



# The State of 2024 NYC Violations

How city agencies are issuing infractions compared to previous years – and how your team can avoid them.

# Where are compliance enforcement trends headed?

Last year's Insights report showed that OATH and HPD violations in 2023 were still on the rise, outpacing pre-pandemic issuances in 2019. This year's report confirms high 2023 violation counts – but shows a different trend for 2024, so far.

So what does that mean for your buildings? And how can you use that information to prevent outsized compliance penalties?

Read on to find out more about this year's numbers, including:

- Which OATH-related agency is still seeing increases in 2024?
- Is March Madness still a thing for violations?
- **NEW FOR THIS YEAR:** Which violations are seeing the biggest fines for each agency?

## TABLE OF CONTENTS

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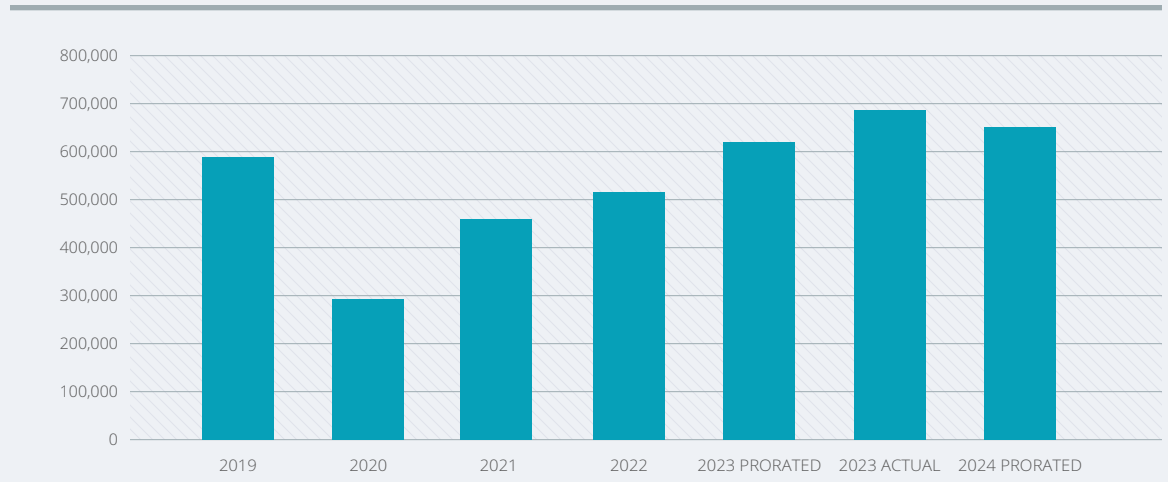
OATH Overall	2
<hr/>	
Agency By Agency	
<hr/>	
▪ DOB	8
<hr/>	
▪ Sanitation	13
<hr/>	
▪ DOHMH	19
<hr/>	
▪ FDNY	24
<hr/>	
▪ Residential Focus - HPD	28
<hr/>	
Beyond The Numbers	33
<hr/>	



# OATH Overall

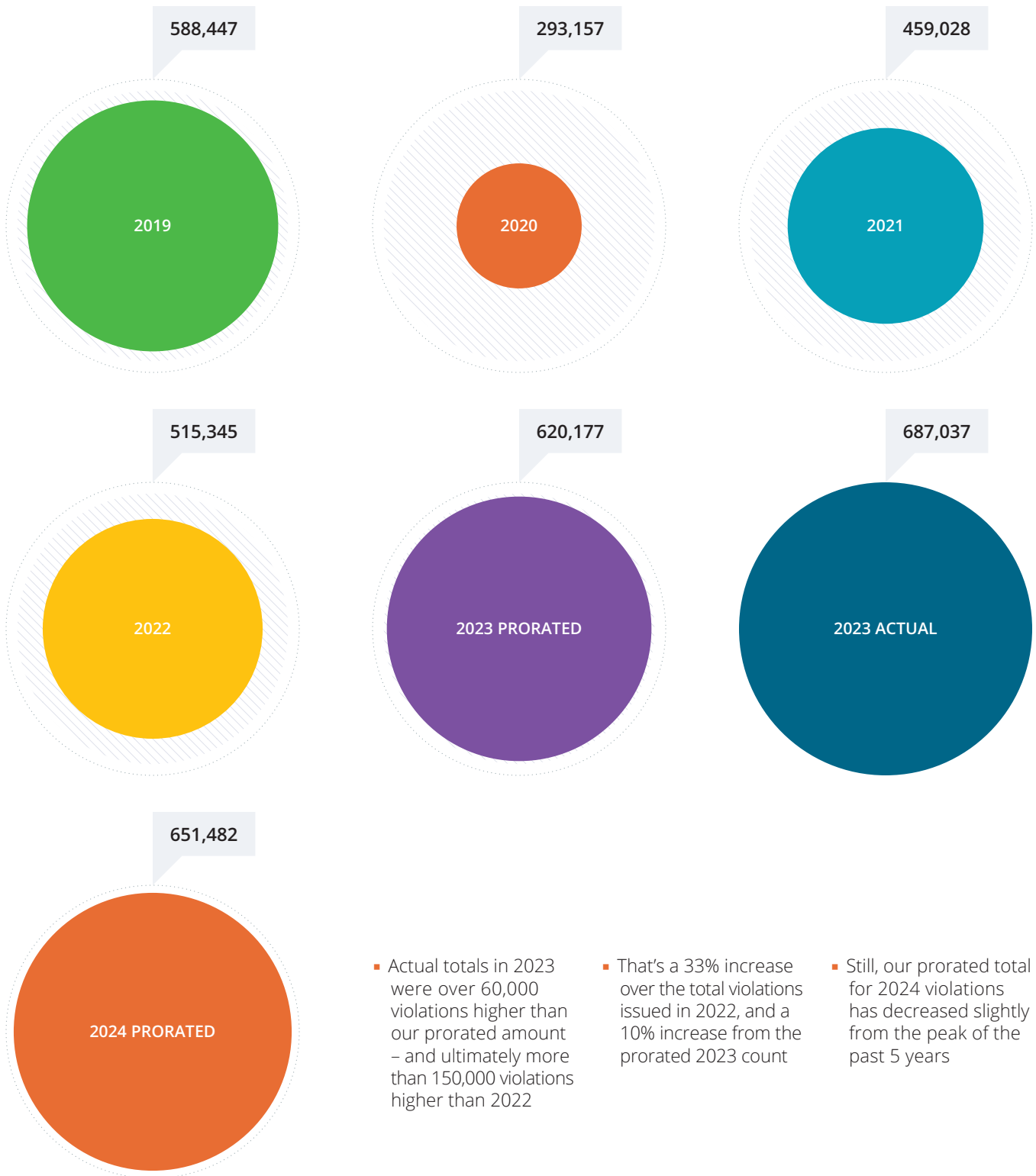
Citywide and borough-by-borough trends give us a good idea of where the numbers will stand for all agencies at the end of 2024.

## OATH Violation Count By Year



\*2023 Prorated was the figure reported in our 2023 Insights report, which is then provided alongside the final 2023 figures that are known today and the latest 2024 Prorated figure.

Here's a different visual representation of violation counts since 2019, including our prorated total from 2023, the actual year-end total, and our prorated total for 2024:



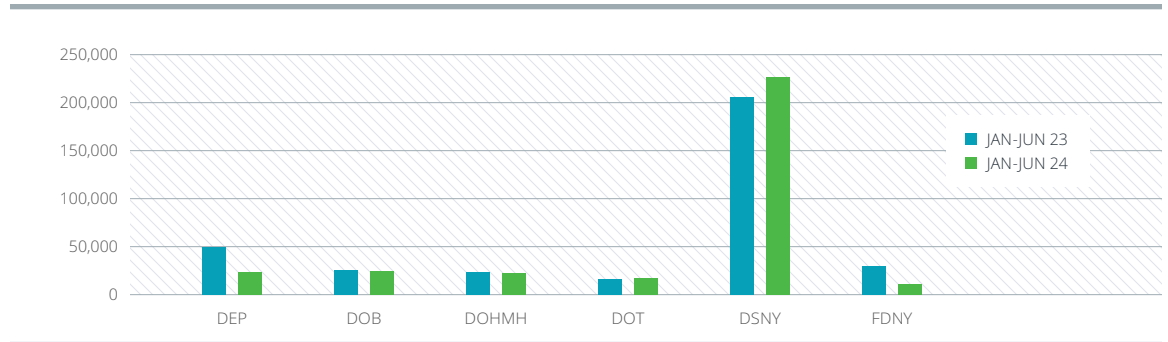
- Actual totals in 2023 were over 60,000 violations higher than our prorated amount – and ultimately more than 150,000 violations higher than 2022
- That's a 33% increase over the total violations issued in 2022, and a 10% increase from the prorated 2023 count
- Still, our prorated total for 2024 violations has decreased slightly from the peak of the past 5 years

\*Prorated total based on average monthly violation counts issued in H1 2023 (January – June).

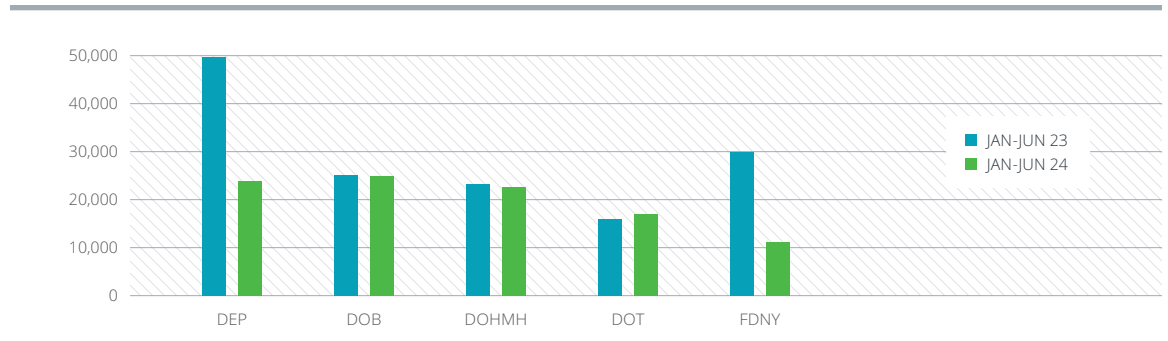
# Deep Dive: Year-Over-Year Comparison

Let's take a look at the first half of 2023 (January - June) compared to the first half of 2024, broken down by agency:

## H1 Comparisons - 2023 vs. 2024 By Agency



## H1 Comparisons - 2023 vs. 2024 By Agency Without DSNY



## Year-Over-Year Change For H1 By Agency - 2023 vs. 2024

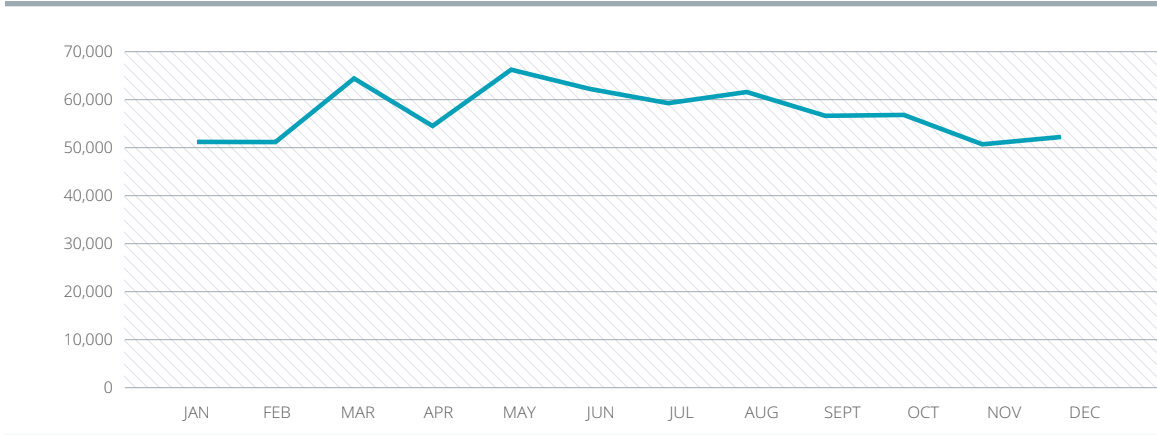
AGENCY	DEP	DOB	DOHMH	DOT	DSNY	FDNY
Change in violation issuances from 2023 to 2024, Jan - Jun	↓ -52%	↓ -1%	↓ -3%	↑ 7%	↑ 10%	↓ -63%

This is a big change from last year, where only the DOB was down. Now, the DOB has little change from their 2023 numbers, and agencies like DEP and FDNY have significantly decreased totals.

We won't do a deep dive into the DEP and DOT – mainly because a number of these violations are related to vehicles or other entities and not related to properties, specifically.

# Violation Trends From Month-to-Month

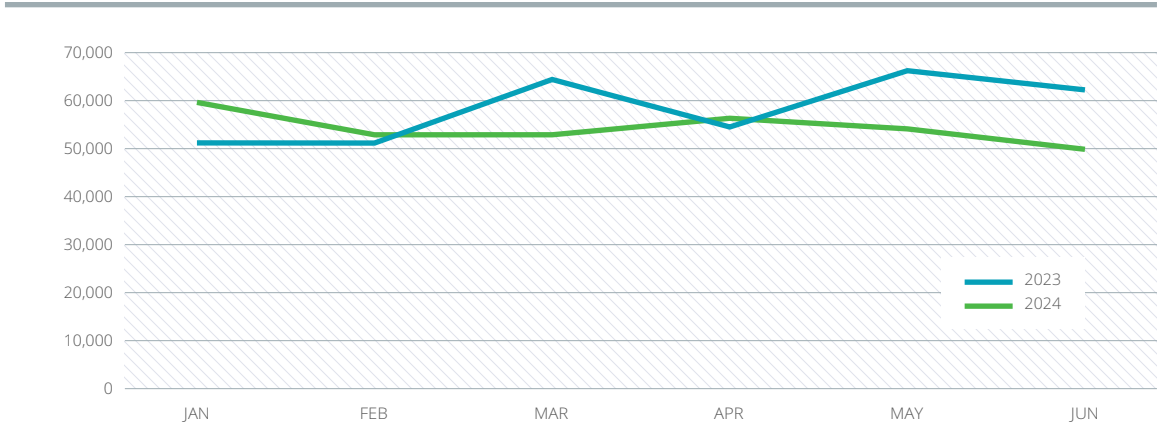
## 2023 Monthly Violation Counts



March (and even more so, May) madness started 2023 on a high point, but monthly totals dropped off afterwards. Still – only one month surpassed 50,000 violations in 2022 (December). That count was exceeded every single month in 2023.

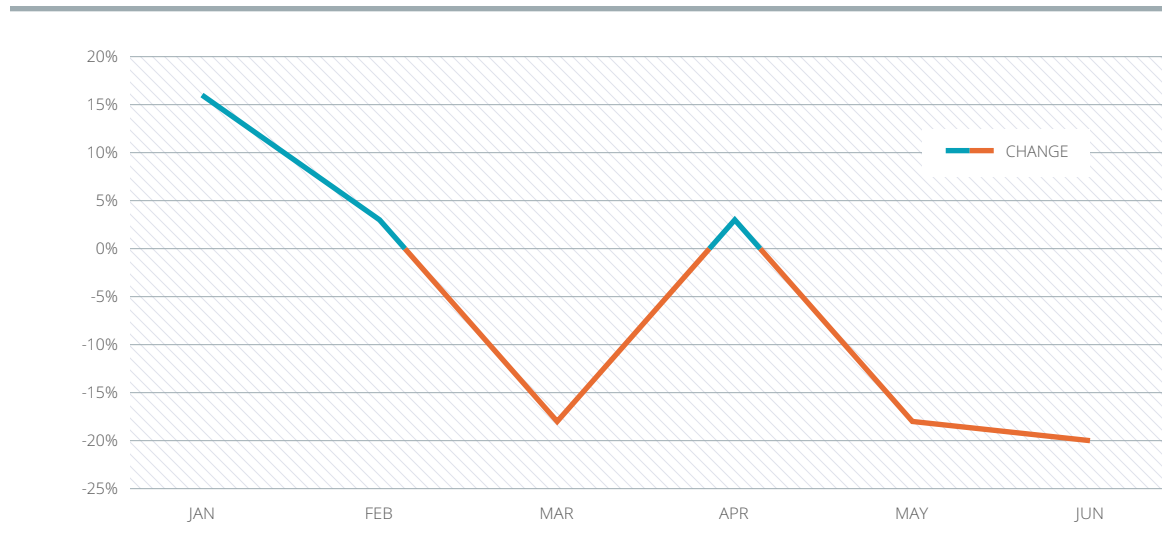
That’s not the case during the first few months of 2024, where no month had over 60,000 violations issued (though January came close) – and June had less than 50,000:

## HI Monthly Violation Counts: 2023 vs. 2024



Despite what seems like lower counts overall, there's no clear trend yet. Here's a chart outlining the percentage change from 2023 to 2024, month by month:

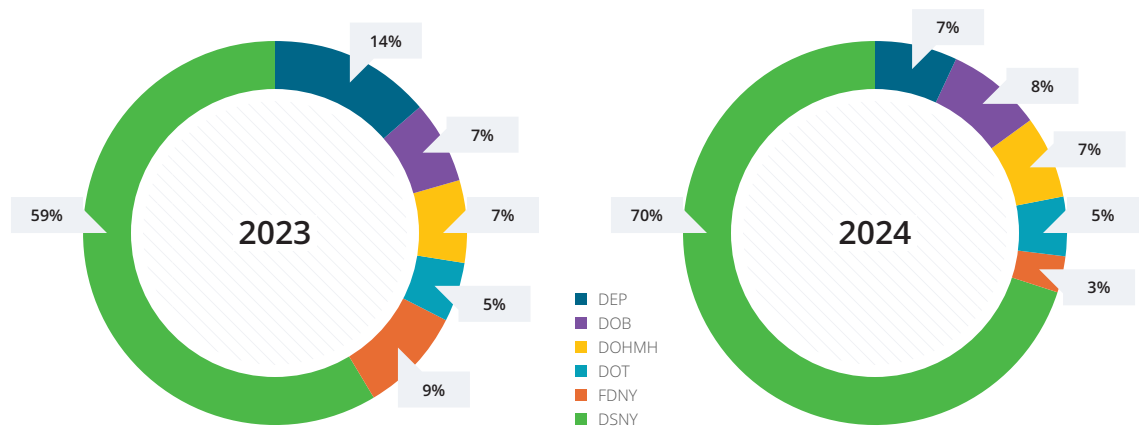
### H1 Monthly Violation Percentage Change: 2023 vs. 2024



While we can't be 100% sure about the trends for the rest of the year (we'll have to wait until 2025 to see final numbers), it's possible that lower monthly counts will continue, resulting in a decrease for 2024.

When it comes to total violation share, Sanitation is taking an even bigger percentage of violations issued in 2024:

### H1 Violation Share By Agency



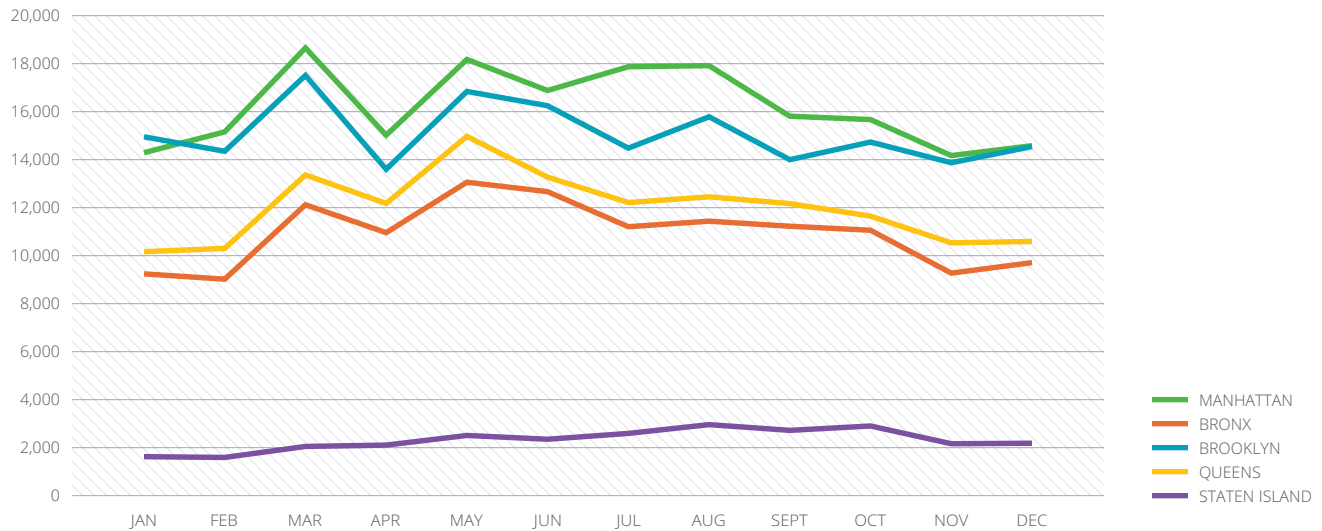
These changes reflect the significant decrease in DEP and FDNY violations shown previously.



