treat the neighborhood as their own by littering, having loud parties, noise complaints, people knocking on your door because they have the wrong address. Having strangers in the neighborhood would give a sense of not being safe. Also homeowners, not being on premises, don't have a vested interest in whom they're renting to and losing daily control of their property as long as they have new income. I listened to the council meeting and I understand that parts of Brooklyn need this to save their home. But it got me thinking, if a homeowner is having difficulty paying their mortgage or taxes, then their home is falling into disrepair and who would want to rent it? Other city programs need to be initiated to help those homeowners afford their real estate taxes and water bills. Instead, initiating Intro 948 would open the field of having Air B&B in areas where people take pride in keeping their neighborhoods family oriented and streets safe. The neighbors would suffer the brunt of having an Air B&B on their block. Please do not pass Intro 948. Thank you for your attention in this matter. Stephanie Fable

November 20, 2025

Subject: Opposition to INTRO 948-A Short-Term Rentals (STRs) in [Your Neighborhood/Community Name] Residential Zones

Dear Esteemed Members of the City Council,

As a resident who was born and raised in this community, and who has chosen to raise my own family and build my life here, my investment in the security and integrity of our streets is absolute. I am writing to express my profound opposition to INTRO 948-A, the legalization or continued allowance of short-term rental properties (STRs), such as those facilitated by platforms like Airbnb, within our established, close-knit residential community. We strongly urge the City Council to maintain or enact comprehensive zoning regulations that restrict such commercial activities to designated tourist or commercial areas.

Our neighborhood is primarily composed of families, long-term residents, and elderly individuals who rely on the stability, familiarity, and safety inherent in a traditional residential setting. The introduction of transient, non-vested occupants fundamentally undermines the very character of our community. Unlike long-term residents who contribute to the social fabric and abide by neighborhood norms, short-term guests lack accountability and connection, leading to a breakdown of community oversight and cohesion.

This issue is critical to the continued viability and safety of our neighborhood, and we urge immediate, decisive action.

Furthermore, the introduction of frequent, unvetted strangers poses significant and unacceptable safety risks. Our residents, especially those with children and seniors, rely on knowing their neighbors and the general population surrounding our schools and homes. Allowing a revolving door of temporary occupants eliminates this crucial sense of security. We should not have to face constant uncertainty regarding the behavior and intentions of individuals utilizing properties for purely commercial gain in areas dedicated to family life.

Finally, STRs exacerbate existing quality-of-life issues. Our community already struggles with excessive speeding and nuisance traffic. Adding a steady stream of unfamiliar vehicles and visitors seeking temporary accommodation will only compound these issues, creating perpetual instability and noise. These operations belong in areas

equipped to handle high turnover and tourist demands, not in residential zones built for stability.

We implore you to recognize and protect the unique interests of our families and permanent residents. Please vote to prevent the commercialization of our homes and keep short-term rentals out of our family neighborhoods.

Thank you for considering the vital importance of this matter to our community's future.

Respectfully submitted,  
Tiffany Brucculeri  
Whitestone, Queens, New York District 19





**From:** [Tim Eliot](#)  
**To:** [Testimony](#)  
**Cc:** [RHOAR Leadership](#)  
**Subject:** [EXTERNAL] Bill 948A — Please vote YES!  
**Date:** Wednesday, November 19, 2025 12:27:00 AM

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[REDACTED]

Dear esteemed City Council,

My name is Tim Eliot, and I live in the Kingsbridge region of the Bronx. My wife and I are millennials, artists, and freelance workers. We've both lived in the city for 20 years, and we were very lucky to buy a 2-family home on Orloff Avenue in January of 2020, just a few months before COVID lockdowns.

We always planned two purposes for our second unit: to host family—including elderly parents on both sides—and to find rental income to help us pay our mortgage and keep up with the cost of living. My father and stepmother came to stay with us for a month after we moved in, so that my father could get a complicated surgery in Manhattan. We had one short-term rental prior to COVID lockdowns, and then we hosted our brother- and sister-in-law (my wife's sister) for several months during that time.

When lockdowns lifted, we decided to explore short-term rental more, and we found that there were many benefits: we could still easily reserve time in our second unit for family, friends, and projects (like independent film shoots); we could clean and inspect the unit regularly; we could host the friends and family of our friends in the neighborhood for extended visits; and we could host people who wanted to explore our Bronx neighborhood for their own future long-term housing, to visit family, and to see local attractions like the NY Botanical Garden and Wave Hill.

We were glad to host lower-income visitors—who deserve economical options for lodging in the outer boroughs when visiting the city—especially as they often frequented our favorite local shops, restaurants, bodegas, and grocery stores, boosting the local economy. Many of them appreciated having a full-sized kitchen and access to laundry, which almost no hotels in the city—let alone outer boroughs—provide. None of our neighbors ever complained about any of our short-term guests, as we screened guests responsibly. We also employed local professional cleaners 3-4 times a month between short-term renters.

With the passage of LL18 and its draconian, punitive, clumsy restrictions, all of that has come to an end. We can no longer easily reserve time for our friends and family to visit us comfortably—our main unit is quite small, and we only have one full bathroom. We cannot reserve chosen times for them in our second unit, as we have to prioritize the schedules of mid-term rental prospects above all else—or we might not be able to pay our mortgage.

We have already lost an average of \$500-\$700 a month in comparable rental income since LL18 went into effect—straining our ability to work as artists, afford necessities, and invest in projects that generate income for local businesses. We only employ our local cleaners once every six 6-8 weeks for the second unit, which is income they would spend at local business as well. In short, many, many working-class people (ourselves, visitors, and local business proprietors and workers) and our wider community have lost something incredibly valuable.

And who has benefitted? Neither housing scarcity nor rents have declined. The only beneficiaries of LL18 have been—unsurprisingly—the major hotel chains in NYC. But ameliorating the housing crisis was never the actual purpose of LL18; it was just the line that was sold to a working class desperate for real reforms that might actually make a difference. It hasn't, and everyone knows it.

The result? Skyrocketing foreclosures and sales to investors who won't live in the homes—shackling more and more New Yorkers in the outer boroughs to tenancy, and crippling efforts to increase homeownership rates, community

stability, and neighborhood stewardship.

What we—and visitors and local businesses—desperately need is a common-sense amendment to LL18 to allow 1- and 2-family homeowners to provide short-term rentals of extra space in the homes that they live in (in case you weren't aware, 80% of NYC 1-family homeowners and 96% of 2-family homeowners live in the homes they own).

Thank you for your time and consideration. I know you have the best interest of all New Yorkers at heart, and that you understand that 948A is a reasonable, common-sense correction to an egregious harm being visited on responsible, working-class homeowners across the city.

Please help me, my wife, and our two dogs stay in the small dream home we have worked our entire lives to afford. Please help us stay connected to our friends, family, and larger community by allowing us to rent part of the home we live in short-term.

Please vote Yes on Bill 948A.

Yours truly,  
Tim Eliot

A black rectangular redaction box covering the signature area.

**From:** [Tim Eliot](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#)  
**Subject:** [EXTERNAL] Intro 948A and 1107A  
**Date:** Sunday, November 23, 2025 10:31:55 AM  
**Attachments:** [Tim Eliot 948 1107 Testimony.pdf](#)

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Dear City Council Housing Committee,

After [testifying at](#) and listening to the public hearing on 948A and 1107A, I wanted to submit further testimony. Please see the attached PDF.

Thank you,  
Tim Eliot

Dear City Council Housing Committee members,

Thank you for the opportunity to [speak to Chairwoman Sanchez](#) and listen to all the collected voices at Thursday's hearing regarding Bills 948A and 1107A. It should be apparent that homeowners—your dedicated constituents—cannot allow their rights and their material concerns to be sacrificed to the ideological fantasies that Local Law 18 promised and has not delivered. We will continue this fight until our rights are respected, one way or another. If you have the courage and the skill to apply nuance and reason to this matter, you will redress a great wrong that has been done to us, and we will have good reason to trust and support you now and in the future.

To my mind, LL18 is either a monopolistic antitrust action by big businesses targeting middle-class worker-owners, or it's a gross violation of human rights—or it's both.

If short-term rental is strictly a commercial activity (many other kinds of which\* occur in private homes all day, every day), then massive corporations have used their influence in government and the media—and encouraged the punitive authority of government—to decimate their only serious competition (made up of thousands of small “businesses”), thus monopolizing a legal market under false pretenses.

Alternately, if renting short-term is only commercial in buildings built for commercial-scale short-term rental (as we do with other “commercial” activities that also take place in homes), then the government is depriving people of their natural and Constitutionally-guaranteed property rights—with the greatest benefit accruing to only the wealthiest commercial operators.

The legality of short-term rental was never in question prior to the proliferation of internet-based home-sharing platforms. In 2008, around the same time that such platforms began making private short-term rental more safe, reliable, and scalable, New York City quietly revised building definitions for private dwellings (1- and 2-family homes). However, it took nearly a decade for government agents to start contentiously, dubiously citing and deliberately misquoting the revised definitions to prohibit and punish short-term rental activity in private dwellings. The particular legal claims and interpretations of the ambiguous definitions aside, it was only seventeen years ago that the City quietly laid the groundwork for suddenly banning (just three years ago) an activity that's been legal for *centuries*, perpetrating massive, outsized harm on specific individuals in service of specious, overhyped benefits to anyone—except massive corporate interests and their C-Suite executives.

