

EXPLANATORY STATEMENT - HOTEL ORDER #52

Explanatory Statement and Findings of the Rent Guidelines Board in Relation to 2022-23 Lease Increase Allowances for Hotels under the Jurisdiction of the Rent Stabilization Law

Explanatory Statement and Findings of the Rent Guidelines Board Concerning Increase Allowances for Hotel Units Under the Jurisdiction of the Rent Stabilization Law, Pursuant to Hotel Order Number 52, Effective October 1, 2022 through and including September 30, 2023.¹

Pursuant to the authority vested in it by the Rent Stabilization Law of 1969 and the Emergency Tenant Protection Act of 1974, implemented by Resolution Number 276 of 1974 of the New York City Council, and extended by the Housing Stability and Tenant Protection Act of 2019, it is the responsibility of the Rent Guidelines Board to establish guidelines for hotel increases. Hotel Order Number 52, adopted on June 21, 2022, applies to stabilized hotel units occupied by non-transient tenants.

Hotel Order Number 52 provides for an allowable increase of **0%** over the lawful rent actually charged and paid on September 30, 2022 for rooming houses, lodging houses, Class B hotels, single room occupancy buildings, and Class A residential hotels. The Order does not limit rental levels for commercial space, non-rent stabilized residential units, or transient units in hotel stabilized buildings during the guideline period. The Order also provides that for any dwelling unit in a hotel stabilized building which is voluntarily vacated by the tenant thereof, the rent charged for a new tenancy may not exceed the rent charged on September 30, 2022.

SPECIAL NOTE

In the past the Board has adopted rent increases to the rent stabilized hotel universe. In recent years, when increases were granted, the Board adopted a proviso that was designed to deny owners from taking these increases under certain conditions. Since the Board voted a 0% increase for all classifications of rent stabilized hotels, this proviso is not included in Hotel Order 52. In the event that increases are considered for subsequent Hotel Orders, at such time the current members of the Rent Guidelines Board urge future Boards to consider reinstating this proviso or some form thereof. Below is the proviso and explanatory language previously adopted in Hotel Order 41:

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

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

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

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

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

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

DEFINITIONS

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

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

BACKGROUND

Due to the COVID-19 health crisis, the Board held both virtual and in-person public meetings and hearings.² Order No. 52 was issued following **six** virtual public meetings, **one** in-person

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

public meeting, **two** virtual public hearings, **two** in-person public hearings, its review of written, oral and video submissions provided by the public, and a review of research and memoranda prepared by the Board's staff. Public meetings of the Board were held on March 31, April 14, 20 and 26; and May 26, 2022 following public notices. On May 5, the Board adopted proposed rent guidelines for hotels, apartments, and lofts.

Two virtual public hearings were held on June 6 and June 8, 2022 to hear comments on the proposed rent adjustments for rent stabilized hotels and apartments. Two in-person public hearings were held on June 13 and June 15, 2022. The hearings were held from 2:00 p.m. to 5:00 p.m. on June 6; 6:00 p.m. to 9:09 p.m. on June 8; 5:30 p.m. to 9:00 p.m. on June 13; and from 4:15 p.m. to 9:02 p.m. on June 15. The Board heard testimony from approximately one hotel tenant and tenant representative, no hotel owners, and one public official. In addition, the Board received approximately zero written, oral and video submissions from tenants and tenant representatives, zero hotel owners, and zero public officials. On June 21, 2022, the guidelines set forth in Hotel Order Number 52 were adopted.

Selected Oral and Written Testimony from Tenants and Tenant Groups:

- “The conditions warranting the Board’s vote last year in favor of a 0% rent increase for SROs remain unchanged. Last year we testified at this Board regarding the lack of resources and housing alternatives for SRO tenants, the profitable uses that owners of SRO buildings make of their properties without renting to permanent tenants, and how we witnessed the COVID-19 pandemic disproportionately affect SRO tenants and how we anticipated it to continue to impact them. These conditions remain unchanged and in fact they’re worse.”
- “SRO tenants often live in barely habitable units and these are very minimal living standards....SRO units are often considered housing of last resort. Raising rents on such small places, which only continue to worsen, seems morally wrong.”
- “These economic impacts, which may seem minimal to some, can be the difference between being housed and being homeless for many of our clients, as they’re already paying a substantial portion of their income towards rent and often are on fixed incomes, any increase to their rent, coupled with other increased expenses, can make them unable to afford to live or pay for the necessities.”
- “The low vacancy rates in NYC suggest building owners have little trouble renting out other units for permanent tenants. However, SRO owners have found more profitable uses of their properties that allow them to reap higher profits and further depleting the availability of affordable housing stock.”
- “I’ve been testifying here over...three decades, before the Rent Guidelines Board, with and on behalf of SRO tenants and honestly I’m just here to thank you for the preliminary vote for the zero guideline for SROs....There’s only a diminishing number of tenants in these remaining SROs, we estimate anywhere between 10 and 15 thousand, it’s hard to know. There’s only less than 1% of rent stabilized tenants out there, but they’re also some of the poorest and live in not the greatest conditions in those tiny rooms and I know you’ve recognized that SROs are highly profitable because of the transient rentals and the money they