# Borough Breakdown

Here's what violation distribution across boroughs looked like in 2023, and below that, what the start of 2024 looks like:

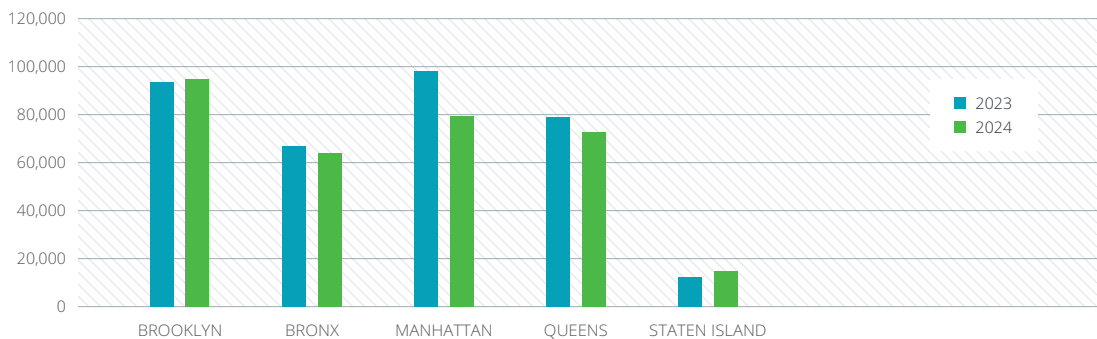
## 2023 Violation Counts By Month And Borough



- Manhattan consistently saw the most violations every month, compared to Brooklyn in 2022
- This year, boroughs coupled off in patterns – Manhattan and Brooklyn, and Queens and the Bronx show similar trends from month-to-month
- Trends in Staten Island remain consistent from 2022 – starting low and gradually increasing throughout the year

March Madness remains a trend, with increases in most boroughs during this month. There's also a sharp increase in May for most boroughs, potentially giving credence to the soft theory that better weather may bring more foot traffic, and with it – increased violations.

## H1 Violation Counts By Borough: 2023 vs. 2024



- In 2023, violation counts outpaced 2022's in every borough. This year, only two boroughs are seeing an increase in 2024 – Brooklyn and Staten Island
- In fact, while Brooklyn's increase is slight (2%), Staten Island saw a 22% increase in violations year-over-year – a smaller percentage than last year's year-over-year increase of 73%
- Queens and the Bronx saw single-digit declines, while Manhattan's decline from 2023 was more significant at 19% - a stark difference from last year's 40% increase over the same annual timeframe

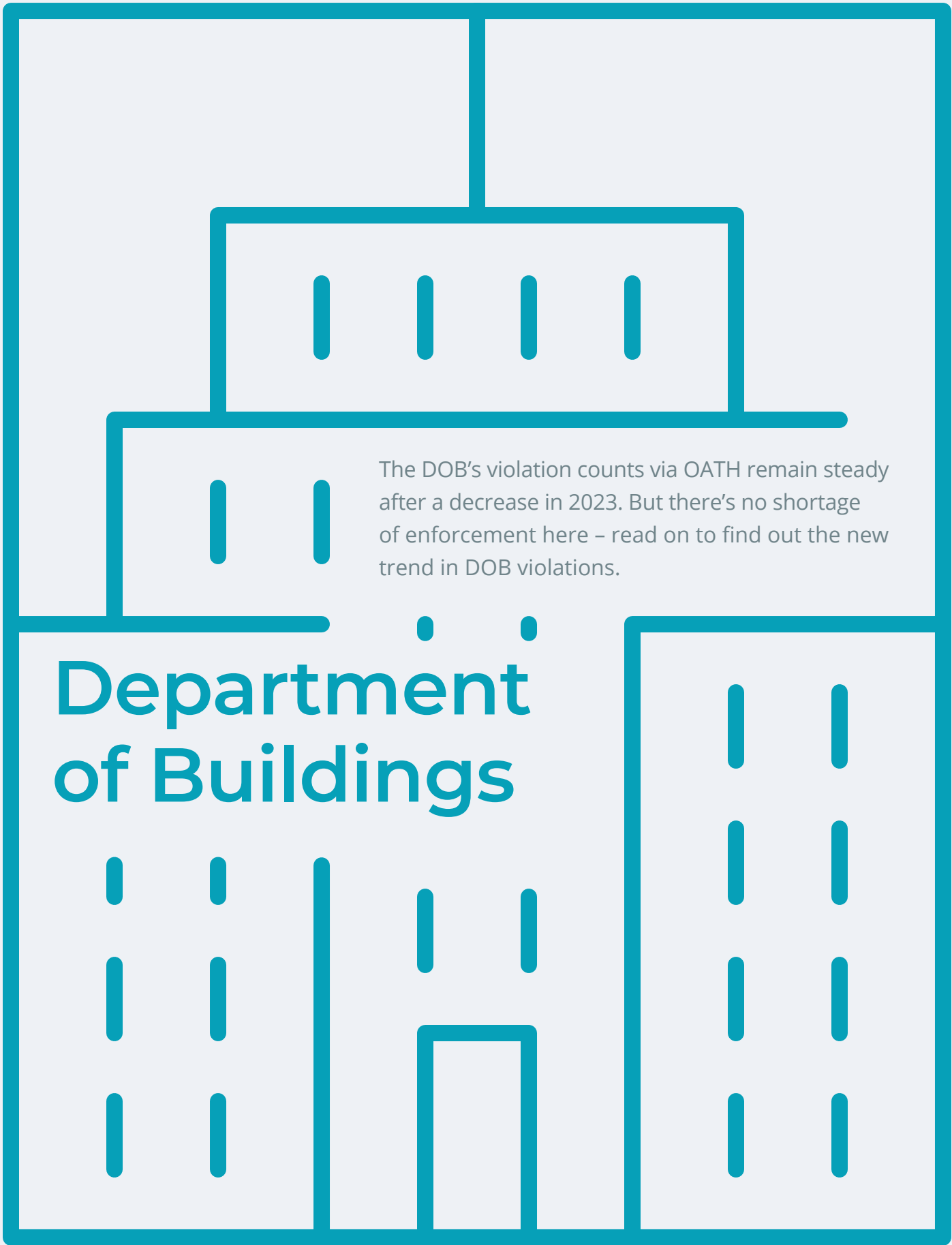
# What does this mean for the rest of 2024?

With the caveat that anything can happen, and it “ain’t over” until the year is over, here’s what the rest of 2024 could look like based on the average changes in monthly violation totals.

Across all boroughs, violation totals decreased an average of 2% from 2023 to 2024. Here’s what it looks like when we apply a 2% decrease to 2023’s monthly totals for H2 (July – December):

	JUL	AUG	SEPT	OCT	NOV	DEC
2023	59,272	61,592	56,637	56,817	50,701	52,227
2024 Prorated	58,087	60,360	55,504	55,681	49,687	51,182

Even if 2024 does end up with less issuances than 2023, it’s still on track to top every other year from the past several years – including 2019.

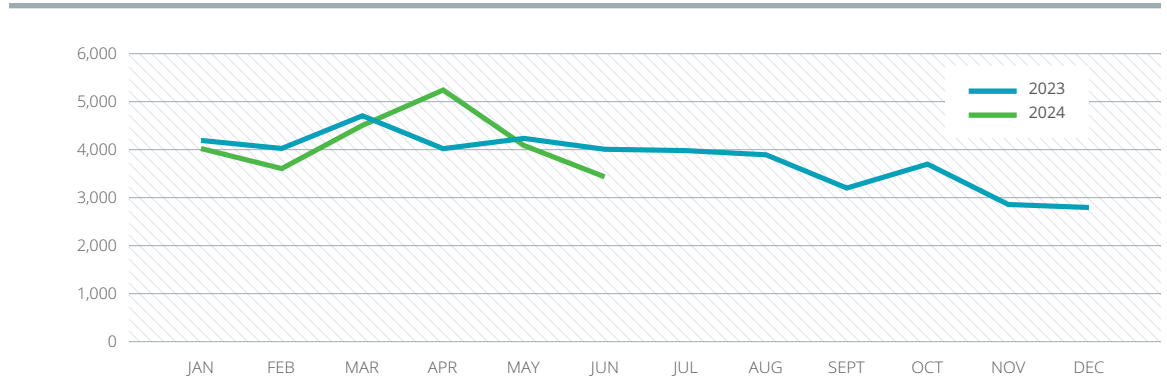


The DOB's violation counts via OATH remain steady after a decrease in 2023. But there's no shortage of enforcement here – read on to find out the new trend in DOB violations.

# Department of Buildings

Here's a deeper look at month-by-month comparisons, and a breakdown for DOB violations in each borough – plus our take on what could be behind the numbers.

## Citywide DOB Violations

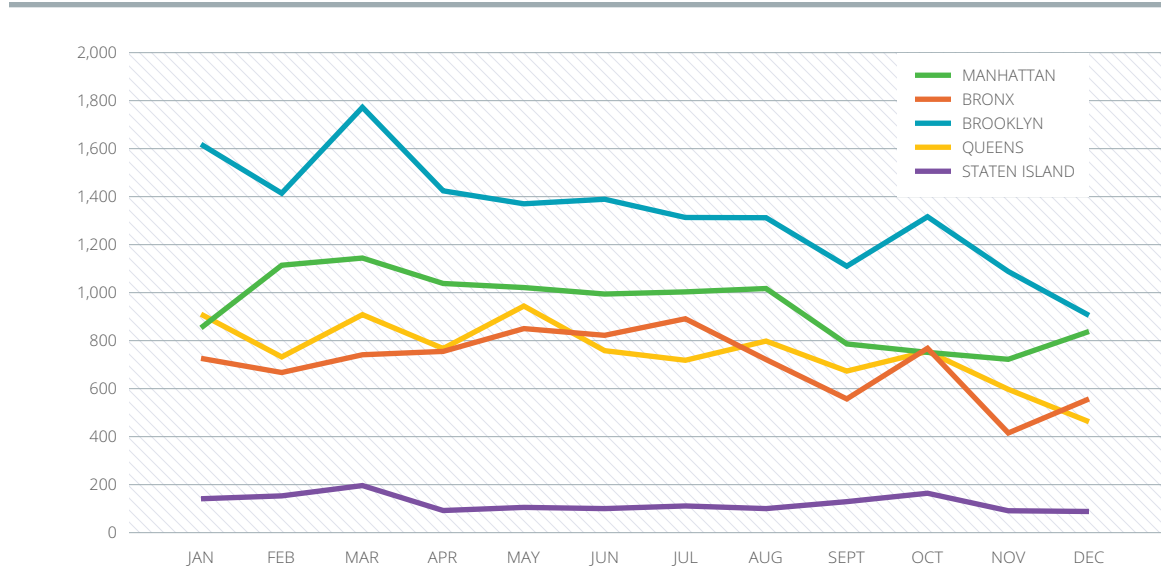


- Monthly DOB violation totals in 2023 continued to decline after a peak in March, while 2024 counts rose sharply in April – a delayed “March Madness” effect
- Compare these numbers with 2022 (not pictured above), which had a monthly peak of over 6,000 violations in March, and saw a year-end uptick of over 5,000 violations in December

Unless construction ramps up significantly or the DOB continues to hire inspectors, violation totals may remain lower throughout the rest of 2024 and beyond.