\*long-term residential rentals, film and television production rentals, child care, teaching, craft and handiwork, freelance and work-from-home labor, business operations labor, etc., etc.

I heard many misinformed or misguided assertions at the hearing on Thursday. I would like to address a few of them.

**Assertion:**

Allowing owner-occupied 1- and 2-family homes to rent rooms or units short-term exacerbates the housing crisis.

**Truth:**

Since the enforcement of LL18, the vacancy rate for leasable units has not increased. Rents have not decreased.

There are many potential pressures creating this outcome—but the strict enforcement of LL18 hasn't created a net positive. If LL18's forcing of ~25,000 otherwise-leasable units back into the long-term rental market didn't outweigh the other, ongoing negative pressures on housing availability, then the City should be prioritizing other, more scalable measures instead of fruitlessly perpetuating harm on good-faith, responsible homeowners—many of whom did not or could not make units or rooms available for long-term leases. If adding ~25,000 units to the long-term housing stock didn't materially advantage renters, "losing" a fraction of that won't materially disadvantage them, either. At best, there are 2,000 vacant units in owner-occupied 2-family homes and zero in owner-occupied 1-family homes that even could be rented short-term.\*

NYC has had a housing crisis for decades. It predates the rise of home-sharing platforms, all the relevant changes to building codes, the passage of LL18, and the debate over current bills (948A and 1107A). According to a Harvard Business Review study, the median *yearly* rent increase for renters due to the widespread availability of STR (prior to LL18) was just \$125. Implementing LL18 to create a significant positive pressure on the housing market was wishful thinking then, and, after three years of punishing homeowners, the City can only blame itself for its thoughtlessness and lack of imagination. 1- and 2-family foreclosures, especially in outer boroughs, are way up. Hand-waving away the clear correlations here as "not equaling causation" is childish sophistry, especially when one of the core counter-claims (short-term rental in private dwellings increases rents meaningfully) is demonstrably specious.

The City Council did the right thing in creating a system for regulation and registration for short-term rentals, but it overstepped in giving enforcement zealots enough room to persecute 1- and 2-family homeowners trying to make ends meet.

\*The numbers here are damning:

- Owners occupying 1-family homes (80% of all such homes) cannot lease rooms in their homes full-time. There are zero long-term leases that become available by preventing these owners from doing short-term rental, unless they lose their home and an investor

rents it full-time, which simply transfers occupancy of a home from a homeowner to a tenant.

- For that matter, long-term renters of 1-family homes can only sublease with permission from their landlords, just as their lease would need to allow them to do short-term rentals. Preventing these people, too, from doing short-term rental is a solution in search of a problem.
- No one is against preventing absentee landlords from running their 1- or 2-family homes as short-term rentals. This is obvious. No one wants this. This category and owner-occupiers are clearly different.
- Only 2,000 units of the 448,000 dwelling units in all 2-family homes are vacant.
- 96% of 2-family homes are owner-occupied, but their use of the second unit in their home varies wildly.
- Many 2-family homeowners have never rented their second unit and have no intention of doing so. They use it for living, storage, or personal guest space.
- Many 2-family homeowners already exclusively rent their second units to tenants long-term, despite being able to rent short-term up until September 2022. These owners will not suddenly begin doing short-term rental just because it becomes available again; the assertion that they would is a paranoid fantasy.
- Many other 2-family homeowners will never rent their second unit permanently, even if they are not allowed to do short-term rental. These owners prioritize the intermittent use of the second units in their homes for a variety of legitimate reasons, and are far more likely to rent for 30-90 days at a time to allow them some flexibility and greater access.
- Some 2-family homeowners who enjoyed short-term rental of their second unit have taken on full-time tenants and may or may not return to short-term rental if they are allowed.

Preventing the third category of 2-family homeowners from freely using the space in their own homes for the sake of adding all the units available in the last category to the long-term leasing stock is hopelessly naïve.

While there is a potential for extreme bad actors with any regulatory scheme, there are already many tools created by LL18 to prevent this. Punishing thousands of responsible homeowners for the sake of preventing any potential harm is deliriously hypocritical: where was this concern for homeowners when LL18 was being created? If the goal is harm-reduction to vulnerable populations, surely the City Council would be more averse to directly harming homeowners than indirectly benefitting renters.

People buy homes (notoriously feeble investments, even at scale) primarily because they are places to live. Stability, security, and community are the real draws—not profitability. Homeowners who live in their homes deserve the right to use their homes how they see fit, barring only direct material harm to others. “Aggregate harm” arguments (this action at scale creates an aggregate of harm that affects many others in increasingly minor ways) should not be used to justify directly harming individuals through denial of property rights and impoverishment.

**Assertion:**

Hotel workers will lose their jobs if owner-occupied 1- and 2-family homes are allowed to rent short-term.

**Truth:**

Hotel profits have spiked since the passage of LL18. Not even a sizable negative market fluctuation would force billionaire hotel owners to cut staff; they would readily claim any flimsy pretext for firings that protected their obscene profit margins. Hotel owners could employ all their current workforce at much higher rates despite any conceivable volume of short-term rentals. Not a single hotel worker will lose their job because individual homeowners host visitors who wouldn't rent in a hotel because of cost or preference. Those visitors simply won't come here; they'll spend their travel money elsewhere.

Holding workers hostage with fear has always been a tool of the highest upper classes, and hotel operators have co-opted even their workers' unions with fear-based manipulation and side-dealing. Hotel owners have collaborated with a patchwork of misinformed organizations, colluded with a handful of authoritarian bureaucrats, and coerced many otherwise-disinterested workers into manipulating the City Council to scapegoat middle-class homeowners for the sake of their obscene profits.

**Assertion:**

Short-term rental has always been illegal.

**Truth:**

The legality of short-term rental was never in question prior to the proliferation of internet-based home-sharing platforms. In 2008, around the same time that such platforms began making private short-term rental more safe, reliable, and scalable, New York City quietly revised building definitions for private dwellings (1- and 2-family homes). However, it took nearly a decade for government agents to start contentiously, dubiously citing and deliberately misquoting the revised definitions to prohibit and punish short-term rental activity in private dwellings. The particular legal claims and interpretations of the ambiguous definitions aside, it was only seventeen years ago that the City quietly laid the groundwork for suddenly banning (just three years ago) an activity that's been legal for *centuries*, perpetrating massive, outsized harm on specific individuals in service of specious, overhyped benefits to anyone—except massive corporate interests and their C-Suite executives.

**Assertion:**

Short-term rental hosts in NYC are disproportionately white.

**Truth:**

The methodology of the “study” presented by Murray Cox is unscientific, deeply problematic, and hopelessly biased. Scraping public-facing photographs on marketing tools for rental listings (AirBnB profiles) and passing them through notoriously flawed facial-recognition technologies fails to control for multiple, obvious confounding factors. Many hosts do not use photos of their actual faces on these platforms, for any of the myriad reasons you can imagine—not least of which is the possibility of being racially profiled by ideologues whose primary intent in doing so is to make their lives harder.

Moreover, the study fails to control for or acknowledge deeper, systemic racial disparities and biases that might be true causes of perceived effects. It implies that AirBnB, as a platform, is a meaningful driver or cause of racial inequity, despite existing for less than twenty years in a country with 400 years of racial inequity.

No one has peer-reviewed the study, given how obviously problematic and offensive it is. Citing or considering it seriously reveals a disqualifying level of bias.

There may be problematic racial disparities among hosts, but employing this form of this argument is an attempt to erase the presence and experience of black and brown homeowners. Implying that only white, affluent people are being harmed by LL18’s restrictions puts a “progressive” veneer on harm to non-white homeowners while simultaneously dismissing their voices.

**Assertion:**

AirBnB has materially contributed to the campaigns for 1107A and 948A.

**Truth:**

This hypocritical attack is patently absurd: The hotel lobby has hired top-tier PR consultants to position this fight as “tenants v. tourists” (since when do hotels dislike tourists in favor of tenants?) or “workers v. AirBnB,” fabricating a cause-effect that ultimately rests on an abusive model of employment (i.e. “allow us to monopolize this industry or we’ll start firing our most vulnerable workers”). They have put tremendous resources into press relations, consultants, political contributions, and coercive manipulation in order to obfuscate their presence in this fight.

Meanwhile, homeowners began and continue this advocacy on their own behalf, despite well-funded opposition from hotel owners who have benefitted massively from their decades-long effort to monopolize short-term rental. Since impoverishing and disfranchising individuals has bad optics, bans on private home-sharing needed a media-ready scapegoat: AirBnB and other home-sharing platforms, which are simply technology firms that became industry leaders by fostering peer-to-peer home-sharing. These platforms did not create private short-term rental; it has existed since the recognition of property rights. AirBnB simply made the private short-term rental market scalable, which poses a threat to only one real entity: hotel owners.



Short-term rental hosts themselves are not beholden to AirBnB. It is a means to an end: safe, reliable, efficient short-term hosting.

**Assertion:**

Short-term rentals are inherently more dangerous and disruptive to communities.

**Truth:**

Per submitted FDNY data, despite being ~33% of all housing in the City, private dwellings account for only 28% of emergencies. Stories of violent and/or dangerous guests are very dramatic, but there is no available data to suggest that, compared to tenants, visitors to the city (especially those in private short-term rentals) are inherently more violent or disruptive. This line of reasoning is akin to the scaremongering about immigrants by the far-right—similarly hyperbolic and tinged with racism.