and later transcribed.” The state of emergency that resulted in Executive Order Number 202 was extended on numerous occasions and was still in affect through June 14, 2022, allowing public bodies to continue to meet remotely.

get from colleges, tourists, and the City placements and therefore you've done a zero guideline for a number of years and I want to thank you..”

Selected Oral and Written Testimony from Owners and Owner Groups:

- None Submitted

Selected Oral and Written Testimony from Public Officials:

- “I strongly support not voting for a rent increase for another year, freezing the rent as we have in the past and certainly to continue for the single room occupancy and the lodging house tenants, because they are the most vulnerable residents and there aren’t many of them left.”

MATERIAL CONSIDERED BY THE BOARD

In addition to oral and written testimony presented at its public hearing, the Board’s decision is based upon material gathered from the *2022 Price Index of Operating Costs* and *2022 Hotel Report*, prepared by the staff of the Rent Guidelines Board, reports and testimony submitted by owner and tenant groups relating to the hotel sector, and reports submitted by public agencies. The Board heard and received written testimony from invited guest speakers on April 26, 2022. Guest speakers representing hotel tenants included Richard Velasquez from the Goddard Riverside Law Project.

FINDINGS OF THE RENT GUIDELINES BOARD

Rent Guidelines Board Research

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

1. *2022 Mortgage Survey Report*, April 2022 (An evaluation of recent underwriting practices, financial availability and terms, and lending criteria);
2. *2022 Income and Affordability Study*, April 2022 (Includes employment trends, housing court actions, changes in eligibility requirements and public benefit levels in New York City);
3. *2022 Price Index of Operating Costs*, April 2022 (Measures the price change for a market basket of goods and services which are used in the operation and maintenance of stabilized hotels);
4. *2022 Hotel Report*, April 2022 (Includes data on rent stabilized hotels derived from NYS Homes and Community Renewal registration files, illegal hotel violations, and the number of Certifications of No Harassment);
5. *2022 Housing Supply Report*, May 2022 (Includes information new housing construction measured by certificates of occupancy in new buildings and units authorized by new building permits, tax abatement and exemption programs, and cooperative and condominium conversion and construction activities in New York City); and

6. *Changes to the Rent Stabilized Housing Stock in NYC in 2021*, June 2022 (A report quantifying all the events that lead to additions to and subtractions from the rent stabilized housing stock).

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

Price Index of Operating Costs for Rent Stabilized Hotel Units

The Hotel Price Index includes separate indices for each of three categories of hotels that contain rent stabilized units (due to their dissimilar operating cost profiles) and a general index for all Hotels that includes all three. The three categories of hotels are: 1) "Traditional" Hotels — a Class A multiple dwelling that has amenities such as a front desk, maid or linen services; 2) Rooming Houses — a Class B multiple dwelling other than a hotel with thirty or fewer sleeping rooms; and 3) Single Room Occupancy (SROs) hotels — a Class A multiple dwelling which is either used in whole or in part for single room occupancy or as a furnished room house.

The Hotel Price Index for all hotels that contain rent stabilized units decreased 1.3% this year, a 3.2 percentage point decline from the 1.9% rise in 2021.

This year there were increases in all of the Hotel PIOC components except Taxes, which fell 14.0% and account for 42% of the entire Hotel Index. The Fuel component increased, rising 15.0% and accounts for 13% of the index. Insurance Costs rose by the second greatest proportion, 10.9%, and account for 6% of the index. The remaining four components all rose by lesser proportions, including Maintenance, which rose 7.6%; Utilities, 7.0%; Labor Costs, 3.6%; and Administrative Costs, 2.7%. See the table on this page for changes in costs and prices for all hotels that contain rent stabilized units from 2021-2022.

