Name

Roberto Goizueta

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Hello,

My name is Roberto Goizueta. I live a block from the Leonard branch of Brooklyn Public Library in East Williamsburg, and its renovation history is a clean example of the exact inefficiency this Commission exists to fix.

From 2022 2029, our small single story library will have been closed for at least 4.5 years across two renovation periods, at a cost of nearly $10M. If the renovations had just been combined, we would have saved money and had additional years of access to vital community infrastructure.

Leonard Library closed at the end of 2022 for renovations that were projected to last 2 years, but lasted until August 2025 (32 months) at a cost of $4.8 million. After less than a year of being open, we learned that it was closing again at the end of 2027 for another projected 2 years to install an elevator, accessible bathroom, and stairs, at a cost of another $5 million. The system rewards closing the same library twice. We pay for it twice, and lose it twice.

To be clear, this work needs to happen. The accessibility upgrades especially are long overdue. What I don't understand is why both renovations couldn't have been completed together at a reduced cost, or why those in charge don't believe it necessary to provide library services during these closures.

I implore COGE to fix the system that produced this waste and to find a way for us to maintain library access in the upcoming closure. I can understand a library being temporarily closed, but I don't understand why ours is temporarily open.

Thank you,
Roberto Goizueta

Attachment(s)

Drop files here or click to browse

Date Submitted: June 20, 2026

Topic: Unnecessary Bureaucracy, Budget Issues, Reporting Requirements, Enforcement

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Unnecessary Bureaucracy

Subtopic: Reduce perceived wasteful spending on capital projects.

Name

Lori Sander

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I was awarded a Temporary Order of Protection from a Kings County Family Court judge, but because the case didn't involve physical violence, they said they wouldn't serve the paperwork until two weeks before the hearing, making the Temporary Order, which was created two months before the hearing and non-actionable until it's served, practically useless to protect me. I subsequently received further threats and harassment from my ex partner / landlord after I had the Temporary Order of Protection in place, but because it wasn't served, could do nothing about it. Harassment, threats, and escalating behavior often become something more. I would like additional process servers to be hired to make a judge's rulings take effect much sooner, possibly within 24 72hrs of them passing an initial temporary order of protection. It is inefficient for a judge to spend time passing an order that isn't enforceable for weeks or months.

Attachment(s)

Drop files here or click to browse

Date Submitted June 21, 2026

Topic Enforcement × Unnecessary Bureaucracy × Tenant Protection ×

Method Received Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Improve court operations

Name

Emm Wilson

Email [redacted]

Professional Affiliation CUNY College of Staten Island

Zip Code [redacted]

Public Comment

I would like to see bus rapid transit, safer bike infrastructure, and rail service to the North Shore prioritized. Through the excessive use of speed cameras, speed bumps, and reduced speed limits across the island, there is an obvious want to limit traffic and increase pedestrian safety, but no acknowledgment of why so many Staten Island residents depend on cars: slow, inefficient busses, no trains, and little protection for bikers leave us with few alternatives. Do better for our borough by prioritizing safe, efficient transportation.

Attachment(s)

Drop files here or click to browse

Date Submitted June 21, 2026

Topic Street Redesigns × Unnecessary Bureaucracy ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Streets

Subtopic	Improve public transit and bike infrastructure in the North Shore of Staten Island

Name

Sharon Pierce

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I would like to see the city focus more on infrastructure, flood prevention and completion of the Van Wyck.
I don't agree with the M96 bus lanes being in residential blocks, the noise from traffic outside gets to be unbearable at times. I am often blocked from leaving out of the garage as well. Parking spaces were reduced in the block as well. The bus lane should begin on the East side if needed.

Attachment(s)

Drop files here or click to browse

Date Submitted June 22, 2026

Topic Street Redesigns, Unnecessary Bureaucracy, Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic

Name

Eric Richardson

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

See attached testimony.

Attachment(s)



Commission on Government Efficiency ...

Date Submitted June 22, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Create a new Department of Fleet Management, moving NYC Fleet away from DCAS

Commission on Government Efficiency

Testimony on New York City Fleet

Good evening, Chair and members of the Commission.

Thank you for the opportunity to testify on a proposal that would strengthen government efficiency and accountability, improve operations, advance the city's sustainability goals, and enhance road safety in New York City and beyond.

I am here to propose the creation of a permanent Department of Fleet Management, established through the New York City Charter and reporting through the Deputy Mayor for Operations.

Before discussing the proposal itself, it is important to acknowledge what New York City has already accomplished.

Today, fleet management is housed within the Department of Citywide Administrative Services, commonly known as DCAS. I am proud to have served the city at DCAS for 23 years before retiring in July 2024.

Before 2012, each city agency managed its own fleet with limited citywide direction, no shared services, and outdated tracking and reporting systems. While some agencies, such as the Parks Department, pursued sustainability goals, those efforts depended largely on the priorities of individual fleet or operations managers.

For almost fifteen years, New York City has been recognized nationally and internationally as a leader in municipal fleet management. Through the work of NYC Fleet and more than 1,400 dedicated public servants who manage and maintain city vehicles each day, New York has become a model for operational excellence, fleet sustainability, data-driven decision-making, and vehicle safety.

The city has led in fleet electrification, alternative fuels, right-sizing, fuel management, road safety, and performance measurement. Fleet professionals around the world look to New York for best practices. New York now operates the world's largest municipal electric vehicle fleet, including emergency service vehicles; has implemented a renewable diesel program that reduces emissions by more than 50%; and has developed Clean Fleet and Safe Fleet Transition Plans in cooperation with the US DOT Volpe Center that are used globally as examples of how to move transportation to a safer and more climate friendly future.

This proposal is not about correcting a failure; it is about preserving a success. It would ensure that one of the city's most important operational functions has the permanence, visibility, and institutional support needed to succeed for decades to come.

DCAS has played a critical role in building the modern fleet program we see today. However, the scope and importance of fleet management have grown significantly over the past two decades.

Fleet management is no longer limited to buying, repairing, and maintaining vehicles and garages. It now sits at the intersection of public safety, climate policy, emerging technology, fiscal responsibility, workforce management, emergency preparedness, and operational efficiency.

The city operates more than 25,000 vehicles that support nearly every municipal function. These vehicles travel hundreds of millions of miles annually and are among the most visible public assets owned by the city.

They deliver critical services, respond to emergencies, maintain infrastructure, and interact with millions of New Yorkers and visitors each year.

Given that reality, I believe fleet management has evolved into a core governmental function deserving of permanent recognition within the City Charter.

The first reason is accountability.

A dedicated Department of Fleet Management would create a clear, transparent structure for citywide fleet policy, performance, vehicle acquisition standards, safety initiatives, sustainability goals, and public reporting.

The second reason is efficiency.

The city’s fleet represents a multi-billion-dollar public investment. Managing it effectively requires centralized leadership, long-term planning, and consistent standards, including decisions about maintenance locations, agency staffing levels, vehicle specifications, procurement processes, and the balance between citywide and agency needs.

The third reason is sustainability.

New York City's climate goals require long-term leadership around electrification, charging infrastructure, emissions reduction, and operational transformation. A dedicated department would provide that continuity.

The fourth reason is road safety.

The city’s fleet is, and should remain, the safest large municipal fleet in America. A Department of Fleet Management could further strengthen Vision Zero by advancing safety technologies such as intelligent speed assistance, expanding citywide and agency-specific driver training, improving claims processing, and institutionalizing vehicle crash reviews.

Finally, this proposal is about institutional permanence.

Government changes. Agency priorities change. Commissioners change. Administrative structures change.

One challenge of housing fleet management within DCAS is that fleet operations must compete for attention with many other important agency responsibilities, including procurement, facilities management, real estate services, and human resources functions.

This is not a criticism of DCAS.

In fact, NYC Fleet’s success is what makes this conversation possible. But a function as important as fleet management deserves a dedicated mission and leadership structure.

A Department of Fleet Management would protect the gains achieved over the past fifteen years while creating a stable framework for future innovation and growth.

This proposal is not revolutionary; it is evolutionary. It builds on a globally recognized success story and positions New York City to remain a leader in fleet management for the next generation.

It strengthens accountability, improves efficiency, advances sustainability, enhances safety, and ensures that the city's fleet program remains strong despite future political or organizational changes.

For these reasons, I respectfully encourage the Commission to consider establishing a Department of Fleet Management within the New York City Charter under the oversight of the Deputy Mayor for Operations.

New York City has spent the last fifteen years building one of the finest municipal fleet programs in the world. Now is the time to give NYC Fleet a permanent place in the City Charter as its own entity.

Thank you for your time and consideration

Name

Katherine Winningham

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Comments to the New York City Charter Revision Commission Regarding Franchise and Concession Review Commission process for Non-Exclusive Intellectual Property Licenses

Attachment(s)



KW Written Testimony CRC-2.pdf

Date Submitted June 22, 2026

Topic Franchises & Concessions

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Public Realm
Subtopic	Reform FCRC to decouple merchandise licensing from street/infrastructure use

Comments to the New York City Charter Revision Commission Regarding Franchise Concession Review Commission process for Non-Exclusive Intellectual Property Licenses

Chair Gaspard and honorable members of the New York City Charter Revision Commission:

My name is Katherine Winningham. I was Senior Counsel at the New York City Law Department in the Legal Counsel Division for 20 years advising on best practices to protect City trademarks, copyrights and other intellectual property (IP) as well as transactions with IP components - ranging from short-term licensing for the production oft-shirts, toys or housewares bearing City marks to 20-year coordinated street furniture franchise (newsstands, bus stop shelters) or 20-year Parks concessions (restaurants, skating rinks, golf courses). I am now a consultant on maintaining the City IP and assisting on matters requested by the City.

My comments are based on my experience in protecting and licensing IP rights and do not reflect official views.

After September 11, 2001, the City needed to protect its rights in the designs and acronyms used to identify our uniformed agencies such as the Police and Fire Departments. Online platforms were awash in unauthorized goods, street vendors were selling counterfeit merchandize near Ground Zero and the City was losing control of what goods featured its IP and losing revenue. I was asked to apply best practices from my days at a NYC firm to set up the legal framework for City licensing as a way to protect and preserve the City's interest in its IP, that revenue from the program benefited the City and to work to get enforcement moving.

In the US, trademark rights are acquired by use and may be registered with the US Patent and Trademark Office. Registration is not required, but it provides substantial advantages - treble damages in the event of infringement; take downs on e-commerce sites such as Amazon, eBay, Etsy; and US Customs seizure of infringing imports at the border. Registration also leads

to a first-class licensing program drawing higher royalties and access to the best business partners. Licensing is also essential to maintaining world-wide rights and keeping City registrations viable in the US and foreign jurisdictions. If we lose licensing business, our rights to particular lines of goods in particular locations may be vulnerable to attack.

The City's iconic marks (NYPD, FDNY, Parks, Sanitation, the NYC design used by most agencies) were registered with the US Patent and Trademark Office to put the City in the best possible position to generate revenue, allow City residents, tourists and others to show affinity for the City and its institutions and expand good will that the most famous marks indicate - much like major league sports teams and university licensing programs. An early brand asset study indicated that New York City was among the 5 most popular brands (along with brands like Disney). We entered into an early deal with Major League Baseball for online retail sales, transferred existing licenses to the City and expected to conduct business as most IP licensors do - via arm's length negotiations with multiple deals (none exclusive) so that merchandise featuring City IP could be sold at a variety of price points all of good quality and with a goal of collaborating with we were particularly looking to collaborate with other brands that are among the most immediately recognizable in their markets - Nike, Adidas, Mattel.

In 2006 after the selection of Snapple as an exclusive beverage partner, the Court of Appeals in In re Comptroller of the City of New York v. Mayor of the City of New York, 7 N.Y.3d 256 (N.Y. 2006), determined that all City property, real or intangible, would be subject to the same process. The Court read NYC Charter section 362(a), which defines a "concession" as "a grant made by an agency for the private use of *city-owned property* for which the city receives compensation other than in the form of a fee to cover administrative costs, except that concessions shall not include franchises, revocable consents and leases" to cover both real property and IP.

The decision has had a substantial adverse impact on the City's licensing program since any merchandise license or sponsorship agreement worth more than $11,000 is subject to the same Franchise Concession Review Commission process even though the City doesn't offer exclusive trademark licenses and none of these licenses allow exclusive use of City streets, sidewalks or park property to a concessionaire for private use or capital installations.

Treating a 4-6 year non-exclusive merchandise license as the equivalent of exclusive occupancy or installation of capital structures on City property makes little sense. Merchandise licensing simply does not involve the same types of property, degree of risk to the City or the same performance demands on the licensee. Printing t-shirts or making keychains and accounting for and paying over a percentage of revenue is a much more limited activity and we are able to address risk by requiring the same or stricter audit, insurance and indemnity provisions as the City requires in other contexts. Rights to immediate termination, oversight of product samples/production enable a degree of control that is not present in concessions or franchises where a third party is installing and maintaining infrastructure and must be reimbursed for its outlay for termination to occur.

The FCRC multi-step process - a minimum of two public hearings or meetings on substantial notice, publication of paper notification in outlets not familiar to license partners, an oblique online system designed for City vendors who are being paid money - drive away the type of partners the City is most interested in attracting. Or, it limits us to short-term deals worth under $11,000 because the highest quality sports, souvenir, toy and housewares makers are unwilling to wait 6 to 9 months for a City process, have the monetary terms publicized and be forced to disclose and make public record address information about where their CEOs reside. In addition, recent FCRC rule changes require that administrative agreements worth less than $11,000 must be registered. This imposes incredibly high hurdles for businesses that want to follow the right process to license City IP.

The current process puts the City in the worst possible position to obtain the best business deals. If the City enters into a coop or joint license which normally results in a split of standard royalty rate because the licensee (e.g., Nike, Mattel) is bringing its own valuable brand to the product, then every other licensee demands the far lower royalty rate. Private business who do not routinely do business with governments are not amenable to waiting 6 to 9 months and their new product lines or seasonal launches do not coincide with the FCRC schedule. It is impossible to act with flexibility or speed in response to a unique opportunity unless the product run and revenue are limited to 2 years and $11,000 in revenue. And once you walk through the full FCRC process, many partners will walk away and decide that they won't do business with the City.

There are adequate means to protect City interests in ensuring the without imposing full FCRC process on merchandise licenses or other IP transactions that do not allow exclusive use of City real property.

It is my recommendation the Commission consider amending Charter section 362(a) to specify that it applies to the private use of "city-owned *real* property". In the alternative, the Commission could explore options to amend Charter sections 371, 373, 374 to streamline a process for these transactions that is faster and far more flexible while protecting the City's interests.

Name

Andrew Rasie

Email [redacted]

Professional Affiliation Civic Hall

Zip Code [redacted]

Public Comment Please find a copy of my testimony from the session on June 11th at Brooklyn Law School.

Attachment(s)



Public Testimony to the Commission on Government Efficiency (COGE)

COGE_Testimony_Rasiej.docx

Date Submitted June 22, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Procurement
Subtopic	Reform procurement so that the City commissions software and upgrades for life of product

Public Testimony to the Commission on Government Efficiency (COGE)

Andrew Rasiej, Founder, Civic Hall

Good morning. My name is Andrew Rasiej. I founded Civic Hall, and I've spent thirty years working at the intersection of technology and the public good, and also imploring every city administration along the way to digitally transform itself, to operate at the level of the rest of the world.

During the transition, I handed a memo to the mayor, which I've attached to my submitted testimony, warning him that he was about to set out on a long, arduous road trip, but the car he'd been handed was a 1998 Pontiac. Bald tires, a leaky gas tank, a steering wheel that comes off in your hand, and a speedometer stuck on five. I suggested he could choose a different car, but it would take time, because this really isn't about technology. It's about changing the city's culture of innovation.

So I'll admit I giggled when I heard COGE was going to work on government efficiency. Because how efficient can you really make a 1998 Pontiac? Rotate the tires, change the oil, maybe tweak the carburetor, but in the end you're still driving a 1998 Pontiac. I applaud the effort. I just want to suggest you might develop a strategy to upgrade the city to a 2015 Toyota Prius.

Let me give you a concrete example, because procurement reform is one of your greatest opportunities. When the city buys software, it uses the same process it uses to buy school buses and pencils. It "procures" it. But software isn't a school bus. A school bus is the same bus the day you buy it and three years later. Software starts going out of date the day you install it. And the city's process is so slow, RFP, contract, approvals, that the technology is often obsolete by the time it's delivered. Software needs constant updates, security patches, fixes.

Think about your iPhone. Apple doesn't sell you the phone and then charge you every time the operating system needs an update. The upgrades come with it, for the life of the product. That's the relationship the city should have with the software it pays for. The city shouldn't procure software. It should commission it, with whoever builds it on the hook to keep it current. That costs more up front, but it pays off in efficiency down the road.

So here's the vision I want to leave you with. Imagine a city where every agency has the capacity to use the most modern tools itself, connected by a shared platform where agencies trade what they build and link their data together. Because the real prize,

especially with AI, isn’t one more app. It’s what becomes possible when the city’s data can finally talk to itself. That’s where the massive gains in efficiency live.

But that doesn’t happen on its own, and it doesn’t happen through an Office of Technology that delivers systems down to everyone else. That’s the old model, and it’s the bottleneck. Staying current isn’t a project you finish. It’s a permanent condition of governing from now on. So in the memo I gave the mayor, I recommended the city create an Office of Digital Transformation, led by a Chief Digital Officer reporting directly to the mayor, the first deputy mayor, and the director of OMB. Not to run technology for the agencies, but to build the capacity inside every one of them, and to keep the whole city moving forward instead of falling behind.

I have much more to say about how we get there, but my time is up, and I’d welcome the chance to come back and give you the full picture. Thank you.

Name

NYC Parent Coordinator

Email	[redacted]
Professional Affiliation	NYCDOE / NYCPS
Zip Code	
Public Comment	Dear Chair Gaspard and members of the Commission: Further to the written testimony I submitted to the Commission as a New York City Parent Coordinator, I am attaching supporting evidence for the record. The attached document sets out the factual basis behind that testimony: the history and scope expansion of the Parent Coordinator title since its creation in 2003, the civil service classification framework under Charter Chapter 35 and DCAS Personnel Rule 11, and publicly available data drawn from the official Local 372 "All Community Titles" pay order effective May 26, 2025. It documents the structural classification gap described in my testimony the absence of any standing mechanism to re examine a title against its evolving duties - and outlines why a Charter-level review mechanism would address it. It is offered to support that structural case, and not as a request that the Commission set compensation or reclassify any title, which I understand falls outside its authority. I respectfully ask that this material be entered alongside my prior testimony in the public record. Thank you for the opportunity to contribute to the Commission's work. Respectfully submitted, A New York City Parent Coordinator 28 years of continuous service

Attachment(s)



Civil Service Classification and the Parent Coordinator Title: Supporting Evidence

Purpose of this document

Key Findings

PC_Evidence_File_COGE-4.pdf

Date Submitted: June 22, 2026

Topic: Reporting Requirements, Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Government Operations

Subtopic: Reform civil service so that the City regularly reviews titles and salaries

SUPPORTING EVIDENCE

Civil Service Classification and the Parent Coordinator Title: Supporting Evidence

Supporting evidence submitted to the Commission on Government Efficiency (COGE)
Accompanying the written testimony of a New York City Parent Coordinator with 28 years of continuous service

Purpose of this document

This document supports written testimony identifying a structural feature of the City's civil service system: there is no standing mechanism to ensure that a title's classification is periodically re-examined against the duties its holders actually perform as a role evolves. Any title whose responsibilities grow faster than its classification presents this same question; the Parent Coordinator title is offered as one documented case study of it. The material below is factual reference. It is not a request that the Commission set compensation, reclassify any title, or alter any collective bargaining agreement, each of which lies outside the Commission's authority. Salary data appears only as the clearest available measure of how far a title's official classification can drift from the work it actually involves.

What the record shows. NYC's ~1,800 Parent Coordinators are classified on the Community Associate (title 56057) schedule — a flat band running from roughly $44,430 (first two years) to a $73,941 ceiling, with no automatic steps and no service-based longevity structure. Comparable titles maintained under a current classification — UFT teachers, paraprofessionals, and school secretaries, and the adjacent DC 37 Community Coordinator title (56058, ceiling $97,343) — carry service-based advancement. The contrast is offered not as a pay claim but as evidence of how a classification set in 2003 and never revisited has fallen out of step with the work the title now involves.

What a Charter-level fix would look like. The remedy is not for this Commission to set any salary. It is to build into the Charter a standing requirement that the City periodically re-examine whether its job titles still match the duties performed (periodic review), publish the workforce data that would reveal where titles and duties have diverged (transparency), and report when a title's real duties have substantially outgrown its official specification (accountability). Such a mechanism would surface cases like this one as a matter of routine, rather than leaving them to be discovered only when an individual compiles the record.

Key Findings

1. **The title was created in 2003 as a low-cost, narrowly-scoped liaison role, and has since absorbed substantially more work without a corresponding change in classification.** Created under Mayor Bloomberg and Chancellor Joel Klein as part of Children First, Parent Coordinators were originally advertised at $30,000–$39,000 to "create a welcoming environment in the school for all parents." The role has since expanded into tech support, attendance monitoring, public-health messaging, crisis/asylum-seeker response, translation/language access, and de facto counseling.
2. **Parent Coordinators have no salary steps and no longevity ladder.** They are paid as Community Associates (title code 56057, Non-Competitive class). The only automatic movement is a two-year graduation from the new-hire rate (~$44,430) to the band Minimum ($51,094); thereafter, reaching the $73,941 ceiling depends on negotiated pay orders, not seniority steps. By contrast, UFT teachers move two steps per year plus longevities at 5/10/13/15/18/20/22 years (each immediately pensionable); paraprofessionals get longevities at 5 and 15 years; and DC 37's own clerical unit won recurring increment payments (RIP) after 2017.
3. **The gap between this title and the adjacent one in the same series is large and widens over a career.** The adjacent Community Coordinator title (56058) — non-competitive, same Local 372 "Community Titles" schedule, similar community-engagement duties — tops out at $97,343, about $23,402 above the Parent Coordinator/Community Associate ceiling of $73,941. Because the Community Associate schedule has no

service-based advancement, a Parent Coordinator with 20–25 years of service can sit at the same ceiling as a two-year employee — a structural feature of the classification, not a function of individual performance.

4. **The lack of pensionable, service-based growth directly harms retirement security.** Parent Coordinators are members of the Board of Education Retirement System (BERS) — founded in 1921 for NYC education employees not eligible for the Teachers' Retirement System — not NYCERS. BERS pensions are based on Final Average Salary (FAS) × a service-based factor. For a Tier 4 member with 25 years, the factor is approximately 43.4% of FAS; Tier 6 uses a 5-year FAS. Because Parent Coordinators' pay flatlines and their only recent raise — the $2,000 Parent Coordinator Allowance (effective CY2024) — is explicitly non-pensionable, their pensions are permanently suppressed relative to titles with pensionable longevity.
5. **The classification framework contains no requirement of periodic review.** Under the NYC Charter (Chapter 35) and DCAS Personnel Rules 11/12, the Commissioner of Citywide Administrative Services classifies and reclassifies positions based on "duties, responsibilities and examination qualifications," and an employee or agency may apply for reclassification with appeal to the Civil Service Commission (Charter §813). What the framework does not contain is any requirement that a classification be revisited on a regular cycle, or whenever a title's duties materially change, once it has been set. Review occurs only if someone affirmatively initiates it.
6. **The question of how this workforce is defined is live in current city governance.** Public statements across the current administration have emphasized building the capacity of Parent Coordinators and evolving the role. This establishes that how the position is defined, classified, and supported is an active governance question — one a standing classification-review mechanism would serve rather than disrupt. The broader point is general: any title whose duties evolve faster than its classification presents the same structural question, and a standing review mechanism would address all of them rather than requiring each to be raised individually.

Details

1. Title history and scope creep

The Parent Coordinator role was created in 2003, a year after the state legislature granted Bloomberg mayoral control. The official launch salary was $30,000–$39,000 to "create a welcoming environment in the school for all parents." The DOE's "Roles and Responsibilities" sheet lists four primary duties: create a welcoming environment, increase parent involvement through outreach, support the principal in addressing parents' concerns, and support the PA/PTA. Chancellor's Regulation A-660 governs the PC relationship to PA/PTAs and bars PCs from handling PA/PTA funds.