Owner-occupiers are the most impacted by unruly guests in their home and screen diligently. Short-term renters, especially in outer boroughs, are very often not just tourists: they're here to visit family and friends, get needed medical care, interview for a job, move into college, explore the area ahead of moving permanently, etc. etc. These people are responsible, caring visitors, not bad apples.

There simply aren't enough hotels outside of Manhattan—all types of visits are way down in the boroughs, where there are fewer hotels, and now, almost no home-shares. Multiple borough chambers of commerce have decried the overwhelming evidence that a loss of visitor foot traffic has hurt local businesses—and their employees.

Homeowners who can rent short term are able to have their own friends, family, neighbors, acquaintances, and even colleagues stay with them more comfortably. These people, too, boost the local economy. Hosts employ local businesses for cleaning, maintenance, and repairs to their spaces—and they pay taxes. They also have more disposable income to spend locally.

Turnover of neighborhoods happens much faster when middle-class people lose their financial stability, especially when they lose their homes—investors are ready to pounce on any home and turn it into as many rentals as possible. Homeowners live in their homes for decades and invest both in their homes and their neighborhoods in ways that tenants often cannot.

Consumer enterprise and residential living have always needed to coincide in every urban environment—what would NYC be without its bodegas, restaurants, cafes, pharmacies, shops, daycares, etc.?

Renting out part of your home for a short time to visitors has been a feature of human civilization since the idea of property rights was codified. If the government can tell you how *long* you can share your own living space—but not how many spaces you can own and rent

sustainably—whom is it protecting? Only entities that have a major stake in renting short-term, i.e. hotels.

TIMOTHY WALKER - 948A TESTIMONY - Nov 20, 2025

Good afternoon, and thank you for the opportunity to speak with you.

My name is Tim, and I'm a homeowner in Brooklyn. My wife and I live in a small two-family row house. I'm a therapist, and I work from home, seeing my patients in the garden suite downstairs.

I want to state clearly that I am not being paid to be here today. I'm here because this issue directly affects my family's ability to stay in our home.

Over the past few years, I've dealt with health issues that make my work very inconsistent. Some months I can see a full panel of clients; other months, my health simply doesn't allow it. That unpredictability has made it much harder to keep up with our mortgage and the rising costs of living in New York — everything from property taxes and insurance to utilities and groceries.

For homeowners like us, home sharing is not a luxury. It's what fills the gap between the income I can bring in and the real cost of staying in our home.

We're not commercial operators. We're not taking apartments off the market and converting them into Airbnb hotels. We live in our home. We're trying to make ends meet and remain in the neighborhood we care about, while continuing to contribute to our community.

Local Law 18 unintentionally swept up families like mine — treating us the same as commercial landlords and large-scale operators. Intro 948A corrects that. It creates a very narrow carve-out for responsible home sharing in one- and two-family homes — homes where the owners live and have every incentive to maintain safety, stability, and good relationships with neighbors.

Supporting Intro 948A means supporting New Yorkers. I urge the Council to pass Intro 948A. This legislation is a lifeline for many of us.

Thank you for your time and consideration.

**From:** [TJ Wilson](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Support of 948A  
**Date:** Thursday, November 20, 2025 10:21:22 AM

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[REDACTED]

As a homeowner and community advocate in Bedford Stuyvesant, I support 948A. I'd previously had an Airbnb business in Brooklyn and it was a tremendous help to our household after the pandemic and health issues. During that time we housed several people that eventually relocated to the area; we introduced them to local realtors and homeowners along with other local businesses in our immediate area. Under the new law, our home is no longer my personal residence - we would be left without security, the mandated regulations would turn my home to a commercial property. We would be required to provide individuals with a space for 30 or more days instead of a weekend getaway or an overnight stay to see a Broadway play or a reasonably priced place to stay before signing a new lease.

Several former guests continue to stay in touch, those that have relocated to Brooklyn and a few from other states, even countries especially during the holiday season.

Finally, as my community continues to gentrify, become unaffordable, and as utility, insurance rates outpace incomes; property taxes have risen, many of us feel less like we control our homes. 948A helps us to feel some empowerment concerning our homes.

I hope more of you in the council will hear us and realize that 1-2 family homeowners are integral to the city too not just tenants or hotel owners.

Regards,  
TJ Wilson  
Sent from my iPhone

**From:** [Tricia Toliver](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Please support Intro 948A  
**Date:** Sunday, November 16, 2025 2:42:43 PM

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- 1.
- 2.
- 3.
4. Opening- Name, Borough, District, One/Two-Family Homeowner- "I am a real NYC Homeowner who lives in my home and I'm not being paid to be here. I am asking this committee to vote YES on Bill 948A" (please paraphrase)
5. Message- Tell your story through the lens of one of the testimony themes below; your previous emails to your CMs is probably a good starting point.
6. Closing- Thank CMs for their time and work for all New Yorkers, and ask once again for CMs to vote YES on Bill 948A. Example: "I am in support of 948A and I would like Council to vote YES."

---

Hello,

I am Tricia Toliver, the owner of a 2-family home in Brooklyn, District 38. I live in my house and have been severely impacted by LL18, as have many other 1-2 family home owners. For this reason, I am urging you to vote YES on Bill 948A.

I tour frequently as a stage manager/lighting director and bought my home counting on the fact that I could have guests stay in my part of the house during my time on the road and as well, could have flexible use of my downstairs apartment for family visits and housing guest artists who come to NYC to work on projects in their fields; they always have a very difficult time finding affordable housing during their stays in spite of how much they offer so much to the cultural landscape of the city. The specifics of LL18 require me to be present in my home during short term rentals, not to have any locks on any doors in my shared units and to have no more than 2 guests at one time. These restrictions rule out the use of either of my units as I had planned. I was looking forward to upcoming retirement (I am 66) but because I am prohibited from inhabiting my own home as I envisioned and because my home was the entirety of my retirement plan, I am now forced to delay retirement for the foreseeable future.

My story is only one example of the harm that LL18 has done to one and two family home owners. NYC's housing affordability crisis does not only affect renters! I urge city council members to consider the needs of their home-owning constituents and vote yes on Bill 948A.

Thank you for your time and consideration in this matter.  
Sincerely, Tricia Toliver

## **Testimony Narratives:**

Pick one narrative below that applies to your experience, and tell your story through that lens.

- Aging in place (Retired)
- Single parent income
- We live in our whole homes and are not housing stock
  - Multi-generational living in 2-family homes
  - Family members living part-time to receive or provide care
  
- Empty nesters
- Family legacy
- Have already lost home/ forced to sell
- Need income to avoid financial vulnerabilities (deed theft, tax liens, pressure from speculators)
- Illness/ divorce/ other extreme financial pressures
- Local economy benefits- additional patronage for local businesses, more work for micro-economies (repair people, cleaners, etc)
- Home-sharing as a community resource/ “mutual aid” - neighbors in small spaces need visiting family to stay nearby AND this helps homeowners remain housed.

**From:** [Tricia Toliver](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Please support Intro 948A  
**Date:** Sunday, November 23, 2025 12:38:27 PM

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[REDACTED]

Hello,

I have previously submitted testimony about my experience as a home owner impacted by LL18. If I am allowed to submit again, I would like to share with you some rebuttals to arguments against Bill 948A that were presented at the hearing on Thursday. The situation is more nuanced than is presented by proponents of the hotel lobby and I hope the points below will help to clarify your understanding of how this bill helps 1-2 family home owners while still upholding the intention of LL18 to subvert bad actors in the short term rental market.

These bills restore fairness for owner-occupied 1- and 2-family homeowners who were never the source of the “illegal hotel” problem. The unintended harm of Local Law 18 has pushed seniors, immigrants, middle-class families, and Black and Brown homeowners toward foreclosure and financial crisis—and these bills provide a lifeline without threatening tenants or our housing stock.

Here are responses, point-by-point, to the issues that have been raised:

—

1. “These bills weaken Local Law 18 and reopen the floodgates to illegal hotels.”

Local Law 18 was designed to stop large-scale commercial operators in multi-unit buildings—and it did. But in the process, it swept up thousands of law-abiding owner-occupants renting a single room or part of their home.

No one is arguing for unlimited unhosted rentals or corporate-run STRs.  
And these bills do not create that.

Owner-occupancy is still required.  
Commercial operators are still banned.  
Full-apartment STRs in 2-family homes remain illegal.

These bills simply ensure the law reflects the lived reality of responsible homeowners—not the abuses of commercial landlords in large buildings.

—

2. “It will convert 27% of NYC’s housing stock into Airbnbs.”

With respect, that assumption has no basis in evidence or logic.

- 1- and 2-family homeowners are not going to convert their homes into hotels—they live there.
- These homes rarely have “extra apartments” to take off the market.
- The bills do not allow a second unit in a two-family home to become a full-time Airbnb.
- Most homeowners rent a room, an attic, a basement suite, or a spare floor, not a full unit already occupied by a tenant.

Before Local Law 18, these homes had decades of hosting history—and NYC did not lose 27% of its housing stock.

The fear is hypothetical; the hardship homeowners face is real.

---

3. “It will increase speculation and drive up home prices.”

STR income from a spare room—maybe \$1,000 to \$1,500 a month—cannot and does not drive speculative buying.

Banks do not underwrite mortgages based on Airbnb income.

Buyers do not spend \$900,000 on a home because they might rent out a guest room 8 weekends a year.

