THE USES OF HOUSING QUALITY DATA IN PUBLIC POLICY FORMULATION Frank S. Kristof, Housing and Development Administration, City of New York

The quality of the Nation's housing has been a public policy issue since the Housing Act of 1949 defining the nation's housing goals as requiring: "the elimination of substandard and other inadequate housing through the clearance of slums and blighted areas, and the realization as soon as feasible of the goal of a decent home and suitable living environment for every American family. "I/Once the Congress mandated the elimination of "substandard" and "inadequate" housing as national policy, the definition of these terms became essential to a determination of the extent of Federal assistance required to achieve these goals. Similarly, since housing programs are undertaken by local communities, these measures were needed in order to ascertain the magnitude of a community's slum clearance and reconstruction programs. How many units require demolition, major rehabilitation or only moderate upgrading? Cnly when these questions are answerable can the level of resources required for a reasonable rate of progress be ascertained.

The second major need for this measure is to permit a community to determine the rate of progress it is or is not making in meeting its housing needs. Many bitter political struggles, local, state and national, have been waged on this issue. Today, nearly two decades after the Housing Act of 1949, the subject has lost none of its heat.

Part of the problem lies in the difficulty of finding quantitative measures for a qualitative concept. The technical problems associated with measurement of housing quality probably constitute the single most difficult task of the three decennial censuses of housing behind us and also in the forthcoming one. Since these facets of the subject are discussed by others, the point will not be belabored here. It is sufficient to say that this type of difficulty is generic to the social science field, particularly where the intervention of public policy substitutes for the operation of the market place. Consequently, the setting up of standards as a guide to public policy cannot be avoided even though one may quarrel with both their level and arbitrariness. That people's perception of what standards should be changes over time, only complicates an already difficult problem. But even this could be lived with if a fairly consistent measure of housing quality could be developed that would permit the scope of the housing job to be ascertained along with some definition of progress over time.

Another part of the disaffection over the measure of housing quality is that the texture of the housing problem has changed materially over the past two decades. When the Housing Act of 1949 was passed, the housing problem of America was set in a relatively simple framework of clearance of slums and their replacement with new housing as part of a program to make standard quality housing available to all families of the nation.

It was assumed that private investment would be used to rebuild the slums while low-income families would be rehoused by public housing. These assumptions proved to be not only over-simplifications lacking in validity but they failed to take into account existent social, demographic and economic forces whose implications in 1949 were not yet clearly perceived. Among these forces were the following:

- The acceleration of Negro migration to the cities in the years since 1949, although this trend had been evident for at least a half century. From a scattered rural status in the nation's South, by 1966 Negroes had reached a point where 56 percent of their total population in the United States was concentrated in relatively small sections of most central cities and large areas of a few.
- 2. The simultaneous mass exodus of the white middle class to the suburbs. Again, migration to the suburbs is an historic American custom, neither new nor unique. The trend has been greatly accelerated in the past two decades by a combination of circumstances such as triumph of the automobile as the dominant means of transportation, the proliferation of roads and highways that opened up large new areas of residential development, and government mortgage insurance programs that encouraged a vast flow of private investment funds into suburban single-family home construction.
- 3. The decentralization of industry to outer areas. Although this occurred for technological and operating space reasons, it was encouraged and reinforced by the movement of population to the suburbs.
- 4. The negative impact of the above developments upon the economic base of the older cities that watched a steady outward drift of their manufacturing employment is a matter of record. Other consequences were a weakening of central business districts of such cities and an erosion of their real estate tax base as land and property values faded.
- 5. The wholesale exchange of better educated, more skilled and higher-income white

population for lower income, poorer educated and unskilled nonwhite population left the cities not only literally poorer but threw new educational, health service, and welfare burdens upon the cities. Thus the past twenty years have witnessed a major shift of Negro poverty from southern rural areas of the nation to the central city slums. In short, this represents a transfer of a major portion of the national poverty problem to communities that economically are poorly equipped to bear this burden.

The collective impact of the above developments was to make untenable the assumption that private investment funds would flow into the renewal of city slums. Such funds were far more readily attracted to the growing new suburban areas outside the cities. Furthermore, these investment areas entailed considerably less risk and trouble compared with the complicated and excruciating task of dealing, in the renewal process, with endless layers of municipal, state and federal governments that functioned sometimes in tandem, more often in conflict, and almost always sequentially. Time dimensions of the renewal process have become so great that only the youngest and most adventurous entrepreneurs now are willing to tackle this task. Only are such persons likely to live long enough to see the projects they have the courage to initiate evolve into completed, if not always profitable, ventures.