# DOB By Borough & Neighborhood

## 2023 DOB Violations - Monthly By Borough



- Brooklyn is still on top for violation totals overall, as they were in 2022
- Unlike 2022, there's no real consistent pattern for violation counts across all boroughs. Shifts and spikes vary throughout 2023
- That said, Brooklyn and Queens have similar movement throughout the year. That may be due to location – all boroughs have their own construction inspection and enforcement units

Here are the neighborhoods that saw the highest totals of DOB violations in 2023, compared with 2024 year to date:

## Neighborhoods With Highest DOB Violation Counts

2023		2024 (TO DATE)	
11207	Bushwick & East New York	10457	Belmont, Mt. Hope, & Tremont
11226	Prospect Lefferts Gardens, Flatbush, & Prospect Park South	10453	Morris Heights & University Heights
10457	Belmont, Mt. Hope, & Tremont	10467	Norwood & Allerton
11211	Williamsburg	10452	Highbridge & Mt. Eden
10458	Fordham, Little Italy, Jerome Park	11206	Bushwick, Bedford-Stuyvesant, & Williamsburg
10453	Morris Heights & University Heights	11226	Prospect Lefferts Gardens, Flatbush, & Prospect Park South
11206	Bushwick, Bedford-Stuyvesant, & Williamsburg	11207	Bushwick & East New York
11201	Dumbo, Downtown Brooklyn, & Cobble Hill	10468	Kingsbridge Heights & Fordham Manor
11221	Bushwick & Bedford-Stuyvesant	11221	Bushwick & Bedford-Stuyvesant
10452	Highbridge & Mt. Eden	11101	Long Island City

- While Brooklyn saw the most DOB violations overall in 2023, three Bronx zip codes are topping the list so far in 2024
- In fact, 10457 has more violations in 2024 to date than most of last year's top areas had all year in 2023
- Long Island City is appearing on the top 10 list for the first time. We'll see where it lands after the year ends

## Violation Types & Fine Amounts

Now let's take a look at the types of DOB violations that are most frequently issued, and the highest fine totals tied to DOB violations.

CODE	TYPE	NOTES
B202	Failure to maintain building in code-compliant manner, Class 2	The top violation in both 2023, and so far in 2024 – a difference from 2022
B206, B106	Miscellaneous	Class 2 and Class 1, respectively
B201, B101	Work Without A Permit	Class 2 and Class 1, respectively
B251	Failure to maintain...service equipment	Class 2, related to elevators
B187	Unlawful Acts – Failure to comply with an order of the Commissioner	Class 1

- Miscellaneous violations can include anything from Partial Stop Work Orders to scaffolding issues, to daily construction logs, or anything in between
- In recent years, top DOB-OATH violations included failure to file facade inspections. We may see more at the end of this year, given the close of Cycle 9 and the start of Cycle 10 in 2025. That said, the city is currently undergoing a review of FISP, and there may be changes in the near future

\*Neighborhood information confirmed via <https://neighborhoodexplorer.cityofnewyork.us/>

\*\* <https://storymaps.arcgis.com/stories/1c9138dc24064b2e8142ff156345a719>

# Top DOB Penalty Amounts

YEAR	CODE	DESCRIPTION	FACE VALUE	TOTAL PENALTIES IMPOSED
2023	B172	Additional daily penalty – Class 1 violation of 28-210 (1 or 2 families converted to 4 families)	\$50,000 - \$70,000	\$15,450,850
2023	B1E8	Dwelling with more than 3 additional total units contrary to C of O	\$15,000 - \$70,000	\$14,577,080
2024	B1E8	Dwelling with more than 3 additional total units contrary to C of O	\$15,000 - \$70,000	\$10,765,210
2024	B172	Additional daily penalty – Class 1 violation of 28-210 (1 or 2 families converted to 4 families)	\$2,500 - \$70,000	\$10,197,740
2023	B106	Miscellaneous Class 1	\$2,500 - \$12,500	\$7,762,063

There’s a clear pattern – the city’s largest DOB-OATH fine totals are for daily penalties related to illegal conversions.

## Where do we go from here?

While DOB-OATH violation counts may be down, non-OATH DOB violations are being issued citywide, en masse. More and more proactive requirements are being put into law, many of them with cyclical or annual filings. Here’s a short list of more recent requirements (in addition to existing requirements for boilers, elevators, facades, etc.):

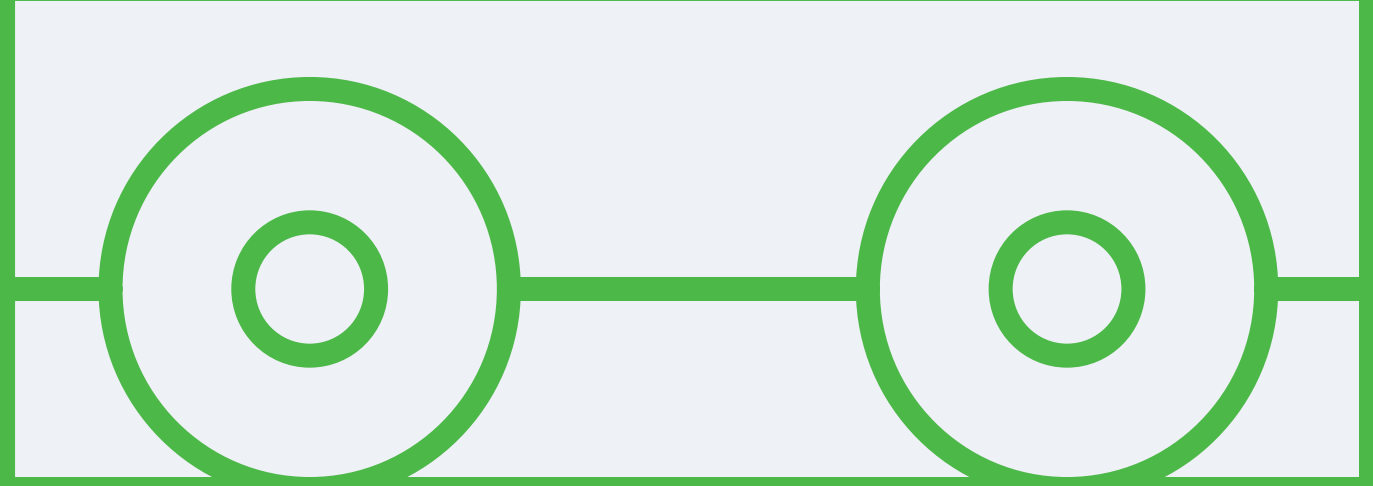
- Gas piping inspections & certifications
- Periodic elevator inspections
- Local Law 97 filings
- Parking garage inspections

...with more potentially on the way. Enforcement has taken a clear turn to not just focus on onsite problems identified by inspectors. **Automatically issued violations for missing paperwork are at an all-time high, and rising.**

While these non-OATH infractions are stored in different ways, preventing similar analysis to data in this report, we’re keeping track. Stay tuned for future looks and insights on proactive-related violations from the DOB.



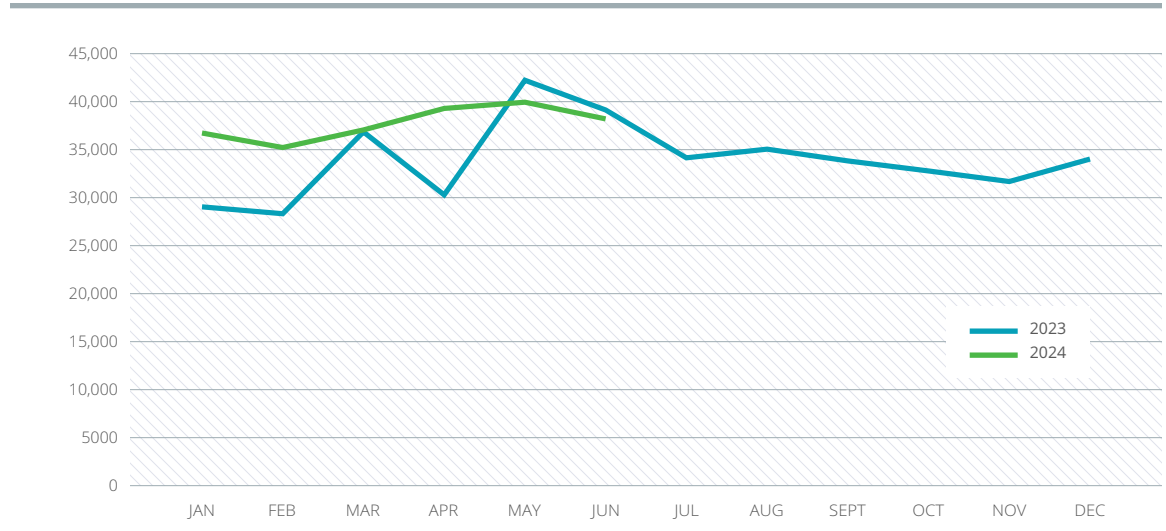
# Department of Sanitation



After a massive increase from 2022 to 2023, DSNY infractions are still being issued at a significant pace. And with upcoming compliance deadlines for new rules, high counts into 2025 seem likely.

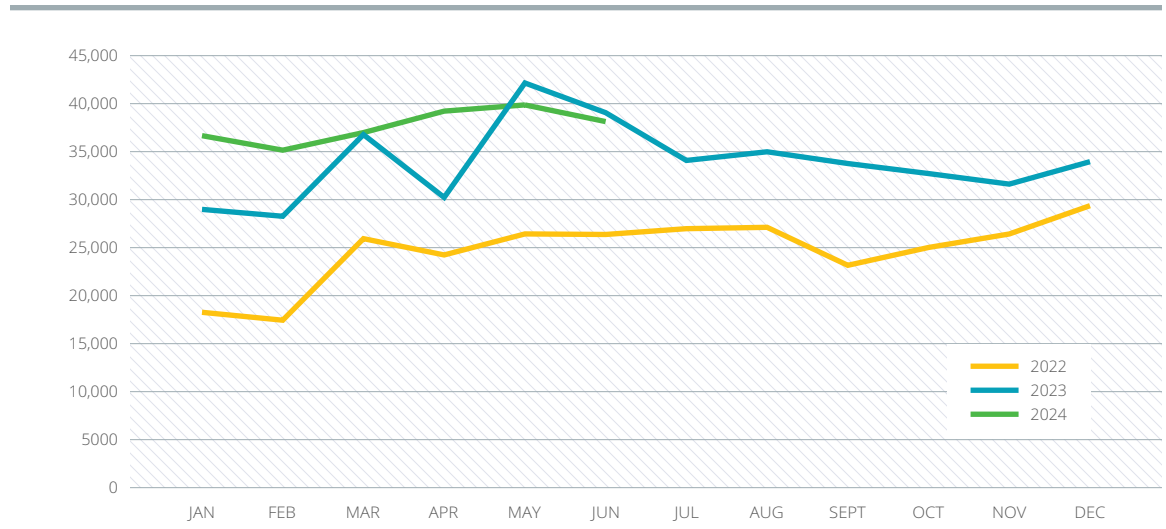
It's important to remember just how much DSNY violations increased in the past few years. Here's a look at this year compared to last year:

### Citywide DSNY Violations



And here's what it looks like compared to violation counts from 2022:

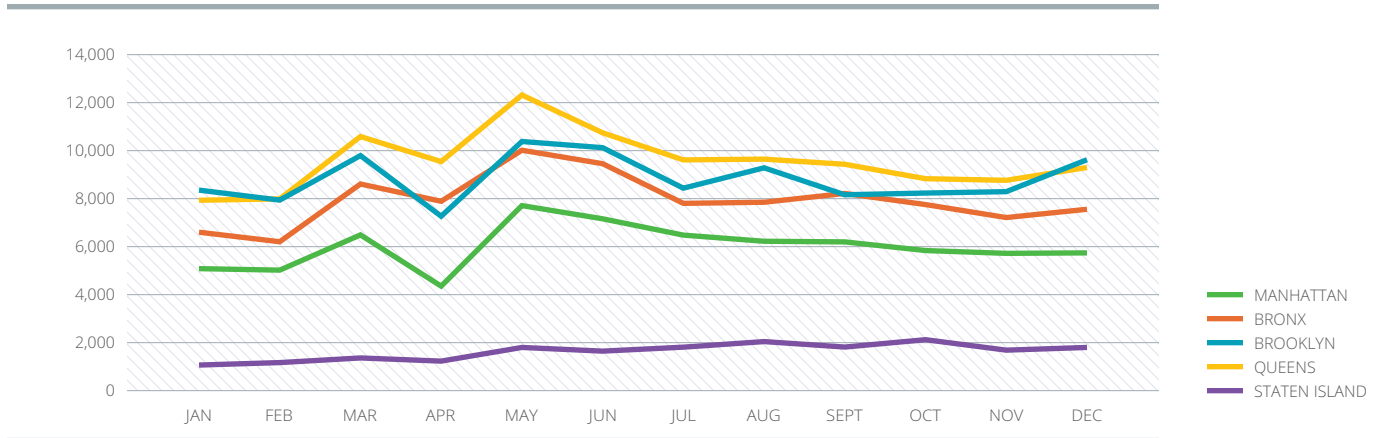
### Citywide DSNY Violations - 2022 Onwards



- We know that DSNY violations are issued much more frequently than other agency infractions and make up a larger share of overall annual totals. That said, these jumps can reflect increases of 10,000 – 15,000 or more when comparing months from year-to-year
- Another noteworthy statistic? Through the first half of 2024, the monthly violation total has not dipped below 35,000. Compare those numbers with dips in previous years
- Interestingly, there's no significant springtime spike in 2024, compared to 2022 and 2023



## 2023 DSNY Violations - Monthly By Borough



- In 2022, Brooklyn and Queens traded off the top spot for most monthly infractions throughout the year. While the bookend months are exceptions, Queens has the highest monthly total for most of the year
- There's also less separation between Brooklyn, Queens, and the Bronx counts throughout 2023, as seen above
- Monthly counts for Staten Island just about doubled from 2022 to 2023. Manhattan's increase wasn't as high, but it's still significant year-over-year
- For comparison, the highest monthly total in 2022 was just over 8,000. In 2023, it was over 12,000 – with many months across multiple boroughs clearing the 8,000 violation mark

Here are the neighborhoods that saw the highest totals of DSNY violations from 2023, and this year to date:

### Neighborhood With Highest DSNY Violation Counts

2023		2024 (TO DATE)	
10467	Norwood & Allerton	10467	Norwood & Allerton
10456	Morrisania	11220	Sunset Park & Bay Ridge
11385	Ridgewood & Glendale	10458	Fordham, Little Italy, & Jerome Park
10458	Fordham, Little Italy, & Jerome Park	10456	Morrisania
10457	Belmont, Mt. Hope, & Tremont	11385	Ridgewood & Glendale
11368	Corona & Willets Point	10457	Belmont, Mt. Hope, & Tremont
10460	West Farms, Crotona, & Van Nest	11233	Bedford-Stuyvesant, Brownsville, & Crown Heights
11207	Bushwick & East New York	11207	Bushwick & East New York
10468	Kingsbridge Heights & Fordham Manor	10460	West Farms, Crotona, & Van Nest
11221	Bushwick & Bedford-Stuyvesant	11226	Prospect Lefferts Gardens, Flatbush, & Prospect Park South

- While Soundview (10472) and Kingsbridge Heights/Fordham Manor (10468) were both on the top 10 list in 2022, and had a number of violations in the first half of 2023, both neighborhoods have fallen off since
- Sunset Park & Bay Ridge are new to the top neighborhoods list, and occupy a high spot here. While we're not seeing violations for composting just yet, Brooklyn was one of the first boroughs to get this service. It's possible that with it came additional attention to ongoing enforcement

# Violation Types & Fine Amounts

Here are the most frequently issued DSNY violations in 2023 and 2024:

CODE	TYPE	NOTES
AS26 & AS06	Failure to clean 18" into the street / Dirty sidewalk, dirty area	Consistently top violations for several years, including 2023 and 2024
ASAC	Storage of receptacles (placed out prior to 8pm without a receptacle)	Fast-growing violation from new set out time requirements. 2024 counts to date have almost reached total 2023 counts
AR7G	Failure to properly put recyclables out for collection – 1 to 8 dwelling units	Given the makeup of the city's residential properties, it makes sense that violations for smaller properties have a high total count

## Top DSNY Penalty Amounts

YEAR	CODE	DESCRIPTION	FACE VALUE	TOTAL PENALTIES IMPOSED
2023	AS06	Dirty sidewalk, dirty area	\$50	\$11,585,190
2023	AS26	Failure to clean 18" into the street	\$50	\$9,744,310
2023	AS6M	Dirty area	\$50	\$6,767,290
2024	AS26	Failure to clean 18" into the street	\$50	\$4,394,890
2023	ASAC	Storage of receptacles (placed out prior to 8pm without a receptacle)	\$50	\$3,811,590

It's important to remember that while the face value of DSNY violations is smaller than DOB or FDNY infractions, for example, fines can still add up. The more defaults or issues found to be "in violation" can lead to increased penalties.

# The Future of DSNY & Violations

The increase in DSNY regulations (containerization, composting, and more) is certainly a factor in annual violation increases. Here are some key changes that you should be aware of:

## Composting



Starting October 6, 2024 with the Bronx, Manhattan, and Staten Island expansion, all boroughs will now have curbside composting service. All buildings with curbside composting service are required to compost their leaf and yard waste, food scraps, and food-soiled paper. Owners of buildings with 4+ units must provide a storage area for the collection of material.

Owners will have a grace period to comply with the above, with enforcement beginning on April 1, 2025. It's possible we'll see an increase in violations at that time.

If you have questions, DSNY is hosting regular trainings geared towards property owners and managers specifically. You can view the schedule and register at [nyc.gov/curbsidecomposting](https://nyc.gov/curbsidecomposting).

## Containerization



Beginning November 12, 2024, all properties with 1-9 residential units will be required to use bins (55 gallons or less) with secure lids for trash set out.

Larger buildings will have different requirements, starting with Manhattan Community Board 9 in Spring 2025:

- Buildings with 31 or more residential units will be required to use stationary, on-street containers for their trash, serviced by DSNY's new automated side-loading garbage trucks. On-street containers will be assigned to a specific building, solely for residents of that building.
- Buildings with 10 to 30 units will be able to choose between stationary on-street containers and smaller wheelie bins.

Expansion to additional districts/areas will be announced after an environmental review. As a reminder, businesses have had to use bins with secured lids since March 1, 2024.

Per the DSNY, if you already use a bin with a secure lid that is 55 gallons or less for trash set out, you may continue to use it until June 2026. After that, you will need to switch to the official NYC Bin.

Anecdotally, DSNY changes have been in the news and touted significantly more than other agency changes or requirements. It's a big area of focus for the council and administration, which generally leads to serious enforcement.

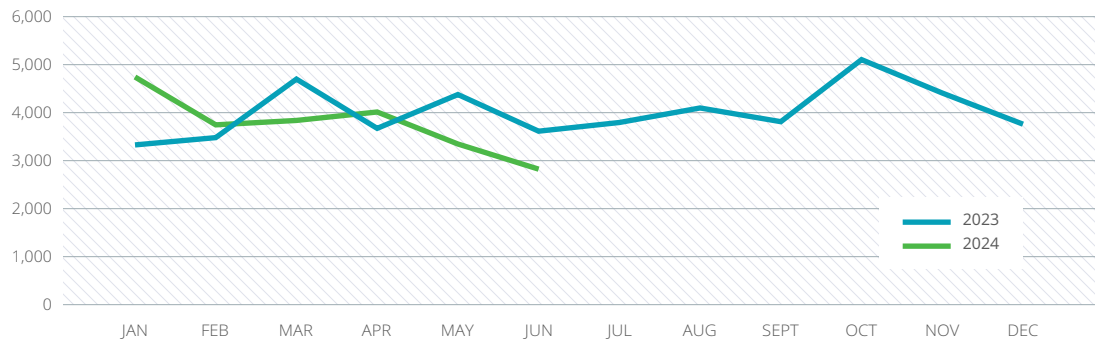
All in all, there's a lot of change over a short time period, with more to come. And for those reasons, for the foreseeable future, DSNY enforcement will continue to be a critical area of focus for owners and managers.



# Department of Health and Mental Hygiene

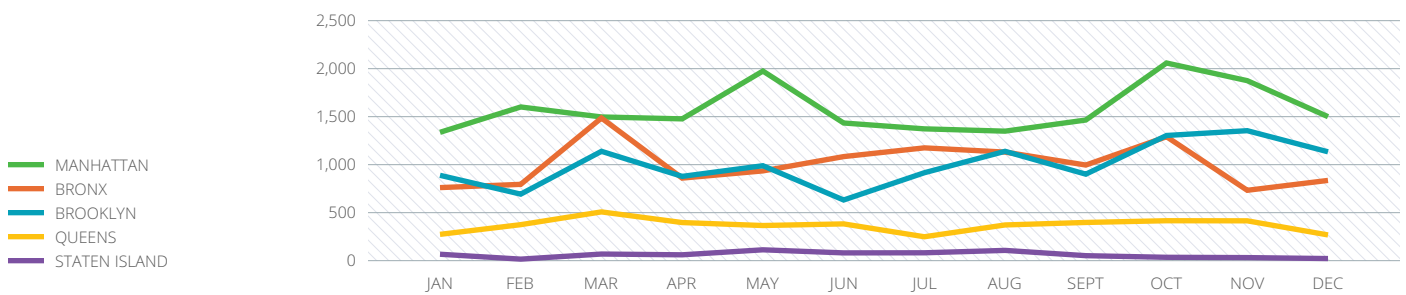
With a renewed focus on rats and designated mitigation zones, DOHMH violations saw a slight increase in 2023. Here's where they stand this year.