What STR income does do:

- Keeps families afloat during economic shocks.
- Prevents missed mortgage payments.
- Helps seniors remain in the homes they raised their families in.

If we truly care about preventing foreclosures—which are rising fastest in Black neighborhoods—then allowing responsible homeowners flexibility is part of the solution, not the problem.

---

4. “This will incentivize evictions.”

It cannot—because the bills do not allow landlords to STR a tenant’s apartment.

Only owner-occupied spaces qualify.

A homeowner cannot evict a tenant to STR the unit—the law still forbids that.

And tenant protections remain fully in place.

The only thing these bills do is allow a homeowner to legally rent part of their own home—not someone else’s home.

---

5. “This creates unacceptable fire and safety risks.”

The safety concerns cited relate to:

- Illegal conversions
- Partitioned basements
- Attics turned into apartments
- Overcrowded multi-family buildings

None of this is what responsible homeowners do.

Hosted STRs are safer than long-term rentals because:

- The owner is physically present.
- The owner knows the exits and the layout.
- There is direct oversight of guests and behavior.

If FDNY desires clearer safety standards—such as smoke alarms, extinguishers, or egress signage—those can be codified.

Safety is solvable without banning responsible homeowners from renting a room.

---

6. “Host presence is the only enforceable standard.”

This is contradicted by the experience of every other global city:



- London
- Paris
- Vancouver
- Toronto
- Los Angeles

All enforce STR regulations using:

- Annual night limits
- Owner-occupancy requirements
- Platform data sharing
- Registration systems

New York already receives data under Local Law 18.

Removing an unnecessary host-presence rule does not break enforcement—it modernizes it.

And again:

Owner occupancy remains required.

These bills do not create anonymous, unhosted mini-hotels.

—

#### 7. “Complaints in 1–2 family STR homes are rising.”

Complaints rose because Local Law 18 pushed formerly legal STR activity underground.

When you remove legal paths, you get:

- Illegal listings
- Frustrated guests
- Confusion
- Neighbors unsure what is allowed
- More calls to OSE

You do NOT reduce demand—you simply reduce compliance.

Creating a clear, legal path for 1- and 2-family homeowners will reduce complaints, not increase them.

People comply with rules when the rules make sense.

—

#### 8. “These bills dangerously redefine the term ‘family.’”

The bills make a narrow, targeted update to accommodate modern household structures and temporary guests.

They do not:

- Redefine family across all zoning codes.
- Affect permanent occupancy standards citywide.
- Alter rent laws or housing maintenance code protections.

Any narrower language the Council prefers can be added.

This is a drafting issue—not a valid reason to block relief to struggling homeowners.

—

#### 9. “Unlimited minors will violate occupancy and safety codes.”

This is an easily correctable technical detail.

But more importantly:

- Building and fire codes already govern occupancy.
- STR rules do not override those codes.
- A family visiting with three children is not a safety hazard.

If the Council prefers a numeric cap, homeowners will support that.  
This is not a structural flaw—it's an editorial note.

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10. "STRs might violate insurance or mortgage policies."

Many everyday activities do:

- Subletting
- Running a home business
- Renovations
- Renting out a basement or ADU

We do not ban those activities—we provide guidance.

Homeowners should have the right and responsibility to manage their own insurance and mortgage compliance.  
The City can add simple disclosure language during registration.  
There is no justification for using insurance contracts as a reason to restrict income for those most at risk of foreclosure.

---

In closing, these bills do not weaken tenant protections. They do not remove housing from the long-term market.  
They do not create commercial hotels in residential neighborhoods.

What they do is simple: they keep families—especially Black, Brown, immigrant, and senior homeowners—in their homes. They support small businesses still recovering from the pandemic. They provide a safe, regulated path for responsible homeowners who were never the problem in the first place.

New York City is strongest when we protect both renters and homeowners.  
And right now, thousands of small homeowners need this Council to restore the balance Local Law 18 unintentionally disrupted.

I urge you to pass Intros 948A and 1107A—not as a step backward, but as a step toward fairness, stability, and equity for the communities that built this city.

Thank you for your time and for your service to New Yorkers.

Sincerely, Tricia Toliver

## Testimony in Opposition

Intro 948 and Intro 1107 — Short-Term Rentals in 1- and 2-Family Homes  
November 20, 2025

Thank you for this opportunity to testify.

I am deeply concerned about the possibility of Intro 1107 and 948 passing into law. Clearly, property owners in need of financial relief should be given assistance but not at the risk of negating laws such as Local Law 18 and eviscerating the powers of the Office of Special Enforcement (OSE).

23 years ago I knew what it was like to endure living in a residential building being run as a commercial youth hostel. At the time our only legal recourse was for our Tenant's Association to convince the city to sue our building management. It took over a year to get them to do it and produced no tangible results (*City of New York v. Dexter Properties et al June 2005*). It wasn't until 2007 when OSE's teams of inspectors were empowered to inspect properties, issue violations and file lawsuits against perpetrators that tenants were given a fighting chance to save their homes from the disruption of transient use. LL18 gave OSE a framework in which to operate and a possibility for real enforcement.

Presently 1- and 2-family homeowners are legally allowed to rent **spare rooms** in their homes for extra income. They are **not** allowed to rent out the **entire home while they are off-site**. This regulation is the only thing stopping residential properties from operating year around as STR hotels. This opens doors wide for Airbnb and other speculators to monopolize the little bit of housing we still have left. **All dwelling units** across NYC would be affected, not simply 1 and 2 family homes.

At a time when affordable residential housing is in such drastic short supply I urge you to reject both Intro 948 and Intro 1107. For people living and working in New York city they would be a disaster.

Vivian Riffelmacher Abuelo  
Coalition Against Illegal Hotels (CAIH)  
Westside Neighborhood Alliance (WSNA)

[REDACTED]  
New York NY 10033  
[REDACTED]

**From:** [Wesley Loden](#)  
**To:** [Testimony](#)  
**Cc:** [District7](#); [Dinowitz](#); [Ratner@council.nyc.gov](#); [District33](#); [Aviles, Alexa](#); [Hudson, Crystal](#); [Feliz, Oswald](#); [District37](#)  
**Subject:** [EXTERNAL] Intro 948A  
**Date:** Saturday, November 22, 2025 5:34:23 PM

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**I am writing in strong support of Intro 948A which is urgently needed to correct the overreach of Local Law 18.**

My name is Wesley Loden, and I live with my husband in a two-family home in Bushwick. We started home-sharing our 2nd unit because we didn't want to choose between hosting our elderly parents and income from a long-term tenant. Two years ago, right after LL18 went into effect, I wrote to my councilmember Sandy Nurse warning that if the law was not adjusted, it would sweep in small homeowners who were never the intended target. Unfortunately, that is exactly what happened.

LL18 has had two years to prove itself — and the results are clear.

The law has not made New York City more affordable.  
It has not increased housing supply.  
It has not decreased rent.

**What it has done is create financial insecurity, mortgage risk, and unnecessary hardship for small homeowners who share space in the homes they live in.**

These are people who were never contributing to the housing crisis, yet we are now shouldering the burden of a policy that treated us the same as large-scale commercial operators.

**Owner occupied 1 & 2 family homeowners should never have been included in LL18 — and 948A simply corrects that mistake.**

LL18's goal was valid: stop large-scale, irresponsible, commercial short-term rental activity. And it succeeded in doing that. The problem is that the law went further and pulled small, responsible homeowners into the same category.

948A doesn't undo LL18; it fixes the part that went too far. It restores the common-sense distinction between someone sharing their home and someone running an unregulated hotel.

**However, the hotel lobby's opposition to 948A tells you everything.**

Their aggressive, coordinated fight against this small, reasonable carve-out is not about housing.  
It is not about affordability.

And it is certainly not about protecting ordinary New Yorkers.

It is about eliminating even the faintest trace of competition.  
It is misdirection. It is greed, pure and simple

**I am reminded of an expression: Pigs get fed, hogs get slaughtered.**

The hotel lobby is getting greedy with their opposition to 948A and I really hope the City Council has the integrity to recognize it and do the right thing.

Actual homeowners in New York City have experienced real harm over the past 2 years. Certainly in the case of me and my husband, we have the receipts to prove it.


We were not the problem, we are not housing stock, and we should not be the collateral damage in this ideological battle of big-moneyed interests.

Intro 948A provides a fair, targeted, common-sense solution that restores LL18 to its original intent.

I urge the NYC Council to correct this mistake and pass Intro 948A.

Respectfully,  
Wesley Loden

District 37  
Brooklyn, NY

  
Belle Harbor, N.Y. 11694

November 19, 2025

To whom it may concern,

The "Airbnb bill" as lifetime Rockaway residents, we are against the "Airbnb Bill" which would allow for 4 short term renters or residents to rent out their homes while not present. Please do all you can to prevent this bill from passing.

Sincerely,

William M. Erhard Jr.

William M. Erhard Jr.

Karen Erhard

Karen Erhard

**To the Members of the New York City Council:**

I'm writing as a Southeast Queens resident to express my strong opposition to Intro 948-A and Intro 1107-A. While both bills claim to offer flexibility for homeowners, they raise serious concerns for neighborhoods like ours — dealing with safety, stability, and long-term impact.