The second assumption--that public housing would take care of the housing of low-income families-also broke down. As the magnitude of the taskexpanded with the influx of low-income nonwhites into the cities, the popularity and even the acceptability of public housing declined as it became clear that this type of housing was developing into nonwhite, low-income ghettoes. Thus, today, aside from being only one facet of the problem of poverty, the housing difficulties of urban America have been compounded by the racial aspects of poverty.

The complexities involved in the regeneration of city slumsare recognized clearly in the Model Cities provisions of the Housing Act of 1966 as a problem of restoring the total neighborhood. The concept includes replacement or provision of major facilities such as housing, public transportation, schools, hospitals, health centers and cultural facilities as well as financing educational, sanitation, social and protective services that have deteriorated seriously with the declining ability of municipal income to cope with the increased need and demand for these services. Finally, the need for development of employment opportunities was recognized as a major concomitant of such a program. Along with acceptance of the concept of total neighborhood regeneration, went emphasis upon the preservation and rehabilitation of existing structures rather than their complete replacement. Thus the problem of measurement of the quality of housing assumes new and larger dimensions. Pressures for more accurate measures that will help a community assess the degree, as well as the magnitude, of its housing problem are multiplied as the complexities are recognized and more sophisticated approaches and resources become available.

The pressures come from two sides:

- Statutory mandates of the Federal Government that local communities must meet specific planning standards to qualify for various types of renewal and housing funds.
- 2. Growing pressures of public policy makers within the local community that they be furnished with a more adequate data base for decision-making purposes.

The planning orientation of Federal housing legislation received further impetus in the Workable Program requirements of the Housing Act of 1954. During the 1960's, Community Renewal Program Funds provided support for develop ment of objective criteria for the allocation of housing and renewal resources.

Cne of the outcomes of Federal legislation undoubtedly has been the influence on the professionalization of municipal housing and renewal efforts. On a larger front, one of the less well recognized facets of twelve years of administration under Mayor Robert F. Wagner is that major advances were made in the professionalization of the upper appointive echelons of municipal government in New York City. $\frac{2}{}$ This trend, nurtured in the Wagner Administration, has been developed and extended over the past 2-1/2 years under Mayor John Lindsay. The massive reorganization of the Executive Departments of the City government has been accompanied by an influx of new, young blood that, if sustained and retained for any reasonable period of time, will provide a major infusion of new and talented personnel resources not experienced by the City since the depression of the 1930's drove into the security of civil service tens of thousands of young college-trained persons of that day. Supplementing the inflow of new talent has been the increased utilization, through new staff acquisitions and on a consultant basis, of modern analytical techniques such as systems analysis, operations research, program-planning-budgeting approaches pioneered by the Defense Department, the Budget Bureau and other sectors of the Federal Government.

The reorganization of City agencies into Administrations that combine similar activities resulted, in the housing and renewal field, in the consolidation under the Housing and Development Administration of seven major functional activities formerly carried out in four independent departments--urban renewal and moderate-cost housing development, relocation, management of City-owned properties in development areas, code enforcement, rent control and servicing of private new construction activity. $\frac{3}{1}$ The Department of City Planning and the City's (low-rent) Housing Authority remain independent agencies although Edward Logue, in his report to the Mayor, had urged that these functions also be consolidated under the Housing and Development Administration. Departmental lines have been retained for operational purposes but for policy purposes, department heads now are deputies of the Administrator.

The potential for development of a housing program whose components would be consistent with one another has been greatly enhanced under the reorganization. Never before had the formal structure of government encouraged or even permitted examination of the inter-relationships of various housing and renewal activities other than through special investigations or ad hoc studies authorized by the Mayor. Prior to reorganization, for the analytical staff or even the Commissioner of one housing agency to comment upon the possible adverse effects of the activities of another housing related agency, would have been considered administrative interference and would have subjected the transgressor to rebuke or worse. Under such conditions, it is possible to obtain (after seven years) a Community Renewal Program report wherein the only passing reference made to rent control in New York City is that "rising costs (of operating old buildings) deter many landlords, especially those who own rent-controlled buildings, from making necessary improvements." On the subject of code enforcement, systematic area-wide cellarto-roof inspections are regarded as a potential assist to preventive maintenance in relatively good areas while the Report notes that the most conspicuous result of full-scale punitive measures directed at landlords has been that "landlords have increasingly abandoned buildings."