## Citywide DOHMH Violations



- With over 5k in issued violations, October 2023 is the highest monthly total of the last few years
- The low point in June 2024 (2,823 violations total) is just about on par with the lowest month in 2022

## 2023 DOHMH Violations – Monthly By Borough



- Like 2022, there's no clear pattern for DOHMH violations or much consistency across boroughs
- There is one change – Manhattan consistently had the highest total violation counts each month (including March, when they had 11 more violations than the Bronx)
- The lowest monthly total? 16 violations in February in Staten Island (which never saw more than 113 in a month)

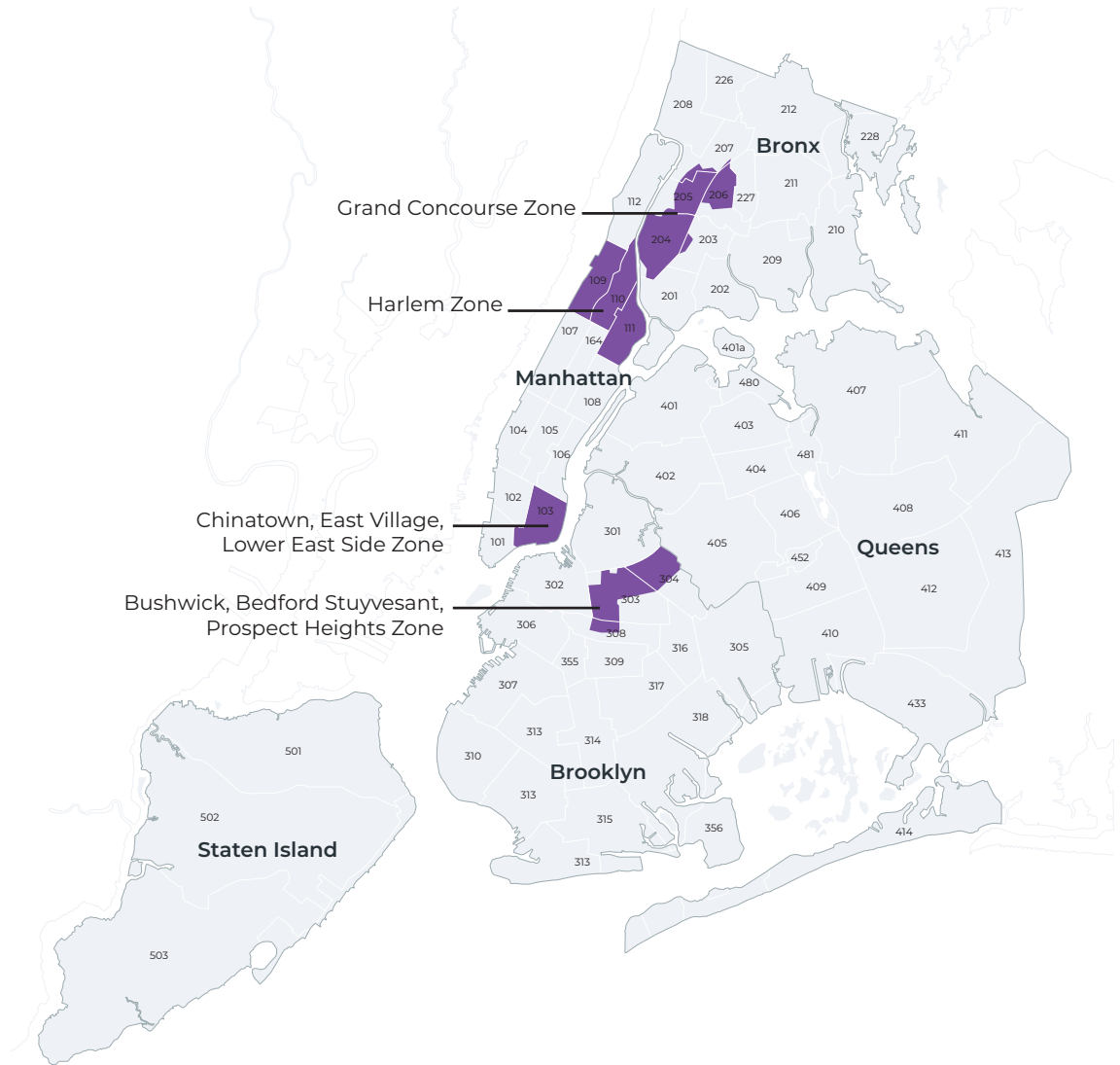
Based on the borough totals, the neighborhood lists are somewhat surprising:

### Neighborhoods With Highest DOHMH Violation Counts

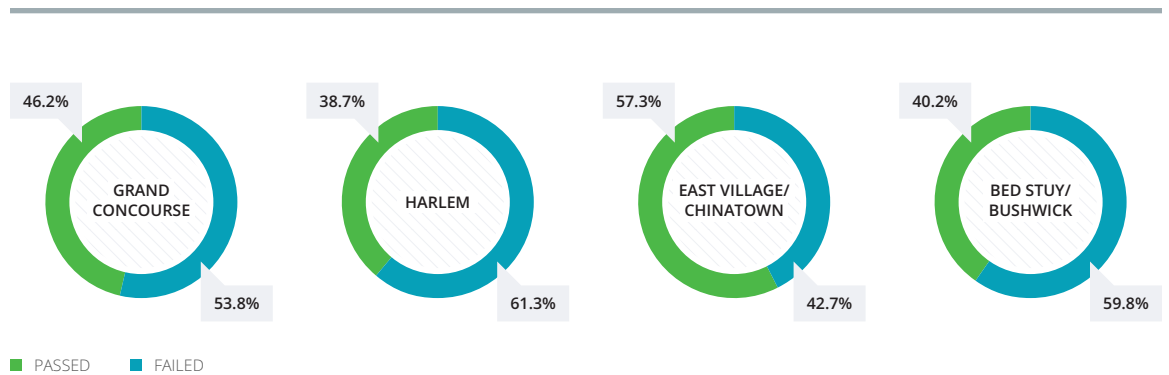
2023		2024 (TO DATE)	
11216	Bedford-Stuyvesant & Crown Heights	11221	Bushwick & Bedford-Stuyvesant
11221	Bushwick & Bedford-Stuyvesant	11216	Bedford-Stuyvesant & Crown Heights
10458	Fordham, Little Italy, & Jerome Park	11237	Bushwick
11237	Bushwick	10458	Fordham, Little Italy, & Jerome Park
10457	Belmont, Mt. Hope, & Tremont	11206	Bushwick, Bedford-Stuyvesant, & Williamsburg
10031	Harlem, Hamilton Heights, & Sugar Hill	10457	Belmont, Mt. Hope, & Tremont
10029	East Harlem & Upper East Side	10029	East Harlem & Upper East Side
10027	Harlem & Morningside Heights	10468	Kingsbridge Heights & Fordham Manor
11206	Bushwick, Bedford-Stuyvesant, & Williamsburg	10452	Highbridge & Mt. Eden
10468	Kingsbridge Heights & Fordham Manor	10456	Morrisania

- Even though Manhattan had the highest violation totals in 2023, the top neighborhoods are in Brooklyn and the Bronx
- There are even fewer Manhattan neighborhoods on the 2024 list so far, making it likely that next year's graphs may look a little different from previous cycles

As a reminder, here's what the city's Rat Mitigation Zones look like:



According to agency data, here's how ongoing compliance inspections are faring in the Rat Mitigation Zones\*:



Per the DOHMH, "Compliance inspections follow failed initial inspections, 2 to 3 weeks after an abatement order. If a property fails a compliance inspection, the owner is issued a summons. A property may fail for active rat signs, garbage, or conditions that harbor rats."

\*Rat mitigation zone map from adopted DOHMH rule: <https://a816-dohbosp.nyc.gov/IndicatorPublic/data-features/rat-mitigation-zones/>



# Violation Types & Fine Amounts

Here are the most frequently issued DOHMH violations in 2023 and 2024:

CODE	TYPE	NOTES
AH3N	Failure to eliminate rodent infestation shown by active rodent signs – 1st	This is the top violation in both years by a wide margin.
AH3P / AH3R	Failure to eliminate conditions conducive to pests & rodents – debris & vegetation / garbage can spillage	The next highest infractions, each with details on the specific issue identified.
AH3W	Failure to eliminate rodent infestation shown by active rodent signs – 2nd	Counts for 2nd rodent notices are increasing - total violations issued in 2023 equal 5% of the 1st infraction counts, but are nearly double that in 2024.

## Top DOHMH Penalty Amounts

YEAR	CODE	DESCRIPTION	FACE VALUE	TOTAL PENALTIES IMPOSED
2023	AH3N	Failure to eliminate rodent infestation shown by active rodent signs – 1st	\$300 \$600 \$1,200 \$2,000	\$7,390,620
2024	AH3N	Failure to eliminate rodent infestation shown by active rodent signs – 1st	\$300 \$600 \$1,200 \$2,000	\$3,619,760
2023	AH3P	Failure to eliminate conditions conducive to rodents – debris & vegetation	\$300 \$600 \$1,200 \$2,000	\$2,880,450
2023	AH3R	Failure to eliminate conditions conducive to pests - garbage can spillage	\$300 \$600	\$1,614,110
2024	AH3W	Failure to eliminate rodent infestation shown by active rodent signs – 2nd	\$600 \$2,000	\$1,416,720

As shown in the progressive face amounts, DOHMH fines can increase significantly for subsequent offenses.

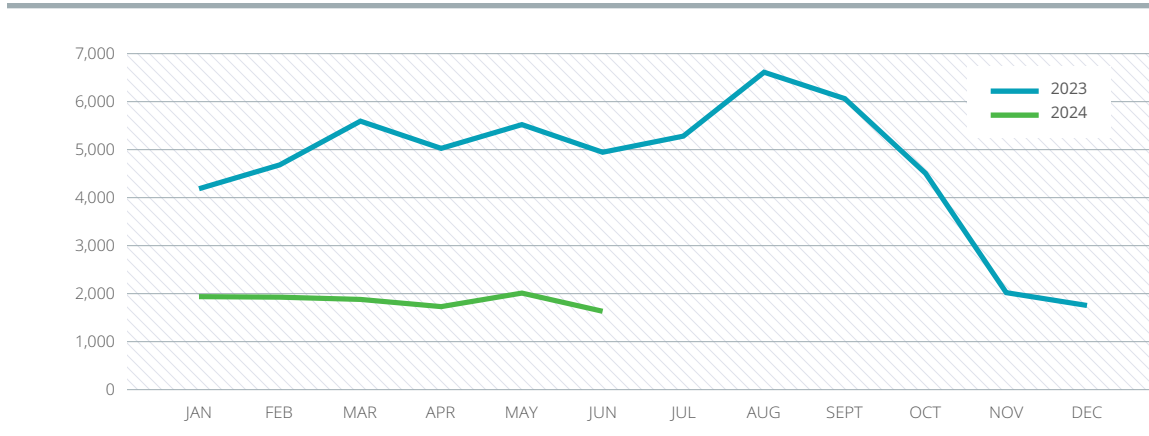


# Fire Department of New York

FDNY violations are some of the most expensive fines across all city agencies – and ones that directly impact critical life and safety requirements.