In practice, the role has ballooned. Chalkbeat's reporting documents that during the pandemic PCs became their school's tech support, public-health workers, and family therapists, distributed devices, ran COVID screening, and chased chronic absenteeism. They are now front-line workers for the 14,000+ asylum-seeking students who enrolled. In Chalkbeat's March 2, 2026 survey, the newsroom heard from nearly 360 current parent coordinators — nearly 20% of the positions in the city. Asked if they were adequately paid, the response was an emphatic and overwhelming "absolutely not." One Manhattan PC summarized: "Love doesn't pay the bills." Unlike most school staff, PCs work year-round with no summers off and are often expected to be available early mornings, evenings, and weekends.

2. Current compensation structure

Parent Coordinators are covered by DC 37 Local 372's "All Community Titles" agreement. The underlying civil service title is Community Associate, code 56057, Non-Competitive class. Per Local 372's official pay order effective 5/26/2025 (verified against the published schedule):

Title (civil service code)	First 2 yrs	Minimum	Maximum
Community Assistant (56056)	$37,698	$43,353	$48,901

Title (civil service code)	First 2 yrs	Minimum	Maximum
Parent Coordinator = Community Associate (56057)	**$44,430**	**$51,094**	**$73,941**
Community Coordinator (56058)	$62,708	$72,114	$97,343

Chalkbeat (March 2, 2026) independently confirms the PC band: salaries start at $44,000 a year, going up to just under $74,000 for those who have already worked for the city for two years — mapping precisely onto the 56057 schedule. The governing citywide agreement (ratified spring 2023) runs from May 26, 2021 to **November 6, 2026**, delivering 3% raises in years 1–4 and 3.25% in year 5 (16.21% compounded), a $3,000 signing bonus, an $18/hour minimum, and a Child Care Trust Fund. Local 372 separately won a $2,000 annual Parent Coordinator Allowance beginning CY2024 — but per the union's own notice it is not base salary and is not pensionable.

The structure of the schedule: There is no automatic per-year step grid between the 56057 Minimum and Maximum. The only automatic movement is the 2-year graduation from new-hire rate to Minimum. The Community titles do not contain the steps or the pensionable longevity structure that other school titles carry — a feature of how these titles were classified.

3. Comparison titles

UFT titles with steps/longevity (the benchmark): Teachers move two steps per year up to Step 8B, then receive longevity increments at 5, 10, 13, 15, 18, 20, and 22 years — each becoming part of base salary and immediately pensionable. Paraprofessionals earn longevities at 5 and 15 years. School secretaries — a closely analogous administrative school title — have a defined step-and-longevity schedule.

DC 37 precedents: The 2017 DC 37 clerical unit contract created recurring increment payments (RIP) added to base salary, with a schedule starting at $370 after six years and rising to $2,512 after 18 years. Separately, DC 37 state-unit longevity payments run $1,500 (5 yrs) / $3,000 (10 yrs) / $4,500 (15 yrs).

The resulting gap: At the top of scale, the Parent Coordinator/Community Associate ceiling ($73,941) sits about $23,402 below the Community Coordinator ceiling ($97,343) for parallel community-engagement work in the same local — and, unlike a teacher or secretary, the title carries no automatic recognition for reaching 20 or 25 years of service. The comparison illustrates how the Community Associate classification was structured, relative to titles whose structures are kept current.

4. Civil service classification framework

All NYC jobs carry a civil service title in one of four jurisdictional classes; Community Associate (56057) is Non-Competitive. The Charter (Chapter 35) and DCAS Personnel Rule 11 empower the DCAS Commissioner to classify and reclassify positions on the basis of duties, responsibilities and examination qualifications. An agency or an employee may apply for reclassification, and determinations may be appealed to the Civil Service Commission under Charter §813 and the applicable civil service rules. The framework provides the authority to classify and to correct a classification; what it does not provide is any standing requirement that classifications be re-examined as duties change. A classification therefore persists unexamined — regardless of how the underlying work evolves — unless someone affirmatively initiates a review.

5. Policy context

The relevance of workforce-classification alignment has been noted across the current city administration. The day before his inauguration (Dec. 31, 2025), Mayor Mamdani said he wanted to improve the Parent Coordinator role to be a meaningful organizer of parents rather than an administrative coordinator reporting to a principal. At a Feb. 10, 2026 City Council hearing, Chancellor Kamar Samuels said: "We need to build the capacity of our parent coordinators… We need to invest more in our parent coordinators and their training." These statements are cited only to establish that how this workforce is defined and supported is a live question in current governance, and that a Charter mechanism ensuring periodic, transparent classification review would serve rather than disrupt the City's own stated workforce-planning interests.

6. Pension impact (BERS)

BERS computes pensions as FAS × service factor. Tier 4: 1.67%/year under 20 years; 2%/year for years 20–30 (so a 25-year member ≈ 43.4% of FAS). Tier 6 (hired after April 1, 2012) uses a 5-year FAS and a later full-retirement age (63). Because longevity/step increases become pensionable base salary in benchmark titles, a teacher's or secretary's late-career raises lift both their FAS and their lifetime pension. Parent Coordinators get neither pensionable steps nor pensionable longevity, and their one recent gain — the $2,000 allowance — is non-pensionable. This is noted not as a compensation claim but to show that the downstream effects of an unreviewed classification reach beyond active employment into retirement, compounding the case for periodic review. (BERS already credits prior City/State service toward pension calculations, an established principle that a classification-review mechanism could parallel on the salary-structure side.)

Why This Matters

The Parent Coordinator title is offered as a case study not because it is unique, but because it illustrates a broader structural weakness in the City's workforce-classification system. Any title whose responsibilities evolve faster than its classification presents the same challenge. Parent Coordinators provide a particularly clear example because the position exists in nearly every public school, has remained substantially unchanged in classification since its creation in 2003, and has experienced significant expansion in responsibilities over more than two decades.

A workforce that serves more than 900,000 students and their families should not have to rely on individual advocacy to trigger a review of whether its official classification still reflects the work being performed. The absence of a standing review mechanism means that classifications can remain unchanged for decades regardless of how dramatically the underlying work evolves.

The consequences of inaction extend beyond the employees who hold these positions. When experienced Parent Coordinators leave, retire, or become increasingly difficult to recruit and retain, schools lose trusted relationships with families, institutional knowledge disappears, and new employees must rebuild community connections from scratch. The City then bears the costs of turnover, retraining, reduced continuity, and diminished effectiveness of family engagement efforts. Workforce misalignment is not simply an employee issue. It is a service delivery issue that ultimately affects students, families, and communities.

This issue also highlights a broader workforce-planning concern. When government relies on employees to perform responsibilities that exceed the original design of their title, but does not periodically evaluate whether classification, advancement structures, and compensation systems continue to reflect that reality, it loses the ability to accurately assess staffing needs, measure workloads, plan career pathways, and retain experienced personnel. The result is an increasingly wide gap between operational reality and the systems intended to manage it.

The Parent Coordinator title demonstrates why periodic classification review, workforce-planning transparency, and accountability mechanisms are necessary. Without them, government has no reliable way to identify when a workforce has evolved beyond its original design until employees themselves are forced to raise the issue.

For that reason, any Charter-level solution should include public reporting requirements. Findings, recommendations, and agency responses should be made available to employees, policymakers, and the public. A review process without transparency risks becoming a procedural exercise rather than a meaningful accountability mechanism.

The broader principle is simple: government functions most effectively when its workforce structures accurately reflect the work being performed. A system that depends on employees to identify classification drift after decades of change is neither modern nor efficient. Building mechanisms that regularly examine whether titles, duties, advancement pathways, and workforce structures remain aligned would strengthen accountability, improve retention, preserve institutional knowledge, and make government more effective for the New Yorkers it serves.

What a Charter-Level Fix Would Look Like

Nothing in this record requires the Commission to set a salary, reclassify a title, or alter a collective bargaining agreement. The Parent Coordinator title is one illustration of a general feature of the system: classifications are set, and then are not required to be revisited as the underlying work changes. A Charter-level remedy would address that feature directly, through three elements:

- **Periodic review.** A standing requirement that the City re-examine, on a fixed cycle or upon a documented material change in duties, whether a title's classification still reflects the work its holders perform.
- **Transparency.** Publication of the workforce-planning data — such as years-of-service distribution, vacancy and turnover rates, and classification-versus-duties information by title — that would reveal where titles and duties have diverged.
- **Accountability.** A requirement that agencies report when a title's actual duties have substantially outgrown its official specification, so that divergence is surfaced as a matter of routine rather than discovered only when an individual happens to compile the record.

Each of these is a structural mechanism within the Commission's mandate to modernize government and remove outdated bureaucratic constraints. None sets compensation or intrudes on bargaining. Together they would ensure that the description of public work does not fall a generation behind the work itself — for this title and for any other whose duties evolve faster than its classification.

Sources: Local 372 "All Community Titles" pay order (eff. 5/26/2025, verified) & allowance notice; DC 37 / NYC Mayor's Office 2023 contract announcement; DCAS Personnel Rule 11 & NYC Charter Ch. 35/§813; BERS Tier 4/6 Summary Plan Descriptions; UFT salary & longevity schedules; Chalkbeat (Mar. 2, 2026).

Name

Gerard Longarzo

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

As a New York City Retiree who dedicated 41 years of his life to the NYC Department of Education (32 years full time and 9 years part time) I contend that the healthcare benefits which we were PROMISED and which we EARNED should not be diminished via inferior "Advantage" Care coverage vs traditional Medicare and/or "copay taxes" with which we are hit repeatedly. A promise made should be a promised kept. The virulent ageism with which the NYC Municipal Government has sought to dismiss the crucial and legitimate concerns of NYC Retirees spits in the face of our collective dignity. Lying, self serving, bully union bosses (Michael Mulgrew and Henry Garrido) should not be empowered to dictate the healthcare benefits of NYC Retirees who are no longer members of their FORMER unions. NYC Retirees should not be "thrown under the bus" of vastly inferior healthcare coverage because of political convenience as evidenced by the apparent leash that Mayor Mamdani wears courtesy of Mulgrew and Garrido. There needs to be a legal mandate that promises made MUST be promises kept. There needs to be a legal mandate that the healthcare benefits of NYC Retirees cannot be diminished via contract negotiations for inservice workers when/where NYC Retirees are wholly unrepresented as per the Taylor Law. Our call is for JUSTICE!

Attachment(s)

Drop files here or click to browse

Date Submitted June 22, 2026

Topic Reporting Requirements × Budget Issues × Miscellaneous ×

Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback
Subtopic	Restore healthcare benefits for retired teachers

Name

Damien Archbold

Email	[redacted]
Professional Affiliation	Doctors Council SEIU
Zip Code	[redacted]

Public Comment

The city charter preamble celebrates the "revolutionary imagination, courage, and resiliency" of New Yorkers.

New York City could lead the nation by building a bold and resilient health system led by health workers, patients and the wider community. Persecuted and defunded scientists and academics, along with mission driven health workers fleeing corporatized health systems could seek refuge in New York City, where they are unleashed to focus on doing the right thing for patients, using their professionalism and creativity to build resilient and integrated care systems, while advancing our collective knowledge to innovate and heal.

We already have the infrastructure: New York City Health + Hospitals is the largest municipal health system in the US with a budget of $17B, serving over 1 million patients per year, employing over 44,000 largely unionized health workers. The DOHMH is the oldest and largest public health service in the US. 1/5 medical students in the US spend some part of their training in NYC. We have the largest number of pre hospital workers in the US. The homecare workforce is the most rapidly growing employment sector, now being mercilessly exploited by bad actors from yellow unions (HHWA) to "non-profit" homecare agencies (CPCHA) to PPL and for-profit insurance companies taking Medicaid money.

If New York state were a standalone country it would have the 8th largest economy in the world.

Here's a dictionary definition of "efficiency": "a situation in which a person, company, factory, etc. uses resources such as time, materials, or labor well, without wasting any"

Why is it that with all of the resources, caring professionals in the richest city in the history of the planet, did we fail so spectacularly to protect New Yorkers during the COVID19 pandemic, when we were the "epicenter of the epicenter" in 2020? Why is every health worker suffering from moral injury and burnout? Why are health workers quitting in droves since COVID19? Why do black mothers still suffer and die disproportionately relative to non-black mothers in NYC, with wider disparities than other parts of the US?

The answer is: a power imbalance between the corporate players who have hijacked our health system, and the workers and patients who interact with it daily.

https://nysfocus.com/2024/02/29/medicaid_greater_new_york_hospital_association-hochul

I am an anesthesiologist at Elmhurst Hospital in Queens and have worked there exclusively, proudly serving a marginalized and largely immigrant community, since 2019.

I am also an elected delegate with Doctors Council SEIU, and am the co chair

of the DSA healthcare working group.

Despite working full-time at a city hospital, my employment is privatized, the shell company "Mount Sinai Services" receiving an opaque city contract worth billions. As part of the bargaining committee during our contract campaign in 2023 2025, my FOIL request appeal was rejected (attached), claiming that the terms of employment of doctors in the public system is a "trade secret".

Mount Sinai defunded then closed Beth Israel hospital, has ended gender affirming care to under 19s, punishes and fires health workers who mention Palestine, and was the favored hospital system of Jeffrey Epstein. Why are we doing business with this real estate portfolio masquerading as a health system? How much less would we spend by simply directly employing doctors at NYCH+H, instead of the "affiliation" privatization arrangement? This arrangement is just one of many examples of privatized essential services, funneling tax dollars to unaccountable corporations who undermine staffing and working conditions for the most marginalized New Yorkers and a good example of how COGE could find billions in savings while improving city services.

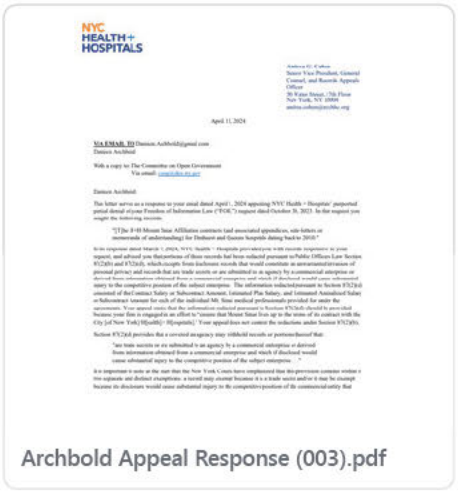
COGE and the city charter present an opportunity to restore healthcare as a human right and a public service for all New Yorkers by re municipalizing our health services, working against decades of privatization, defunding, and anti-worker neoliberal structures.

What if all city workers had a single contract? This contract could include "bargaining for the common good" measures such as mandatory green spaces, widened sidewalks with bus and bike lanes, pedestrianized areas accessible only to EMS near city health and educational facilities. It could include a 4 day work week, guaranteed 6 months of paid parental leave, sufficient staffing devised by worker and patient led staffing councils, and save billions by cutting out middle managers and waste. It would include a demand for the New York Health Act from every level of city government, to save billions for the state and more efficiently allocate health resources by need rather than revenue-generation - this would also embolden workers to demand more for themselves and their patients, which I argue here:

https://www.thechiefleader.com/stories/workers_can_strike_back_with_the_new-york-health-act,55117

The status quo favored by moneyed elites and the hospital cartel stopped working a long time ago for everyday people all New Yorkers understand that the health system is rigged. In New York City we have the opportunity, under the inspiring leadership of Zohran Mamdani, to build a shining example of a truly integrated municipal health system which addresses the health drivers of the affordability crisis.

Attachment(s)



Archbold Appeal Response (003).pdf

Date Submitted: June 22, 2026

Topic: Real Estate and Development, Procurement Reform, Budget Issues, Unnecessary Bureaucracy, Enforcement, Tenant Protection, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Public Health

Subtopic: Re-municipalizing our health services

NYC HEALTH+ HOSPITALS

Andrea G. Cohen
Senior Vice President, General Counsel, and Records Appeals Officer
[redacted]

April 15, 2024

VIA EMAIL TO [redacted]
Damien Archbold

With a copy to: The Committee on Open Government
Via email: [redacted]

Damien Archbold:

This letter serves as a response to your email dated April 1, 2024 appealing NYC Health + Hospitals' purported partial denial of your Freedom of Information Law ("FOIL") request dated October 30, 2023. In that request you sought the following records:

> "[T]he H+H-Mount Sinai Affiliation contracts (and associated appendices, side-letters or memoranda of understanding) for Elmhurst and Queens hospitals dating back to 2010."

In its response dated March 7, 2024, NYC Health + Hospitals provided you with records responsive to your request, and advised you that portions of those records had been redacted pursuant to Public Officers Law Section 87(2)(b) and 87(2)(d), which excepts from disclosure records that would constitute an unwarranted invasion of personal privacy and records that are trade secrets or are submitted to an agency by a commercial enterprise or derived from information obtained from a commercial enterprise and which if disclosed would cause substantial injury to the competitive position of the subject enterprise. The information redacted pursuant to Section 87(2)(d) consisted of the Contract Salary or Subcontract Amount, Estimated Plan Salary, and Estimated Annualized Salary or Subcontract Amount for each of the individual Mt. Sinai medical professionals provided for under the agreements. Your appeal states that the information redacted pursuant to Section 87(2)(d) should be provided because your firm is engaged in an effort to "ensure that Mount Sinai lives up to the terms of its contract with the City [of New York]/H[ealth] + H[ospitals]." Your appeal does not contest the redactions under Section 87(2)(b).

Section 87(2)(d) provides that a covered an agency may withhold records or portions thereof that:

> "are trade secrets or are submitted to an agency by a commercial enterprise or derived from information obtained from a commercial enterprise and which if disclosed would cause substantial injury to the competitive position of the subject enterprise . . ."

It is important to note at the start that the New York Courts have emphasized that this provision contains within it two separate and distinct exemptions: a record may exempt because it is a trade secret and/or it may be exempt because its disclosure would cause substantial injury to the competitive position of the commercial entity that

submitted the information. *See*, *e.g. Matter of Verizon NY Inc. v NY State Pub. Serv. Commn.*, 46 Misc 3d 858, 873 (Sup Ct, Albany County 2014) ("it appears to be the more common practice for courts to have, based on the underlying arguments, either evaluated whether the information is a "trade secret" *or*, separately, whether the information submitted by a commercial enterprise would, if disclosed, cause "substantial injury" to its competitive position"), *aff'd*, 137 A.D.3d 66 (3d Dept 2016); *Matter of Sunset Energy Fleet v New York State Dept. of Envtl. Conservation*, 285 AD2d 865, 867, 728 NYS2d 279 (3d Dept 2001) (affirming lower court finding that documents were not exempt from disclosure as trade secrets, and then separately addressesing the commercial information part of the exemption); *Matter of New York Regional Interconnect, Inc. v Oneida County Indus. Dev. Corp*., 873 NYS2d 513 (Sup Ct, Oneida County 2007) (after rejecting petitioners' first argument that information does not meet definition of a trade secret, court next addresses the "primary contention by petitioners," whether disclosure of the records submitted by a commercial enterprise "would cause substantial injury to the competitive position of the petitioners"); *Waste-Stream, Inc. v St. Lawrence County Solid Waste Disposal Auth.*, 166 Misc 2d 6 (Sup Ct, St. Lawrence County 1995) (analyzing the "trade secrets" prong separate and apart from the "cause substantial injury" prong, finding the former not proven and the latter inapplicable).

Here, NYC Health + Hospitals redacted the salary information because disclosing it would cause substantial competitive injury to Mt. Sinai. While FOIL fails to define what constitutes a substantial competitive injury, the federal analogue, the Freedom of Information Act ("FOIA"), contains a similar exemption for "commercial or financial information obtained from a person and privileged or confidential." S*ee,* 5 USC § 552 (b)(4). Under FOIA, commercial information is deemed "confidential" if its disclosure would impair the government's ability to obtain necessary information in the future or cause "substantial harm to the competitive position" of the person from whom the information was obtained. *See*, *National Parks & Conservation Assn. v Morton,* 162 U.S. App. D.C. 223, 498 F.2d 765, 770 (DC Cir).

New York courts have, in turn, looked to the federal definition and jurisprudence to determine the standard for competitive injury under FOIL. For example, in *Encore Coll. Bookstores, Inc. v. Auxiliary Serv. Corp. of State Univ. of New York at Farmingdale*, 87 N.Y.2d 410 (1995), the Court of Appeals cited FOIA in finding that "whether 'substantial competitive harm' exists for purposes of FOIA's exemption for commercial information turns on the commercial value of the requested information to competitors and the cost of acquiring it through other means." *Id.* at 420.

In this instance, it is clear that there is commercial value to the redacted information. Publicly providing information regarding how much Mt. Sinai is paying its employees would cause a "substantial injury" because "there would be an unfair advantage to competitors . . . if this information were to be disclosed . . . because they would be in a position to know how [Mt. Sinai] arrived at the costs and prices . . . and could then adjust their own internal cost procedures to take advantage of that." Belth v. Ins. Dep't, 95 Misc. 2d 18, 20 (Sup. Ct. 1977). Mt. Sinai is a commercial enterprise operating in a highly competitive marketplace for the employment of medical professionals. Were a competitor to be able to obtain the information you seek, it would be able to effectively undercut Mt. Sinai by offering services to NYC Health + Hospitals or other hospital systems at a lower price and simultaneously target Mt. Sinai employees and offer higher salaries. *See*, *Matter of Catapult Learning, LLC v New York City Dept. of Educ.*, 109 AD3d 731, 732 (1st Dept 2013) (upholding redaction of information about pricing, budget, and insurance from petitioner's contract proposal as it constituted "essential information about its previously successful approach to bidding for educational services contracts" and its disclosure would likely result in substantial competitive injury); *Matter of James, Hoyer, Newcomer, Smiljanich & Yanchunis P.A. v. State of NY*, 27 Misc 3d 1223[A], 1223A, (Sup Ct, NY County 2010) (upholding the redaction of records that "contain detailed information about the terms and conditions of servicing and purchasing loans, and the terms of products and services, including lines of credit, benefits and marketing which a competitor could use to copy the structure

of the agreement or offer more favorable terms.") Furthermore, the information sought here is not publicly available, and "[w]here FOI[L] disclosure is the sole means by which competitors can obtain the requested information, the inquiry ends [t]here." *Encore*, 87 N.Y.2d at 420.

For these reasons, the subject information was properly redacted pursuant to Public Officers Law Section 87(2)(d), and your appeal is denied.

Sincerely,

Andrea G. Cohen
Senior Vice President, General Counsel, and Records Appeals Officer

[redacted]

Name

Stanley Slater

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I urge you to place on the ballot on November 3rd a proposal as to whether open primaries should be adopted in NYC. I feel that no voter should be excluded from participation in our elections simply because they choose not to affiliate with a political party. More than 1.4 million NYC voters are registered as independent or unaffiliated voters and they are unable to participate in primary elections that often determine the outcome of the general election. With open primaries, these voters would have a say in their government.

Attachment(s)

Drop files here or click to browse

Date Submitted June 22, 2026

Topic Open Primaries

Method Received Airtable Form

Is it charter related?

Charter Related Yes

Topic Simplified	Elections
Subtopic	Open primaries

Name

Camille Dee

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

A June 10th letter from COGE (which sounds like DOGE) stated that "We believe that true efficiency will be found but learning from the expertise and knowledge of our workforce."

As a retired member of said workforce and former DC37 member, I am upset to learn that Henry Garrido was appointed to serve on COGE. He was in the forefront of trying to force NYC retirees into Medicare Advantage, which overcharges the federal government between $80 120 billion dollars annually. He has spent union funds to lobby against retirees who have been fighting for what we earned and were promised. He also threatened City Council members who supported our legislation with refusing to endorse them.

He was also a perpetrator of misusing funds from the Health Insurance Stabilization Funding in 2018—for raises—instead of offsetting increases in healthcare costs. Former Comptroller Brad Lander's audit found that OLR and the MLC did not take adequate steps to improve the fund. Instead, Garrido et al used it as a slush fund and bankrupted it.

I hope Ms. Chang will be asking questions about this mismanagement of funds and Garrido's push for Medicare Advantage on the backs of 250,000 NYC retirees.

Sincerely,
Camille Croce Dee

Attachment(s)

Drop files here or click to browse

Date Submitted June 22, 2026

Topic	Budget Issues ✕ Reporting Requirements ✕ Enforcement ✕ Miscellaneous ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback
Subtopic	Restore healthcare benefits for retired teachers

Name

Alicia Grullon

Email	[redacted]
Professional Affiliation	CUNY
Zip Code	[redacted]

Public Comment

Good afternoon, and thank you to the Council members and everyone present today.

I am an artist, professor, writer, lifelong New Yorker, community gardener, and parent raising a family in an increasingly difficult economic and environmental landscape. My work sits at the intersection of art, ecology, community organizing, cultural practice, and policy advocacy.