- **Under Intro 948-A:** The bill would *increase* the number of allowable boarders, roomers or lodgers in a private one- or two-family dwelling to **up to four (4) overnight boarders, roomers or lodgers plus children under 18**, provided the permanent occupant has registered the property as a short-term rental. It also permits the permanent occupant *not* to be physically present during the stay.
- **Under Intro 1107-A:** The bill seeks to amend the “common household” or “unlocked doors” requirement for short-term rentals in one- and two-family dwellings, by allowing boarders, roomers or lodgers to be provided reasonable access to the unit without the permanent occupant having to open all private spaces. It is explicitly described as aiming to expand flexibility for small homeowners to offer short-term rentals, including the potential for the homeowner not to be present.

**Our Concerns:**

- **Public safety & turnover:** Permitting up to four paying guests plus children in a home without the occupant present means more frequent changes of unfamiliar people on our blocks — more traffic, more strangers, more strain on local enforcement.
- **Quality of life:** Our part of Queens is primarily residential, with long-term families who build community ties. These bills shift toward short-term occupancy models that don't support those stable relationships.
- **Gentrification & private equity risk:** By loosening the owner-presence requirement and increasing allowable overnight renters, the bills open the door for speculators or private equity firms to treat one- and two-family homes like mini-hotels. That threatens homeownership and affordability in communities like ours.
- **Extra vulnerability — near the airport:** Being so close to the airport (John F. Kennedy International Airport) already means higher pressure — from noise, zoning, housing turnover and external investors eyeing our area. These bills amplify that risk because a house used largely for short-term rental generates less commitment to the neighborhood than a long-term homeowner occupant.

For all of these reasons, I urge the City Council to **reject** Intro 948-A and Intro 1107-A — or at minimum delay them until we have true community input from Southeast Queens, with protections to safeguard stable homeownership, public safety, and affordability.

Sincerely,

Name:

\_\_\_\_ **William Scarborough** \_\_\_\_\_

Address:

\_\_\_\_\_

\_\_\_\_ **Jamaica, NY 11434** \_\_\_\_\_

## **Memorandum in Opposition to Proposed Int. No. 948-A**

I Bishop Willie Billips opposes Intro 948-A, which **is a overt effort to dismantle existing protections against illegal short-term rentals and is a threat to** our housing supply, the tourism economy, jobs, community safety, and the character of our neighborhoods As the Pastor of The Faith Hope & Charity church serving the New York City community I must stand against this proposed Int. #948A.

Proposed Int. No. 948-A seeks to amend multiple sections of the New York City Building Code and Administrative Code to expand the number of boarders allowed in one- and two-family homes, enable locked spaces within homes, and, crucially, allow short-term rentals without requiring the permanent occupant to be physically present. By enacting these changes, Int. 948-A would legalize de facto hotels in residential neighborhoods. This directly conflicts with the intent of Local Law 18, which requires that short-term rentals be hosted by a permanent resident to ensure safety, accountability, and community stability.

We oppose this legislation because This legislation would remove housing from our city and make our housing crisis even worse, increasing the price of housing by making homes scarcer. In addition to our strong objection for this legislation, we are deeply dismayed by the willingness of some to allow Airbnb to claim that these changes will be largely beneficial to Black and Brown New Yorkers.

Prior to Local Law 18, the short-term rental crisis took thousands of units off the market, disproportionately displaced communities of color, threatened hospitality jobs, and directly contributed to increased rents. Int. 948-A would effectively reopen the door to commercialized, unhosted short-term rentals, undermining Local Law 18 and reversing years of progress in protecting New York City from illegal hotel activity.

**For these reasons, I urge the City Council to vote no on Proposed Int. No. 948-A**



## **Yesenia**

My name is Yesenia, and I oppose Intros 948 and 1107. Companies that profit from short-term rentals are not looking out for New Yorkers. Their interest is in expanding their business, even when it harms the people who actually live and work in this city. We've all seen how much they've spent to lobby elected officials. Even though people like me can't spend millions of dollars on influencing laws, we deserve to be heard. We know what happens when you let Airbnb into our communities. Before Local Law 18, rents rose, communities were destroyed, and long-time residents were forced out of homes that had been in their families for generations. In neighborhoods like mine, Black people were pushed out as apartments that were turned into short-term rentals, while newcomers made all the money. If you pass these bills, you are choosing corporate interests over your own constituents. I'm asking you to vote no on these bills to protect New Yorkers like me.

# Written Testimony in Support of Intro 948A

Submitted to the New York City Council

By: District 37 Homeowner, Young Parent & Dental Student

Dear Council Members,

My name is Yuheng Shi, and I am a homeowner and young parent living in District 37. I live in my two-family home with my wife and our one-year-old child, and I am writing to express my strong support for Intro 948A.

I want to begin by saying clearly:

I am a real homeowner, a real New Yorker, and I live in the home I am speaking about.

I am not being paid to be here. I am participating because this bill directly affects my family's ability to stay housed and stable during one of the most challenging periods of our lives.

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## Our Family Story & Why the Second Unit Matters

My wife and I purchased our two-family home a little over three years ago with the hope of building a stable foundation for our young family. Since becoming parents, our second unit has been essential in ways we never could have imagined.

It has never been used as a long-term rental and is not part of the city's rental housing stock.

It is family space — a place where my parents or my wife's parents can come stay for weeks or months at a time to help take care of our baby. Their help allows us to save on childcare, keep our household functioning, and maintain some stability while I complete dental school.

Being able to occasionally share our home when family is not visiting helps us bridge the financial gaps created by rising expenses. For us, home-sharing is not a business — it is a lifeline.

---

## Our Financial Reality as Young Parents

I am currently in dental school and carry significant student loan burdens. At the same time, I am a full-time parent to a one-year-old. My wife is a dedicated public high school teacher whose salary has not increased meaningfully in years.

We are doing everything we can to stay afloat, but the cost of living — childcare, food, utilities, insurance, and taxes — rises every year.

Like many New Yorkers, we work hard, we contribute to our community, and we love our neighborhood deeply. But the financial strain is real. When my parents come to stay with us to help raise our child, it reduces childcare costs and allows us to cook at home to manage expenses. Without that support — and without the ability to home-share responsibly — remaining housed in Brooklyn would be extremely difficult.

---

## **Unexpected Hardships: Flooding & Repair Costs**

Although our home is a newer construction, recent hurricanes brought repeated basement flooding.

We spent over \$20,000 repairing the damage — a devastating hit for a young family already juggling student loans, childcare, and basic living expenses. Home-sharing has been one of the few practical tools available to help us recover and stay on stable footing.

---

## **Intro 948A Supports Families, Not Speculators**

I want to emphasize what is true for us and for many families like ours:

- Allowing owner-occupied one- and two-family homes to share space does not reduce the city's long-term rental stock.
- It helps parents, caregivers, and multigenerational families remain housed.
- It keeps homes like ours from being forced into foreclosure or sold to wealthy buyers who would convert them into single-family luxury homes — a trend already happening in many Brooklyn neighborhoods.

Intro 948A is a balanced, compassionate, community-strengthening approach.

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## Our Commitment to New York City

As a future dentist, my goal is to serve my community — especially families and seniors who lack access to affordable dental care. My wife already serves the city through public education. We want to continue building our lives here, raising our child here, and contributing to this city.

But to do that, we need stability.

We need the ability to responsibly share the home we live in — the home we are working so hard to keep.

---

## Closing

Thank you for your time and for your commitment to protecting New Yorkers. I respectfully urge you to listen to the lived experiences of families like mine — young parents, public-sector workers, and future healthcare providers who want nothing more than to remain in the communities we love.

I am in full support of Intro 948A, and I respectfully ask the Council to vote YES.

Sincerely,

Yuheng Shi

District 37 Homeowner

Young Parent & Dental Student

Husband and Father

**From:** [Zachary Hickman](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony in Support of Intro 948A  
**Date:** Sunday, November 23, 2025 9:55:49 PM  
**Importance:** High

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## Written Testimony in Support of Intro 948A

Submitted to the New York City Council

By: Dr. Zachary Hickman, District 37 Homeowner & NYC Health + Hospitals Physician

Dear Council Members,

My name is **Dr. Zachary Hickman**, and I am a physician working in **NYC Health + Hospitals**, the city's public hospital system. I live with my wife and children in **District 37**, in a **two-family home** that we occupy and maintain ourselves. I am submitting this testimony to express my strong support for **Intro 948A**.

I want to begin by stating clearly:

**I am a real New Yorker, a public servant, and a homeowner who lives in my home. I am not being paid to submit this testimony.**

I am participating because this bill directly impacts my family's ability to remain housed and stable in the city we serve and love.

---

### My Family Story & Why Our Second Unit Is Essential

My wife and I purchased our two-family home with a vision of raising our children here, supporting our extended family, and building a multigenerational foundation. Our second unit has always been an essential part of that plan.

It has never been, and will never be, part of the city's rental housing stock. It is *family space* — not an investment property, and not a long-term rental unit.

Our oldest child will be leaving for college soon, and he will rely on this second unit when he returns home for school breaks. As our younger children grow and as our family evolves, this home will continue to serve multiple generations. Our home is 100 years old, and like many older houses, it requires continuous maintenance — roofing, heating, cooling, plumbing, electrical work — none of which can be deferred without risking safety and habitability.

---

### The Reality of Public-Sector Work & Rising Costs

I chose to work for NYC Health + Hospitals because I believe deeply in serving communities that

have historically lacked adequate access to care. But public-sector healthcare salaries have not kept pace with the rising cost of living in New York City. Each year, it becomes more challenging to keep our home stable, maintain necessary repairs, and absorb the constant increases in taxes, insurance, utilities, and basic household expenses.