Both the housing reorganization and the onrush of events have resulted in placing under critical scrutiny the relationship of rent control and code enforcement to the rate of deterioration and abandonment of structures in the City's housing inventory. In the brief period of the past six years, the City has witnessed a startling transformation in its housing situation. Between December 1962 and February 1965 available rental vacancies in the City nearly doubled--from 37, 500 to 68, 400 units. More significant is another new phenomenon--the sharp increase in vacant, boarded-up,or abandoned rent-controlled apartment structures, with or without occupants. As of December 1967, a computor run indicated that this figure had reached 2,000 buildings with 18,500 units plus an additional 700 buildings classified as rooming houses or other transient quarters that contained probably another 10,000 single-room units. $\frac{4}{2}$

A field review of this list revealed that it was not complete. In areas where the investigation was carried out, an average of two vacant structures were found for each one listed. There is good reason to believe that the 2,700 buildings on the list more readily may total somewhere between 4,000 and 5,000 containing 40,000 to 50,000 units.⁵/

A development of this incredible magnitude in a City whose vacancy rate probably was the lowest in the Nation as recently as 1962 has created both a serious set of problems and opened up major new renewal possibilities. It should be made clear that the abandoned vacant buildings phenomenon is not a unique one--it is a frequent occurrence in cities with a declining population and an increasing housing supply. Philadelphia experienced this seven years ago; it also has occurred in Cleveland, Detroit, Baltimore and Newark. New York City, with the largest collection of on-going public and publicly-assisted housing programs in the Nation, has added about 200,000 such units since 1950: about half are low-rent and half are middle-income rental or cooperative developments. The private sector has contributed nearly 500,000 houses or apartments. The net addition to the City's housing supply (after deducting all losses) was about 500,000 units. Over the course of this period, meanwhile, the City's total population is estimated to have decreased by approximately 200,000 (from 7.8 million in 1950 to 7.6 million currently). Sooner or later, the cumulative effect of this continued injection of new housing into the City's supply during a period when its population was declining had to show up somewhere. During the early part of the present decade, the major impact was on the City's rooming house inventory. Our current estimates are that in excess of 45,000 rooming house units have disappeared from the market since 1960--primarily through demolition and to a lesser extent through conversion to apartments. Tens of thousands of Negro and Puerto Rican households have shifted from rooming houses into low-rent (controlled) apartments that have become available in many of the older sections of the City.

The climax to this process came when the adoption of a new and more restrictive Zoning Ordinance in December 1961 led to an outburst of new construction that jumped the rate of new units completed from an average of 31,000 in the 15 years 1947-1961 to 52,000 annually for the four years 1962-1965. In the effort to "beat the Zoning Ordinance" builders placed into construction every buildable plot in the city that they owned or could acquire. The 4-year output of 209,000 new units resulted in a net addition of 186,000 units to the City's total inventory. Estimated net new household formation during this period equalled about 116,000 households which led to a gross addition to the city's vacancy supply of about 70,000 housing units. As a consequence of the chain of housing turnover that ensued, the new units gradually were absorbed and tens of thousands of vacancies began to appear in other sectors of the housing inventory, many in the form of vacant and abandoned buildings scattered throughout the city. In essence, a large part of the abandoned building phenomenon in New York City is associated directly with housing output substantially in excess of new household formation over the past two decades. For years, the City has been waiting for the day when the supply of housing would reach a stage wherein a sufficient surplus of housing would appear that would permit old and obsolete units to be drained off and replaced in an orderly renewal process. Unfortunately, the market does not work in such an orderly manner. First, these vacant buildings are scattered throughout the City. And in those sections of the city where they have been concentrated, the result included some severely destructive side-effects. In some areas where vacant structures became numerous, they constituted a hazard and danger to the residents of the neighborhood. In sections of the city, such as the South Bronx and in Brownsville-East New York in Brooklyn, where this phenomenon was accompanied by rapid change in the racial and ethnic composition of the neighborhood, the emptying structures along with the accompanying vandalism and criminal activity made the neighborhood literally unsafe to the older residents, with the result that entire blocks have been evacuated and many structurally sound buildings have been lost.