During the pandemic, I worked collaboratively with gardeners, artists, and organizers to support land based initiatives in a small community garden in the Bronx. That garden was ultimately shut down by the Parks Department. This experience deeply shaped my understanding of the vulnerability of community gardens and the urgent need for stronger protections, coordinated advocacy, and long term policy support.

My research and writing have long focused on ecological practices and land-based resistance. I have written about Las Casitas and the community gardening movement that emerged in the 1970s in response to city disinvestment and landlord abandonment. These gardens were not simply beautification projects; they were acts of survival, stewardship, and community governance created by residents to stabilize their neighborhoods.

Today, community gardens and neighborhood green spaces remain vital climate infrastructure. They absorb stormwater, reduce urban heat, strengthen biodiversity, provide educational opportunities, and serve as critical gathering spaces. As climate impacts intensify through flooding, extreme heat, and air pollution—these spaces will only become more essential.

For this reason, I propose the creation of a Percent for Green policy. Much like the Percent for Art program, a small percentage one percent or more of publicly supported construction budgets could be allocated toward green infrastructure across New York City. These funds could support community gardens, bioswales, rain gardens, urban forests, soil restoration, and the neighborhood stewardship networks that have sustained these systems for decades with minimal public investment.

Nature based solutions must also remain central to climate mitigation efforts. Bluebelts, permeable surfaces, rain gardens, urban forests, and well maintained parks help cities manage water naturally while improving ecological health and community resilience. These systems are often more sustainable and equitable than relying solely on large scale engineered infrastructure.

At the same time, environmental justice requires that we listen carefully to the lived experiences of residents. Issues such as flooding, air quality, public housing conditions, transportation access, and waste management are interconnected. Climate mitigation cannot succeed without community knowledge and participation.

Climate change will shape the future of New York City for generations. The question before us is whether we invest in the people, the soil, and the shared spaces that sustain our neighborhoods.

Thank you for your attention and for your continued commitment to the environmental future of New York City.

Attachment(s)



LOCAL LAWS
OF
THE CITY OF NEW YORK
FOR THE YEAR 1982

No. 65

ALOCAL LAW

Local Law 65.pdf

Date Submitted: June 22, 2026

Topic: Real Estate and Development, Tenant Protection, Budget Issues, Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Public Realm

Subtopic: Community gardens and green spaces

LOCAL LAWS

OF

THE CITY OF NEW YORK

FOR THE YEAR 1982

No. 65

Introduced by Council Member Sadowsky (by request of the Mayor) and Council Members Dryfoos, Greitzer and Stern; also Council Members Messinger, Michels and Wallace—

A LOCAL LAW

To amend the New York City Charter, in relation to providing for works of art in public buildings.

Be it enacted by the Council as follows:

Section 1. Chapter nine of the New York city charter is amended by adding a new section two hundred thirty-four, to read as follows:

§ 234. Works of art. a. As used in this section the term "works of art" includes all forms of the visual arts conceived in any medium, material or combination thereof.

b. Works of art shall be provided for each capital project which involves the construction or the substantial reconstruction of a city-owned public building or structure the intended use of which requires that it be accessible to the public generally or to members of the public participating in, requiring or receiving programs, services or benefits provided thereat. For the purposes of this section a police precinct house and a firehouse shall be deemed to be such buildings.

c. An amount not less than one per cent of the first twenty million dollars and one-half of one per cent of any amount in excess of twenty million dollars of capital funds appropriated by the city for each such capital project, other than funds appropriated for the acquisition of real property, shall be allocated for works of art provided, however, that this section shall in no case require the expenditure of more than four hundred thousand dollars for works of art for any capital project; nor more than the sum of one and one-half million dollars for works of art in any fiscal year. The mayor

may exempt a capital project from the provisions of this section if in his sole judgment the inclusion of works of art as provided hereby would be inappropriate.

d. Reasonable advance notification of the intention to include works of art in a project shall be provided to the appropriate district council member, council-members-at-large, borough president and chairperson of the community board of the district in which the project is located. All such works of art shall be subject to the approval of the art commission pursuant to section eight hundred fifty-four of this charter.

e. The mayor shall adopt rules and regulations to implement the provisions of this section.

§ 2. This local law shall take effect immediately and shall apply to any capital project for which the scope of project is submitted for approval on or after January first, nineteen hundred eighty-two.

THE CITY OF NEW YORK, OFFICE OF THE CITY CLERK, s. s.:

I hereby certify that the foregoing is a true copy of a local law of The City of New York, passed by the Council on October 14, 1982, and approved by the Mayor on October 29, 1982.

DAVID N. DINKINS, City Clerk, Clerk of the Council.

CERTIFICATION PURSUANT TO MUNICIPAL HOME RULE LAW SECTION 27

Pursuant to the provisions of Municipal Home Rule Law Section 27, I hereby certify that the enclosed local law (Local Law 65 of 1982, Council Int. 1093-A) contains the correct text and:

Received the following vote at the meeting of the New York City Council on October 14, 1982:

29 FOR 7 AGAINST 1 NOT VOTING

Was approved by the Mayor on October 29, 1982.

Was returned to the City Clerk on October 29, 1982.

FREDERICK A. O. SCHWARZ, JR., Corporation Counsel.

Name

Emery Bergmann

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

This request is an extension of the charter review, but as Coge uncovers ways to maximize efficiency of city government, it may be of interest that the city create public facing performance dashboard that gives each department a letter grade, from A to F, based on the value it delivers to taxpayers.

The intention is less to measure department spending, but how effectively it turns public dollars into meaningful outcomes. A transparent, easy to understand dashboard could compare the expected benefits of government programs with their recorded performance, giving New Yorkers a clearer picture of where their tax dollars are going.

For those skeptical of government spending, this would provide evidence of which programs generate real value and which fall short. At the same time, it would encourage accountability by highlighting areas where departments could improve efficiency or reduce unnecessary costs.

Each department's summary could include a breakdown of major expenditures, the services those dollars fund, measurable outcomes, and an honest assessment of where improvements are needed. Where shortcomings exist, the city could also publish a timeline and plan for addressing them.

Ultimately, this is not about shaming departments or encourage austerity, it's about building public trust. By making performance more transparent, New Yorkers can better understand both the costs and the benefits of city government, while holding leaders accountable for delivering the highest possible value from every taxpayer dollar.

Attachment(s)

Drop files here or click to browse

Date Submitted	June 22, 2026
Topic	Reporting Requirements, Unnecessary Bureaucracy, Support Oversight Agencies, Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Implement public dashboard and performance management for City

Name

Pei Shan Wei

Email	[redacted]
Professional Affiliation	
Zip Code	

Public Comment

Good evening. Commissioners
My name is Pei Wei, and I co own small Thai restaurant named Zaab Zaab from underserved southeast Asian community.
Board director member of nyc hospitality alliance .

I support the idea of creating vibrant public spaces that bring people together. Outdoor dining during the pandemic has helped many restaurants to survive.

However, There are many challenges for
New Dinging out program .

Outdoor dining has largely become a luxury that only well funded restaurants in wealthier neighborhoods can afford to maintain. They can afford the application fees, construction costs, storage expenses, and legal requirements. They also have customers with higher income that can support those investments.

Take my restaurant as an example. We applied for a sidewalk dining permit when the program first launched. We paid a $1,050 non-refundable application fee, a $1,500 refundable security deposit, and a $1,200 annual consent fee. In total, we spent about $3,750 before receiving approval.

After waiting several months, our application was denied because our landlord's signature was not notarized. Unfortunately, our landlord was overseas at the time, and we were unable to complete the process. We also received tables, umbrellas, and fencing through a Congresswoman small business support program, we later received a $500 violation and were told we could face an additional $1,000 penalty if not remove the fence.

Another restaurant owner in my neighborhood spent more than $7,000 on attorneys and architects just to obtain a sidewalk café permit.

I strongly urge the commission to eliminate the Revocable Consent requirement. Doing so could significantly reduce costs and shorten the approval process for small businesses by several months.

I would also like to address Open Streets.

We were told that Open Streets would bring programming and activity to our neighborhood. However, we typically see only one to three small events each year.

Website open street funding $50000, merchant association funding $100,000

Most weekends there are no activities, parking spaces are removed and traffic patterns have changed from two-way to one-way streets. Customers often complain about the inconvenience, cancel reservations, or choose to go elsewhere. Many local businesses, including mine, have experienced

significant declines in sales.

We even explored bringing a farmers market to our neighborhood, but were told there was not enough staffing available.

Local merchants have tried to organize events and secure funding ourselves. However, funding is often directed to outside nonprofit organizations rather than local merchant associations. We were told we need $100,000 in the bank able to accept funding.

We respectfully ask that SBS and other city agencies provide more direct support to local merchant associations. We are the people who own businesses here, employ local residents, and serve this community every day. We understand the needs of our customers and our neighborhood better than anyone.

Elmhurst is where many of us grew up. We have invested our savings, our time, and our futures in this community. We are not asking the City to eliminate outdoor dining or Open Streets. We are asking for programs that are fair, affordable, accountable, and responsive to the needs of local residents and small businesses.

Thank you for your time and consideration.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 22, 2026

Topic

Revocable Consent ✕ Unnecessary Bureaucracy ✕ Enforcement ✕ Real Estate and Development ✕ Street Redesigns ✕ Support Oversight Agencies ✕

Method Received

Airtable Form

Is it charter related?

Charter Related

Yes

Topic Simplified	Public Realm
Subtopic	Improve dining out progra

Name

Steven

Email	[redacted]
Professional Affiliation	FDNY
Zip Code	
Public Comment	When is the mayor going to meet with NYC Public Service Retirees Representative Marianne Pizziatola? Seems he doesn't want to address the issue of broken promises made to the people who built this city! Save our health care and stand up for decency, get out of the unions pockets!
Attachment(s)	Drop files here or click to browse
Date Submitted	June 22, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback

Subtopic	Public service retirees

Name

Henry Smith

Email	[redacted]
Professional Affiliation	Long Island City Partnership
Zip Code	[redacted]

Public Comment

Good evening, members of the Commission on Government Efficiency. My name is Henry Smith, and I am the Director of Economic Development and the LIC BID at the Long Island City Partnership. The Long Island City Partnership's mission is to advocate for economic development that benefits LIC's industrial, commercial, science and technology, cultural, tourism, and residential sectors. We operate the LIC Business Improvement District.

Our organization works daily with city agencies to keep our streets clean, our public spaces functional, and our neighborhood safe. Now more than ever, New Yorkers want to be outside and neighborhoods are defined by their public spaces. As the local BID we continuously look for opportunities to create events and longstanding, thriving public spaces. We have run into many difficulties building vibrant streetscapes and public spaces due to the extensive and expensive processes mainly because of high insurance requirements, the extensive PDC process, and longtime contracting process for doing anything in the public space. Additionally, with public spaces, very rarely do projects consider adequate maintenance plans and an adequate budget to keep them thriving in the future.

LIC has few public spaces, but one of them, Dutch Kills Green has been a major issue of recent years. This small park was cleaned and maintained by the Parks Department for years. A couple of years ago, Parks determined it was no longer their responsibility. Since then, our organization has been forced to fund DOT to clean and maintain the space ourselves, out of our own limited budget and by all reasonable expectations it has taken lots of advocacy and follow up to hold DOT accountable to the cleanup agreement. A business improvement district should not have to fund basic park maintenance because two agencies cannot agree on who owns the space.

More broadly the 311 system. The 311 system is supposed to be an accessible and effective platform for New Yorkers to report problems and get them resolved. In practice, we have repeatedly seen cases closed out by agencies before the underlying issue is actually fixed and even a couple of minutes after opening them. Then it takes an organization like ours to follow up and push the city agency to resolve the quality of life issue. Excluding DSNY, the issue never gets resolved without follow up from an organization like ours with connections. The 311 system does not provide the extensive line of communication that is needed for the city's complex issues. The outcome descriptions positive or negative give no information. This isn't just frustrating it actively erodes public trust in government. When residents and businesses stop believing that reporting a problem will lead to a fix, they stop reporting altogether, and agencies lose the very data they need to allocate resources effectively. Additionally, the DOT system of reporting issues provides no follow up or outcomes of the cases that are submitted. Additionally, if there are multiple city agencies involved, they will continuously point fingers at each other for responsibility and nothing will get done.

We can't build public space unless they feel safe. Currently, DOT has studied, reviewed, and formally accepted 10 plus cases of lighting requested we submitted nearly four years ago. The need was identified, the engineering was done, the project was approved — and it still has not been installed, because of internal contracting delays that we have heard about for the past 2 years.

These are not controversial projects this is minimum lighting in very dark parts of the city where people are walking.
On permitting, we have heard about the difficulties of getting permits to open businesses. We have worked hard with them to communicate and keep the process going, but we repeatedly have seen their lack of staffing. This has cost businesses thousands, mainly because of DOB and FDNY being understaffed.
Thank you for your time and consideration. These are a couple of examples on the government's inefficiencies and I hope they are taken seriously. They create serious public safety issues that deter people from living or opening a business in NYC.

Attachment(s)



2026 06 22 LIC Govt Efficiency Testim...

Date Submitted: June 22, 2026

Topic: Unnecessary Bureaucracy, Department of Buildings (DOB) Issues, Enforcement, Budget Issues, Reporting Requirements, Policing, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Public Realm

Subtopic	Lack of agency coordination around public spaces

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seriously. They create serious public safety issues that deter people from living or opening a business in NYC.

Name

Samantha W

Email [redacted]

Professional Affiliation: Tour guide and substitute teacher

Zip Code [redacted]

Public Comment:

I am a non driver, partly due to the financial burden and partly because I fear other drivers on the road. I primarily rely on our bus services to get to work everyday. It is a constant struggle. Sometimes the delays are so bad that I have to call an uber just to get to work on time even though I've left with more than enough travel time. Sometimes the busses are so crowded and I'm afraid I'll get sick with how much the buses resemble a sardine can. I can't tell you how many times that I've just missed a bus because it was early and then had to wait 30 minutes to get the next one. Some busses are so few and far between it's a miracle when I get the bus and we don't get delayed. I would like to see our busses more reliable and safer. Some stops are not safe to be at as a pedestrian. So many people are reliant on our bus systems and we are constantly failed. I would also like to see busses that make it easier to get to one side of the island to another without making 2 or 3 transfers. Making it easier to get to the other boroughs and to New Jersey and not have to go through the city to get there would also be a huge step in the right direction.

Attachment(s): Drop files here or click to browse

Date Submitted: June 23, 2026

Topic: Unnecessary Bureaucracy, Street Redesigns, Enforcement, Miscellaneous

Method Received: Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Transit
Subtopic	Safer and more reliable buses

Name

Evelina Washington

Email	[redacted]
Professional Affiliation	City Employee
Zip Code	[redacted]

Public Comment

Good evening Commissioners.

My name is Evelina Washington, and I am a long-time New York City public servant with more than three decades of City service.
I respectfully urge the Commission to consider Charter reforms that improve accountability, transparency, and fairness in City agencies.

First, employees who request workplace accommodations or protected leave should have clear, enforceable timelines for responses and decisions. Delays and inconsistent processes can create unnecessary stress for workers and reduce productivity. The Charter should require agencies to track and publicly report response times for accommodation requests and workplace concerns.

Second, City employees should have greater transparency regarding job assignments, training opportunities, and performance expectations. When work assignments, training, or responsibilities are distributed inconsistently, employees may feel excluded and agencies lose valuable talent. Clear standards and reporting requirements would help ensure fairness and accountability.

Third, there should be stronger oversight of complaint and dispute resolution processes. City employees and members of the public should be able to trust that concerns raised through agency channels are reviewed promptly, impartially, and with meaningful follow-up.

Finally, I encourage the Commission to explore ways to improve communication between agencies and the public. Too often, people struggle to understand where requests stand, who is responsible for decisions, and what steps remain in a process. Greater transparency would increase public trust in government.
New York City works best when its workforce is supported, treated fairly, and given the tools needed to serve the public effectively. I hope the Commission will consider reforms that promote accountability, transparency, and equal access throughout City government.

Thank you for your time and consideration.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 23, 2026

Topic

Reporting Requirements ✕ Unnecessary Bureaucracy ✕ Support Oversight Agencies ✕

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	City employee protections

Name

ZARA NASIR

Email [redacted]

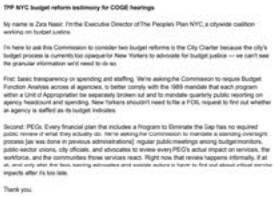
Professional Affiliation

Zip Code [redacted]

Public Comment

TPP NYC budget reform testimony for COGE hearings
My name is Zara Nasir. I'm the Executive Director of The People's Plan NYC, a citywide coalition working on budget justice.
I'm here to ask this Commission to consider two budget reforms to the City Charter because the city's budget process is currently too opaque for New Yorkers to advocate for budget justice — we can't see the granular information we'd need to do so.
First: basic transparency on spending and staffing. We're asking the Commission to require Budget Function Analysis across all agencies, to better comply with the 1989 mandate that each program within a Unit of Appropriation be separately broken out and to mandate quarterly public reporting on agency headcount and spending. New Yorkers shouldn't need to file a FOIL request to find out whether an agency is staffed as its budget indicates.
Second: PEGs. Every financial plan that includes a Program to Eliminate the Gap has no required public review of what they actually do. We're asking the Commission to mandate a standing oversight process [as was done in previous administrations]: regular public meetings among budget monitors, public sector unions, city officials, and advocates to review every PEG's actual impact on services, the workforce, and the communities those services reach. Right now, that review happens informally, if at all, and only after the fact, leaving advocates and outside actors to have to find out about critical service impacts after it's too late.
Thank you.

Attachment(s)



TPP NYC budget reform testimony for ...

Date Submitted: June 23, 2026

Topic: Budget Issues ✕ | Reporting Requirements ✕ | Support Oversight Agencies ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Budget

Subtopic: Transparency on spending and staffing and reporting on PEGs

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Thank you.

Name

Jessica Cheung

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

More flexibility on telework. Agencies are often waiting until the last minute to alert workers to work from home ahead of an event/storm. This led to a pile up on thursday the knicks parade at fulton street. Staff was informed an hour into the work day to telework. Late notice for events/weather cause employees to trek out into the city, only to be told to go home. It is inefficient and a waste of business hours.

Attachment(s)

Drop files here or click to browse

Date Submitted June 23, 2026

Topic Unnecessary Bureaucracy × Technology ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Government Operations

Subtopic

Improve and telework

Name

Asif Alam

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I encourage the Commission to consider expanding flexible and remote work options for positions where job duties can be effectively performed outside the office.

Many City employees spend several hours each day commuting. In my case, commuting from Southeast Queens to Lower Manhattan takes approximately 1.5 hours each way. Reducing unnecessary commuting time would allow employees to devote more time and energy to their work while improving morale and retention.

For many office based roles involving digital services, content management, administration, and other computer based tasks, productivity can be maintained while working remotely. Expanding agency flexibility to determine remote work eligibility based on job function and performance could help modernize City government, improve efficiency, reduce operational costs, and make public service more attractive to current and prospective employees.

Attachment(s)

Drop files here or click to browse

Date Submitted June 23, 2026

Topic Technology × Unnecessary Bureaucracy × Miscellaneous ×

Method Received Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Improve and telework

Name

Guillermo Gomez

Email	[redacted]
Professional Affiliation	Urban Design Forum
Zip Code	

Public Comment

Urban Design Forum Written Testimony to the New York City Charter Revision Commission (Commission on Government Efficiency)

Introduction

Urban Design Forum is a member-powered civic organization of more than 1,200 civic leaders — planners, designers, architects, lawyers, developers, and neighborhood advocates working to design, build, and care for a better New York City. Through our Local Center initiative, a partnership with the Association for Neighborhood and Housing Development (ANHD), we have worked alongside neighborhood leaders in 17 low-income communities across all five boroughs to activate parks, plazas, and streets. We have also convened our members, City agency partners, and peer organizations over many years to develop concrete ideas for reforming how the City manages and invests in the public realm.

We welcome the Commission on Government Efficiency's focus on infrastructure and the public realm, and we submit this testimony to share what we have learned — from practitioners, from partners, and from our own direct experience navigating the systems that govern public space in New York City.

What We Have Seen

Public spaces across New York City are sustained by an extraordinary network of grassroots and nonprofit partners: conservancies, block associations, Business Improvement Districts, community development corporations, Open Streets partners, and cultural organizations. These groups collectively invest hundreds of millions of dollars annually while fostering economic vitality, social connection, and civic life. Yet in neighborhoods without well-resourced BIDs or conservancies — typically neighborhoods where low- and moderate-income New Yorkers of different backgrounds live local organizations are left to navigate a fragmented and often hostile regulatory system on their own.

Through the Local Center, we have documented this experience directly. Our partners in Richmond Hill, Soundview, Brownsville, Tompkinsville, and elsewhere came to us with strong visions and deep neighborhood relationships. What stopped them was not a lack of ideas. It was a system not built to support them.

The Scale and Geography of Public Space Stewardship

Urban Design Forum recently completed the first comprehensive citywide survey of public space stewardship organizations in New York City the most expansive effort of its kind since the USDA Forest Service's STEW-MAP project in 2017. Drawing on records from 33 partner organizations across all five boroughs, we identified 6,052 unique organizations stewarding public space

in New York City today. That number is substantially larger than any previous estimate, and it reflects how much of our city's public realm depends on civic infrastructure that government has rarely counted, funded, or organized as a constituency.

Several findings are directly relevant to this Commission's work. The field skews dramatically small and informal: more than half of organizations with IRS filings operate on budgets under $100,000 a year, and one in three public space partners roughly 2,000 organizations are informal volunteer groups with no nonprofit registration at all. These groups are largely invisible to City procurement systems, locked out of most grant programs, and unable to carry the insurance that permitting agencies require. The regulatory systems this Commission is examining are not just burdensome for established organizations they are effectively closed to a third of the people doing this work.

The geographic distribution of stewardship also reveals a significant equity gap. Manhattan and Brooklyn together account for 65% of all stewardship organizations. Queens, the Bronx, and Staten Island are all underrepresented relative to their populations — and when stewardship density is mapped against income, a clear pattern emerges: many low income neighborhoods across the Bronx, eastern Brooklyn, and southeast Queens have both the fewest public space partners and the fewest resources to compensate for that gap. The neighborhoods most in need of vibrant, well-maintained public spaces are the least served by the civic infrastructure that makes them possible.

At the same time, this field generates substantial economic activity. Among organizations whose primary purpose is public space Business Improvement Districts, park conservancies, and "Friends of" groups at least $532 million flows annually, including $194 million through BIDs and $330 million through conservancies and stewardship organizations. This is a floor estimate. The civic and economic value of this field is significant, and it depends on a permitting and funding infrastructure that currently fails many of its most important contributors.

Recommendations

We offer three areas where charter reform can make a material difference.

1. Streamline Permitting and Grant Grantmaking Authority to More Agencies Working Directly with Public Space Partners

Activating a public space in New York City requires navigating a fragmented matrix of agencies the Street Activity Permit Office, the Department of Transportation, the Department of Parks and Recreation, the Department of Small Business Services, the Department of City Planning, and others — each with its own rules, timelines, and points of contact. There is no uniform process, no single interface, and no shared accountability for getting neighborhood organizations to a permit.

Our partners have experienced this firsthand. In Sunnyside, Queens, the Sunnyside Shines BID and their design team faced significant roadblocks obtaining temporary concession agreements and parking allowances for a night market — even with direct agency connections through the Local Center and dedicated legal support. According to their legal counsel, there was no transparent, uniform process: they were "at the whim of whoever was looking at the application."

The City Charter can address this in two ways:

First, the Charter could establish a dedicated coordinating office or designate a senior official within the Office of Operations — currently authorized under Section 15 of the Charter to coordinate City services and promote efficient agency delivery with explicit authority over agencies managing permitting in the public realm, including Parks, DOT, SBS, and SAPO. With the Chief Public Realm Officer role now eliminated, there is no single point of accountability for interagency coordination in the public realm. A charter backed structure, rather than one dependent on executive discretion, would ensure that coordination function endures across administrations.

Second, the Charter could be amended to grant the Department of Transportation explicit authority to make grants directly to nonprofit partners for public space activation. Currently, DOT's powers under the Charter are defined around traffic and infrastructure; there is no grantmaking authority. This forces public space funding to flow through SBS and other agencies not primarily designed for this purpose, creating bottlenecks and limiting the scale of investment. The gap is particularly stark given how central DOT already is to the work — it manages the plaza and Open Streets programs that neighborhood organizations depend on. Making DOT a vested grantmaking agency would better align funding tools with the partners it already serves.