For families like mine, **occasionally sharing a portion of our home is not about business — it is about survival and stability**. It is one of the only ways to fill the gap between what it costs to remain here and what public-sector incomes realistically allow.

---

## Intro 948A Protects Families Without Affecting Rental Stock

I want to emphasize a critical point:

**Intro 948A does not reduce the supply of rental housing in New York City.**

It applies **only** to one- and two-family homes that are *owner-occupied*. These homes are not part of the long-term rental market. Allowing families like mine to share our homes responsibly does not remove a single apartment from availability.

What 948A *does* do is offer a practical, humane pathway for homeowners to remain housed, especially in multi-generational households and aging homes that require constant care.

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## Home-Sharing Strengthens Community, Especially for Parents

I'm part of a Brooklyn parent community, and I can tell you from firsthand experience: There is a constant, unmet need for safe, nearby places for visiting family members to stay.

Parents are asking for help every week — grandparents visiting newborns, relatives traveling for school assemblies, graduations, and holidays, family members coming to support new parents or care for elders. With limited hotel options in our neighborhoods and the high cost and inconvenience of Manhattan hotels, home-sharing is often the only realistic option.

Intro 948A supports:

- **Families who need loved ones close by**
- **Parents who rely on relatives for childcare support**
- **Grandparents who want to be near their grandchildren**
- **Neighbors who already share their homes out of community need**

This is not tourism-driven demand — it is community-driven, family-driven, and deeply human.

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## Home-Sharing Helps Homeowners Stay Housed

Allowing responsible home-sharing for owner-occupants is a form of **housing stability**, not displacement. It prevents foreclosures, prevents forced sales, and prevents small homes from being purchased by large investors who convert them into rentals — a trend that ultimately **raises rents** and reduces community stability.

Intro 948A protects the very homeowners who help keep our neighborhoods anchored.

---

## Closing

I would like to close by thanking the Council for its work and its dedication to keeping New Yorkers housed. I respectfully ask you to consider the lived experiences of families like mine — families who contribute to this city, who raise our children here, who serve this community through public-sector work, and who want nothing more than to remain stably housed in the place we call home.

**I am in full support of Intro 948A, and I urge the Council to vote YES.**

Thank you for your time, your service, and your commitment to all New Yorkers.

Sincerely,

**Dr. Zachary Hickman**

District 37

NYC Health + Hospitals Physician

Homeowner and Father

I oppose Intro 948-A because credible data shows that expanding short-term rentals in one- and two-family homes will raise housing costs, reduce affordability, and invite large-scale investor takeover of New York City neighborhoods.

Key data points:

1. Investor activity rises sharply when STR restrictions are loosened.

Cities including Boston, Los Angeles, and Barcelona documented a 20–40% increase in investor purchases following similar deregulation.

2. Short-term rentals raise rents and home prices.

Research in Urban Studies and Harvard Business Review confirms that a 10% increase in STR listings raises rents by 0.4% and home prices by 0.7%. In a constrained market like NYC, that impact is amplified.

3. Intro 948-A allows commercial hotel operations inside residential housing stock.

A two-family home could legally rent 8 rooms every night, to multiple unrelated guests, without the owner present. This is essentially a hotel license inside a residential zone.

4. NYC already faces investor pressure.

The NYC Comptroller reports that in some neighborhoods, over 20% of purchases of 1–3 family homes are by investors. This bill will accelerate that trend.

5. The bill is heavily driven by lobbying money.

AirBnB has spent over \$700,000 lobbying this year and committed \$5 million to push this bill. Multiple “advocacy” groups backing the bill are funded with \$150,000–\$450,000 from AirBnB itself.

The data is clear: Intro 948-A will worsen affordability, reduce housing supply, and destabilize communities. I urge the Council to reject this legislation.



I am writing in opposition to Intro 948-A which will allow short-term stays in one and two-family homes. This plan will make the housing shortage that we are currently experiencing ten times worse than it already is by taking countless apartments out of the rental market and into the "hotel market". After all, a daily rental is more lucrative than a traditional monthly rental. Since there are no landlord-tenant issues to deal with, landlords and investors have even more of an incentive to switch to the daily rental format. After the mayor-elect's promise to make NYC more affordable, adding more housing units and the passage of the City of Yes, this is very hypocritical. Now I understand why I have been receiving unusual inquiries the past two months by real estate companies asking if I am interested in selling my house.

Thank you.

STATEMENT IN OPPOSITION TO INTRO 948 — THE “AIR BnB REVIVAL” BILL  
To Brooklyn Council Members Narcisse, Louis and Banks and Bronx Councilmembers Riley  
Feliz and Stevens,

I’m writing in the strongest possible terms to oppose Intro 948, a bill that represents nothing less than a back-door reversal of Local Law 18 and a direct threat to the stability, safety, and affordability of New York City’s residential neighborhoods.

City officials have long described illegal hotel conversions as “displacement in slow motion.” Every apartment diverted into short-term occupancy erodes the residential housing stock, drives up rents, and destabilizes entire blocks. Local Law 18 finally stopped that pipeline. Intro 948 would reopen it.

The bill allows up to four adult guests in a one-family home with no limit on the number of children under 18, and—most dangerously—no requirement that any adult renter or host be physically present on-site.

This means that homes could again operate as unmanned, high-occupancy, transient lodging facilities. The amended definitions even allow interior rooms like kitchens or living rooms to be locked off, permitting rentals where guests have access only to a bathroom and sleeping area. This raises obvious and severe concerns about fire safety, egress, and overcrowding, and directly contradicts the spirit of New York’s multiple dwelling laws.

Taken together, these provisions would enable exactly what Local Law 18 prohibited: full-time, commercialized short-term rentals masquerading as “home-sharing.”

Without an on-site host requirement, private equity firms, LLCs, and commercial operators will once again have the financial incentive to buy up smaller homes—especially in high-demand neighborhoods—removing them from the residential market and converting them into de-facto hotel units. This is not speculation; this is precisely what occurred in the years before Local Law 18.

Intro 948 is not a narrow homeowner relief bill. It is a structural weakening of the city’s residential protections.

It would undermine every stated housing goal of this administration—from its so-called “City of Yes” rezonings to its claims about producing affordability—by allowing Wall Street investors to extract enormous profits through transient rentals far above any local market rent.

Meanwhile, everyday New Yorkers—especially first-time buyers who must rely on mortgages—are already losing bidding wars to cash-rich investment entities. This bill further tilts the playing field by increasing the profitability of speculative home purchases. It accelerates displacement. It accelerates inequality. And it hollows out communities block by block.

Residential neighborhoods are not investment vehicles. Homes are not hotel rooms. The Council must not allow the city to slide back into the destructive era where residential buildings functioned as transient lodging facilities at the expense of tenants, families, and long-term community members.

Intro 948 moves New York City in the wrong direction. It threatens housing stability, public safety, and the future of our communities. It should be rejected unequivocally.

Vote no!

As a Harlem resident and small homeowner, I cannot emphasize enough how vital this bill **INTRO 948-A** is for families like mine who are fighting to remain in our homes. Our properties are not part of speculative housing supply, we live in our homes. We are not corporate landlords, investors, or developers. We are long-time members of this community, deeply rooted here, and our homes represent stability, generational security, and community continuity.

Due to the rising cost of living in New York City, many small homeowners have had to rely on renting part of our homes simply to afford to stay. This is not a luxury, it is a necessity for survival in the neighborhoods we helped build and care for. Without supplemental income, many of us will be forced out, contributing to the displacement and erasure of long-standing Harlem residents, but also new and young residents.

Intro 948-A is not a threat to housing stability, it strengthens it. It protects the ability of homeowners to remain in the communities they love. It does not harm Harlem; in fact, it helps prevent displacement and keeps our neighborhoods diverse, stable, and thriving. Opposing this bill essentially leaves small homeowners with no path to stay in their homes.

I respectfully request the Council Members public support for Intro 948-A. This bill represents fairness, housing stability, and the protection of Harlem families and legacy homeowners, values I know all our Council Members also stand for.

**From:** [Gania Joseph Phillips](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Pass Intr948A and protect outer borough communities  
**Date:** Wednesday, December 3, 2025 6:29:17 AM

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Dear Official NYC Council Testimony Submission,

While I am thankful to live in the greatest city in the world, I have to string together multiple streams of income to be able to afford the monthly mortgage and housing expenses, repair costs that come with owning a hundred-year-old home, and provide for my family. Local Law 18 stripped away an essential source of income for me and my family. I have several neighbors who have been forced to leave our community because they can no longer make ends meet.

Until Local Law 18, it was possible for lower- and middle-income New Yorkers to own a home, particularly in the outer boroughs. Regular New Yorkers like me could make ends meet by renting out a spare room, renting out our homes while traveling, or renting an in-law's space for the holidays while they're away visiting family.

I don't own multiple units that could be long-term rentals, and I am not taking housing off the market. I own the home I live in. Throughout the year, my family and I use our whole home to welcome family and community members in need of temporary housing. In between, we rely on home-sharing to help make ends meet. I have not contributed to the disruption and safety concerns associated with short-term rentals in apartment buildings, nor am I the cause of NYC's housing crisis. Punishing homeowners like me is only making communities more vulnerable, making homeownership unsustainable, and pushing regular New Yorkers out of the city, ceding our neighborhoods to wealthy speculators.

