

January 23, 2025

The Honorable Adrienne Adams
New York City Council Speaker
250 Broadway
New York City, NY

The Honorable Pierina Ana Sanchez
New York City Council Member, Chair of the Committee on Housing and Buildings
250 Broadway
New York City, NY

Dear Speaker Adrienne Adams and Housing Chair Pierina Ana Sanchez,

We, the undersigned organizations, stand united as **Tenants Not Tourists**, a coalition committed to protecting New York City's housing stock for the people who live here—not for the short-term profits for multi-billion-dollar tech companies and real estate speculators. Our name reflects our belief that housing should serve tenants and communities, not be transformed into transient accommodations at the expense of long-term stability.

We strongly oppose **Intro 1107**, a bill introduced in the New York City Council that threatens to dismantle key tenant protections and exacerbate the housing crisis in New York City. This proposed legislation undermines the progress made by **Local Law 18 of 2022**, which was enacted to address illegal short-term rentals (STRs) and protect the city's housing for long-term residents.

It is critical to clarify that **Local Law 18 did not change the law around short-term rentals in New York City—it only strengthened enforcement mechanisms**. STRs that violate zoning or housing regulations have long been illegal. However, for years, landlords and homeowners engaging in these practices faced minimal accountability. Local Law 18 created a registration system to ensure compliance with existing laws, finally giving the City tools to enforce these long standing regulations.

The proposed **Intro 1107** would carve out an exemption from enforcement for owners of 1- and 2-family homes. It does not change the underlying laws but instead weakens the City's ability to hold violators accountable. This carve-out undermines the integrity of Local Law 18 and sets a dangerous precedent for further erosion of tenant protections.

Key Concerns with Intro 1107:

1. Housing Stock at Risk:

- Implementation of Local Law 18 has already resulted in significant decreases in STRs, particularly in gentrifying neighborhoods like Bedford-Stuyvesant, where Airbnb listings

have dropped by 80%. As reported in an article by *The City* titled “These Bed-Stuy Blocks Lost 80% of Their Airbnbs After NYC’s Short-Term Rental Crackdown,” **many Airbnb hosts in Bedford-Stuyvesant have transitioned to long-term rentals, finding tenants whose rent sufficiently covers property taxes and mortgage payments.** The article provides a detailed look at the impact of Local Law 18, enacted to regulate short-term rentals and ensure hosts register with the city.

- Intro 1107 threatens to reverse these gains, potentially converting up to **29% of NYC’s housing stock** into tourism use, worsening the housing shortage and driving up homelessness.

2. Disproportionate Impact on Black and Brown Communities:

- Black and Brown New Yorkers have faced decades of systemic housing discrimination, from redlining to predatory lending to displacement caused by gentrification. Airbnb has contributed to this displacement by encouraging the removal of housing units from the rental market, disproportionately affecting communities of color.
- Between 2010 and 2020, **more than 200,000 Black New Yorkers left the city**, with gentrification and housing scarcity playing significant roles. Airbnb-fueled speculation has made entire neighborhoods unaffordable, driving Black and Brown tenants out of their communities.
- Black New Yorkers now make up **56% of heads of household in shelters**, highlighting the devastating impact of the housing crisis.

3. Risk of Predatory Speculation:

- The passage of Intro 1107 would open the floodgates for **private equity firms and predatory investors** to exploit housing stock. Across the U.S., private equity firms have aggressively purchased single-family homes (over 44% of the purchases of single-family homes in 2023 were by private equity firms), often converting them into STRs. If Intro 1107 passes, these firms will likely target 1- and 2-family homes in New York City, especially in neighborhoods of color, further driving displacement.
- Predatory investors often create multiple LLCs to obscure ownership and circumvent enforcement, transforming communities into transient tourist hubs. Intro 1107 would incentivize this behavior, putting entire neighborhoods at risk of speculative buyouts and destabilization.
- Communities of color, particularly in Brooklyn and the Bronx, would bear the brunt of this speculative activity. These neighborhoods, already vulnerable to gentrification, could see a surge in home purchases by investors aiming to capitalize on STR revenue.

4. A Misguided and Misdirected Solution:

- Homeowners arguing for STR income as a financial lifeline ignore the broader harm to tenants and communities. If small homeowners need assistance to stay in their homes, the solution should come from government programs—such as grants or interest-free loans—not at the expense of housing stability for others.

- This carve-out for 1- and 2-family homes undermines the principle of equitable enforcement. **Weakening enforcement creates loopholes that speculators and bad actors will exploit, worsening the housing crisis for tenants. This also risks shutting out future Black and Brown New Yorkers from homeownership, as they would be forced to compete with lucrative private equity firms eager to capitalize on the housing market.**

We deeply appreciate your leadership and your commitment to addressing the concerns of tenants and prioritizing housing stability for New Yorkers. Thank you for listening to the voices of those most impacted by the housing crisis and for working to ensure that New York City remains a place where tenants, not tourists, come first.

Sincerely,

Allerton Avenue Homeowners & Tenant Association
 Allerton Barnes Block Association
 Astoria Tenants Union
 Carroll Gardens Association
 Churches United for Fair Housing (CUFFH)
 Citizen Action of NY
 Coalition Against Illegal Hotels
 Coalition for Asian American Children and Families
 Communities Resist
 Community Service Society
 Community Voices Heard
 Coney Island Empowered Citizens
 Crown Heights Tenant Union
 El Puente
 Faith in New York
 Friends of Pelham Parkway
 Housing Conservation Coordinators
 Housing Justice for All
 Housing Organizers for People Empowerment (HOPE)
 IMPACCT Brooklyn
 Inside Airbnb
 Jews for Racial and Economic Justice (JFREJ)
 Make the Road
 Met Council on Housing
 Morris Park Community Association
 National Federation of Filipino American Associations (NaFFAA)
 National Organization for Women at Hunter College
 New York Communities for Change (NYCC)
 New York Immigration Coalition (NYIC)
 Pelham Parkway Neighborhood Association (PPNA)
 Pratt Center for Community Development

Ridgewood Tenants Union
Save 63 Tiffany
Southwest Brooklyn Tenant Union
Sunset Park Votes
TenantsPAC
The Action Lab
The Legal Aid Society
Urban Homesteading Assistance Board (UHAB)
Van Nest Neighborhood Alliance (VNNA)
VOCAL-NY
Woodside on the Move
Young Invincibles