2. Extend the Public Design Commission's Approval Period for Temporary Installations with Accountability Safeguards

The City Charter currently requires that any temporary public art installation intended to remain for more than one year undergo full Public Design Commission review (Section 854g). In practice, this means community built structures — the product of months or years of neighborhood engagement, design work, and permitting — face a hard one-year ceiling before triggering an additional approval process, with no guarantee of extension. Across our Local Center projects, teams consistently identified this threshold as a barrier to lasting impact. As one of our design partners reflected: "It feels wasteful to go through such meaningful engagement and develop a community asset and not have a clear pathway to deliver more lasting change for the neighborhood."

We recommend that the Charter be amended to raise this threshold from one year to two years allowing temporary public art and installation projects to remain in place for up to two years without triggering full PDC review. This

would reduce the administrative burden on small nonprofits, give installations time to demonstrate their value, and create space for neighborhoods to build the case for permanent capital investment.

To ensure this change works well in practice, we recommend that extended approvals be paired with a straightforward accountability framework: sponsoring organizations would demonstrate a maintenance plan as a condition of the longer permit; agencies would retain authority to modify or revoke approvals if safety standards are not met; and a light touch midpoint check in at the one year mark would confirm the installation remains active and well-maintained. These are not additional bureaucratic hurdles — they are the kind of responsible stewardship practices that would ensure that a longer approval period benefits neighborhoods without locking spaces into installations that have run their course.

3. Modernize Civil Service to Build Government Capacity in the Public Realm

The City's ability to deliver on public realm improvements depends on its ability to hire, retain, and coordinate skilled staff across agencies. Civil service rules present significant barriers: cumbersome examination requirements, infrequent testing dates, pay scales disconnected from the private sector, and limited flexibility in scheduling and work arrangements make it difficult to fill critical positions in housing, planning, and public realm agencies.

We recognize that many civil service rules are governed by New York State law and fall outside the City Charter's direct jurisdiction. However, the Charter does govern how the Department of Citywide Administrative Services administers examinations and manages the City workforce (Sections 812–817), and there is room for the Charter to direct more flexible and timely examination scheduling, broader use of provisional and exempt appointments for hard-to-fill positions, and requirements for interagency technology coordination that would improve the efficiency of public space permitting and delivery across agencies.

Conclusion

New York City's public spaces are not failing for lack of vision. They are failing because the systems that govern them the permitting processes, the approval timelines, the funding pipelines, the workforce rules — were not built to support neighborhood-led stewardship, particularly in the communities that need it most.
The Commission on Government Efficiency has an opportunity to change that. Charter reform can enshrine the coordinating authority needed to streamline permitting, unlock new funding tools for neighborhood organizations, and give community built assets the longevity they deserve. Urban Design Forum and our partners across the five boroughs stand ready to support that work.

We also want to lift up the testimony of M. Blaise Backer, which offers a number of compelling ideas for amending the Charter to address these challenges, including: creating a fourth instrument in Chapter 14 in the form

of a public realm stewardship agreement; rightsizing the Franchise and Concession Review Committee for small and community scale agreements; allowing a defined share of locally generated revenue to remain with the space that generates it; and providing bounded term security for partners that finance public improvements. We encourage the Commission to consider these recommendations alongside our own.

We thank the Commission for the opportunity to submit this testimony and look forward to continued engagement.

Sincerely,

Daniel McPhee, Executive Director
Martha Snow, Director of Community Design
Guillermo Gómez, Director of Programs

Urban Design Forum
urbandesignforum.org

Attachment(s)



Urban Design Forum COGE Public Com...

Date Submitted: June 23, 2026

Topic: Unnecessary Bureaucracy ✕ | Procurement Reform ✕ | Franchises & Concessions ✕ | Real Estate and Development ✕ | Technology ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Public Realm
Subtopic	Streamline permitting for public spaces and extend the PDC approval period for temp installations

URBAN DESIGN FORUM

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James von Klemperer

Secretary ↓
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Executive Director ↓
Daniel McPhee

Urban Design Forum
[redacted]

urbandesignforum.org
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We offer three areas where charter reform can make a material difference.

1. Streamline Permitting and Grant Grantmaking Authority to More Agencies Working Directly with Public Space Partners

Activating a public space in New York City requires navigating a fragmented matrix of agencies — the Street Activity Permit Office, the Department of Transportation, the Department of Parks and Recreation, the Department of Small Business Services, the Department of City Planning, and others — each with its own rules, timelines, and points of contact. There is no uniform process, no single interface, and no shared accountability for getting neighborhood organizations to a permit.

Our partners have experienced this firsthand. In Sunnyside, Queens, the Sunnyside Shines BID and their design team faced significant roadblocks obtaining temporary concession agreements and parking allowances for a night market — even with direct agency connections through the Local Center and dedicated legal support. According to their legal counsel, there was no transparent, uniform process: they were "at the whim of whoever was looking at the application."

The City Charter can address this in two ways:

First, the Charter could establish a dedicated coordinating office or designate a senior official within the Office of Operations — currently authorized under Section 15 of the Charter to coordinate City services and promote efficient agency delivery — with explicit authority over agencies managing permitting in the public realm, including Parks, DOT, SBS, and SAPO. With the Chief Public Realm Officer role now eliminated, there is no single point of accountability for interagency coordination in the public realm. A charter-backed structure, rather than one dependent on executive discretion, would ensure that coordination function endures across administrations.

Second, the Charter could be amended to grant the Department of Transportation explicit authority to make grants directly to nonprofit partners for public space activation. Currently, DOT's powers under the Charter are defined around traffic and infrastructure; there is no grantmaking authority. This forces public space funding to flow through SBS and other agencies not primarily designed for this purpose, creating bottlenecks and limiting the scale of investment. The gap is particularly stark given how central DOT already is to the work — it manages the plaza and Open Streets programs that neighborhood organizations depend on. Making DOT a vested grantmaking agency would better align funding tools with the partners it already serves.

2. Extend the Public Design Commission's Approval Period for Temporary Installations with Accountability Safeguards

The City Charter currently requires that any temporary public art installation intended to remain for more than one year undergo full Public Design Commission review (Section 854g). In practice, this means community-built structures — the product of months or years of neighborhood engagement, design work, and permitting — face a hard one-year ceiling before triggering an additional approval process, with no guarantee of extension. Across our Local Center projects, teams consistently identified this threshold as a barrier to lasting impact. As one of our design partners reflected: "It feels wasteful to go through such meaningful engagement and develop a community asset and not have a clear pathway to deliver more lasting change for the neighborhood."

We recommend that the Charter be amended to raise this threshold from one year to two years — allowing temporary public art and installation projects to remain in place for up to two years without triggering full PDC review. This would reduce the administrative burden on small nonprofits, give installations time to demonstrate their value, and create space for neighborhoods to build the case for permanent capital investment.

To ensure this change works well in practice, we recommend that extended approvals be paired with a straightforward accountability framework: sponsoring organizations would demonstrate a maintenance plan as a condition of the longer permit; agencies would retain authority to modify or revoke approvals if safety standards are not met; and a light-touch midpoint check-in at the one-year mark would confirm the installation remains active and well-maintained. These are not additional bureaucratic hurdles — they are the kind of responsible stewardship practices that would ensure that a longer approval period benefits neighborhoods without locking spaces into installations that have run their course.

3. Modernize Civil Service to Build Government Capacity in the Public Realm

The City's ability to deliver on public realm improvements depends on its ability to hire, retain, and coordinate skilled staff across agencies. Civil service rules present significant barriers: cumbersome examination requirements, infrequent testing dates, pay scales disconnected from the private sector, and limited flexibility in scheduling and work arrangements make it difficult to fill critical positions in housing, planning, and public realm agencies.

We recognize that many civil service rules are governed by New York State law and fall outside the City Charter's direct jurisdiction. However, the Charter does govern how the Department of Citywide Administrative Services administers examinations and manages the City workforce (Sections 812–817), and there is room for the Charter to direct more flexible and timely examination scheduling, broader use of provisional and exempt appointments for hard-to-fill positions, and requirements for interagency technology coordination that would improve the efficiency of public space permitting and delivery across agencies.

Conclusion

New York City's public spaces are not failing for lack of vision. They are failing because the systems that govern them — the permitting processes, the approval timelines, the funding pipelines, the workforce rules — were not built to support neighborhood-led stewardship, particularly in the communities that need it most. The Commission on Government Efficiency has an opportunity to change that. Charter reform can enshrine the coordinating authority needed to streamline permitting, unlock new funding tools for neighborhood organizations, and give

community-built assets the longevity they deserve. Urban Design Forum and our partners across the five boroughs stand ready to support that work.

We also want to lift up the testimony of M. Blaise Backer, which offers a number of compelling ideas for amending the Charter to address these challenges, including: creating a fourth instrument in Chapter 14 in the form of a public realm stewardship agreement; rightsizing the Franchise and Concession Review Committee for small and community-scale agreements; allowing a defined share of locally generated revenue to remain with the space that generates it; and providing bounded term security for partners that finance public improvements. We encourage the Commission to consider these recommendations alongside our own.

We thank the Commission for the opportunity to submit this testimony and look forward to continued engagement.

Sincerely,

Daniel McPhee, Executive Director
Martha Snow, Director of Community Design
Guillermo Gómez, Director of Programs

Urban Design Forum
urbandesignforum.org

Name

Rob Richie

Email [redacted]

Professional Affiliation: President, Expand Democracy

Zip Code:

Public Comment: I testified by zoom on June 23, 2026, focusing on the case for extending ranked choice voting to general elections, as done in every other jurisdiction that uses RCV in primaries. Attached are my written remarks.

Attachment(s)



Testimony on Voting Rights and Electoral Reform
New York City Charter Commission, June 23, 2026

By Rob Richie: President Expand Democracy, Senior Fellow Reinvent Albany, Co-Founder & Former CEO FairVote

Thank you for this opportunity to share my insights about potential changes to improve elections in New York City. My congratulations for your service on the commission.

My name's Rob Richie I am well known as a national authority on ranked choice voting (RCV). In 1992, I co-founded FairVote and led it until 2020. It was in that role that I first met your commission chair Patrick Gaspard when we joined to work to preserve the RCV form of proportional representation for community school board elections as eventually upheld by the Department of Justice when it denied preclearance to a proposed law to move to a less representative way of voting). Today I lead Expand Democracy, a nonprofit seeking to catalyze conversations about better elections and consult with FairVote and Reinvent Albany.

I recommend that your commission follow the model of elections in Maine, Washington, D.C. and Arlington (VA). Most importantly, I wanted to suggest extending RCV to all city elections. New York City is the only jurisdiction to use RCV in primaries, but not the general election.

Ranked choice voting for all city elections. New York City has successfully implemented RCV for primaries – a change that, as an aside, could have helped voters better negotiate their congressional primaries today. It's not been flawless, but some 99.7% of voters cast valid ballots and nearly 90% rank candidates. The number of voters in 2021 and 2025 mayoral primaries were the 2nd and 3rd highest in City history. The City also uses RCV for special elections, but not the general election.

In contrast, Maine has extended RCV for all elections where RCV has been determined legal – that is, for its state, congressional and presidential primaries and for congressional and presidential general elections. Arlington County has enacted RCV for both primary and general elections. In Washington, D.C., a measure to institute RCV to all primary and general elections won with 73%, and it is being rolled out well this year, with its primary setting a record for voters in the Democratic primary.

RCV was debated for years in New York before earning consensus support for its use in primaries, including approval in 2019 from 74% of voters. That year's charter commission was closely divided on using RCV in general elections. I believe it's time to extend RCV to general elections and am confident that voters would strongly back it.

Semi-open primaries for unaffiliated voters: Legislatures in Maine and New Mexico recently have voted to allow unaffiliated voters to choose a party ballot in primaries. Washington, D.C.

Submitted_Testimony_NYC_Richie_2026...

Date Submitted: June 23, 2026

Topic: Open Primaries

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Elections
Subtopic	Expand ranked choice voting for all City elections

Testimony on Voting Rights and Electoral Reform

New York City Charter Commission, June 23, 2026

By Rob Richie: *President Expand Democracy, Senior Fellow Reinvent Albany, CoFounder & Former CEO FairVote*

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Semi-open primaries for unaffiliated voters: Legislatures in Maine and New Mexico recently have voted to allow unaffiliated voters to choose a party ballot in primaries. Washington, D.C.

voters backed semi-open primaries and RCV and will have both changes in place in its 2028 cycle. Arlington holds its election within Virginia's open primary system.

The number of unaffiliated voters is increasing steadily. A change to allowing such voters to pick a party's primary ballot is all the more compelling with the rollout of automatic voter registration, as new voters must be automatically registered as unaffiliated. In 2025, even before AVR was fully in place, CUNY professor John Mollenkopf reported that nearly a third of young men of color in New York City were registered as unaffiliated. I believe your voters would strongly support not punishing unaffiliated voters for being automatically registered as unaffiliated.

Maine's recent primary shows the value of RCV and semi-open primaries. A total of 222,405 voters cast ballots in the Democratic primary – by far the highest ever, including surging past the 162,681 who had voted in the highest-ever previous Senate primary and 126,139 who had voted in the highest-ever previous gubernatorial primary. In the wake of the legislature passing semi-open primaries, this year some three-quarters of unaffiliated voters apparently picked the Democratic ballot, which will strengthen their connection to the party's nominees this fall.

I will close with two details on implementing RCV in general elections:

- **Adapting fusion ballots to RCV in November:** Fusion nominations allow minor parties a voice in November. The logical way to combine fusion voting with an RCV ballot is to have candidates listed once and have each of their party nominations listed after their name, which is how fusion is practiced in Oregon and Vermont. To strengthen political association, you also might consider allowing candidates in primary and special elections to list up to three confirmed endorsements from parties and organizations that would give voters helpful information- a proposal that a 2025 poll found had majority support in the City.

- **Accelerating the release of RCV tallies**: The great majority of cities - including San Francisco, Minneapolis, Las Cruces and Oakland – release preliminary RCV tallies within 24 hours of poll closing. San Francisco typically does so within an hour of poll closing. New York City could accelerate its reporting of RCV tallies with modernization of its procedures. While that modernization does not necessarily need to be put into the charter, doing so would ensure it occurs.

Thank you for your consideration. If you have any questions, please contact me at [redacted]

Name

Max Vilgalys

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

The charter revision commission should consider reforms to the historic district LPC process to avoid blocking new housing. In particular, the powers of the LPC should be restricted so that they can only limit the materials or general appearance of new buildings but not the height or amount of new housing generated. The height of buildings is already subject to considerable restriction through ordinary zoning tools. When aesthetic opinions of a handful of preservationists should not stand in for the city's overall housing and building plans.

In the current system, the LPC supersedes the City's other efforts to rezone historic neighborhoods by rejecting buildings of a permissible height/FAR. This happens because the commissioners who comprise the LPC and attend meetings prioritize community aesthetics/continuity over the need to create housing for New Yorkers. Reforms to this process can deliver consistent historical style without compromising the need to build new housing. If the commission is not given any information on the height of the building (which should not be subject to the opinions of these preservationists if we want to add new housing), they will be able to deliver historically contextual housing that meets the city's growing need for housing.

This morning (June 23), I attended an LPC meeting regarding an application to build new housing on the edge of the SoHo historical district (277 Canal St). After a thoroughly researched presentation from a team of architects seeking to develop a historically appropriate building style, neighborhood preservation associations delivered a barrage of comments criticizing the height of the building. The height of the building is modest by lower Manhattan standards, as the project promoters demonstrated by pointing to taller buildings on neighboring streets just outside of the SoHo historic district. The committee acted on these voices, requesting revisions to the project. These revisions add delays to a project that has already been in planning since at least 2023, adding costs and lowering the amount of housing the project can deliver. If we want to develop significant new housing in historic districts, we cannot allow this current group of actors to continue to regulate the height of every building.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 23, 2026

Topic

Real Estate and Development ×

Department of Buildings (DOB) Issues ×

Unnecessary Bureaucracy ×

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Housing
Subtopic	Reform the historic district LPC process to avoid blocking new housing

Name

Shafee Ahmed

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

To the COGE team:

My name is Shafee Ahmed. Bangladeshi-American. Born and raised in New York City, and a Bronx resident.

I am a GED holder with no degree but have a background in technology (software development and IT).

I am reaching out to voice a matter on how fatiguing it is to find work in New York City. The argument might be convenient, that I don't have a degree that's why work is hard for me to find. Or that the economy is in bad shape.

But I want to push back for just a minute:
I have the skills the tech skills I worked hard to learn from self learning to coding bootcamps, and apprenticeships. And more importantly, I see large gaps where there is a lot of potential for new jobs.

I am working in a profession that doesn't align with what I studied for and what I want to do, or be.

For two years (2023 2025) I've watched doors close on real job applications in NYC before I ever got a chance to show what I can do, because of outdated job screening systems. That: if I don't possess a college degree, then I am barred from a job that I am perfectly qualified for [with skills and experience I can prove]. It was a difficult period in my life and I can only imagine how many New Yorkers face the same issue. The process is even more hard for city jobs.

Currently I am a seasonal worker for NYC Parks for which I am grateful I am seeing how strenuous it is just to get a job in the city, or move up the ladder.

I believe the two main factors that contribute to this uphill battle are:

1. the often demanding overhead required just to get a specific role. A prime example of this is the civil service exams that are scheduled only on availability.
2. lengthy periods of waiting, which again is due to how dated systems are within the NYC government, and lack of data efficiency. A person waiting for a door to open is dependent on large internal queues, human labor, outcomes for civil service exams, and the system that rewards seniority over performance, allowing processes to stagnate without anyone being accountable for the slowdown.

It pains me that our great city, the best city in the world, has to suffer in such a way where important (possibly life altering) matters stagnate and have to stay in limbo. There is so much potential for technology and the right people to improve this cycle of inefficiency. Substantial artificial intelligence tools and automation systems are abundantly available today we would do good to

start incorporating them there is a great hiring pool potential there too. We should also find that tenure that doesn't carry excellence in work deserves stricter consequences, which subsequently implies we would have more room for younger, brighter minds to help lower the stagnation.

I would also like to know how I can contribute to COGE, because I truly believe this is the catalyst to bring New York to its feet. The mission is important and I am all for it.

Thank you.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 24, 2026

Topic: Unnecessary Bureaucracy, Technology, Procurement Reform

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Government Operations

Subtopic: Improve City hiring

Name

Richard Schnall

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I am writing to support a vote on the question of Sanctuary status for NYC. Citizens deserve the right to decide if they want their tax dollars to be spent on undocumented immigrants.

Attachment(s)

Drop files here or click to browse

Date Submitted June 24, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic	Referendum on sanctuary status

Name

Madeline Frew

Email [redacted]

Professional Affiliation NYC Parks

Zip Code [redacted]

Public Comment

Make the public hiring process more transparent and expedited. Folks wait months, and sometimes over a year, after receiving a job offer to begin work. At Parks, most postings are only for internal hires.

Attachment(s)

Drop files here or click to browse

Date Submitted June 24, 2026

Topic Unnecessary Bureaucracy × Procurement Reform ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Government Operations

Subtopic	Improve City hiring

Name

Weitny Anderson

Email	[redacted]
Professional Affiliation	Technology
Zip Code	
Public Comment	Being new to public service has left me with a few things to ponder in my mind. The city is an awesome place because it has a lot to offer, but there is always space for improvement. Many are comfortable in their comfort zone, but we need to do the walk, not just the talk. Demonstrating that we really care for public service and want to give the best service to all New York taxpayers. Why are certain things in the public service overlooked? 1 Holding individuals accountable for their jobs instead of accepting excuses after excuses for errors that cost tax payers thousand of dollars. I'm wondering if the notion of learning from your mistakes is not part of the culture in public service. It's okay to make mistakes because we are human, but not acknowledging them to improve is detrimental to a city that's supposed to be the leading city in the world. It's a culture of the past. We are in 2025, and we are operating like we are in 1990. 2- The city should send individual who are leading teams to Stress Management training to give them the skills needed to handle stressful situations and not let that trickle down to the staff and affect their daily deliverables. 3- Put time and effort into the morale of agencies to boost their morale. 4 Survey your employees because you want to make sure that they are happy, not because someone at the top tells you, but because there is a survey. Thank you for giving me the opportunity to present my observations.
Attachment(s)	Drop files here or click to browse

Date Submitted	June 24, 2026
Topic	Unnecessary Bureaucracy ✕ Support Oversight Agencies ✕ Miscellaneous ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Improve City personnel management

Name

Maigen S. Jones

Email	[redacted]
Professional Affiliation	Department of Sanitation
Zip Code	[redacted]
Public Comment	HELLO I HAVE LIVED IN NEW YORK ALL MY 48 YEARS AND BEEN EMPLOYED IN NY FOR 30 YRS I'VE JUST MOVED OUT FROM FAMILY IN 2023 AND I HAVE NEVER SEEN SUCH HIGH OVERLY PRICE ROOM AND APARTMENT IN MY LIFE. WHY ARE SO MANY PEOPLE WHO ARE HARD WORKING UNABLE TO RECEIVE THE BENEFITS AS THOSE WHO CLAIM TO NEED ASSISTANCE, ON PAPER THE HARDWORKING SEEM TO NOT NEED ASSISTANCE AND OTHER SCHEME TO GET EVERYTHING IT'S NOT FAIR AT ALL.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 24, 2026
Topic	Tenant Protection, Budget Issues, Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback

Subtopic	Rent is too high

Name

Matthew Picarillo

Email	[redacted]
Professional Affiliation	NYC Department of Citywide Administrative Services
Zip Code	[redacted]

Public Comment

I am writing in regards to Section 824 of the New York City Charter. As an employee of the Department of Citywide Administrative Services (DCAS), one of my duties is the coordination of the public outreach required under this section of the charter.

To summarize, for all leasing and most acquisition real property transactions, Section 824 requires a public posting of the transaction summary to the City Record followed by a public hearing. Upon the completion of said hearing, a mayoral authorization document (MAD) is executed by the Deputy Mayor, which in turn certifies that the hearing took place.

Per the Calendar delivered each month by MOCS, the intent of these hearings is to, "receive testimony regarding the proposed sale, disposition, acquisition and leasing of Real Property of the City of New York." However, while this may appear to be a touchpoint between the public and the City government, this hearing and its related processes do not in fact serve that purpose. In the 1.5 years for which I have managed this process (which includes public hearings for 50+ transactions), not a single member of the public has testified. In fact, although these hearings are briefly advertised in the City Record per the terms of the charter, locating information for these hearings on the Mayor's Office of Contract Services (MOCS) website is nearly impossible for members of the public.

For leasing transactions, the public has already been made aware of the transaction through the ULURP process. In order to get to the point of the process in which the lease document can be executed, the terms have already been reviewed and approved by many people in the City's management, including at DCAS, OMB, and the client agency. For acquisition transactions, the project has also already been presented to the public through the ULURP process, and the transaction will proceed to another step of DCAS Commissioner and Mayoral approval once the Section 824 public hearing has concluded. The extra steps required by this section of the charter do not effectively provide any additional insight to the people of New York City or the decision makers in our government.

The net effect of this process is to add upwards of six (6) months to the timeline of any leasing or acquisition transaction. The largest cause of this delay is the number of people who need to sign off on the required documentation. A single MAD could have upwards of a half dozen people review and/or forward the document along before it reaches the intended signatories. Often, the document itself needs multiple routing sheets and signatures from people within the DCAS hierarchy. Meanwhile, the MAD document itself is a single-page transaction summary and a certification that he hearing did in fact occur, facts which should have been known to most decision makers by this time. At this stage of the process, very few changes can be affected based on input from anyone along the approval chain, so this becomes another extensive process of rubber-stamping documentation.

As it stands, I believe this process is too lengthy, duplicative, and ineffectual

to justify the extensive delays it causes for the City. While I support public engagement and mayoral review of these transactions, the process as it stands today does neither.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 24, 2026

Topic: Real Estate and Development, Unnecessary Bureaucracy, Reporting Requirements

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Unnecessary Bureaucracy

Subtopic: DCAS public notice process for real estate is burdensome and causes delays

Name

Anonymous Sanitation

Email	Have to hide to avoid punishment
Professional Affiliation	Sanitation
Zip Code	
Public Comment	As a higher level of management on the uniform side, the fake data being used to pressure staff to write more Summosn, take on additional responsibilities, face punishment if not in a special click is unproductive for management that wants to get work done and help the residents of our city
Attachment(s)	Drop files here or click to browse
Date Submitted	June 24, 2026
Topic	Enforcement × Unnecessary Bureaucracy × Policing ×
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	DSNY

Name

Jeremy Gruber

Email [redacted]

Professional Affiliation: Senior Vice President, Open Primaries

Zip Code:

Public Comment: Attached is the testimony delivered in person at the Staten Island Hearing on June 23, 2026.