Keeping the strongest protections in place to prevent party homes and keep our communities safe, 948A will make small, common-sense updates so that New Yorkers like us who own and live in our homes full-time can:

- host up to 4 guests, not including children (current law only allows 2 guests including children)
- rent out their property without being physically present, like while traveling
- put locks on private spaces

These simple changes will mean the difference between low- and middle-income New Yorkers being able to stay in the city we love or not. Please pass Intro 948A.

Gania Joseph Phillips

[REDACTED], New York City, NY, US, 11434

**From:** [Kyle Spencer](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] Pass Bill 948A to keep homeowners in their homes  
**Date:** Wednesday, December 3, 2025 2:47:21 PM

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Dear City Council Members /

I am writing to express my strong support for the bill currently before the City Council: Bill 948A, which proposes thoughtful and narrowly tailored amendments to Local Law 18 to allow one- and two-family homeowners to engage in responsible home-sharing.

We are homeowners in a city we can now hardly afford.

Homeowners - not just industry giants - ought to be able to financially benefit from folks who need places to stay in NYC. It's wrong to let the wealthy hotel industry make money off of NY's popularity, while hurting homeowners who can't. It's just wrong. And it's exactly what New Yorkers voted against in this most recent mayoral race

The idea that by keeping us from doing this, we are going to free up housing space is crazy! It doesn't even make sense. If this law passes more people will be able to rent rooms in people's houses! That's adding supply!!!! You are telling us we cannot add housing supply in a city with a housing crisis!!!!

Bill 948A offers a balanced and fair solution. By permitting responsible home-sharing, it gives owner-occupants a way to earn modest supplemental income—often the difference between keeping and losing a home. This financial flexibility helps families stay current on mortgages, avoid deed theft, tax liens, and other predatory practices, and preserve the generational wealth that is so vital to community stability.

Additionally, responsible home-sharing in our neighborhoods provides much-needed accommodations for visiting loved ones who want to stay close by, while also generating additional income for our local small businesses—from cafés and corner stores to repair shops and restaurants. This helps strengthen our local economy and supports the entire community.

Importantly, this legislation maintains protections against commercial operators and “bad actors” who exploit the system. At the same time, the bill ensures honest, responsible homeowners are not unfairly penalized for trying to stay afloat in an increasingly unaffordable city.

We want to thank the New York City Council for its continued efforts to preserve homeownership opportunities for middle- and lower-income families across the outer boroughs. Keeping homeowners in their homes strengthens our neighborhoods and safeguards the cultural and social diversity that makes New York City so special.

For these reasons, we urge the Council to pass Bill 948A. This measured amendment will help homeowners remain in their communities, support responsible home-sharing, and advance a fairer, more sustainable housing future for New York City.

With appreciation for your leadership and continued commitment,

Kyle Spencer

A solid black rectangular box used to redact the signature of Kyle Spencer.

Brooklyn

## Written Testimony in Support of Intro 948-A

**Submitted by: Tanya Taylor, NYC homeowner  
27-year Brooklyn property owner**

Thank you for considering Intro 948-A. I am submitting this testimony as a homeowner who has been directly affected by New York City's current enforcement approach toward short-term rentals in private homes.

### Who This Bill Actually Impacts

Intro 948-A concerns one very specific group of New Yorkers:  
**primary-residence owners of one- and two-family dwellings.**

These homes are classified under state law as *private dwellings*, not part of the city's regulated housing stock. They follow different occupancy rules, building requirements, and safety codes. Renting a room in one of these homes does not legally convert it into a commercial hotel or a regulated apartment.

Yet, enforcement under Local Law 18 treats these homes as though they were commercial lodging businesses. 1 & 2 family homeowners cannot legally rent parts of their home to tenants because they are not entitled to rent and use and occupancy under New York Law. For 2 family homeowners, for various reasons they may be unable to rent their second unit long term but also cannot afford to keep it vacant for an extended period. Intro 948-A would allow us to earn income to pay our bills and remain in our home, while having the flexibility to have our home available for family members who may live out of the state for half of the year (e.g. my dad), or my children who are away at college.

This bill does not address multifamily apartment buildings, does not deregulate landlords, and does not affect tenant protections. It simply aligns city enforcement with existing state law for private homes.

### How Current Rules Harm Homeowners

When Local Law 18 was implemented, it did not shut down large-scale illegal hotels. Instead, it made it significantly harder for ordinary homeowners to maintain ownership of their primary residence. So the HTC got exactly what they wanted to continue to boost their revenues, leaving small homeowners like myself struggling to hold on to our only asset. The people harmed have largely been seniors, first-time buyers, immigrant homeowners, and families who depend on modest supplemental income to afford rising expenses.

As a homeowner of 27 years, I fall squarely into this group.

- I came to this country undocumented at 16, worked my way through school, purchased my home at 25, and built a career as a CPA in banking and insurance.

- Four years ago, an accident left me disabled and unable to return to work, so I had to give up my career, and have minimal income.
- Around the same time, I was paying thousands of dollars each month for medical expenses for my daughter whose medical condition was not covered by insurance – which I continue to pay today.
- During this hardship, I was unable to collect rent from a tenant who lived in my home for three years without paying, and continues to live there today, supported by nonprofit whose attorney has created a case filled with lies, all of which have been ruled in my favor, yet this professional squatter and thief remains in my home. ([LT-321583-23/KI](#))
- The tenant was represented for free by an attorney who deliberately extended the case to the point where a judge restricted her from requesting any more delays. All motions filed were ruled against her, because they were blatant and deliberate lies. After fighting for almost 3 years, I learned that I cannot collect almost \$100k in rent and occupancy, because apparently when the contractor worked on my home he did not file the final C of O and therefore I cannot legally collect rent and occupancy for a 2 bedroom 1.5 bath owners unit. This means I can NEVER rent this unit to a tenant. My children are away at college. I cannot afford to leave this space empty. I have extremely limited income.
- Additionally, the unit that I have that is rentable, I cannot rent because the criminal tenant (she stole my 3 months rent after I generously offered to pay her daughters tuition for 3 months when she could not sell her stolen sneakers and had lost her part time job paying her \$5000 monthly, stating that I did not put a cap on how much she should deduct from the rent. The court has ruled that she needs to repay me the money she stole (SC-001095-23/K1)) that continues to occupy my home rent free and continuously harrasses myself and occupants in the upstairs unit, that no one can live longterm in that unit. Additionally she recently cut the cord for the heating, so the thermostat no longer works. I've spent the last three years trapped in a nightmare at the hands of a professional criminal, and there are hardly words to describe what it has done to my life emotionally and financially while the city drags it feet and nonprofit support these activities.

Despite all of this, I am expected to continue paying my mortgage, taxes, insurance, and repairs with no legal protection similar to what I would have if I were operating a commercial building. With no ability to rent the space long-term due to safety concerns, my only viable option to avoid foreclosure was to temporarily host short-term guests while my family members are in and out because they cannot stay long term due to the ongoing harassment. This choice did not create a "hotel." It kept my family from losing our home by using an apartment that I am currently unable to rent.

### **Why 948-A Is Necessary**

Without this bill, homeowners in my situation face a paradox:

- We cannot safely or reliably rent unused portions of our home because we are legally not allowed to collect rent and occupancy.



- We cannot leave the space unused because we depend on the income to pay for the home.
- We are fined as though we were commercial operators if we use our own property to stay afloat.

This is not tenant protection. It is financial instability for families who lack the economic resources, media presence, or lobbying power to defend themselves.

### **Who Supports This Bill**

Intro 948-A is backed by respected civic and community institutions, including:

- New York State Conference of the NAACP
- Manhattan Chamber of Commerce
- Brooklyn Chamber of Commerce
- National Action Network
- Center for NYC Neighborhoods
- Brooklyn Recovery Coalition
- NYC Housing Partnership
- Dominican American Chamber of Commerce

These organizations work directly with homeowners, small business owners, and communities of color. Their support reflects what this bill actually is: a correction to protect working and middle-class homeowners, not a benefit to corporations. *They know this bill isn't about taking housing from tenants—it's about allowing struggling homeowners to earn modest income from space that cannot be permanently rented, so they can afford to keep their homes.*

### **.Conclusion**

New York's current enforcement against private dwellings treats ordinary homeowners like commercial operators, even though state law makes clear that the two categories are not the same. Intro 948-A restores that legal distinction and allows homeowners to maintain stability without being forced into foreclosure or displacement. It is a targeted solution to a documented problem, written and supported by the very people it affects.

For these reasons, I strongly urge the Council to vote in favor of Intro 948-A. The last hearing made it painfully clear how one-sided this process has been. It prioritized regulators who misrepresented the bill, gave hotel-industry operators a platform to spread misinformation, and offered almost no meaningful opportunity for the actual drafters to explain what the bill truly does. The committee chair conducted the hearing as if she were speaking on behalf of hotel interests, opening with a biased narrative and carrying that tone throughout the proceeding.

We are asking for something simple and fair: to be heard. We are asking for this bill to be discussed openly and truthfully. Because once the facts are presented honestly, there is only one reasonable outcome—passing this bill to protect your constituents – working and middle-class homeowners.

Thank you for your consideration.