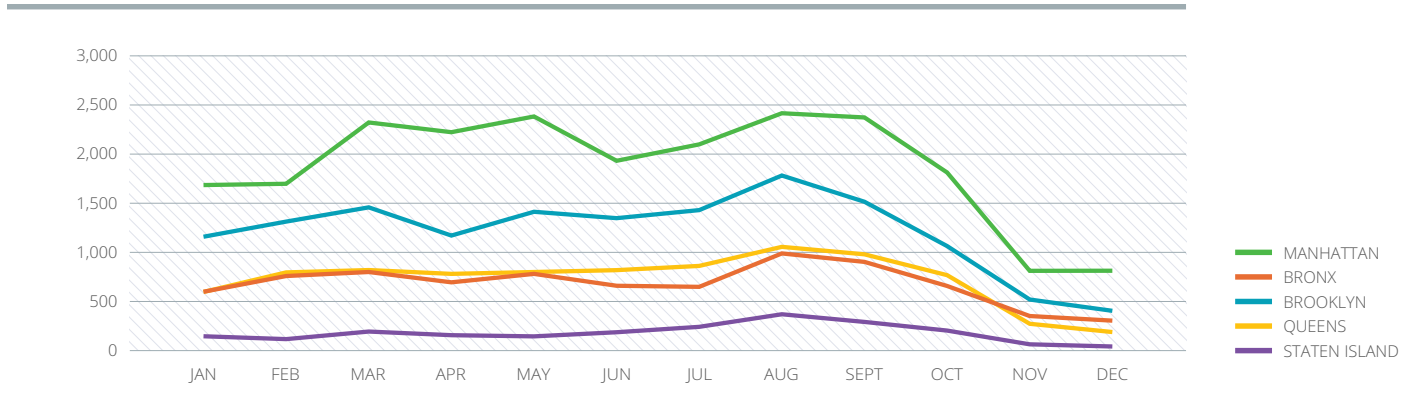
FDNY violation totals tend to trail behind other departments. Here's what 2023 looked like compared to the start of this year:

### Citywide FDNY Violations



- FDNY violation totals had a steep dropoff following an August 2023 peak
- Monthly totals have remained steadily low since that August peak

### 2023 FDNY Violations – Monthly by Borough



- All boroughs had a decrease at the end of the year, but Manhattan's was most significant – counts decreased 66% from August (peak) to November (lowest – by 1 violation)
- That said, Manhattan is still the #1 borough for FDNY violations. Even low counts are on par with numbers from 2022

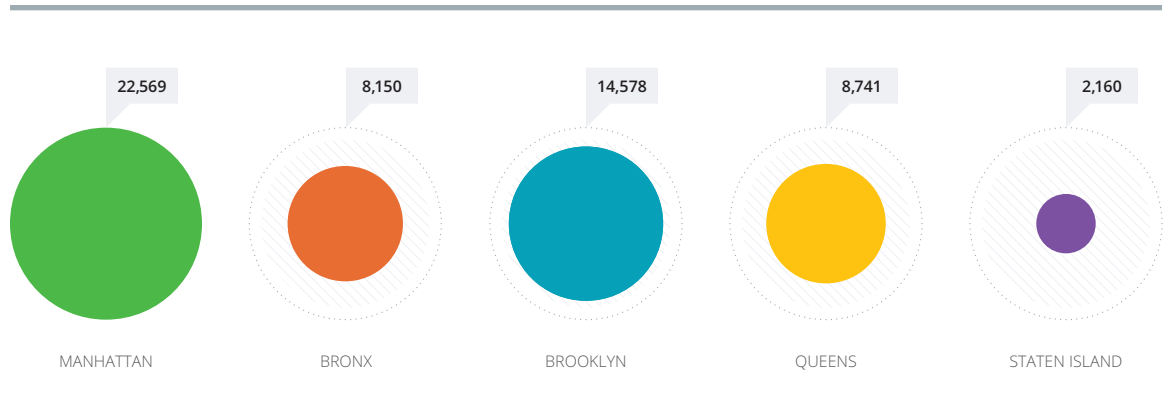
Based on the borough totals, there are no real surprises here:

### Neighborhood With Highest FDNY Violation Counts

2023		2024 (TO DATE)	
10001	Chelsea, Hudson Yards, & Koreatown	10036	Midtown West & Hell's Kitchen
10019	Hell's Kitchen	10001	Chelsea, Hudson Yards, & Koreatown
11201	Dumbo, Downtown Brooklyn, & Cobble Hill	10003	Gramercy, East Village, & Union Square
10018	Midtown West	10016	Kips Bay & Murray Hill
10036	Midtown West & Hell's Kitchen	10019	Hell's Kitchen
10016	Kips Bay & Murray Hill	10013	Soho & Chinatown
10013	Soho & Chinatown	10018	Midtown West
10002	Lower East Side	11201	Dumbo, Downtown Brooklyn, & Cobble Hill
10003	Gramercy, East Village, & Union Square	10011	Chelsea & West Village
10022	Midtown East	10022	Midtown East

- Only one Brooklyn neighborhood made it onto the list in 2023. It's lower in 2024, but could potentially rise
- This aligns with Manhattan's continued outsized share of FDNY infractions via OATH:

### FDNY Violation Share by Borough – 2023



# Violation Types & Fine Amounts

Here are the most frequently issued FDNY violations in 2023 and 2024:

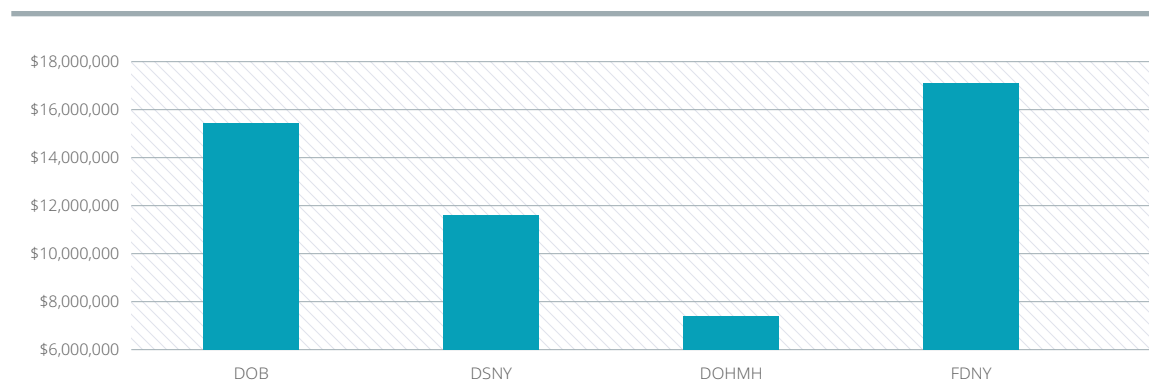
CODE	TYPE	NOTES
BF35 / VC12	FPS (Fire Protection System): Failure to prevent unnecessary/unwarranted alarms	This infraction remains a top challenge for owners and managers year after year
BF20 / VC20	Inspection and Testing	A common top violation, especially as it relates to sprinkler/standpipes or other violation types
BF05 / VC5	Posting of permits and recordkeeping	Can apply to different systems or requirements; the specific remedy will be detailed on the violation copy

## Top FDNY Penalty Amounts

YEAR	CODE	DESCRIPTION	FACE VALUE	TOTAL PENALTIES IMPOSED
2023	BF35	FPS: Unwarranted Alarms	\$750 - \$1875	\$17,113,365
2023	BF20	Inspection and testing	Multiple	\$7,550,055
2023	BF05	Permits and recordkeeping	Multiple	\$6,628,482
2024	BF35	FPS: Unwarranted Alarms	\$750 - \$1875	\$6,076,440
2023	BF12	Fire protection systems: general	Multiple	\$5,009,842

Despite FDNY’s lower violation issuance counts compared to other agencies, the total penalties imposed are among the highest:

### Highest Total Individual Fine Amounts – All Agencies 2023 & 2024



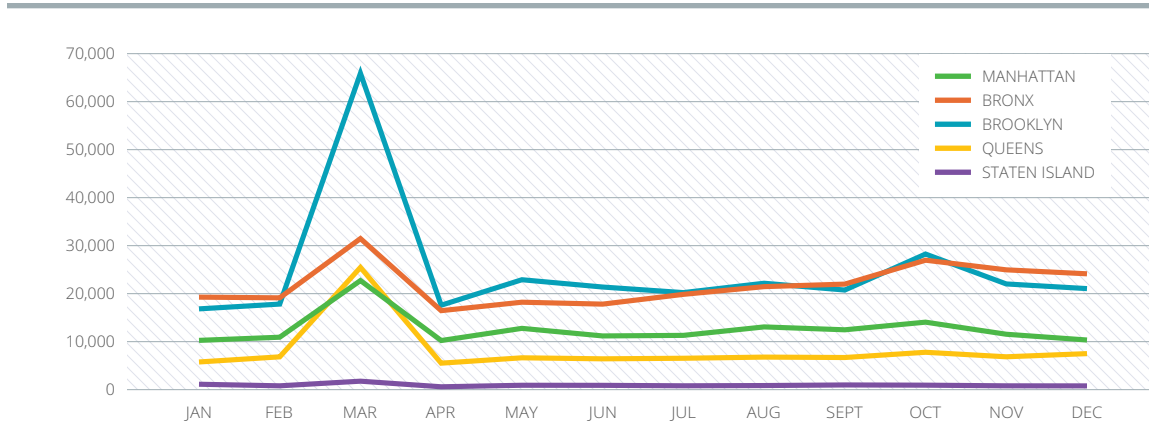
# Housing Preservation & Development

This year's slowdown for OATH-related violations isn't happening at the city's residentially-focused agency. HPD violations are on the rise once again, which reflects the focus on key quality-of-life priorities introduced and expanded upon during the past several years.