Attachment(s)


OPENPRIMARIES

NYC Charter Revision Commission Hearing
Staten Island
June 23, 2026

Testimony of Jeremy Gruber, JD
Open Primaries SVP

My name is Jeremy Gruber. I'm a lawyer, an election law expert, and the Senior Vice President of Open Primaries, a national organization dedicated to protecting the voting rights of independent voters.

We represent more than 5,000 independent voters in New York City, primarily from Manhattan, Brooklyn, and Queens - many of them voters of color.

I want to thank the Commission for the opportunity to testify today, particularly on election day when the contrast is unavoidable: 1, like 1.2 million independent voters in this city, including 54% voters of color, am denied the right to participate in the election that determines who will govern us.

That is not a minor procedural issue. It is a denial of democratic participation.

Previous Commissions have heard from independent voters about what it means to be treated as second-class citizens in this city. You will continue to hear from us because we are not going away.

I'm here today to share the findings of an independent survey we commissioned of New York City Democrats that will be submitted for the record. The results are clear: a majority of Democrats support opening NYC's primaries.

But one finding should especially concern this Commission: 40% of registered Democrats in New York City identify as Republicans or independents. Why? Because our closer primary system pressures voters with government support, to join political parties they do not believe in simply to have a meaningful voice.

That includes two-thirds of Latino voters and a majority of Asian voters in New York City who identify as independent but are forced by the rules of our election system to choose a party label they do not align with in order to participate.

CRC Gruber.pdf


OPEN PRIMARIES independent Voter Project

New Poll: Majority of NYC Democrats Favor Open Primaries; 40% of Democrats are Actually Independents

Open Primaries will enter polling into the public record before the NYC Charter Revision Commission showing a large share of registered Democrats are actualy independents.

New York NY – In new polling released today conducted independently by IVC Media and commissioned by Open Primaries and the Independent Voter Project, New York City's registered Democrats support opening primaries to independent voters by more than two-to-one. 51% in favor are just 23% oppose. The poll also discovered that approximately 40% of registered Democrats are actually independents or Republicans who register as Democrats to be able to vote in the Democratic Party primary, the election of consequence in NYC.

At a Charter Revision Commission hearing on Tuesday, June 23, Open Primaries will enter these findings into the public record. Importantly, the independent polling finds:

- Only 40% of NYC registered Democrats call themselves proud party members.
- A statistically equal 39% say they are really independents who registered Democratic for one reason only: to vote in primaries.
- Among Latino Democrats only 1 in 3 (33%) actually consider themselves Democrats, the lowest share of any racial or ethnic group surveyed.
- 60% believe that the NY Democratic Party should allow independents to vote in the 2026 primary — only 23% of NYC registered Democrats disagree.
- A majority of self-described "proud Democrats" say independents should be able to vote in the 2026 Democratic primary.

New Poll_ Majority of NYC Democrats F...

Date Submitted: June 24, 2026

Method Received:

Charter Related:

Topic Simplified:

Subtopic

Show 2 hidden fields

OPEN PRIMARIES

NYC Charter Revision Commission Hearing
Staten Island
June 23, 2026

Testimony of Jeremy Gruber, JD
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OPENPRIMARIES

Throughout American history, every expansion of voting rights - from ending property qualifications, to women's suffrage, to the civil rights movement - has been met by those who demanded that excluded citizens prove their worthiness before being allowed to vote.

But the right to vote in a public election is not something government can make contingent on joining a private political organization. It is a fundamental right of citizenship.

As we approach the 250th anniversary of the Declaration of Independence, we should remember its opening words: "We hold these truths to be self-evident." The right of citizens to participate in their own government is one of those truths.

Dr. Martin Luther King Jr. called the denial of voting rights a "tragedy of human dignity and a denial of democracy itself." Former President Obama said the right to vote is "the cornerstone of our democracy" and that we should "make it easier - not harder - for people to exercise that right."

Independent voters across New York City are organizing. We are demanding nothing more and nothing less than equal citizenship.

The question before this Commission is simple: Will New York City continue a system that excludes over a million eligible voters, or will it open the door to a democracy that truly belongs to everyone?

Thank you.

New Poll: Majority of NYC Democrats Favor Open Primaries; 40% of Democrats are Actually Independents

Open Primaries will enter polling into the public record before the NYC Charter Revision Commission showing a large share of registered Democrats are actually independents.

New York, NY – In new polling released today conducted independently by IVC Media and commissioned by Open Primaries and the Independent Voter Project, New York City's registered Democrats support opening primaries to independent voters by more than two-to-one: 51% in favor and just 23% oppose. The poll also discovered that approximately 40% of registered Democrats are actually independents or Republicans who register as Democrats to be able to vote in the Democratic Party primary, the election of consequence in NYC.

At a Charter Revision Commission hearing on Tuesday, June 23, Open Primaries will enter these findings into the public record. Importantly, the independent polling finds:

- Only 40% of NYC registered Democrats call themselves proud party members.
- A statistically equal 39% say they are really independents who registered Democratic for one reason only: to vote in primaries.
- Among Latino Democrats, only 1 in 3 (33%) actually consider themselves Democrats, the lowest share of any racial or ethnic group surveyed.
- 60% believe that the NY Democratic Party should allow independents to vote in the 2028 primary – only 20% of NYC registered Democrats disagree.
- A majority of self-described "proud Democrats" say independents should be able to vote in the 2028 Democratic primary.

2026 OPEN PRIMARIES NYC POLL

Sponsored by **Open Primaries** and the **Independent Voter Project** · Fieldwork by IVC Media

FIELD PERIOD	SAMPLE	MODE	MARGIN OF ERROR
June 11–12, 2026	N = 1,394 NYC registered Democrats (2024/2025 general-election voters)	MMS-to-web	±3.1 pp at 95%

Results are weighted to the L2 voter-file population of NYC registered Democrats who voted in at least one of the last two general elections, on race × gender × age. Margin of error is reported at 95% confidence and includes the weighting design effect. Percentages may not sum to 100 due to rounding.

HEADLINE FINDINGS

- **More than two-to-one support for opening NYC primaries to all voters.** 51% would support an initiative to open New York City primaries; 23% are opposed and 27% are not sure.
- **Three-to-one support for letting independents vote in the 2028 Democratic primary** — 60% yes to 20% no, including a 53% majority of self-described "proud Democrats."
- **Registered does not mean committed.** Just 40% of NYC registered Democrats say they are proud members of the Democratic Party; a statistically equal 39% say they are really independents who registered only to vote in primaries.

Q1 · WHY ARE YOU REGISTERED AS A DEMOCRAT?

"Which best describes why you registered as a Democrat?"

RESPONSE	RESULT
I'm proud to be a member of the Democratic Party	**40%**
I consider myself independent, but I'm registered Democrat to vote in primary elections	**39%**
I'm not sure / Other	**10%**
I'm not very political but I usually vote for Democrats	**8%**
I consider myself a Republican, but the Democratic primary is the only election that really matters	**3%**

1 IN 3

Just 33% of Latino voters registered as Democrats in New York City actually consider themselves Democrats.

38% say they are really independents who registered as Democrats only to vote in primary elections — the lowest "proud Democrat" share of any racial or ethnic group surveyed.

Q2 · OPENING NYC PRIMARIES

"In New York, you have to register with a political party to vote in that party's primary. Would you support an initiative to open New York City primaries to all voters?"

RESPONSE	RESULT
Support	**51%**
Oppose	**23%**
Not sure	**27%**

Q3 · INDEPENDENTS IN THE 2028 DEMOCRATIC PRIMARY

"The Democratic Party could allow independent voters to participate in the primary even if New York City doesn't change the rules. Do you think the New York Democratic Party should allow independent voters to participate in the 2028 Democratic primary election?"

RESPONSE	RESULT
Yes	**60%**
No	**20%**
Not sure	**20%**

PARTY IDENTITY BY RACE / ETHNICITY

GROUP	PROUD DEMOCRAT	REALLY INDEPENDENT	UNW. N
Black	**51%**	34%	258
Asian	**38%**	49%	83
White	**36%**	42%	850
Hispanic or Latino	**33%**	38%	203

Subgroup estimates carry wider margins of error than the topline (Asian n = 83 in particular) and are reported for directional insight.

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BENEATH THE TOPLINE

- **Identity — not demographics — is the dividing line.** Self-described independents back opening primaries 59–17 and 2028 participation 69–15. Even "proud Democrats" are on board: 44–29 for opening primaries and 53–25 for 2028.
- **Support is broad, not niche.** Opening primaries leads among every racial group (48–53% support) and every age band. Latino Democrats register the lowest opposition (15%) and the most undecided (35%).
- **The youngest Democrats are the most open.** Voters 18–29 back 2028 independent participation 73–9 (small subgroup; n = 79).

Base: 1,394 validated, weighted responses. Submissions failing duplicate or integrity checks were excluded. Full methodology and weighting targets available separately.

"The current closed primary system forces people to lie in order to vote," **said John Opdycke, president and founder of Open Primaries.** "Thirty-nine percent admit they're independents who were forced to register as Democratic just to get access to the ballot. Our opponents insist that closed primaries are necessary to protect the integrity of the process. It's actually the opposite."

The findings arrive as New York City's closed primary system faces growing scrutiny. Over a million independents – 54% of which are voters of color – are currently locked out of primary elections that, in most districts, are the only contests that matter. On Tuesday, June 23, close to 1.2 million unaffiliated voters across the city will be barred from participating in the primaries.

"New York independents have been forced into a box: give up their independence or give up their voice. This is not a choice – it's a disenfranchisement. And even Democrats want it to end," concluded Opdycke.
IVC Media's research crosstabs are available for members of the media upon request.
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About Open Primaries

Open Primaries is a national election reform organization working to ensure every voter can participate equally in every public election. Learn more at: openprimaries.org

BACKGROUND

Survey Methodology:

IVC Media conducted the poll June 11–12, 2026 via MMS-to-web survey among N = 1,394 NYC registered Democrats who voted in at least one of the 2024 or 2025 general elections. Results are weighted to the L2 voter-file population on race × gender × age. Margin of error is ±3.1 percentage points at 95% confidence, including the weighting design effect. Percentages may not sum to 100 due to rounding. Subgroup estimates carry wider margins of error and are reported for directional insight.

Name

Beatty

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

To improve efficiency I think some agencies should have an agency wide tracking system for true transparency. And City Hall needs to address the issue of favoritism causing those who do the work being overlooked by those who cozy up to or have personnel relationships with management. For too long managers are pulled from outside of a group with no background experience in relation to the units they oversee. It causes tension and unnecessary duplication of efforts that are often wasteful.

Attachment(s)

Drop files here or click to browse

Date Submitted June 24, 2026

Topic Unnecessary Bureaucracy × Technology ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Government Operations

Subtopic	Favoritism at agencies

Name

Rebecca Heywood

Email	[redacted]
Professional Affiliation	
Zip Code	

Public Comment

My name is Rebecca Heywood, Founder and Principal of Civic Works Studio. I testified in person at the Brooklyn hearing on June 11, 2026 on modernizing government and streamlining government technology. I am submitting this written comment to expand on my remarks.

I am a former New York City public servant at DOT, DCAS, and Emergency Management, and a technologist who has advised senior state and local government leaders on digital services, technology procurement, and workforce strategy. I run a consulting practice on government technology and workforce strategy and a newsletter and job board with more than 22,000 subscribers serving technologists moving into public service.

My core argument: the Charter promises that merit based hiring produces effective service delivery. It assigns no one the duty to verify that either end of that chain is working. The full written comment is attached.

I am asking the Commission to consider four amendments:
Give the Civil Service Commission's existing review duty under Section 813 a defined cycle and published findings, answering whether agencies have the personnel they need, in the right titles, to deliver services effectively.
Put the city's technology governance in the Charter, not an executive order, with a requirement to verify on a defined cycle that technology investments, whether built internally or by contract, are actually delivering.
- Amend Chapter 35 to require transparency in hiring: terms disclosed at offer and when they change, plain language notice when titles change, and published data on time to hire and time to start.
- Amend Section 813(b) to add technology workforce expertise to the required categories for Civil Service Commission nominees.

The full written comment with detail, sources, and Charter citations is attached.

Rebecca Heywood
Civic Works Studio LLC
[redacted]

Attachment(s)



COGE Written Public Comment_Heywo...

Date Submitted: June 24, 2026

Topic: Technology ✕ | Reporting Requirements ✕ | Unnecessary Bureaucracy ✕ | Support Oversight Agencies ✕

Method Received: Airtable Form

Is it charter related?:

Charter Related: Yes

Topic Simplified: Unnecessary Bureaucracy

Subtopic: City hiring and civil service

WRITTEN PUBLIC COMMENT
New York City Commission on Government Efficiency (COGE)

To: New York City Commission on Government Efficiency (COGE), a Charter Revision Commission
From: Rebecca Heywood, Founder & Principal, Civic Works Studio

Re: Written public comment for Modernizing Government and Streamlining Government Technology

Wednesday, 24 June 2026

To Chair Gaspard, Executive Director Cheng, and commissioners,

My name is Rebecca Heywood, Founder and Principal of Civic Works Studio. I welcome the opportunity to submit written comments to accompany my testimony delivered in-person on Thursday, June 11, 2026.

To provide context for my recommendations, I will share more detail on my own background. I am a former New York City public servant with experience at the Department of Transportation, the Department of Citywide Administrative Services, and NYC Emergency Management. My work in New York City spanned leading discovery work on civil service modernization at DCAS, creating and implementing the Neighborhood Loading Zone program at DOT and leading project and data management for COVID-19 response programs including field hospitals and quarantine hotels at NYCEM. I spent five years at U.S. Digital Response, a civic tech non-profit helping governments nationwide deploy people-first digital services, where I advised senior state and local government leaders on digital services, technology procurement, and workforce strategy in jurisdictions across the country. I have worked across the civic tech ecosystem with the organizations and funders shaping the field to engrain best practices and build partnerships to support digital transformation including serving on the board of Technologists for the Public Good.

I now run Civic Works Studio, a consulting practice on government technology and workforce strategy. I also run a well-known newsletter, #PublicSectorJobBoard, and job board, Tech Jobs for Gov, with more than 22,000 subscribers, serving the technologists interested in moving into public service. I hear every day from the people this city is struggling to hire.

Section 812 of the Charter directs the city's personnel system to "preserve and promote merit and fitness in city employment" and to "promote and support the efficient and effective delivery of services to the public." These are fundamental tenets for how New York City is run, but the Charter assigns no one the duty to verify that either is actually happening.

Section 813 assigns the Civil Service Commission "the power and duty to conduct reviews, studies, or analyses of the administration of personnel in the city, including the classification of titles by the commissioner." With no defined cycle, no publication requirement, and no trigger, that duty is underutilized.

Today, technology plays a major role in government operations and service delivery. Across the country, state and local governments are grappling with how to build and buy technology that

supports their policy goals. In New York, we need to ensure that how we build technology in-house or buy technology from the market is done in a way that not only meets the requirements of the Charter, but also supports this administration's affordability agenda and goal to improve quality of life for working-class New Yorkers. Our current civil service and procurement systems mean the city struggles to hire technology experts at scale and struggles to hold vendors accountable for the technology products and outcomes they deliver.

Many of the problems I describe in this submission will also need to be addressed through parallel efforts focused on state legislation, collective bargaining, or management practices. The people running this system at DCAS, at agencies, and in HR offices across the city are doing their best within a structure they are charged with upholding, not redesigning. Changes and improvements have been made, but some gaps cannot be closed from inside, because they require a structural mandate that does not exist.

The Build vs. Buy Decision

We rely on external vendors to build, maintain and operate vital systems for delivering on city policy goals, and make build-versus-buy decisions without sufficient internal capacity to be savvy customers. New York City, like many other local governments, doesn't have enough people who understand how modern technology is built and to know if a vendor is telling the truth about what they can deliver. We have built up silos between program, technology, and procurement teams that make it difficult for them to collaborate closely from the get-go to ensure that the selected vendor can meet all of the needs of the program and be managed effectively. This means the City cannot always choose deliberately between building in-house and buying and struggles to hold vendors accountable that what they deliver actually works.

A recent analysis of city spending data found NYC spent at least $769 million in FY 2025 on outside digital services, but the actual number is likely larger, with over $2.2 billion spent on vendors providing some mix of digital services and IT hardware.. We owe it to ourselves and the city to ensure that this spending is leading to the outcomes we want to see. There are numerous examples from across the country that ensuring technical knowledge on program teams to manage vendors and hosting internal digital teams that can build more quickly at a lower cost, improves resident access to services and lower costs.

The Hiring Gap and Who the System Excludes: Building Digital Services In-House

New York City's civil service and hiring system is difficult for candidates, employees, hiring managers and even HR staff to navigate. It lacks transparency for candidates and agencies on rules and procedures, on hiring timelines and on other issues. As project lead for the Citywide Hiring Assessment[1] completed from 2019-20 at DCAS, I heard these challenges first hand from over 10,000 New Yorkers who sat down for interviews, participated in design workshops and responded to surveys. The process and system are unfamiliar to many newcomers to New York,

[1] The results of the Citywide Hiring Assessment were never shared publicly. The discovery phase of the work wrapped in February 2020 and there were several planned pilot projects set to launch in March 2020 that were put on indefinite hold due to the City's response efforts to the COVID-19 pandemic.

or to New Yorkers who don't have close family or friends already working for the City. Anecdotally, it can be difficult to understand what an exam is and if it is the right fit for you, when it may be offered and what that means for your potential career path, as well as how long the process may take if you apply directly to a city job. Hiring managers struggle to find candidates with the right skills and experience using broad civil service titles and ambiguous rules about technical exercises or other filters to ensure that a candidate has the required skills, and HR staff often must subjectively interpret civil service regulations and requirements to answer employee questions, leading to differing interpretations across the City.

Long hiring timelines, lack of transparency and confusing information about how to get a city job has real impacts on the careers of city employees, workload of colleagues unsure of when a vacancy will be filled, on the lives of potential City employees and on residents receiving services. I have personally heard dozens of stories from New Yorkers of all types about the difficult decisions they've had to make in order to join city government and whether the long and unknown timelines are worth it.

I recently heard from a new New Yorker who received a conditional offer from a New York City agency on December 23, 2024. She was living out of state at the time, and her manager was unable to provide a sense of how long it might take to receive OMB approval to be able to schedule her start date. She ultimately received notice that they were able to schedule her start date in mid-May 2025, nearly six months after she received the conditional offer. That notice also came with an apology that they were no longer able to offer the salary that she was offered conditionally, but instead the job could be hers at a lower salary. Because the team and function were new, this was considered an expedited review process. In the meantime, she had to decide whether she was able to wait an unknown period of time to be able to work for the City, and whether after a 6 month wait she could accept a lower salary. After she ultimately started her job in June 2025, it took nearly three months for her to receive her first paycheck.

This unfortunately is not unusual. On her team alone, there are several other examples of staff who had to endure long hiring and approval timelines. They recently onboarded a new employee in early June 2026 who received a conditional offer in July 2025. Another colleague waited two years for OMB to approve the position. And while those positions sat empty, their colleagues carried the work with no additional compensation, no formal recognition and no timeline for relief.

This is not a new challenge. My own experience joining the City over a decade ago was similar. In February 2016, I received a conditional offer from the city while finishing my graduate degree. Six months of waiting followed with no timeline for a start date, income and health benefits. I ended up having to leave the country to stay with family because I could not afford to wait with no income, and could not commit to another job.

Before I could start, my future boss, not HR, told me the civil service exam for my title had opened and I needed to take it. I paid the fee and submitted my resume for the education and experience evaluation. On orientation day in August, my offer had changed. I was at a different level, offered a different salary, and I learned for the first time that my health insurance would not start for four months. Months later I found out, by logging into NYCAPS, that my civil service title had been changed to one with a different union, different benefits, and a different salary schedule. When I asked about it, I was told it was done because I would not be reachable on

the list for the exam I had taken, without any explanation of what that might mean for me and my career path.

This doesn't just affect new employees; a former colleague received an offer to move between agencies for a more senior position with higher pay. It took over 9 months for his prior agency to release him to be able to start his new job; if he wanted to stay in city employment he needed to accept a lower salary for an unknown period of time. I personally have heard stories of many others who end up leaving the city for other sectors to get out of a job they no longer wanted to be in when they had an offer elsewhere in the city they couldn't immediately take.

I had every advantage: an advanced degree, a future boss who advocated for me, family I could stay with, and enough confidence to push back. I still struggled. The system does this to those with every structural advantage who can weather the wait and unexpected changes. The question worth sitting with is who is the city losing because they don't have the privilege and advantages available to wait it out.

A five-month or longer wait between offer and start date is a financial filter. It selects for candidates in stable jobs, with savings, or with family to fall back on. It screens out recent immigrants, first-generation professionals, career changers without a cushion, and anyone who cannot suspend their lives indefinitely. These are not marginal cases in New York. They are the city.

That wait can be even longer for those who start pursuing city employment by taking an exam. In my work at DCAS on a citywide hiring assessment, I observed a consistent pattern: employees who had successfully navigated the civil service exam process before starting disproportionately had a close family member or friend already working for the city. Knowing that the exam exists, knowing when it opens, knowing how to phrase your submission to pass an education and experience evaluation — that knowledge is not public. It travels through networks, both for current and prospective employees. If you now must know someone who can guide you, and if you do not have those connections, you may struggle to get a city job. The system designed to prevent patronage now quietly encodes it.

Knowing that the system exists isn't enough. There are thousands of civil service titles, and no telling which one a hiring manager may pick for a particular role. While the police officer exam has a clear starting point, something like the staff analyst exam is used to hire for hundreds or thousands of very different jobs. Similarly, someone skilled in data analytics looking for a data job needs to decide which of many potential exams to take because a hiring manager and agency may choose a different title depending on list age, hiring timelines, team make-up and more. They may miss out on a good fit job because one to five years ago, they chose a different exam. They may not take an exam at all because none of them seem like they fit their skills.

Current listings on the NYC Careers page with a business title of "Data Analyst" or "Data Scientist" are being hired in titles including:

- RESEARCH PROJECTS COOR(MA)-MGR
- CITY RESEARCH SCIENTIST
- ASSOCIATE STAFF ANALYST
- CYBER SECURITY ANALYST
- MANAGEMENT AUDITOR

The city loses people it would genuinely like to hire, and who genuinely want to work in public service, because they simply cannot wait.

The product-based model and the title gap

New York City already has proof of what is possible when the right people are hired. NYC Planning Labs and NYC Opportunity have delivered products like Access NYC and the digital Zoning and Land Use map that have been widely acclaimed. These teams work in a product-based model that has been standard in the private sector for decades and is only now taking hold in government. They deliver faster, at lower cost, and with better outcomes for residents.

But there is no civil service pathway to hire this kind of staff at scale. We cannot hire product managers, user researchers, or data scientists at scale through titles like Computer System Manager and Computer Associate titles. The eligibility for these titles is much broader than the specialized skills needed for each of these roles; they do not align with how these roles are trained or how this work is organized. Fitting specialized skills into ill-fitting titles may mean that the candidates a hiring manager can interview do not have the skills they need, and the process must start over. In some cases, agencies then hire external contractors at higher cost to get the skills they require, compounding the problem the hiring system created.

The standard for modern technology delivery has been the product-based model for decades in the private sector. New York City has demonstrated it works here too. The Charter does not give the city the tools to hire for it at scale.

The Technology Failure: What Happens When We Cannot Hire

The hiring failure and the technology failure are not parallel problems. They are directly connected and two parts of the same problem. When the city cannot hire the technologists who could build, evaluate, maintain or oversee technology, it defaults to vendors. And without in-house expertise to hold vendors accountable, it leads to projects that are often over budget, over schedule and don't lead to the outcomes the team wanted to achieve.

In FY25, New York City spent over $2.2 billion on digital services and IT hardware, with at least $769 million of that on outside digital services. We owe it to New Yorkers to verify that this is leading to the outcomes we want to see. Evidence from across the country and world[2] shows that internal digital teams can often build faster, at lower cost, with better resident outcomes. But we cannot assemble those teams under the current structure.

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[2] The UK Government Digital Service saved billions while giving "thousands of hours back" to delivery teams. According to their 2020 impact report, the U.S. Digital Service saved $3.5 billion in one year (a 17x return on their team of ~200).

We make build-versus-buy decisions without sufficient internal capacity to understand how modern technology is built, to choose deliberately between building and buying rather than defaulting to procurement, or to hold vendors accountable that what they deliver actually works. Government software doesn't need to be so expensive[3], but we need to be able to better advocate for what we need, have flexibility to just buy what is needed, and have sufficient capacity to understand what is needed, oversee vendors and maintain products in-house.