In one sense this may be regarded as a deplorable loss of useful low-rent housing. But where it occurred in areas that are being fled by their occupants, it also is a reflection of neighborhoods that no longer are functioning. From this standpoint, the Brownsville-East New York phenomenon may be regarded as an opportunity to clear and rebuild neighborhoods since the opportunity to rehabilitate and preserve them has been lost.

The Administration has taken this view and has used Federal funds to demolish, in Brooklyn alone, some 500 structures comprising about 2,500 units in the latter half of 1967. A large proportion of these were in Brownsville-East New York. It was ascertained from data supplied by the Bureau of the Census that 2/5 of the housing demolished with Federal funds in 1967 was classified as substandard in 1960. These demolished buildings represent the end of a market process that clearly demonstrates the functioning of "filtration" in periods of high output that exceeds normal market demand.

If this were the end of the story, it might be said that the city's problem is not overly serious. We have discovered to our dismay, however, that the abandoned building phenomenon is not limited to decaying areas and obsolete buildings. This process also has encompassed perfectly sound, solid, elevator-buildings built to modern standards in the 1920's. To some extent, such buildings may have been caught up in the weakening market in low-income areas, particularly those involved in rapid changes in racial and ethnic composition. Evidence exists, however, that some portion of the abandonment process may constitute much more than the normal market process described above. As a consequence, a full-scale investigation into this snow-balling development has led to investigation of concentrated code enforcement activities of the city as well as punitive rent-control actions. The inquiry currently under way is designed to ascertain to what extent a program of intensive code enforcement (cellar-to-roof inspection of every multi-family structure in a neighborhood) designed to induce owners to eliminate code violations, actually has had the reverse effect. Legislation permits the City's Rent Agency to reduce rents in buildings that have certain code violations. Serious questions have been raised as to whether this combination of activities has accelerated the abandonment process. Thus the correlation of cyclical code enforcement, rent reductions, and the subsequent abandonment of buildings is under intensive investigation. Since most owners of marginal buildings with controlled rents are faced with a negative cash flow situation in removing code violations, it appears that many do not find it worthwhile to continue operations when punitive action is undertaken.

In addition to the above investigation, the Rent Agency earlier had contracted with Professor George Sternlieb to conduct a major study of the cost of operating rent-controlled structures in an effort to ascertain definitively the overall operational economics of the rent-controlled sector. $\frac{6}{}$ The Rand Corporation is conducting for us an even wider study of housing costs that covers all housing ranging from the poorest slum structures to luxury buildings. It is clear from the above that analytical approaches that cut across parochial departmental boundaries offer dramatic possibilities of coming to grips with problems whose political potency has been so great that they have remained untouched for many years beyond the point where rational investigation and correction was warranted.

The potential size of the deterioration problem in New York City that could lead to abandonment can be sketched in outline. Older rent-controlled buildings, owned free and clear, can be operated on a break-even cash flow basis of about \$15.00 per room, (including a requirement for about \$2.50 per room in taxes and about \$1.00 for management) with no allowance for (1) return on investment, or (2) reserves for major improvements. An allowance for necessary reserves would increase break-even rents to \$18.00 and if we wished to allow the owner a 15% return on the assessed value of the building, average rent per room would reach \$20, a figure that could liquidate a reasonable mortgage structure.

In 1965, rents per room for rent-controlled structures in New York City were distributed as follows:

Rent per room	Number of units
All units	<u>1,307,000 a/</u>
Less than \$10	27, 700
\$10 to \$14	249, 500
\$15 to \$19	242, 100
\$20 to \$29	464,700
\$30 to \$49	240,500
\$50 to \$74	61,900
\$75 or more	20,600

a/omits 28,700 no cash rent units

Thus clearly in the danger zone are some 520,000 units with an aggregate of about 2.3 million rooms or nearly half of the 4.9 million rooms in the existing rent-controlled inventory. Crude calculations of the aggregate additional rental income required for proper maintenance of these buildings (using the \$20 per room figure), or the implicit subsidy of renters being borne by a combination of landlords, the City and in the form of housing deterioration, amounts to approximately \$155,000,000 or \$300 per unit annually. This is a surprisingly small figure when we consider that it relates to the potential loss of two-fifths of our rent-controlled housing stock. This 'deficit' also is a small figure next to an estimate of \$300,000,000 as the City's annual welfare payments for housing. Incorporated in this estimate, however, are rent increases approximating 122 percent for the 2 percent of the rent-controlled units with rents below \$10 per room; a 60 percent increase for 19 percent of the inventory with rents between \$10 and \$14 per room and a 14 percent increase for 18 percent of the inventory at rents of \$15 to \$19 per room. Hypothetically, if the City were to pick up, in the form of a City-financed rent subsidy, that portion of rent increases exceeding 20 percent of their income for all families whose rents were increased to