Among the different categories of Hotels, the index for "Traditional" Hotels decreased 6.0%, while Rooming Houses increased by 4.6% and SROs increased by 3.6% .

Percent Change in the Components of the Price Index of Operating Costs April 2021 to March 2022, By Hotel Type and All Hotels

Item Description	All Hotels	Hotel	Rooming House	SRO
TAXES	-14.0%	-17.4%	-3.0%	-13.1%
LABOR COSTS	3.6%	3.5%	3.8%	4.0%
FUEL	15.0%	14.2%	18.0%	15.8%
UTILITIES	7.0%	5.6%	8.9%	7.1%
MAINTENANCE	7.6%	7.2%	7.7%	8.8%
ADMINISTRATIVE COSTS	2.7%	2.0%	4.7%	4.2%
INSURANCE COSTS	10.9%	10.9%	10.9%	10.9%
ALL ITEMS	-1.3%	-6.0%	4.6%	3.6%

Source: 2022 Price Index of Operating Costs

Changes in Housing Affordability

NYC's economy in 2021 showed many strengths as compared with the preceding year. Positive indicators include rising employment levels, which increased by 2.1%.³ Gross City Product also increased, rising in inflation-adjusted terms by 5.6% in 2021.⁴ The unemployment rate fell, decreasing by 2.5 percentage points, to 9.9%.⁵ Both average wages and total wages increased in the most recent 12-month period, rising by an inflation-adjusted 6.8% and 3.2%, respectively.⁶ Personal bankruptcy filings also fell in 2021, dropping 24.2%, to their lowest level since at least 2000.⁷ Concurrent with various eviction moratoriums, homeless levels also fell for the third consecutive year, by 14.4%,⁸ as did evictions (which fell by 95.5%),⁹ and both non-payment filings and non-payment calendared cases in Housing Court (which fell by 47.8% and 54.2%, respectively).¹⁰

However, negative indicators include an increase in caseloads for cash assistance of 2.3%; for SNAP (food stamps) of 5.3%; and for Medicaid of 2.5%.¹¹ In addition, while many indicators are positive as compared to 2020, this is not necessarily the case when measured against 2019 (the last full year preceding the pandemic). Inflation-adjusted GCP was slightly lower in 2021 than 2019, while the unemployment rate is much higher and employment levels are much lower. It is also expected that both non-payment filings and evictions will increase sharply by the end of 2022, following the end of the eviction moratorium.

The most recent quarter for which there is comprehensive data is the fourth quarter of 2021. As compared to the fourth quarter of 2020, the fourth quarter of 2021 shows many positive indicators, including the unemployment rate, down 5.8 percentage points; employment levels, up 5.8%; GCP, up 4.0% in real terms; homeless levels, down 15.0%; cash assistance caseloads, down 1.3%; Medicaid enrollees, down 0.1%; and in Housing Court, the number of non-payment filings, down 61.9% and the number of non-payment cases heard (calendared), down 75.0%.¹² However, SNAP caseloads are up 0.5%.

Fourth quarter data can also be analyzed in relation to the third quarter of 2021, to illustrate more recent trends. As based on seasonally adjusted employment data, there was a decrease of 1.5 percentage points in the NYC unemployment rate in the fourth quarter of 2021 as compared to the third, and an increase of 1.9% in total employment. There was also a decrease of 1.7% in SNAP caseloads, 1.6% in Medicaid enrollees, and 15.8% in non-payment calendared cases in Housing Court. GCP in real terms also increased on an annualized basis, up by 1.9%. However, homeless levels were up 1.3%; cash assistance caseloads were up

³ NYS Dept. of Labor; <http://www.labor.state.ny.us>; Data accessed March 2022. Data is revised annually and may not match data reported in prior years.

⁴ Data from the Office of the NYC Comptroller as of March, 2022. GCP figures are adjusted annually by the Office of the NYC Comptroller. The figures in this report are the latest available estimate from that office, based on inflation-adjusted 2012 chained dollars.

⁵ NYS Dept. of Labor; <http://www.labor.state.ny.us>; Data accessed March 2022. Data is revised annually and may not match data reported in prior years.

⁶ NYS Department of Labor: <https://dol.ny.gov/>. Data is preliminary.

⁷ Administrative Office of the U.S. Courts: <https://www.uscourts.gov/statistics-reports/caseload-statistics-data-tables>.