Documented failures

The MyCity platform took four years and over $100 million, involving more than 120 contracts with roughly 50 vendors. The Comptroller's December 2025 audit found it largely rebranded existing websites. Its AI chatbot told employers they could take workers' tips and told landlords they could turn away tenants with housing vouchers, both illegal under New York City law. OTI contracted with approximately 50 firms for work including project planning, design, development, and quality assurance, citing a lack of internal staff to do the work itself. OTI disagreed with all seven audit findings and has planned approximately $74 million in additional capital spending to maintain what was built.

The Department of Buildings paid a single vendor $110 million over eight years to build its permitting system. The city has become so dependent on that vendor that even small changes require costly contract amendments. This is a documented example of vendor capture: the city lacks the technical ability to manage the very system it purchased with taxpayer dollars.

When vendors do not deliver, the city often pays them again to fix the problem — because the vendor owns the product, or because the timeline to complete a new procurement is untenable. This pattern is not unique to New York. Rhode Island paid Deloitte $682 million for a benefits system that launched to catastrophic results — cutting off or miscalculating benefits for hundreds of thousands of residents — and then awarded Deloitte a new $99 million contract to keep running it. California paid four companies over $450 million for a Next Generation 911 system that did not work when turned on, and then scrapped the design entirely. San Francisco spent more than $40 million on a school payroll system, entered its third year with a backlog of 3,000 unresolved issues, and responded by hiring additional consultants at a cost of over $15 million.

As I wrote in my newsletter in June 2026: the pattern is consistent: the technology is procured correctly, contracts are properly awarded, and yet outcomes are still catastrophically bad. What is missing is not better vendors or bigger budgets. It is the internal conditions that make technology actually work.

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[3] Waldo Jaquith, a leading expert in tech procurement in government, writes about why government software costs hundreds of million dollars and what can be done about it.

What internal conditions look like

Colorado's Office of Information Technology recently announced a fundamental restructuring and published, publicly, exactly why it was necessary. Their diagnosis names failure patterns common to nearly every government IT organization: manual effort doing work that tools should do, agencies routing around their IT department because it was not a useful partner, governance built to prevent yesterday's failures now preventing today's delivery, and skilled agency staff treated as a problem rather than an asset. As Jennifer Pahlka and Kelly Taylor, who co-founded the Colorado Digital Service, have written: moving to a product model is not about doing the old thing better. These are different jobs, with different skills, different instincts, and different measures of success.

New York City already has proof this works. NYC Planning Labs and NYC Opportunity have delivered products like Access NYC and the digital Zoning and Land Use map that have been widely acclaimed. The skills and approaches that produced them like product management, user research, and iterative delivery, are not available at scale through the current civil service structure. Titles like Computer System Manager and Computer Associate do not align with how this work is trained or organized. The result is that the city contracts out the work it cannot staff, loses the internal expertise to manage the contracts, and pays again when the contracts fail.

The durability problem

There is a harder question underneath every example of government digital service work: not whether a team can build the capability, but whether it can survive. Most digital service capacity exists at the pleasure of a single executive. It is created when someone with political will is in office, funded through discretionary budgets, and gone when that person leaves. Ontario built a genuine digital service organization over seven years, launching more than 30 mission-based product teams. It was dissolved in a departmental reorganization in March 2024, having moved through five different ministry homes until the mandate evaporated. 18F proved what was possible over eleven years and was eliminated by a late-night email when the administration changed.

New Jersey's Office of Innovation existed for seven years before Governor Murphy, in his final weeks in office, signed legislation making it the first state in the nation to permanently enshrine a state innovation office into law explicitly because he wanted to ensure the work continued 'long after my time in office.' OTI's current form exists by executive order. The next mayor could dissolve it on day one. What happened in New Jersey, and what Colorado is attempting by restructuring the whole organization rather than standing up a separate team, is the model: make the capability structural, not discretionary.

The connection

These technology failures are a downstream consequence of the hiring failure. The city cannot evaluate vendors rigorously because it lacks the in-house technical expertise that would make rigorous evaluation possible. A Niskanen Center analysis published in June 2026 puts it plainly: the government is classifying 21st-century work against mid-20th-century benchmarks, forcing managers to shoehorn data scientists into categories designed for file clerks. The cycle is predictable: agencies cannot hire the specialists they need, so they contract the work out; once they have contracted it out, they lose the internal capacity to manage contractors well; poor contract management produces poor outcomes; auditors find the poor outcomes; agencies request more budget for more contractors. You cannot reform government through consultants. You need people on staff who are empowered and accountable.

What the Charter Can Do

The Charter promises that merit-based hiring produces effective service delivery. It assigns no one the duty to verify either end of that chain. These are the fixes the Charter can make.

New York State is already moving in this direction

Since 2023, New York State has waived civil service exam fees through 2027, required that exam announcements reach schools and job training programs rather than traveling only through insider networks, and updated qualifications for nearly 800 job titles to accept equivalent experience in place of degrees. The State is launching a new vacancy-based Training and Experience examination system that scores candidates on education and work experience rather than a written cognitive test, a direct acknowledgment that the written test format does not serve all candidates or all roles. Other governments around the world have introduced new, effective ways to evaluate candidates. As part of their civil service reform, the UK instituted a Success Profiles framework in 2019, replacing competency-only testing with role-specific assessment. At the US federal level, USDS introduced subject matter expert peer technical review as formal assessment during the hiring process.

These are meaningful reforms. They acknowledge precisely the barriers this testimony describes: financial filters, insider knowledge, and credential requirements that screen out capable candidates.

But New York City has not waived exam fees, has opted out of the State's NY HELPS program, and has no comparable modernization underway. Other cities — Albany, Rochester, Ithaca — participated in NY HELPS and made thousands of hires. Fifty-two of the fifty-seven counties outside New York City opted in. The State is moving. The city is not. The Charter is part of why: without a structural obligation to evaluate and update how the city assesses merit and fitness, there is no institutional pressure to act.

1. **Amendment 1.** Give the Civil Service Commission's existing review duty a clock and an audience. Section 813 already assigns the Commission "the power and duty" to review how personnel administration works, including title classification. With no defined cycle, no publication requirement, and no trigger, that duty is not meaningfully used. Amend Section 813 to establish a recurring, published review that answers one question: do agencies have the personnel they need, in the right titles, to deliver services effectively? The review should explicitly address whether examination methods match the actual work, whether obsolete titles have defined transition pathways, and whether workers in evolving roles have accessible, competency-based routes to reclassification. Section 12 of the Charter already requires the mayor to report twice yearly on whether agencies are delivering services. The same accountability logic applied here would create the first structural mechanism for verifying that the Charter's own merit and fitness promise is being kept.

New York State's own transformation, like moving from written tests to vacancy-based Training and Experience assessments scored on education and work experience, validates the premise that assessment methods can and should vary by role and change over time. The Charter should require New York City to undertake the same evaluation, with published findings that answer whether the current system is actually producing the workforce city agencies need.

2. **Amendment 2.** Put the city's technology governance in the Charter, not an executive order. The Office of Technology and Innovation exists by virtue of Executive Order 3 of January 2022. The next mayor could reorganize or dissolve it on day one. Chapter 48 of the Charter still describes a department organized around cable franchises and telecommunications; it has never been updated to reflect what the city's technology function actually is or should be required to do. Amend Chapter 48 to establish a durable, Charter-mandated technology governance function with a requirement to verify, on a defined cycle, that technology investments, whether built internally or by contract, are actually delivering the outcomes they were meant to achieve, and with mechanisms to require changes when they are not.

Other jurisdictions have solved the durability problem by codifying their technology functions in law. In January 2026, New Jersey became the first state in the nation to enshrine its Office of Innovation into statute, converting seven years of executive-branch work into a permanent authority with a governing board that requires expertise in data science, digital product development, public engagement, and the delivery of digital services. The explicit rationale, stated by Governor Murphy on signing: to ensure the office continues to deliver for New Jerseyans "long after my time in office." Colorado's Office of Information Technology was established by statute and modernized by bipartisan legislation in 2021. Because it has statutory standing, Colorado's OIT can publicly acknowledge when it is not delivering well enough and undertake a fundamental restructuring — something an executive-order dependent

agency cannot do without risking abolition. An executive order can be undone. A Charter mandate must be fixed. New York City should follow New Jersey and Colorado's lead.

3. **Amendment 3.** Require transparency in the hiring process. Amend Chapter 35 to require: disclosure of all material employment terms at conditional offer, and notification when those terms change; plain language notice to employees when their civil service titles change; and published data on time to hire and time to start including where time is lost in the hiring process, from position approval through offer to start date. Without these requirements, the people who can navigate this system are the people who already know how it works. Publishing the data creates public accountability for a process that is currently invisible to candidates, to agencies, and to the public.

4. **Amendment 4.** Add technology workforce expertise to the Civil Service Commission. Amend Section 813(b) to add demonstrated expertise in technology workforce management or professional services to the categories the screening committee must include among Commission nominees. The body governing employment for more than 300,000 city workers currently has no structural requirement that any member understand what it takes to hire a software engineer, a product manager, or a data scientist.

Rebecca Heywood
Founder, Civic Works Studio LLC
Board Member, Technologists for the Public Good
[redacted]

Name

Jules

Email [redacted]

Professional Affiliation: NYC Parks

Zip Code:

Public Comment:

Street trees planted on Parks contracts are guaranteed for one year (e.g. if they die within the first year of planting, they are replaced). However, there is no contract mechanism to make contractors water the replaced trees, and they are therefore extremely likely to die again after the contractor is no longer liable for them. This is a huge waste of money--each tree costs upwards of $2,000 to plant (excavation+planting costs). It also reduces public faith in the tree planting program. A contract mechanism must be built to enforce watering replacement trees, and stronger contract language must be put in place to change contractor workflows (for example, mandating the use of tank trucks to water trees rather than laboriously filling and pouring buckets) in order to prevent the original trees from dying.

Thank you!

Attachment(s): Drop files here or click to browse

Date Submitted: June 25, 2026

Topic: Enforcement, Procurement Reform, Unnecessary Bureaucracy

Method Received: Airtable Form

Is it charter related?

Charter Related	Yes
Topic Simplified	Procurement
Subtopic	Reform parks contracts for street trees so that vendor is responsible for multiple years

Name

Jimmy Pan

Email [redacted]

Professional Affiliation: Executive Director, NYC Equal Employment Practices Commission

Zip Code:

Public Comment: The New York City Equal Employment Practices Commission (EEPC) raises three inter-related structural inefficiencies that COGE could address as it reviews the whole of the New York City Charter.

Attachment(s)



2026.02.25 EEPC Charter Submission.pdf

Date Submitted: June 25, 2026

Topic: Unnecessary Bureaucracy ✕ Support Oversight Agencies ✕

Method Received: Airtable Form

Is it charter related?:

Charter Related: Yes

Topic Simplified	Budget
Subtopic	Reform OMB funding mechanisms to better retain and attract human capital

NYC
Equal Employment
Practices Commission

Aldrin Rafael Bonilla, Ed.D, MPA
Chair/Commissioner

Elaine S. Reiss, Esq.
Vice-Chair/Commissioner

Minosca Alcantara, Ed.D.
Ngozi Okaro, Esq.
Nicole Yearwood, MPA
Commissioners

Jimmy Pan, Esq.
Executive Director

Andreana G. Mirabella, Esq.
Executive Agency Counsel

[redacted]

BY EMAIL

June 25, 2026

Patrick Gaspard, Chair
Emma Wolfe , Vice-Chair
NYC Commission on Government Efficiency

Dear Chair Gaspard and Vice-Chair Wolfe:

The New York City Equal Employment Practices Commission (EEPC) raises three inter-related structural inefficiencies that COGE could address as it reviews the whole of the New York City Charter.

Accountability breeds Efficiency – Unaccountability breeds Inefficiency

Effective accountability bodies increase efficiency by calling out waste, ineffectiveness, poor practice, or corruption. In that way, they can function similarly to how a corporate board might in the private sector. Not only might they improve efficiencies, they can also prevent lawsuits, and—most importantly—they can bolster public trust.

Nonetheless, many accountability bodies remain subject to OMB funding decisions, which naturally erodes their ability to provide accountability. Furthermore, a Mayoral administration—and sometimes even the local legislature—has little structural incentive to fund them properly. Unsurprisingly, then, the City budget does not provide accountability bodies with nearly enough resources meet their basic mandates.

For years, the EEPC has submitted proposals to several Charter Revision Commissions arguing for a Charter-protected budget. Other agencies have requested the same. Rather than revisit this issue repeatedly in various Charter Revision Commissions, we suggest that COGE speak with every accountability agency and devise a universal system that protects budgets for a variety of such agencies, can ratchet up with new needs and statutory obligations, and will withstand mayoral impulses to ratchet down funding.

OMB's Structural Design Disincentivizes Efficiency

Even when accountability agencies have funding, OMB can slow down or even stop hiring or promotion. OMB practices have slowed down critical EEPC personnel needs many times over the years,

despite our status as an independent oversight agency. This affects functionality, retention, and knowledge for accountability bodies.

Naturally, the same applies for non-accountability agencies. Large city agencies may find themselves unable to hire personnel or build out programs long after the Mayor and Council have decided on funding levels.

Thus, it may appear to the public that they get less service for every budgeted tax dollar. In addition, high-quality hires leave before OMB lets the hiring process move forward; high-quality staff leave before OMB finally lets deserved promotions go through.

OMB's structural role incentivizes the institution to reduce fiscal spending. Delay, whether intentional or not, perpetrates the fiction of short-term budget savings. While delay may cause the City long-term inefficiencies, the Charter does not set up OMB to internalize the costs of citywide inefficiency caused by OMB's own processes.

Thus, while OMB's role in many city functions may be primarily procedural, it often uses its *procedural* checks to cause *substantive* effects on the City's work.

OMB's intentions are not to blame. The current structure of city government establishes the incentives for such actions. COGE should set Charter safeguards around OMB's role to ensure that OMB's role in estimating revenues and helping set budget does not bleed into serving as a brake on substantive work. In other words, OMB should not do at the local level what DOGE set out to do at the federal level.

Subpar Personnel Policy causes Inefficiencies

Poor hiring, employee turnover, and loss of institutional knowledge comprise the highest forms of inefficiency for most organizations, including local government. Yet the Charter contains little structural design to focus local government on high-quality municipal employment. OMB helps administer the budget, and DCAS helps administer personnel requirements. Neither has the explicit mandate or power to improve employment quality.

In a time when technology reshapes job environments and roles more rapidly than ever, government cannot rely solely on pensions and security to attract and retain talent.

We saw that DOGE devastated federal efficiency by attacking staffing and related systems. COGE should do the opposite. The Commission has many options to address municipal employment policy. It could:

- Link OMB's structural incentives with retention rates at city agencies;
- Remove OMB's substantive role in personnel action decisions;

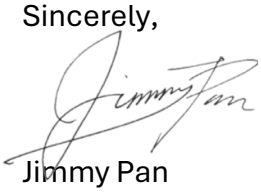
- Empower and protect municipal employment watchdogs like the EEPC, or create insulated pathways that would permit DCWP and CCHR to investigate agency practices without concern of mayoral retribution;
- Create institutions or related political mechanisms (reports, plans, funding requirements) that can help the city track and improve retention, promotion, job quality;
- Amending the mission of the OMB (see, e.g., the Federal Reserve's dual mandate of managing inflation and maintaining full employment across the nation).

Conclusion

COGE has many options to improve government efficiency through the mechanism that plays the most critical role to government success: its people.

The EEPC stands ready to assist COGE, and we attach as appendix for reference our previous Charter Revision Commission testimony.

Sincerely,



Jimmy Pan
Executive Director

cc: Ann Cheng, Executive Director

NYC Equal Employment Practices Commission

APPENDIX

Aldrin Rafael Bonilla
Chair

Minosca Alcantara
Elaine S. Reiss, Esq.
Commissioners

Jeanne M. Victor
Executive Director

Jennifer Shaw, Esq.
Executive Agency Counsel/
Director of Compliance

[redacted]

October 4, 2021

BY EMAIL
Jennifer Jones Austin, Chair
Henry Garrido, Vice Chair
NYC Racial Justice Commission

Re: Proposed Revisions to Chapter 36 of the New York City Charter, As Amended

Dear Chair Jones Austin and Vice Chair Garrido:

On behalf of the Equal Employment Practices Commission's (EEPC) Board of Commissioners, please accept this letter in support of the EEPC's proposed revisions to Chapter 36 of the New York City Charter, as amended (City Charter). The EEPC's proposed changes are being submitted for your consideration as a part of the NYC Racial Justice Commission's overall strategy of dismantling structural racism and ensuring a fair and equitable program of equal employment opportunity for a diverse workforce within the City of New York.

Background

As one of New York City's largest employers, the City of New York (City) has approximately 294,000 full-time employees. Created in 1989 by amendment to the City Charter, the EEPC is an independent, non-mayoral City agency empowered to audit and evaluate employment practices and procedures of City entities[1] and their efforts to ensure fair and effective equal employment opportunities for women and minorities as well as for applicants seeking employment. See Chapter 36, Section 831(d)(5). Only those City entities that meet the following criteria are subject to the EEPC's audit, evaluation, and monitoring:

- The majority of the Board Members are appointed by the Mayor;
- The majority of the Board Members serve by virtue of being City Officers; or
- The entity is funded, in whole or in part, by the City treasury.

[1] Sec. 831(a) of the City Charter provides, in pertinent part, that the Commission: (i) shall monitor the employment policies, programs and practices of each city, county, borough or other office, administration, board, department, division, commission, bureau, corporation, authority, or other agency of government. For simplicity, the word "entity" shall be used to cover all such offices that otherwise meet the criteria for falling under the jurisdiction of the EEPC.

APPENDIX

In short, the EEPC's mandate is to ensure that the City's employment practices, including Equal Employment Opportunity (EEO) policies and programs, are properly structured, efficiently administered, and in compliance with federal, state, and city EEO requirements. Programmatic changes resulting from the EEPC's audits provide a mechanism, at an institutional level, to assist City entities in preventing employment discrimination and avoid costly litigation.

The EEPC currently audits, evaluates, and monitors approximately 143 City entities. Most recently, the EEPC was charged with conducting a ten-year study of the underutilization of women and minorities, by job group, within City government. As part of its analysis, the EEPC will also look at occupational segregation by race and gender, pay disparities, how individuals are hired and promoted, and how the City entities recruit and train the next generation of workers.

Although the EEPC performs its functions, its continued success is hampered by questions regarding its lack of enforcement power, jurisdiction and independence, lack of a secure and autonomous budget, and failure to have Commissioners timely appointed to its Board. To address these areas of concern, a brief summary of the proposed changes to the City Charter follows:

Additional Enforcement Measures

The EEPC's enforcement authority is limited to publishing a report and recommending to the Mayor the appropriate corrective action the EEPC deems necessary to ensure compliance with the City Charter provisions. Such a repercussion for failure to implement assigned corrective actions creates minimal consequences for non-compliance, especially for non-mayoral entities. Currently, if an entity fails to comply with the EEPC's recommended corrective actions, the EEPC's remedy is to issue a Determination of Non-Compliance, publish that determination in the EEPC's annual report and conduct another audit of the entity the following year. The proposed language to Sec. 832(c) strengthens the EEPC's enforcement authority by permitting it to recommend budgetary consequences for an entity's failure to correct areas of EEO non-compliance.

Jurisdiction

Throughout the years, a considerable amount of the EEPC's time has been spent responding to challenges pertaining to its authority and jurisdiction. To provide clarity and avert jurisdictional arguments, the definition of "agency" established in City Charter Sec. 831 warrants additional clarification and a clearer delineation of those entities subject to the EEPC's authority. The additional language proposed is consistent with criteria applied in New York City Corporation Counsel Opinion No. 11-90, and subsequent opinions, which examined whether and to what extent the provisions of City Charter Chapter 36 extend to which governmental entities.

Fiscal Independence

As a result of its audits, the EEPC is tasked with providing entities, officials and, upon request, the public with nonpartisan information pertaining to employment practices, policies, and procedures, as well as, making related legislative and budgetary recommendations to the Department of Citywide Administrative Services, the Office of the Mayor and the New York City Council. The EEPC seeks to properly establish and preserve independence in its budget structure by using a

comparative appropriations model similar to the fiscal structure of the Independent Budget Office.[2] The Office of the New York City Comptroller was selected as the comparator to the EEPC due to its similarity in independence and its duty to audit the programs and activities of each entity, thus safeguarding the City from fraud, waste, and abuse in employment practices. The proposed strategy anchoring the amount of the EEPC's budget to a set percentage of that of the New York City Comptroller will stabilize the fiscal structure of the EEPC and its ability to operate independently, thus providing the City of New York with a consistent and well-run EEO program.

Vacancies on the Commission

City Charter Sec. 830 requires that the EEPC Board consist of 5 members: 2 City Council appointees, 2 Mayoral appointees, and 1 Chair who is jointly appointed by the Office of the Mayor and the New York City Council. Section 830 also mandates the Board to meet at least once every 8 weeks and 3 members constitute a quorum. The EEPC's Board of Commissioners is currently comprised of only 3 of 5 members: a jointly appointed Chair and 2 Mayoral appointments. When one of the Commissioners is unavailable to attend a Board meeting, there is no quorum, which results in no business being conducted. Over the past 10 years, there have been long periods of time during which the EEPC functioned without a Chair and/or with only the minimal number of Commissioners needed to constitute a quorum. It is extremely important that the EEPC have the full complement of Commissioners, as contemplated by the City Charter, to conduct its work and demonstrate to City entities that the Mayor's Office and New York City Council fully support the work of the EEPC.

While not a "public-facing" agency, the EEPC assists the City's entities behind the scenes. And while these proposed charter language changes may appear relatively minor, they will have a significant impact towards helping to ensure that City entities establish and maintain a fair and equitable workplace. The City, as a major employer in New York City, has already taken many steps to demonstrate its commitment to dismantling structural racism by establishing commissions and enacting rules and laws to address it. It is respectfully requested that the necessary steps be taken to empower and support the EEPC so that it may make a significant and positive contribution towards this end. The importance of this work only serves to highlight the EEPC's need for further independence and an autonomous funding stream. It is for these reasons that this request is being made. I am available to meet with you to discuss these proposed amendments to Chapter 36 of the City Charter at your convenience and can be reached at 212-615-8933, if you should have any questions. For your convenience, I have attached an unaltered copy of the current law and a marked up copy of the law with the proposed changes.

[2] City Charter Chapter 11 Sec. 259(b) provides that the appropriations available to pay for the expenses of the independent budget office should not be less than 10 percentum of the appropriations available to pay for the expenses of the office of management and budget during such fiscal year.

Equal Employment Practices Commission

APPENDIX

Thank you for your attention to this matter and I look forward to hearing from you.

Respectfully submitted,

Jeanne M. Victor
Executive Director

Attachment

c: Anusha Venkataraman, Executive Director of the Racial Justice Commission
Phillip Thompson, Deputy Mayor for Strategic Policy Initiatives
Aldrin Rafael Bonilla, Chair, Equal Employment Practices Commission
Elaine Reiss, Vice Chair, Equal Employment Practices Commission
Minosca Alcantara, Commissioner, Equal Employment Practices Commission
Mathieu Eugene, Chair of the Committee on Civil and Human Rights
Darma V. Diaz, Chair, Committee on Women and Gender Equity
I Daneek Miller, Chair, Committee on Civil Service and Labor
Helen Rosenthal, Council Member
Jacqueline M. Ebanks, Executive Director of Commission on Gender Equity

APPENDIX

Chapter 36: Equal Employment Practices Commission

Section 830. [Equal employment practices commission.]

a. There shall be an equal employment practices commission which shall review, evaluate and monitor the employment procedures, practices and programs of any city agency and the department of citywide administrative services to maintain an effective affirmative employment program of equal employment opportunity for minority group members and women who are employed by or who seek employment with city agencies.

b. The commission shall consist of five members who, shall be compensated on a per diem basis. The mayor and the council shall each appoint two members. In addition, the mayor and the speaker of the council shall appoint a fifth member to serve as the chair of the commission for a term of four years.

c. A vacancy in the commission shall not impair the right of the remaining members to exercise all the powers of the commission and three members thereof shall constitute a quorum.

d. Members shall be appointed for four-year terms except that of the members first appointed, one of those appointed by the mayor and one of those appointed by the council shall serve for terms expiring on the thirtieth day of June, nineteen hundred ninety-two, one of those appointed by the mayor and one of those appointed by the council shall serve for terms expiring on the thirtieth day of June nineteen hundred ninety-five; and the chair shall serve for a term expiring on the thirtieth day of June, nineteen hundred ninety-four.

e. The commission may, within the appropriations available therefor, appoint an executive director and such deputies, assistants, and other employees as may be needed for the performance of the duties prescribed herein.

f. The commission may meet as necessary to implement the provisions of this chapter provided that the commission shall meet at least once every eight weeks.