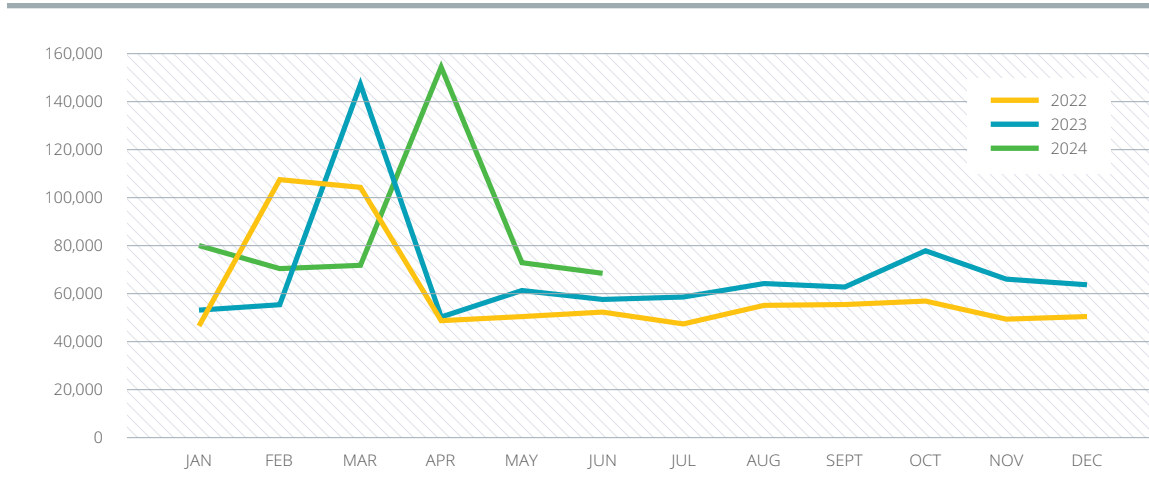
Let's start with final violation totals from all 12 months of 2023, and compare those numbers to the previous year, and the first half of this year:

### HPD Violations By Month and Borough – 2023



- “March Madness” was evident in all boroughs, where even Staten Island saw a spike in violations issued during this month
- Brooklyn stayed on top throughout most of 2023, with issuances in the Bronx staying on pace or overtaking it in some months
- Queens saw an increase in monthly infractions during the fall and winter, while Manhattan saw a slight decrease

### Citywide HPD Violations: 2022 – 2024 To Date



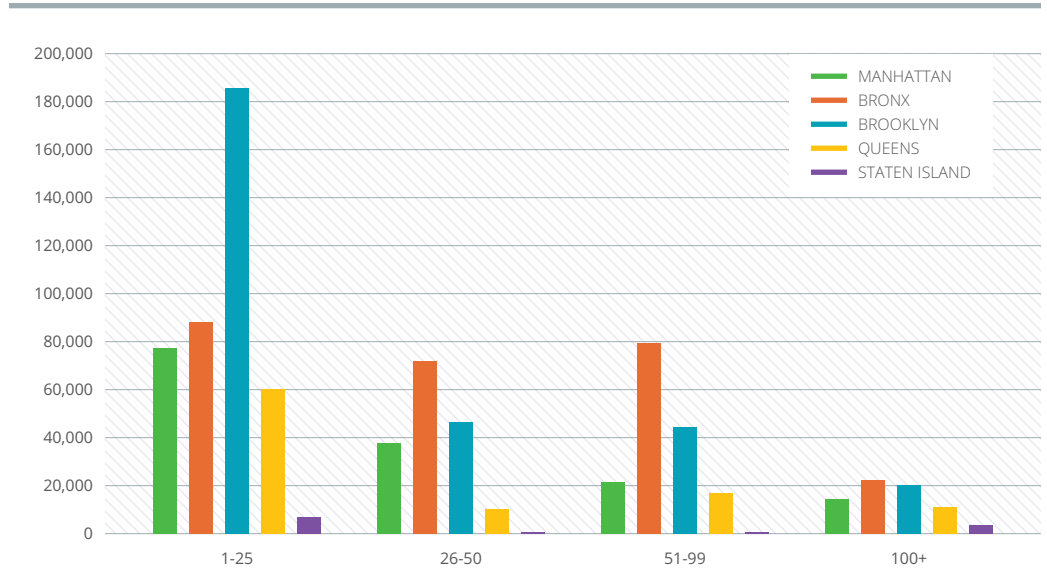
- While 2024 saw its peak (so far) in April instead of March, it's currently on pace to have more HPD violations than 2023 and 2022
- There were nearly 520,000 HPD violations issued during the first half of 2024, where counts for 2023 and 2022 were both under 430,000 in that same timeframe

Now let's take a look at violations by building size and borough, including Staten Island (which we left out of last year's report):

## HPD Violations By Unit Count and Borough – 2023

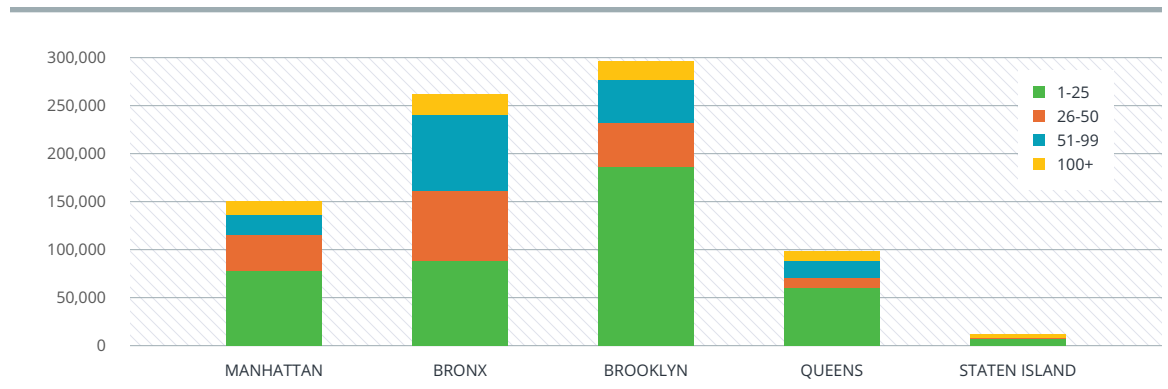
### Here's how NYC unit counts are distributed:

Per HPD registration information, units in NYC are distributed on an inverted bell curve: most units are part of buildings with 1-9 units total (the smallest properties), or 100+ units total (the largest properties). Fewer units overall are part of properties with 25-50 or 51-99 total units. That said, unit totals from Manhattan and Brooklyn may skew these stats a bit.



Here are the same counts, stacked. This helps us see the distribution for each borough overall, and the share of violations for each building size:

## HPD Violations By Unit Count and Borough, Stacked – 2023



- The stacked chart for 2023 is nearly identical to 2022, with smaller buildings making up the largest share of violation issuances in each borough
- Brooklyn's large share of small-building violations makes sense given that over half of the total units in the borough are located in buildings with 1-9 units
- The Bronx still has the largest share of violations for mid-size building categories in all boroughs. In fact, violations for all building sizes are pretty evenly distributed in this borough, outside of the largest properties
- The only caveat when comparing years? There are more violations in each borough overall for 2023



## HPD Violation Benchmarks By Borough

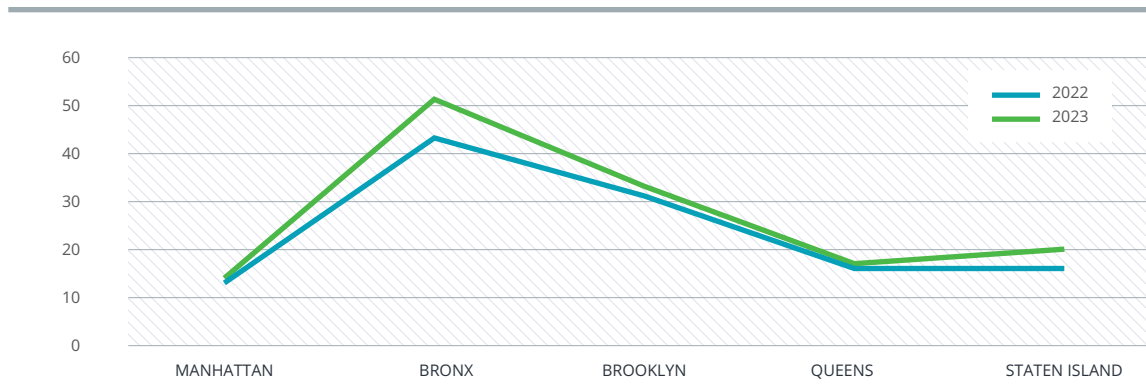
VPU (violations per unit) is becoming an increasingly important statistic when it comes to HPD enforcement. For certain enforcement programs, VPU count is being used as an indicator for inclusion. Basically, the more violations there are relative to the size of a property, the more likely it may be targeted for additional enforcement and fines from HPD.

Let's compare VPU counts from 2022 to 2023, grouped by borough. On average:

### VPU by Borough – 2022 and 2023

	2022	2023
Buildings in Manhattan receive	12 – 13 violations per 100 units	14 violations per 100 units
Buildings in Bronx receive	43 violations per 100 units	51 violations per 100 units
Buildings in Brooklyn receive	31 violations per 100 units	33 violations per 100 units
Buildings in Queens receive	16 violations per 100 units	17 violations per 100 units
Buildings in Staten Island receive	15 – 16 violations per 100 units	20 violations per 100 units

## HPD Violation Issuances By Month & Borough



While Manhattan still has the smallest overall VPU, average counts are slightly up in every borough. Given the pace of 2024 violations to date, that number is likely to continue to climb.

# What's Being Issued Citywide?

Going beyond the numbers, here are the top infraction types owners and managers should be aware of:

## Failure To File Bedbug Reports

**ORDER #: 1507**

Failure to file annually required bedbug reports was the biggest HPD violation last year, skyrocketing to the top of the list after being in effect for a few years. In 2023, 91,336 violations were issued citywide for this infraction. At time of publication, more than 77,859 violations for this infraction were issued in 2024.

**TIP:** It's important to make sure property-wide bedbug information is collected from Nov 1<sup>st</sup> of the previous year through October 31<sup>st</sup> of the current year. Reports can be filed with HPD starting December 1<sup>st</sup>, and are due by December 31<sup>st</sup>.

## Paint, Plaster, Repair Broken/Defective

**ORDER #: 508, 501, 502**

The next three top issues focus on general repairs – paint, plaster, and broken and/or defective items. These are consistently high issuances from year to year, and - depending on what's broken – can be issued as a hazardous Class C violation. Even though these issues may not seem as urgent as heat and hot water infractions, these violations can add up over time if left open and potentially cause increased enforcement or inclusion in remedial programs.

## Infractions By Borough

Here are the top HPD NOVs in each borough:

BOROUGH	ORDER NUMBER	VIOLATION TYPE
Manhattan	Order 508	Paint/Plaster
Bronx	Order 508	Paint/Plaster
Brooklyn	Order 1507	Failure to File Bedbug Report
Queens	Order 1507	Failure to File Bedbug Report
Staten Island	Order 1507	Failure to File Bedbug Report

# Beyond The Numbers

## In light of the data, how do we prevent violations?

There are a few key strategies your team can (and should) employ to prevent NYC agency violations, which have still seen significant increases from pre-pandemic numbers.

- **PROACTIVE IS THE NEW REACTIVE:** Understanding your risks by knowing your buildings – what's required and when is it due, what type of equipment is onsite and which agency is tracking it, what's happening in the industry, and how does it impact my portfolio – is the key to preventing many agency violations.
- **KNOW THE STEPS:** That said, even the most compliant properties get violations from time to time. Knowing how to respond quickly can prevent escalation and increased fines. Some of the time clearing violations is as simple as submitting paperwork and the appropriate fees – something your team can do without being charged excessive rates for cleanup assistance.
- **IDENTIFY AND DELEGATE:** With the rise in proactive requirements and the increase in specific agency regulations (Sanitation especially) it's important to identify the folks responsible on your team for managing each compliance component. Who is responsible for coordinating new trash setout times and following the composting rules? Who is responsible for ensuring facade filings are done on time, and any follow-ups are taken care of ASAP? Whether they're third-party expert vendors or in-house, make sure your entire team is aware of their individual responsibilities, and how that ladders up to your compliance success.

This report is just one example of how we're here to help your team better understand the shifts and trends in NYC compliance, and use that information to protect your properties and the people in them.

All of us at SiteCompli are here to continue providing you with the latest industry news, ongoing requirements, and the information you need to keep fines down, respond quickly, and keep your portfolio safe.

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