**Respectfully submitted,**  
**Tanya Taylor, CPA, MBA**  
27-Year New York City Homeowner  
Brooklyn, NY

## **Testimony of Viren Brahmbhatt**

**Architect & Urban Designer**

**Resident of Chelsea, Manhattan**

**Before the New York City Council**

**Regarding Intro 948 – Boarders, Roomers, and Lodgers in One- and Two-Family Dwellings  
[December 3, 3025]**

Chairperson, Council Members, and members of the Committee:

My name is **Viren Brahmbhatt**, and I am an **architect and urban designer** living in **Chelsea**, Manhattan. Thank you for the opportunity to submit testimony on **Intro 948**, a bill that would expand the number of lodgers permitted in one- and two-family homes and eliminate the requirement for owner presence during rental periods.

I support the bill's goal of helping small homeowners who are struggling under rising costs and who depend on supplemental rental income to remain in their homes. Shared housing is a valuable part of New York City's housing landscape, and thoughtful legislation can promote both affordability and stability.

However, based on my professional experience and my lived experience as a resident of Chelsea, I believe the current draft of Intro 948 could unintentionally create serious challenges—particularly in neighborhoods like Chelsea, Hell's Kitchen, and Midtown West, where dense development, aging building stock, and longstanding pressures from illegal short-term rentals intersect.

### **1. Risks in High-Density, High-Tourism Areas**

Neighborhoods in and around CB4—including Chelsea and Hell's Kitchen—have historically faced intense pressure from short-term rental activity. Many operators converted small buildings into de facto hotels until Local Law 18 enforcement began to curb these practices. Relaxing occupancy limits and removing the owner-presence requirement without additional safeguards risks reopening that door.

Areas near Times Square, Penn Station, and the Theater District are especially vulnerable due to constant tourism demand. Any change that facilitates high-turnover lodging can have disproportionate impacts here compared to lower-density parts of the city.

### **2. Safety Concerns in Older Building Stock**

Chelsea and Hell's Kitchen contain numerous pre-war walk-up buildings with:

- limited fire egress,
- narrow stairwells,
- interior rooms without proper secondary exits, and
- aging electrical and mechanical systems.

Allowing up to four unrelated adults in these spaces—particularly without owner supervision—raises legitimate questions about safe evacuation, overcrowding, and emergency access. As an architect and urban designer, I am especially sensitive to how incremental occupancy changes can have major implications in buildings not designed for higher-density or transient residential use.

### **3. Quality-of-Life and Livability Impacts**

Many blocks in these neighborhoods already experience:

- late-night noise,
- trash overflow,
- foot traffic from nightlife and entertainment uses, and
- ongoing construction and infrastructure strain.

Increasing the number of renters—especially short-term occupants—can intensify these pressures. Frequent turnover also disrupts residential cohesion and stability, something neighbors feel acutely in high-density environments.

### **4. Impact on Long-Term Housing Availability**

Without clear distinctions between long-term and short-term lodgers, property owners may be incentivized to prioritize shorter stays, which typically generate more income. This could reduce the availability of affordable, stable rooms for individuals seeking permanent housing—undercutting one of the bill's potential benefits.

### **5. Need for Effective Enforcement Capacity**

City enforcement agencies already face high caseloads. Without guardrails, Intro 948 could introduce new categories of housing arrangements that are difficult to monitor and regulate, particularly in areas with a history of illegal conversions and non-compliant conditions.

### **Recommendations to Improve the Bill**

To preserve the benefits of shared housing while minimizing negative outcomes, I respectfully urge the Council to consider the following amendments:

**1. Require owner presence for stays under 30 days.**

This is the single most effective safeguard against short-term misuse.

**2. Establish a simple, mandatory registration system.**

A light-touch registry (no inspections required unless complaints arise) would allow the City to track lodgers, ensure accountability, and support enforcement.

**3. Tie maximum lodger count to legal bedrooms or square footage.**

This aligns the law with building safety standards and avoids overcrowding.

**4. Restrict eligibility to primary-residence, owner-occupied homes.**

This prevents commercial operators or LLCs from using the law to run unregulated hotel operations.

**5. Exclude buildings with inadequate fire egress or substandard safety features.**

Safety must be foundational, especially in older walk-ups and non-sprinklered buildings.

**6. Create enhanced rules for high-tourism impact zones.**

Neighborhoods like Chelsea and Hell's Kitchen need additional safeguards such as required registration and owner presence for short stays.

**7. Require basic written house rules for tenants.**

Clear expectations about noise, trash, and safety can reduce conflicts and improve coexistence.

### **Conclusion**

Intro 948 seeks to support small homeowners and expand affordable housing options—goals I fully support. But without additional protections, the bill could unintentionally reintroduce

illegal hotel activity, destabilize residential blocks, jeopardize safety in older buildings, and place new burdens on neighborhoods already under strain.

With the targeted amendments outlined above, the Council can achieve a balanced approach that helps homeowners while protecting the health, safety, and stability of New York's communities.

Thank you for your time and for your commitment to responsible housing policy. I appreciate the opportunity to submit this testimony and am available for any questions or follow-up.

Sincerely,

Viren Brahmbhatt

Architect & Urban Designer

Resident of Chelsea, Manhattan

# HOW LL18 HURTS EVERYDAY FAMILIES

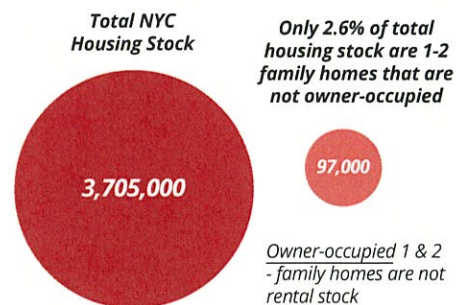
## Key Restrictions Under LL18:



## Impact On Families:

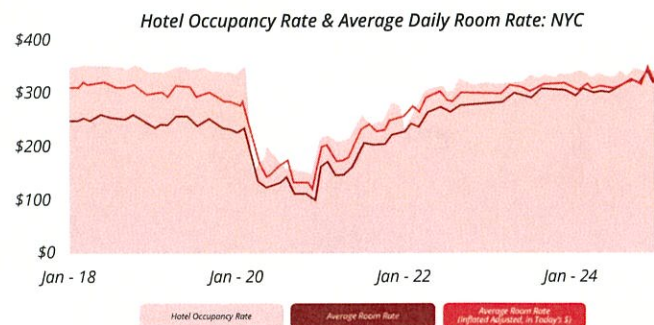
### 01 Rising property costs, taxes, insurance      02 Multi-generational families losing flexibility

There are 466,000 single family homes, of which 378,000 (81%) are owner-occupied. There are 225,000 2-family homes, of which 216,000 (96%) are owner-occupied. Together, the 594,800 owner occupied 1-2 family homes in NYC makes up only 16% of the city's housing and none of them are part of the rental stock. These homes are concentrated in the outer boroughs, while only 20% of NYC's 135,000 hotel rooms are located there. As a result, families in Brooklyn, Queens, Bronx, and Staten Island have almost no nearby or affordable options when hosting visiting relatives or friends.



## Impact on Hotels, Renters, Homeowners:

### 01 Hotels enjoyed higher revenues as room prices and occupancy rates increased. 02 Rental affordability did not improve for tenants despite LL18. 03 Homeownership costs increased



### A Small Comparison

	Before LL18	After LL18	% Change
Hotel Occupancy	80%	86%	
Average Hotel Room Rate	\$280	\$318	+14%
NYC Hotel Revenue	\$2.1B	\$2.9B	+38%
Median Asking Rent	\$3,290	\$3,495	+6%
Average Rental Vacancy Rates	1.4%	1.4%	Unchanged
Average Home Insurance Premium	\$1,514	\$1,950	+22%
Average Price for Electricity	23 cents per kWh	27 cents per kWh	+17%



# INTRO 948A

## - A FAIR, FAMILY-FRIENDLY SOLUTION

### What Intro 948A allows:



### Who benefits:

**81%**

Located in Brooklyn, Queens, Staten Island, and Bronx

**69%**

Has owned their homes for 6-30+ years

**53%**

Are People of Color

**82%**

Are older than 40 years old (20% older than 60)

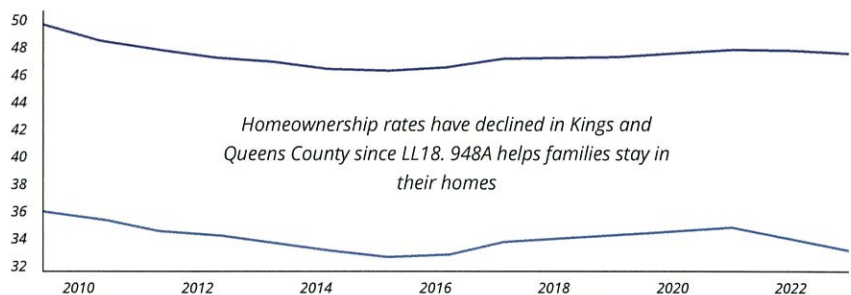
**52%**

Make less than \$125,000 per year

*Note:  
Based on a survey of 1-2 family homeowners who home share*

**Protects neighborhoods**

**Keeps families housed**



Home Ownership Rates  
(5 Year Estimate) for Queens County, NY

Home Ownership Rates  
(5 Year Estimate) for Kings County, NY

### Why it works:

**01**

Does not impact rental housing supply

**02**

Supports responsible home-sharing, not corporations

**03**

Helps families stay housed

**04**

Stabilizes neighborhoods