⁸ NYC Department of Homeless Services daily reports.

⁹ NYC Department of Investigation, Bureau of Auditors data.

¹⁰ ST-30 reports from the Civil Court of the City of New York.

¹¹ New York City Human Resources Administration. HRA Charts: <http://www.nyc.gov/html/hra/html/facts/charts.shtml>.

¹² This data is obtained from the Civil Court of the City of New York, which cannot provide exact "quarterly" data. The Court has 13 terms in a year, each a little less than a month long. This data is for terms 10-13, which is from approximately the middle of September through the end of the year. It is compared to the same period of the prior year.

3.4%; and in Housing Court, non-payment filings were up 11.8% in the fourth quarter of 2021 as compared to the third.

Consumer Price Index

The Board reviewed the Consumer Price Index. The table that follows shows the percentage change for the NY-Northeastern NJ Metropolitan area since 2014.

Percentage Changes in the Consumer Price Index for the New York City - Northeastern New Jersey Metropolitan Area, 2014-2022 (For "All Urban Consumers")									
	2014	2015	2016	2017	2018	2019	2020	2021	2022
1st Quarter Avg. ¹³	1.4%	-0.2%	0.7%	2.5%	1.6%	1.5%	2.3%	1.5%	5.5%
Yearly Avg.	1.3%	0.1%	1.1%	2.0%	1.9%	1.7%	1.7%	3.6%	N/A

Source: U.S. Bureau of Labor Statistics.

Effective Rates of Interest

The Board took into account current mortgage interest rates and the availability of financing and refinancing. It reviewed the staff's *2022 Mortgage Survey Report* of lending institutions. The table below gives the reported rate and points for the past ten years as reported by the *Mortgage Survey*.

2022 Mortgage Survey ¹⁴ Average Interest Rates and Points for New and Refinanced Permanent Mortgage Loans 2013-2022										
New Financing of Permanent Mortgage Loans, Interest Rate and Points										
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Avg. Rates	4.4%	4.9%	4.3%	4.0%	4.3%	4.8%	4.7%	4.0%	3.8%	3.9%
Avg. Points	0.59	0.54	0.70	0.42	0.44	0.44	0.38	0.22	0.38	0.32

Source: 2013-2022 Annual Mortgage Surveys, RGB.

NYS Homes and Community Renewal (HCR) Registration Data for Rent Stabilized Hotels

An analysis of 2020/2021 HCR registration data identified registration records for 81 hotels and 231 rooming houses (a total of 312 buildings). These 312 buildings contained 5,394 hotel units and 4,794 rooming house units (a total of 10,188 units). Slightly less than half of these units (5,037) were registered as "rent stabilized," with most units including corresponding rent data. The balance of the units (5,151) were registered as either vacant or exempt. For those units where rent data is reported, the median legal rent is \$745 for hotels and \$1,161 for rooming

¹³ 1st Quarter Average refers to the change of the CPI average of the first three months of one year to the average of the first three months of the following year.

¹⁴ Institutions were asked to provide information on their "typical" loan to rent stabilized buildings. Data for each variable in any particular year and from year to year may be based upon responses from a different number of institutions.

houses (with an overall median of \$864). The average legal rent is \$1,033 for hotels and \$1,086 for rooming houses (with an overall average of \$1,066). The median “rent received” (the legal rent, except in cases where there is a preferential rent provided) is \$725 for hotels and \$941 for rooming houses (with an overall median of \$800). The average “rent received” is \$790 for hotels and \$981 for rooming houses (with an overall average of \$908). In addition, a longitudinal analysis of the change in rent in the same set of units in both 2020 and 2021 shows that the median legal rent was unchanged in hotels, rose 1.5% in rooming houses, and fell 0.3% overall. The average legal rent in the longitudinal sample rose 1.2% in hotels, 0.1% in rooming houses, and 0.4% overall. For the “rent received” by owners in the longitudinal sample, the median was unchanged in hotels, and fell 2.0% in rooming houses and 0.2% overall. Average “rent received” in the longitudinal sample rose 2.2% in hotels, fell 0.3% in rooming houses, and rose 0.6% overall.¹⁵

SRO Housing and Airbnb Rentals

SRO owners may convert SRO housing to other uses after obtaining a “Certification of No Harassment” (CONH) from the NYC Department of Housing Preservation and Development (HPD). After falling by 69.6% in 2020 (to 34), the number of CONHs granted by HPD rose in 2021, by 85.3% (to 63).¹⁶