Section 831. Duties and powers of the New York city equal employment practices commission.

a. The commission: (i) shall monitor the employment policies, programs and practices of each city, county, borough or other office, administration, board, department, division, commission, bureau, corporation, authority, or other agency of government, where the majority of the board members of such agency are appointed by the mayor or serve by virtue of being city officers or the expenses of which are paid in whole or in part from the city treasury, including the board of education, city and community colleges, the financial services corporation, the health and hospital corporation, the public development corporation, and the city housing authority; and (ii) monitor the coordination and implementation of any city affirmative employment program of equal employment opportunity for minority group members and women who are employed by or who seek employment with city agencies, including the activities of the department of citywide administrative services, and the civil service commission, pursuant to chapter thirty-five, and any other agency designated by the mayor to assist in the implementation or coordination of such efforts, and all city agencies required by section eight hundred fifteen to establish agency programs

b. The commission may request and shall receive from any city agency such information, other than information which is required by law to be kept confidential or which is privileged as attorney-client communications, attorney work products or material prepared for litigation, and such assistance as may be necessary to carry out the provisions of this chapter.

c. The commission shall communicate to the commission on human rights any information regarding suspected or alleged violations of chapter one of title eight of the administrative code.

d. The commission shall have the following powers and duties:

1. to review the uniform standards, procedures, and programs of the department of citywide administrative services pursuant to paragraphs twelve and fourteen of subdivision a of section eight hundred fourteen, and to review the plans adopted by city agencies in accordance with the provisions of paragraph nineteen of subdivision a of section eight hundred fifteen, and to provide any such agency or the department of citywide administrative services with such comments and suggestions as the commission deems necessary and appropriate;

2. to recommend to the department of citywide administrative services, all city agencies, or any one or more particular agencies, procedures, approaches, measures, standards and programs to be utilized by such agencies in their efforts to ensure a fair and effective affirmative employment program of equal employment opportunity for minority group members and women who are employed by or seek employment with city agencies;

APPENDIX

3. to recommend to any city agency actions which such agency should consider including in its next annual plan as required by paragraph nineteen of subdivision a of section eight hundred fifteen;

4. to advise and, if requested, assist city agencies in their efforts to increase employment of minority group members and women who are employed by or who seek employment with city agencies;

5. to audit and evaluate the employment practices and procedures of each city agency and their efforts to ensure fair and effective equal employment opportunity for minority group members and women at least once every four years and whenever requested by the civil service commission or the human rights commission or whenever otherwise deemed necessary by this commission;

6. to make such policy, legislative and budgetary recommendations to the mayor, council, the department of citywide administrative services or any city agency as the commission deems necessary to ensure equal employment opportunity for minority group members and women;

7. to publish by the fifteenth of February of each year a report to the mayor and the council on the activities of the commission and the effectiveness of each city agency's affirmative employment efforts and the efforts by the department of citywide administrative services to ensure equal employment opportunity for minority group members and women who are employed by or seek to be employed by city agencies;

8. to establish appropriate advisory committees;

9. to serve with such other agencies or officials as shall be designated by the mayor as the city liaison to federal, state and local agencies responsible for compliance with equal employment opportunity for minority group members and women who are employed by or who seek to be employed by city agencies; and

10. to take such other actions as are appropriate to effectuate the provisions and purposes of this chapter.

Section 832. Compliance procedures.

a. The commission shall conduct such study or investigations and hold such hearings as may be necessary to determine whether agencies are in compliance with the equal employment opportunity requirements of this chapter and chapter thirty-five.

b. For the purpose of ascertaining facts in connection with any study or investigation authorized by this chapter, the commission shall have power to compel the attendance of witnesses, to administer oaths and to examine such persons as they may deem necessary. The commission or any agent or employee thereof duly designated in writing by them for such purposes may administer oaths or affirmations, examine witnesses in public or private hearing, receive evidence and preside at or conduct any such study or investigation.

c. If the commission makes a preliminary determination pursuant to subdivision d of section eight hundred thirty-one, that any plan, program, procedure, approach, measures or standard adopted or utilized by any city agency or the department of citywide administrative services does not provide equal employment opportunity; and/or if the commission makes a preliminary determination pursuant to this chapter and chapter thirty-five, that an agency has not provided equal employment opportunity, the commission shall notify the agency in writing of this determination and provide an opportunity for the agency to respond. If the commission, after consideration of any such response and after consulting with the agency, concludes that the corrective actions, if any, taken or planned by the agency are not sufficient to correct the non-compliance identified in the preliminary determination, it should make a final determination in writing, including such recommended corrective action as the commission may deem appropriate. The agency shall within thirty days thereafter respond to the commission on any corrective action it intends to make and shall make monthly reports to such commission on the progress of such corrective action. If the commission, after a period not to exceed six months, determines that the agency has not taken appropriate and effective corrective action, the commission shall notify the agency in writing of this determination and the commission may thereafter publish a report and recommend to the mayor whatever appropriate corrective action the commission deems necessary to ensure compliance with equal employment opportunity pursuant to the requirements of this chapter and chapter thirty-five. Within thirty days of such determination the agency shall submit a written response to the commission and the mayor. The mayor after reviewing the commission's findings and the agency's response, if any, shall order and publish such action as he or she deems appropriate.

Name

Ben Weinberg

Email [redacted]

Professional Affiliation: Citizens Union

Zip Code:

Public Comment: Please see attached a written testimony from Citizens Union that details the organization's full list of recommendations to the Commission on Government Efficiency

Attachment(s)



Citizens Union Recommendations to th...

Date Submitted: June 25, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified	Government Operations
Subtopic	Restructuring independent watchdogs

CITIZENS UNION
OF THE CITY OF NEW YORK

Recommendations to the New York City Commission on Government Efficiency

June 2026

This written testimony summarizes Citizens Union's recommendations to the 2026 Charter Revision Commission, also known as the Commission on Government Efficiency (COGE).

Citizens Union is a nonpartisan good government group fighting for honest and accountable government, free and open elections, and reforming New York City and State governments. Throughout our nearly 130 years, we have played a role in nearly every charter revision process. We have advised commissions, had members serve as commissioners, and helped place reforms on the ballot and secure their passage.

This written testimony is divided into four parts: **ethics and accountability, government modernization, democracy and elections,** and **charter revision process reform**.

Ethics and Accountability: Preventing Waste, Fraud, and Misuse of Resources

Establish Minimum Budgets for the Department of Investigation and the Conflicts of Interest Board

Reducing red tape, streamlining permitting, and increasing government capacity to execute its mission are all crucial to providing New Yorkers with effective services. But as this commission tackles longstanding bureaucratic hurdles, it should also prioritize strengthening public integrity and accountability by ensuring we have strong, independent oversight agencies that keep government effective, efficient, and committed to the public interest.

Strong watchdogs save taxpayer dollars by investigating ethics violations, combating corruption and abuses of power, and protecting taxpayer money from fraud and waste.

The Department of Investigation generated more than $6 million in financial recoveries last year.[1] The Conflicts of Interest Board provides same-day legal advice to thousands of city employees annually, helping prevent violations before they occur.[2]

To fulfill their mandates, these agencies must have the independence and resources to operate without undue influence from the branches of government they oversee.

That is why earlier charter revision commissions established budget protections for other essential independent agencies, including the Campaign Finance Board, the Independent Budget Office, and the Civilian Complaint Review Board.

But two of the city's most important oversight agencies, the Department of Investigation (DOI) and the Conflicts of Interest Board (COIB), do not enjoy such budget protections. As a result, they suffer from chronic underfunding that impairs their missions.

The Department of Investigation has lost over 100 staff in recent years—a period that coincided with the agency's high-profile investigations into former Mayor Eric Adams. [3]

These staffing losses have measurable consequences. According to the Mayor's Management Report[4], the average time to complete DOI investigations has increased from 201 days in FY2023

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[1] The New York City Department of Investigation – 2025 Annual Report https://www.nyc.gov/assets/doi/press-releases/2026/February/04CYend2025.02.18.2026.Visual.Release.pdf

[2] The New York City Conflicts of Interest Board – 2025 Annual Report https://www.nyc.gov/assets/coib/downloads/pdf2/annual_reports/2025-nyc-coib-annual-report.pdf

[3] March 18, 2026 Testimony of Christopher Ryan, Acting Commissioner, NYC Department of Investigation before the Council Committee on Oversight and Investigations https://www.nyc.gov/assets/doi/Testimony/2026/DOIPrelimBudgetTestimony.CYend.03.18.2026FINAL.pdf

[4] The Mayor's Management Report (MMR) – Department of Investigation https://dmmr.nyc.gov/city-services/public-safety-and-access-to-justice/department-of-investigation

to 251 days in FY2025. And it's on track to get even worse, with data from the first four months of FY2026 showing that it is now taking an average of 325 days to complete an investigation. Background checks and the vetting of new public sector hires are also taking longer. As staffing declines and caseloads grow, the City's ability to detect and address misconduct in a timely manner is increasingly at risk. At a recent Council hearing, DOI Commissioner Nadia Shihata warned that the proposed executive budget would have a tangible impact on the agency's ability to fulfill its anti-corruption mandate.[5]

The Conflicts of Interest Board has nearly the same headcount it had when it was founded in 1990, despite enormous growth in the size of the city workforce, the city's budget, and COIB's own responsibilities—which now include oversight of legal defense trusts and affiliated not-for-profits.[6] The widening gap between a sprawling municipal government and the small agency tasked with enforcing its ethics laws poses a serious risk to the city's ability to maintain clean, honest government.

Even when these agencies receive budget allocations for new personnel, that funding may be withheld or modified under the Mayor's impoundment authority during the year. Both COIB and DOI have testified about the Office of Management and Budget's refusal to approve funding for vacancies.

To ensure these watchdogs' independence, protect them against politically motivated cuts, and preserve the city's internal waste-reduction mechanisms, the DOI and COIB should be guaranteed minimum budgets.

This Commission can build directly on work already done. The Commission to Strengthen Local Democracy—the charter commission established by the City Council—recognized the need to strengthen both agencies and developed charter amendments, already vetted by the Law Department, that would set minimum funding levels of 0.06 percent and 0.0035 percent of the city's total budget for DOI and COIB, respectively.[7] Given this Commission's tight timeline, those proposals are well positioned for adoption.

This reform is long overdue. A wide range of stakeholders—advocates, prior Public Advocates, Council Members, and agency commissioners themselves—have repeatedly called for a

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[5] June 2, 2026 Testimony of Commissioner Nadia I. Shihata on DOI's FY 2027 Executive Plan, before the Council Committee on Oversight and Investigations https://www.nyc.gov/assets/doi/Testimony/2026/DOITestimonyExecBudget.06.02.2026Final.pdf

[6] Testimony before the New York City Council Committee on Finance and the Committee on Governmental Operations, State & Federal Legislation Concerning the FY27 Executive Budget, Carolyn Lisa Miller, Executive Director, NYC Conflicts of Interest Board https://legistar.council.nyc.gov/View.ashx?M=F&ID=15559237&GUID=F2A3E2A3-7FBB-41BB-99A9-B5F110D5687F

[7] The NYC Commission to Strengthen Local Democracy Final Report https://static1.squarespace.com/static/678ab684e1a2cb193dfc38af/t/6930a3eb72d92366241d0693/1764795371419/FINAL_Report_12.3.25_w_appendices.pdf

minimum budgets for COIB and the DOI through proposals to previous charter revision commissions and legislation introduced in the Council.[8]

Merge Lobbying with Ethics Oversight - from the City Clerk to the Conflicts of Interest Board

Restructuring oversight bodies is another way to preserve taxpayer dollars and improve government effectiveness and accountability. Chief among the needed reforms is lobbying oversight.

New York City's lobbying industry grows every year, with $144.5 million spent in 2025 alone.[9] Effective lobbying oversight is essential to ensuring that public resources serve the public interest rather than private interests. Yet the regulation of the lobbying industry is better suited to a small town that focuses on administrative recordkeeping than to the largest municipal lobbying market in the country.

Lobbying oversight is currently handled by the City Clerk, an office appointed by and housed within the City Council—the very body in which most lobbying takes place. This arrangement creates an inherent conflict of interest.

The City Clerk's Lobbying Bureau, a five-person unit, focuses primarily on compliance rather than enforcement. Its enforcement tools are limited: it administers late fees, conducts approximately 45 audits per year, and has issued just $10,000 in civil penalties since 2018. Few violations, if any, are referred to DOI.[10]

Effective lobbying regulation in other major cities is conducted by joint lobbying-ethics agencies. Several of the nation's largest cities use this model, including Los Angeles (City Ethics Commission), Chicago (Board of Ethics), Philadelphia (Board of Ethics), San Francisco (Ethics

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[8] Conflicts of Interest Board, "Past and Proposed Charter Amendments," available at https://www.nyc.gov/site/coib/the-law/past-charter-revisions-and-proposed-amendments.page ; Testimony of DOI Commissioner Jocelyn E. Strauber to Commission to Strengthen Local Democracy https://static1.squarespace.com/static/678ab684e1a2cb193dfc38af/t/6839c408899dec43c683a71a/1748616200735/Department+of+Investigations+Testimony.pdf; June 2, 2026 Testimony of Commissioner Nadia I. Shihata on DOI's FY 2027 Executive Plan, before the City Council https://www.nyc.gov/assets/doi/Testimony/2026/DOITestimonyExecBudget.06.02.2026Final.pdf; Citizens Union, 2010. *City Charter Revision Recommendations: Increasing Avenues for Participation in Governing and Elections in New York City*. https://citizensunion.org/wp-content/uploads/2010/06/0610CU_Charter_Revision_ReportRecommendations.pdf; legislation Int. No. 1099-2009; Int. No. 0095-2010; Int. No. 1045-2009; Final reports of the following charter revision commissions: 2002 Charter Revision Commission, at 113–116, https://www.nyc.gov/assets/charter/downloads/pdf/2002_final_report.pdf, 2003 Charter Revision Commission, at 136, 156–157, https://www.nyc.gov/assets/charter/downloads/pdf/final_report2003.pdf, 2018 Charter Revision Commission, at 122–123, 127, https://www.nyc.gov/assets/charter/downloads/pdf/final-report-20180904.pdf.

[9] Clerk of the Council, Lobbying Bureau, March 2026 Annual Report https://www.cityclerk.nyc.gov/assets/cityclerk/downloads/pdf/2026%20Annual%20Report%20final.pdf

[10] Office of the New York City Clerk, *Lobbying Bureau Annual Reports*; *Testimony by the New York City Clerk before the Committee on Governmental Operations, State & Federal Legislation*. April 19, 2024.

Commission), and San Antonio (Ethics Review Board). New York State similarly consolidates these functions in the Commission on Ethics and Lobbying in Government (COELIG).

We recommend transferring lobbying oversight to COIB, with dedicated funding and staffing for this expanded responsibility.

COIB already oversees lobbyists under the Lobbying Gifts Law and manages disclosure reporting for over 10,000 individuals. Given its expertise in ethics regulation, consolidating lobbying oversight under COIB would create a more coherent and effective system.

Consolidate the Three External Police Oversight Bodies into One Board

A significant challenge for police accountability in New York City is the fragmentation system of oversight.

Former Judge James Yates, who, by order of a federal court judge in the NYPD stop-and-frisk cases conducted the most comprehensive analysis of the NYPD discipline system, found a dozen offices and agencies—both inside and outside the NYPD—that oversee police actions. Yet coordination among them is limited and access to NYPD information is inconsistent, undermining their collective effectiveness.[11]

A more effective system should be utilized.

The three primary external oversight bodies—the Inspector General for the NYPD (OIG-NYPD), the Mayor's Commission to Combat Police Corruption (CCPC), and the Civilian Complaint Review Board (CCRB)—should be consolidated into a single Police Oversight Board. Consolidation would strengthen collective capacity and streamline access to NYPD information.

The OIG-NYPD and the CCPC perform similar and somewhat overlapping functions. The CCRB serves a somewhat different purpose, but its ability to investigate complaints, obtain relevant information, and prosecute wrongdoing could be strengthened as part of a larger and more comprehensive police oversight agency.

The consolidation proposal was included in the 2021 NYC Police Reform and Reinvention Collaborative Plan[12] and endorsed by then-Mayor Bill de Blasio. DOI had recommended the same approach in its December 2020 report on the NYPD's response to George Floyd protests[13].

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[11] James Yates, September 19, 2024. *Report to the Court on Police Misconduct and Discipline*. https://www.nypdmonitor.org/wp-content/uploads/2024/09/Discipline-Report.pdf

[12] The New York City Police Reform and Reinvention Collaborative Plan, found at: https://www.nyc.gov/site/policereform/reform-plan/reform-plan.page

[13] New York City Department of Investigations, December 2020. *Investigation into NYPD Response to George Floyd Protests*. https://www.nyc.gov/assets/doi/reports/pdf/2020/DOIRpt.NYPD%20Reponse.%20GeorgeFloyd%20Protests.12.18.2020.pdf

The proposal was not included in the 2021 City Council resolution implementing the reform plan. Given ongoing concerns about police accountability, it should be revisited.

Modernizing Government: How the City Manages Its Workforce and Its Technology

We urge the Commission to be bold in addressing two areas where structural reform is overdue: civil service and technology.

Explore Civil Service and Municipal Workforce Reform

Citizens Union has helped shape the city's workforce since our founding nearly 130 years ago. We championed the transition from Tammany Hall patronage to merit-based civil service and were part of the effort that established the city's first civil service system.

And across many decades since, we've documented where that system has fallen short.[14]

Today, more than 13,000 positions sit vacant. Hiring a single civil servant often takes over a year, sometimes even longer, largely due to the current exam system and the required hiring processes for qualified candidates. This is not sustainable for a modern city. If we cannot staff the agencies within city government responsible for essential services, such as building housing or maintaining our parks, then our city will fall behind.

The rules set to safeguard civil service hiring and workforce management have been the subject of criticism for decades, and some issue experts argue that New York City's civil service system ranks worst in the country.[15]

While civil service is largely a state matter, the city retains meaningful room to modernize within existing constraints. We encourage the Commission to make this a priority in its final report. Some ideas already raised by advocates—including meaningful performance evaluations, broadbanding titles to ease the exam burden on DCAS, and moving toward continuous rolling recruitment—are especially worth exploring.[16]

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[14] See for example, 1976 Citizens Union report: Beaumont, Enid F. Promoting Efficiency in Government: Proposals for a New Personnel System for the City of New York. 2012 Citizens Union report: Tensions, Trends and Trade-Offs: Recommendations Towards an Equitable, Efficient, and Effective New York City Civil Service System. https://citizensunion.org/wp-content/uploads/2016/07/CU_CapstoneReport_CivilServiceReform.pdf. 5BORO Institute 2023 report: Solving the Staffing Crisis: Saving City Government for New Yorkers. https://fiveboro.nyc/wp-content/uploads/2023/02/Solving-the-Staffing-Crisis.pdf.
[15] Robert Gordon and Gabe Paley, "New York's Civil Service System vs. Public Sector Progress," *Vital City*, November 11, 2025, https://www.vitalcitynyc.org/new-yorks-mamdani-ny-civil-service-system/.
[16] Robert Gordon, "The Wrong Kind of Outlier," June 16, 2026, https://robertmgordon.substack.com/p/the-wrong-kind-of-outlier; Lewis, Caitlin. "NYC Has the Power to Fix Its Hiring Process—The Charter Commission Should Use It." *Searchlight*, June

Address the Use of Tech in Government

Technology faces similar problems. City government's use of technology is hampered by procurement delays, vendor capture, and data fragmentation. The procurement process is so lengthy that by the time an agency's new product—whether a website, a portal, or something else—is actually deployed, the technology is already outdated.

Additionally, because the city contracts out its applications to external vendors, the vendor assigned to build the initial application is often the only one who can fix it. This allows the vendor to dramatically upcharge what it really costs to fix the issue, wasting what some have argued is hundreds of millions of dollars on single applications alone.[17]

When different vendors build different applications, the resulting data is siloed and cannot easily be shared or integrated across agencies. Creating systems that enable interoperability, with appropriate data management and segmentation, would significantly increase efficiency.

Experts broadly agree that the answer is to build more capacity in-house, [18] meaning that the city would hire the workers who build technology applications directly, not through contractors. This would allow the city to bypass convoluted procurement processes, deliver up-to-date products, avoid vendor capture, and enable data interoperability, potentially saving the city hundreds of millions, if not eventually billions of dollars.[19] This may require civil service reform and therefore, state action.

In the meantime, a dedicated NYC digital service team working on a project-by-project basis is worth serious exploration.[20] A 200-person team at the United States Digital Service saved the federal government $3.5 billion in 2019 alone—a 17-to-1 return on investment.[21] A few dozen people working in exempt roles outside exam requirements could generate real savings for New York City while broader reform takes shape.

23, 2026. https://searchlight.citizensunion.org/nyc-has-the-power-to-fix-its-hiring-process-the-charter-commission-should-use-it/.

[17] Hendrick Townley, "Vendor Capture in NYC Government," *Tech Mayor NYC*, December 9, 2025, https://techmayor.nyc/p/vendor-capture-in-nyc-government.

[18] Jordan Shapiro, "Testimony to the Commission on Government Efficiency, COGE, a Charter Revision Commission," BetaNYC, June 11, 2026, https://www.beta.nyc/2026/06/11/coge-testimony/

[19] Bannon, Leah. "COGE Testimony." June 11, 2026. https://docs.google.com/document/d/1rnT9IfxA97nYf8k3cLVe7q58-r4kuArlXGc2uKvEWAU/edit?tab=t.0.

[20] Rebecca Heywood, "What I Said to New York City's Commission on Government Efficiency," *#PublicSectorJobBoard*, June 16, 2026, https://publicsectorjobboard.substack.com/p/what-i-said-to-new-york-citys-commission.

[21] Tech Mayor NYC, "NYC's Digital Service Teams," *Tech Mayor*, January 1, 2026, https://drive.google.com/file/d/1Ov6yHYxdGN3VLc9Fy98qEdRnd_HWBJzn/view.

Democracy and Elections: Open Primaries and Independent Expenditure Reform

Opening New York City's Closed Partisan Primary System

New York City is one of the few large cities that still uses a closed partisan primary. Because the winner of the Democratic primary—and in some areas, the Republican primary—is effectively guaranteed to win the general election, and because primary turnout is low, a very small share of the voting-age population ultimately decides who holds office.[22]

The partisan primary system is particularly exclusive of the more than 1 million "independent" or "unaffiliated" voters, who are not enrolled in any political party and are locked out of any primary. The rate of unaffiliated voters has been steadily increasing and now accounts for nearly 22% of registered voters in New York City, over twice the number of Republican voters. Younger generations tend more to identify as independent, and research has shown that unaffiliated voters are engaged in politics and believe voting is their civic duty.

New York City should open its primary system to all voters, while retaining party designations on the ballot so voters have relevant context about candidates. We have presented such recommendations to previous charter commissions as well.

Reforming the Independent Expenditure Disclosure Regime

New York City's first rules regulating super PACs—also known as independent expenditure committees—were adopted by voters based on the recommendations of the 2010 Charter Revision Commission, immediately following the U.S. Supreme Court's *Citizens United* decision opened the door to unlimited, unregulated spending in American elections.

The most recent municipal election demonstrated that the regulatory framework governing independent expenditures (IEs) requires significant improvements. More than any other development in the 2025 election cycle, IE activity reached new levels of scale, complexity, and intensity, and poses the greatest long-term risk to the City's campaign finance system.

A key development was the use of intermediary pass-through entities—including political committees and LLCs—to channel millions of dollars into IE spending, significantly undermining the City's dark money disclosure regime. Independent spenders have also exploited

[22] See more at Charter Reforms for Better New York City Government - Citizens Union report for the 2025 Charter Revision Commissions https://citizensunion.org/wp-content/uploads/2025/02/Charter-Reforms-for-Better-New-York-City-Government-Citizens-Union-Report-Feb-2025.pdf

administrative grace periods, delayed enforcement, trivial penalties, and divergent state and city rules to minimize disclosure before Election Day.

These practices are already prevalent in state and federal elections, and the risk of their expansion in New York City is real. Creating a donor-nesting scheme is neither legally nor administratively complex, and the costs are easily absorbed by large spenders. If widely adopted, such methods would significantly erode a disclosure framework that has historically been one of New York City's most important campaign finance safeguards.