\$20 per room per month, it is doubtful that the City budget would be taxed by as much as \$100,000,000 annually--which is pin money relative to the City's 1.36 billion dollar welfare budget. -

Unfortunately, however, the above arithmetic omits a vital consideration. How many of the 520,000 apartments in the above calculation are in such condition that they require major rehabilitation or at least substantial capital replacements in order to put the buildings in sufficiently decent working order that a rent of \$20 per, room per month would properly maintain them?⁸/This question brings us to a full turn of the wheel. The objective data on the quality of the City's housing are soscanty and so incomplete that it is a source of continued embarrassment to City officials when they are asked, at least once a week, questions such as the following:

- 1. How many units in the City are so bad that they should be demolished?
- How many units require (and warrant) complete rehabilitation (at an average of \$10,000 per unit)?
- 3. How many units require only substantial improvements or equipment replacements to return them to useful life (range of \$1,000 to \$4,000 per unit)?

What is worse, the estimates that are available in the City, attributable to various agencies or individuals, are embarrassing in their range. For example, note the following estimates for New York City:

U.S. Bureau of the Census (1965)

- 1. Substandard units 214,000
- All units that are deteriorating; plus sound units with shared plumbing facilities; plus all dilapidated units. 584,000

Community Renewal Program (1965 Report), City of New York

- "Somewhere between 450,000 and 550,000 of the City's households cannot find housing of an appropriate size and rental to fit their needs."
- 2. "There are more than 800, 000 dwelling units located in deteriorating areas where some form of governmental assistance is essential to restore a sound environment. "

Frank S. Kristof--Housing Policy Goals and Turnover of Housing, Journal of the AIP, August, 1965.

Housing need (replacement of substandard units and standard units with 1.01 persons per room or more):

> Jan. 1, 1960--385,000 Jan. 1, 1970--210,000

Census data alone, depending upon how one chooses to interpret them, provided in 1965 a minimum estimate of 214,000 substandard units to a maximum of 584,000 "unsound" units as interpreted by the Abrams Task Force Report to Mayor Lindsay in January 1966.²⁴ The Community Renewal Program report of 1965 with the estimate of "800,000 housing units located in deteriorated areas" is less helpful in arriving in magnitudes although the statement is a recognition of the neighborhood conception of the renewal problem.

Cn the other hand, my 1965 estimate of a decline of housing needs from a figure of 385,000 in 1960 to 210,000 in 1970 appears optimistic in face of recent developments suggesting that continued deterioration in rent-controlled structures containing over one-half million units plus an accelerating rate of abandonments, appears to be a clear and present danger. It is my judgement that, unless remedial steps are soon taken to provide sufficient incomes to owners of rent-controlled buildings to restore an almost lost incentive to the maintenance of their properties, the City will have a new public utility on its hands within the next decade--about 50,000 rent-controlled structures containing in excess of one-half million units in various degrees of obsolescence, decay and deterioration. A worse disaster than the withdrawal of private professional real estate resources from the management of low-rent properties cannot be conceived for New York or any other city with a large rental supply. The public sector is totally unprepared to cope with the magnitude of responsibilities implicit in such a transfer.

Certainly, the problem of a decaying housing stock is no monopoly of New York City. It is endemic to most of the older cities of America. George Sternlieb's pioneer work on The Tenement Landlord in Newark showed clearly that many forces were operative in creating the miserable slum conditions of an older central city. As the composition of the population in these areas changed, attitudes toward properties changed, born of a combination of inexperience, fright, stupidity and cupidity, on the part of tenants as well as property-owners. City services declined perceptibly with the advent of lower-income nonwhite families insufficiently sophisticated to develop political pressures for the maintenance of public services. Ownership shifted into weak, inexperienced

or absentee hands and disinvestment in properties became the norm. The strongest attempts at maintenance of properties came from owneroccupants or professional real estate operators. As properties deteriorated, vacancies rose, rents fell, and the quality of tenants became more marginal. It should be noted that rent control played no part in the Newark story. Furthermore, rent control largely is irrelevant in areas of New York City that have reached similar states of dispair. Controlled rent levels generally are at, or at above, the market price in such locations and stringent code enforcement only compounds the problem.