Efforts are also underway to ensure that units meant to provide permanent housing are not used as transient hotels. As of May 1, 2011, a law was passed clarifying that Class A multiple dwellings were only to be used for occupancy of 30 consecutive days or more,¹⁷ and on October 2, 2012, a companion law was passed strengthening the City’s ability to crack down on housing being used illegally for transient occupancy.¹⁸ In addition, a bill in October of 2016 authorized fines up to \$7,500 for illegally advertising short-term rentals in Class A Multiple Dwellings.¹⁹ In 2021, 2,760 violations were issued by the Mayor’s Office of Special Enforcement (OSE) for the illegal rental of units for short-term use (including apartments, hostels, and SROs), an increase of 80.7% from 2020. The majority of violations, 1,507 (54.6%) were for dwelling units in Manhattan, with 716 violations in Brooklyn (25.9% of the total); 472 violations in Queens (17.1% of the total); 59 violations in the Bronx (2.1% of the total); and 6 in Staten Island (0.2% of the total).²⁰ Between May of 2011 and December of 2021, approximately 23,000 violations have been issued by this agency as part of its efforts to address illegal short-term rentals.

In January of 2022, another law was enacted to help curb the use of permanent housing for short-term rentals. The law, which takes effect in January of 2023, requires anyone wishing to operate as a host of a short-term rental (a rental of less than 30 days) to register with OSE and receive a registration number. Registration numbers will not be issued by OSE unless the unit meets the requirements of a valid short-term rental, as defined by law. The law also prohibits the registration of rent regulated units, and allows building owners to certify that short-term rentals are not allowed in their building, thereby preventing OSE from issuing a registration number to an individual tenant of such a building. In addition, upon receipt of registration applications from renters, OSE will notify the owner of record of the dwelling unit/building. The

¹⁵ 2020 and 2021 NYS Homes and Community Development apartment registration files.

¹⁶ NYC Department of Housing Preservation and Development.

¹⁷ Press Release, Mayor’s Office. “Mayor Bloomberg Announces Results of City’s Efforts to Curb Dangerous Illegal Hotels in New York City After State Legislation Enhances Enforcement Abilities.” April 27, 2012.

¹⁸ Local Law No. 45 of 2012 (Council Int No. 404-A of 2010).

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

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

law also requires that booking services (such as Airbnb, and other similar platforms) verify that listings are properly registered with OSE before they can take a fee.²¹

OTHER RELEVANT INFORMATION

The NYS Division of Housing and Community Renewal released a memo to the Board dated May 25, 2022 in which they outline information from their registration database relating to Hotels/SROs/Rooming Houses. The following is an excerpt from that memo (Pages 4-5):

9. What is the total number of SRO/Hotel units registered with the DHCR in 2021? How many of these units are rent stabilized? How many are temporarily and permanently exempt? How many are registered as transient? How many as vacant?

Rent Stabilized Units	9,149
Vacant Units	1,616
Temporary Exempts Units	4,880
Permanent Exempt Units	25
Total Number of Units	15,670

10. What is the total number of SRO/Hotel units registered with the DHCR on an annual basis from 2009-2021?

- In 2009 the total number of units registered was 25,336
- In 2010 the total number of units registered was 26,322
- In 2011 the total number of units registered was 25,746
- In 2012 the total number of units registered was 25,113
- In 2013 the total number of units registered was 23,244
- In 2014 the total number of units registered was 23,533
- In 2015 the total number of units registered was 23,013
- In 2016 the total number of units registered was 21,649
- In 2017 the total number of units registered was 21,345
- In 2018 the total number of units registered was 21,142
- In 2019 the total number of units registered was 20,136
- In 2020 the total number of units registered was 18,803 and
- In 2021 the total number of units registered was 15,670

11. What is the average and median rent for rent stabilized SRO/Hotel units in 2021?

- The average rent stabilized rent for SRO/Hotel units in 2021 is \$1,173.56; the median rent is \$1,238.31.

[END OF MEMO]

²¹ New York City Local Law 18 of 2022 (Int 2309-2021).

VOTE

The vote of the Rent Guidelines Board on the adopted motion pertaining to the provisions of Order Number 52 was as follows:

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

Dated: June 21, 2022

Filed with the City Clerk: June 29, 2022



David Reiss
Chair
NYC Rent Guidelines Board

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Written, oral and video submissions by tenants, tenant organizations, owners, and owner organizations.