The special problem for New York City is that areas of the city that contain fundamentally good housing where rents are substantially below market levels also appear to be subject to deterioration and ultimately, to abandonment of properties. To the extent that rent control is responsible for disinvestment and the withdrawal of professional real estate management from presently sound areas, the City is unnecessarily inviting disaster that a modification of the rent laws can avert.

For the rock-bottom areas of the city, only a massive infusion of public funds implicit in the Model Cities sections of the Housing Act of 1966 can help the situation. It will take a full-scale mobilization of all the public resources available, as well as the identification and involvement of the local residents, with these endeavors, to break the cycle of unemployment and low-incomes, poor health, poor education and other lacking public services. The dimensions of this task have not even begun to be perceived.

The task of reconstructing and rehabilitating the housing stock of these and less seriously affected areas requires a base of detailed and accurate information on condition and quality of the existing inventory. Housing oriented persons are well aware of the dissatisfaction, within the Bureau of the Census, of previous attempts to assess condition of housing in the effort to obtain some measure of quality of housing.

It is a frustrating fact, however, that if Census data on this subject are discarded, public officials will be left with absolutely no basis for arriving at a satisfactory determination of the quality of the city's housing inventory, to say nothing about satisfactory estimates of the number of units that require major or minor rehabilitation versus those that should be demolished. With the greater proclivity of public administrators to rely upon their planning and research staffs to generate such information as a guide to the allocation of housing and renewal resources, it becomes increasingly clear that the responsibility of the Bureau of the Census for improved housing quality information in 1970 is greater than ever before. That the problem is a thorny one is indisputable. But that it should be evaded or sidestepped at a time when such information is more vital than ever is inconceivable. Time is critically short for the work necessary to accomplish this end. It would be a most unfortunate failure if the Bureau of the Census did not meet the challenge necessary to give local public officials a usable tool to ascertain the magnitude of their housing task and to provide a reliable benchmark for a measure of progress.

- 1/ To be sure, the Housing Act of 1949 was not the beginning of housing as a public policy issue since many decades of local, state and federal legislation relative to many aspects of the subject preceded and was necessary to development of the political momentum that culminated in the 1949 Act.
- 2/ Mayor Wagner more than once expressed the view that he regarded this as his major contribution to New York City during his tenure. It is literally true that the majority of his political appointees to top levels of the municipal government had genuine familiarity and ability to deal with their areas of responsibility. He, furthermore, had occasion subsequently to commend Mayor Lindsay's efforts in accelerating this trend.
- 3/ The latter refers to examination of and approval of plans for new construction, issuance of building permits, construction inspections, and issuance of Certificates of Occupancy for completed residential structures.
- 4/ The 1961 figure did not include a count of vacant rooming houses and other transient quarters.

- 5/ A vexing aspect of abandoned buildings is that there is no single channel by which they come to the attention of the City. Some are noted when the owner obtains a certificate of eviction from the Rent Agency; others are recorded when complaints to the Code Enforcement Agency lead to their discovery, while inspectors in the course of their rounds note the existence of such structures and report them for the record. Another distressing facet of this story is that many owners have abandoned their buildings along with their occupants. Such owners have simply ceased to collect rents, literally disappearing from the scene.
- 6/ Professor Sternlieb's study of Newark's problem tenements (<u>The Tenement Landlord</u>) was a major contribution to knowledge in the analysis of owner and tenant attitudes and the economics of marginal tenement buildings.
- 7/ This is not quite the complete picture. If we were to assume that owners of all buildings with rental incomes greater than \$20 per room were permitted to restructure their rent rolls to obtain an average of 15 percent more income (for which they would be deliriously happy) another \$148,000,000 per annum would be added to the aggregate rent bill of tenants. Based upon the same supplemental City rent subsidy premise described above, it is doubtful that the City's welfare costs would rise by more than an additional \$50 million per annum.
- 8/ Also relevant for public policy is how much would the capital expenditure be and how would it be financed and amortized.
- 9/ An "unsound" unit as used above is any unit that is not classified by the Census as "sound, with all plumbing facilities" for the exclusive use of the household.