Citizens Union has proposed several reforms to the disclosure rules, including enacting new donor traceback requirements modeled on Arizona's 2022 Voters' Right to Know Act, strengthening enforcement and compliance mechanisms, and increasing penalty limits for violations.

More information is available in our most recent testimony to the Campaign Finance Board[23]

Charter Revision Commission Process: Vulnerabilities and Reform

Finally, Citizens Union believes the charter revision process itself merits reexamination.

It is a topic this panel knows well, given the commissioners' extensive government service and involvement with prior charter revision commissions.

Revising the City Charter through popular referendum is a critical component of New York City's system of government. Charter revision commissions have produced some of the city's most important reforms, helping create a more effective, accountable, and responsive government.

Charter revision commissions are also an innovative governing tool we wish other levels of government would possess. They combine the strengths of an independent expert panel—with the capacity to examine fundamental questions of governance in relative isolation from daily political pressures —with the legitimacy of direct democracy through a public vote.

But recent experience suggests that the charter revision process is drifting away from the qualities that make it valuable. Charter revision should be an extraordinary tool for structural reform, conducted through a deliberative and open process. Vulnerabilities in the current system, resurfaced repeatedly in recent years, have allowed for misuse of the city's governing document for political maneuvering, little public input, and growing cynicism.

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[23] The New York City Campaign Finance Board 2025 Post Election Hearing - Supplemental Testimony from Citizens Union https://citizensunion.org/wp-content/uploads/2026/06/CFB-2025-Post-Election-Hearing-Supplemental-Testimony-from-Citizens-Union.pdf

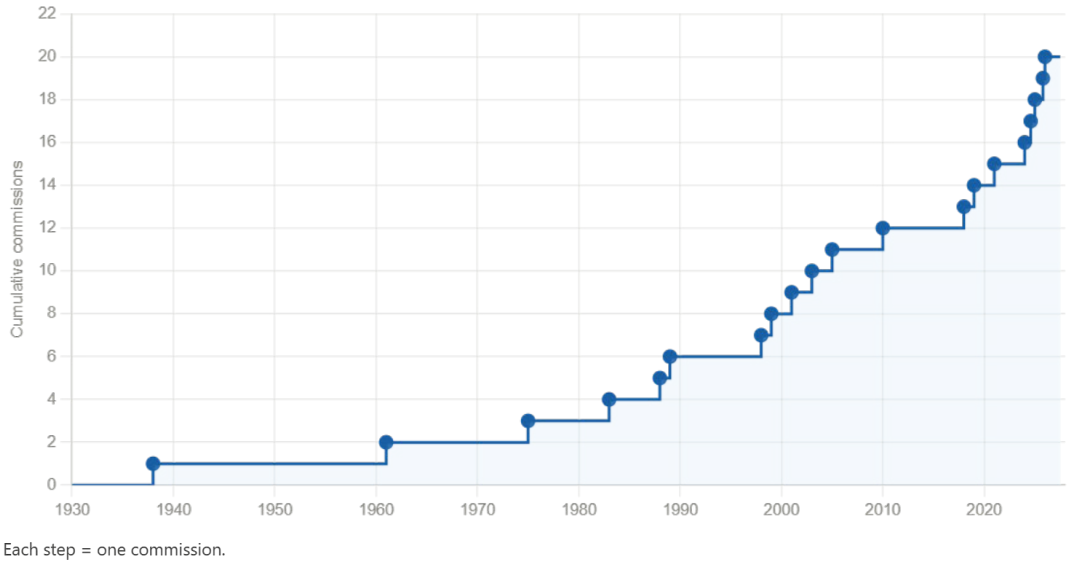
We urge the Commission to examine not only what reforms belong in the Charter, but also how the charter revision process itself can better reflect those principles.

Restore the Charter Revision Process as an Extraordinary Tool Reserved for Major Structural Reforms

The 1989 Charter Revision Commission is often brought up as a role model for such panels. But the truth is charter commissions are no longer being used as extraordinary bodies convened to address fundamental questions of governance. Eight commissions have been established in the last eight years—more than were created during the nearly 30 years before that. By comparison, there were only five commissions in the half-century between the 1938 Charter and the adoption of the 1989 Charter.

This rapid growth is turning charter revision into a routine mechanism for bypassing the normal legislative process, despite the existence of an elected legislative body.

Chart 1: The Growth of Charter Revision Commissions in New York City, 1938 to 2026



Each step = one commission.

That trend is reinforced by the fact that many proposals submitted to voters resemble ordinary legislation that could be enacted by local law or even addressed administratively without requiring a referendum.

The city should consider ways to preserve charter revision as an extraordinary process, including establishing limits on the frequency of commissions or reexamining the types of proposals that warrant a referendum.

Protect the Charter Revision Process from Political Manipulation

The City Charter is New York City's foundational governing document. Decisions about when and how it is revised should be driven by the public interest and the merits of proposed reforms, not by short-term political gamesmanship.

Yet many recent commissions have been created primarily for strategic political reasons. Most charter commissions established during the last three years were created by mayors to "bump," or block, other ballot questions. We have repeatedly criticized this undemocratic power.[24] Although the State Legislature attempted to eliminate it last year, that legislation was unfortunately vetoed by Governor Kathy Hochul.[25]

The State recently addressed one vulnerability by closing the loophole allowing mayors to appoint "lame-duck" commissions, after Mayor Eric Adams established a charter revision commission on his final day in office, but further refinements are still needed.[26]

Political incentives also contribute to commissions being established far too late in the year. Both the 2024 Charter Commission and this Commission effectively operated on roughly two-month timelines during the summer and election season – among the shortest charter revision processes in the city's history. When commissions are established at the last minute, they have little opportunity to gather public input, conduct research, or engage in a thorough and deliberative process.

We greatly appreciate this Commission's efforts to engage the public and have been impressed by commissioners thoughtful considerations of issues at hearings. Nevertheless, we believe short-term charter commissions should not be permitted. Our proposal for minimum timeframes is detailed below.

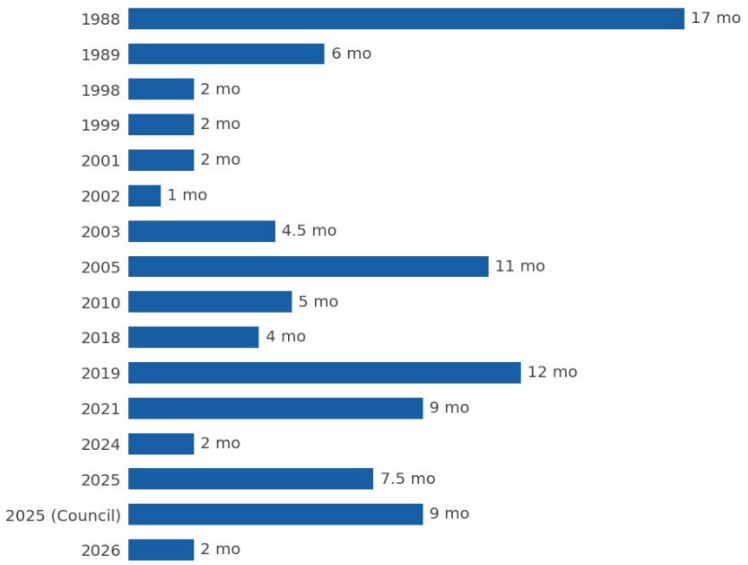
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[24] *Mayor Adams' Proposed Final-Day Charter Commission Lacks Mandate, Credibility, and Makes Mockery of City's Charter Revision Process* (Dec. 31, 2025), https://citizensunion.org/document/2025-12-31/mayor-adams-proposed-final-day-charter-commission-lacks-mandate-credibility-and-makes-mockery-of-citys-charter-revision-process/. *Statement from Citizens Union on Mayor Adams' Announcement of a New Charter Revision Commission* (Dec. 13, 2024), https://citizensunion.org/document/2024-12-13/statement-from-citizens-union-on-mayor-adams-announcement-of-a-new-charter-revision-commission/; *Testimony Before the 2024 Charter Revision Commission: Government and Election Reform Hearing* (June 17, 2024), https://citizensunion.org/document/2024-06-17/testimony-before-the-2024-charter-revision-commission-government-and-election-reform-hearing/.

[25] *Gov. Hochul's Veto of Mayoral Referendum Bumping Bill: A Missed Opportunity to Stop Ballot Gamesmanship* (Dec. 6, 2025), https://citizensunion.org/document/2025-12-06/gov-hochuls-veto-of-mayoral-referendum-bumping-bill-a-missed-opportunity-to-stop-ballot-gamesmanship/

[26] Bernadette Hogan & Kelly Mena, *Sources: Legislature May Let Mamdani Disband Adams' 'Zombie' Charter Commission*, NY1 (May 20, 2026), https://ny1.com/nyc/all-boroughs/news/2026/05/20/eric-adams-charter-commission-moves-forward-without-mamdani-s-support. See also: Citizens Union *Explainer: Charter Revision Commissions Appointed by Prior Mayors* (Feb. 24, 2026), https://citizensunion.org/document/2026-02-24/explainer-charter-revisions-commissions-appointed-by-prior-mayors/.

Chart 2: Duration of New York City Charter Revision Commissions, First to Last Meeting



Additional safeguards are needed to protect the charter revision commissions from further politization. The City should reconsider the appointment powers so that more elected officials and branches of government are represented on commissions, and commissions' sole discretion on drafting ballot questions.

Establish Rules for a Deliberative and Open Charter Revision Process

Meaningful public participation and adequate deliberation are essential for successful charter commissions. Yet only very rudimentary transparency and public input practices are codified in Minimum procedural requirements should be established. That includes:

- **Minimum timeframes**
  For charter revision commissions, we recommend requiring at least 180 days between a commission's first meeting and the filing of ballot proposals with the City Clerk, as well as at least 30 days between publication of a commission's final report and the filing of ballot proposals. Currently, commissions are only required to hold a single public hearing and could theoretically be established just days before the ballot-filing deadline. We made a similar recommendation to the 2024 and 2025 charter revision commissions, and legislation has been previously introduced in Albany to implement such timetables[27]

[27] Citizens Union, *Charter Reforms for Better New York City Government* (Feb. 2025), https://citizensunion.org/wp-content/uploads/2025/02/Charter-Reforms-for-Better-New-York-City-Government-Citizens-Union-Report-Feb-2025.pdf. Citizens Union, *Testimony Before the 2024 Charter Revision Commission: Government and Election Reform Hearing* (June 17, 2024), https://citizensunion.org/document/2024-06-17/testimony-before-the-2024-charter-revision-commission-government-

Similarly, the City Council should not be able to place Charter amendments before voters without sufficient time for public engagement. We recommend requiring that any local law proposing a Charter amendment that must be approved by referendum be passed twice by the Council, with at least 30 days between votes, and that a public hearing be held before each vote. This mirrors the amendment process for the New York State Constitution, which requires constitutional amendments to pass twice before appearing on the ballot.

- **Robust public hearing and transparency requirements**
  Although commissions often hold hearings in every borough, they are not required to do so and may conduct their work with limited transparency.

  The commission established by former Mayor Adams on December 31 is currently operating without a website, without webcasts of its meetings, and without making public its reports or resolutions public. Some commissions have regularly published testimony received from the public; others have never done so.

  Clear rules should ensure that commissions meaningfully solicit and incorporate input from stakeholders, experts, and the public.

Although the charter revision process is governed by the Municipal Home Rule Law, New York City retains authority to establish its own procedural rules on charter revision so long as they do not conflict with state law. That is the case for most of issues mentioned above.

In fact, a Charter Revision Commission currently operating in Buffalo has advanced preliminary recommendations to codify charter revision procedures in the Buffalo City Charter, addressing weaknesses in its own system, like periodical commissions, a fixed appointment structure, and eligibility requirements for commissioners.[28] Citizens Union is not advocating for these specific reforms, but Buffalo's example demonstrates that cities can take the initiative to strengthen and modernize their charter revision processes.

The issue is not whether charter revision commissions remain valuable. They do.

Given the recent problems surrounding charter revision and the growing interest in reform at both the city and state levels, there is a window of opportunity to strengthen this important mechanism for structural reform further erosion of public confidence occurs. We urge the Commission to address these issues in its final report.

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and-election-reform-hearing/; S590 (Krueger)/A3665 (Simone) – original version https://www.nysenate.gov/legislation/bills/2025/S590/.

[28] J. Dale Shoemaker, *Buffalo Commission Will Draft Up Major Reforms to City Charter*, Investigative Post (June 10, 2026), https://investigativepost.org/2026/06/10/buffalo-commission-to-draft-up-major-reforms-for-city/

Name

Wil Fisher

Email	[redacted]
Professional Affiliation	
Zip Code	
Public Comment	Hello and thank you for the opportunity to comment. Today, the City maintains property records via ACRIS for all boroughs except Staten Island, which is administered by the Richmond County Clerk. That office should be folded into DOF and administered the same way as the other boroughs.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Real Estate and Development ✕ Unnecessary Bureaucracy ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Property records for Staten Island should move from Richmond clerk to DOF

Name

Jessica

Email	[redacted]
Professional Affiliation	CPSE Administrator with Department of Education
Zip Code	[redacted]
Public Comment	To allow educational leaders more time for maternity leave to bond with their newborn babies and support their families during this important transition.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Public Health

Subtopic

Expand parental leave

Name

Kyle Brillante

Email	[redacted]
Professional Affiliation	NYCPS
Zip Code	[redacted]
Public Comment	Please fix the payroll system for NYCPS -- it should not be a DOS based system that for some titles, like DC37, needs to be manually entered. This is very inefficient and prone to human error.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Technology ✕ Unnecessary Bureaucracy ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Technology

Subtopic	Improve and modernize NYCPS payroll system

Name

Diane Kelly

Email	[redacted]
Professional Affiliation	NYC Teacher
Zip Code	
Public Comment	We are paying for over priced office supplies and art supplies. Staples charges outrageous prices because their mark up prices are insane!
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Procurement Reform
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Education & Youth
Subtopic	Fund schools and equip teachers for supplies

Name

Robert Tweeddale

Email	[redacted]
Professional Affiliation	NYC Educator
Zip Code	
Public Comment	Do Not Allow Non-U.S. Citizens or Non-New York City Permeant Residents the right to Vote or make other Policy Influencing decisions for New York Citizens. Also, when will the Middle Class Taxpayers of New York City receive, 'Free Stuff' or some type of incentive for contributing more in tax for non tax payers?
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Miscellaneous, Budget Issues
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Elections

Subtopic	Votes for citizens only

Name

Jacqueline Ortega

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Charter schools don't belong in public schools. There is often a clash with schedules as well as with students especially if the public school is one that services students with special needs. The special needs students are made to feel as less than and the charter school staff look down on the public school staff as inferior. Also the budget disparity is enormous. Public schools cannot compete with the charter school budget and it serves as a reminder to public school students and staff how underbudgeted they are. If you go to a school that is co located with a charter school you can see the difference.

Attachment(s)

Drop files here or click to browse

Date Submitted June 25, 2026

Topic Budget Issues × Tenant Protection × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Education & Youth

Subtopic	Anti charter schools

Name

Diane Kelly

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

As a former Common Core Fellows I am very disapppointed with the Science curriculum options. Amplify, aside from the company being involved in writing the test and grading them, they are also the gatekeepers to review/test prep materials. (previous exams are no longer published) I find the materials lacking a substantial amount of content while spending an inordinate amount of time on basic concepts. Previously, we as fellows wrote curriculum including tasks that were more closely aligned and realistic for NYC. Having professionals that write materials inhouse, I believe would be more cost effective.

Attachment(s)

Drop files here or click to browse

Date Submitted June 25, 2026

Topic Procurement Reform × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Education & Youth

Subtopic	Move curriculum writing back in house at NYCPS

Name

Victoria

Email	[redacted]
Professional Affiliation	NYC DOE
Zip Code	

Public Comment

There is an urgent need for a comprehensive overhaul of our special education system. Unfortunately, we are failing some of our most vulnerable students. Graduation rates among students with disabilities remain unacceptably low, and there is a well-documented correlation between special education and incarceration. More than half of the inmates at Rikers Island received special education services at some point during their schooling, highlighting the long-term consequences of educational inequity and systemic failure.

At its core, this is an issue of educational equity. The current system concentrates decision-making power at the central office and administrative levels, often leaving families and educators with limited influence over the services students receive. The growing number of impartial hearings and the millions of dollars the Department of Education spends each year on litigation and settlements for failing to provide a Free Appropriate Public Education (FAPE)—demonstrates that these challenges are not isolated incidents but symptoms of a deeply flawed system.

Addressing this crisis requires systemic reform from the top down. While reducing class sizes is an important step, it is only one piece of the solution. Every school should have equitable access to funding, specialized programs, support services, and Academic Intervention Services (AIS). Currently, this is far from reality. Too many students go years without receiving the interventions they need, and we continue to graduate students who have not been adequately prepared for postsecondary education, employment, or independent living.

Specialized programming should be available in every school community, including services for students with Autism Spectrum Disorder (ASD), dyslexia, behavioral challenges, and other disabilities. Every school should have access to sensory spaces, evidence-based interventions, and highly qualified specialists in areas such as autism, dyslexia, and behavioral support. Rather than relying primarily on separate specialized schools, we should invest in building robust supports within neighborhood schools. Students with disabilities benefit from meaningful access to their neurotypical peers, and inclusive environments better prepare all students for life in a diverse society.

Increased funding should be directed toward expanding Integrated Co Teaching (ICT) classrooms, developing smaller specialized classes, and creating programs tailored to the unique needs of each school community. Investing in school based services would not only improve student outcomes but would also be far more cost effective than the current cycle of litigation and reactive interventions.

We must also prioritize the development of high quality programming, recruit and retain specialized staff, and expand innovative school models led by principals with a strong vision for inclusion and student success. Schools should incorporate career pathways, industry partnerships, experiential learning opportunities, and life skills instruction. Many successful education

systems across Europe and Asia emphasize hands on learning, community based experiences, and real world skill development rather than relying solely on traditional classroom instruction.

For too long, we have accepted a system that allows students with disabilities to fall behind year after year while their needs remain unmet. New York has the opportunity—and the responsibility—to create a more equitable, effective, and inclusive educational system. Our children deserve nothing less.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 25, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Is it charter related?:

Charter Related: No

Topic Simplified: Education & Youth

Subtopic: comprehensive overhaul of our special education system

Name

Jennifer Quintero

Email	[redacted]
Professional Affiliation	helter-Based Community Coordinator, NYC Public Schools (or NYC Public Schools
Zip Code	[redacted]

Public Comment

As a Shelter Based Community Coordinator with NYC Public Schools, I work directly with families experiencing homelessness and see firsthand how government processes affect their daily lives. Because I work closely with families in shelter settings, I also see how coordination between multiple City agencies impacts their ability to access services.

One of the biggest opportunities to improve government efficiency is strengthening coordination between City agencies. Families are often required to provide the same information multiple times because systems do not always communicate with one another. This creates unnecessary delays, duplicate work, and frustration for both families and staff.

In my experience, families living in shelter also become frustrated by delays related to shelter processes and documentation. Parents are often waiting for paperwork, approvals, or updates but are unsure of where their request stands or who is responsible for the next step. Better communication and clearer timelines would reduce confusion and improve the overall experience for families.

Another significant concern I see involves student transportation. One of the most common frustrations expressed by parents is the amount of time it can take for a student's school bus route to be created or updated. In some cases I have worked on, families have waited weeks or even months before transportation was in place. During that time, parents struggle to get their children to school consistently, which can affect attendance and place additional stress on families already experiencing homelessness.

These delays often result in repeated phone calls, emails, and visits to multiple offices as families search for answers. Frontline staff across agencies also spend valuable time following up on requests instead of providing direct services.

I encourage the Commission to consider:

• Improving data sharing and coordination between City agencies while protecting privacy.

• Reducing duplicate paperwork and document requests.

• Reviewing the transportation approval and routing process to reduce delays and provide families with clearer timelines and status updates.

• Improving communication regarding shelter-related processes so families know the status of their requests and what steps remain.

• Creating a formal process for frontline employees to regularly recommend operational improvements based on their day-to-day experience.

These changes would make City government more efficient while improving

the experience of families experiencing homelessness. Better coordination, clearer communication, and faster processing would allow frontline employees to spend more time serving New Yorkers and less time navigating administrative barriers.

Thank you for the opportunity to provide feedback.

These comments reflect my personal observations based on my experience as a Shelter Based Community Coordinator and are submitted in my individual capacity

Attachment(s)

Drop files here or click to browse

Date Submitted: June 25, 2026

Topic: Unnecessary Bureaucracy, Enforcement, Reporting Requirements, Technology

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Unnecessary Bureaucracy

Subtopic

Improving data sharing and coordination between City agencies while protecting privacy.

Name

Patrick Joseph

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Please consider replacing the School Construction authority with something more ethical and efficient or at least changing the regulations on SCA so that it has substantial oversight from NYCDOE officials and families. While it is well known among education policy analysts, local elected officials, and some parent-led organizing groups, that cronyism determines which contractors get SCA jobs, it may be lesser known that SCA is also highly irresponsible when it comes to sharing data on school seats and costs. It's timelines are always off in their 5 year capital plans and the jobs it executes are rarely completed on time. There are schools in our city that have had scaffolding around them for years because SCA contractors cannot or will not finish jobs in a timely fashion. Perhaps the most egregious issue is that SCA appears to be moved by socioeconomic and racial politics such that a school in Harlem may be left an unfinished construction site for years while schools in privileged neighborhoods may have their jobs finished over the course of a single summer. Look at the history of school constructions jobs in District 3 for evidence of this. In addition, when SCA testifies at City Council hearings, they often obfuscate or even outright lie to City Council. When they do share the data that the public would benefit from, it's done so in private with specific members of the Council to appease them, but this keeps NYers in the dark. I believe SCA needs to be deeply investigated to see if there is anything that can be done to make school construction jobs more equitable. I believe NY needs a school construction plan that supports the city's need to desegregate schools, make schools accessible, and reduce seats, but SCA does not seem up to the task.

Attachment(s)

Drop files here or click to browse

Date Submitted June 25, 2026

Topic	Enforcement × Reporting Requirements × Unnecessary Bureaucracy × Real Estate and Development × Tenant Protection × Support Oversight Agencies ×
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Reform SCA

Name

Christty Fabre

Email	[redacted]
Professional Affiliation	School Social Worker
Zip Code	[redacted]

Public Comment

I am writing to urge you to take action to expand maternity leave benefits for New York City Department of Education employees. As a DOE employee and a New York City resident, I have seen firsthand how current policies fail to support working mothers, jeopardize their health, and create inequities between City employees and the rest of New York State's workforce.

Right now, DOE employees are required to return to work just six weeks after giving birth. Six weeks is not enough time for a mother to recover physically, stabilize emotionally, or bond with her newborn. New York State's Paid Family Leave program provides 12 weeks of paid leave to millions of workers across the state — yet City employees are excluded from this benefit and must return to work six weeks earlier than everyone else. At minimum, City employees deserve access to the same 12 weeks that Paid Family Leave already guarantees statewide.

The situation is made even more difficult because DOE employees must use their Cumulative Absence Reserve (CAR) days to cover maternity leave. Many employees spend years saving every sick day, avoid taking time off when they are ill, or even borrow CAR days, putting themselves into debt just to have time to recover from childbirth. I personally know colleagues who come to work sick because they are trying to save enough days to afford maternity leave. No parent should have to choose between their health and their paycheck.

This issue affects me deeply. I want to expand my family, but the stress of not having enough maternity leave stops me from pursuing my dream of having more children. When I worked in the nonprofit sector, I received 12 weeks of Paid Family Leave and 6 weeks of disability, giving me a total of 18 weeks at home with my first newborn. That time was invaluable it allowed me to heal, bond, and transition into motherhood without fear or financial strain. Yet as a City employee, if I decide to have more children, I would only be able to take six weeks off. The difference is profound, and it directly impacts my family planning.

When mothers are pressured to return to work prematurely, it increases the risk of postpartum depression and anxiety. Those additional six weeks can make a life changing difference in a mother's mental and physical health. Supporting mothers is not only the right thing to do it strengthens our schools. Employees who return when they are truly ready are more focused, more stable, and more effective in their roles.

Mayor Mamdani has emphasized improving childcare access for all families, and meaningful family leave is the foundation of that vision. New York City has the opportunity to lead by example. Extending maternity leave for DOE employees is an investment in healthier families, stronger schools, and a more equitable city.

I respectfully ask that you champion legislation or policy changes that would

grant DOE employees access to at least 12 weeks of paid family leave, aligning City policy with the rest of New York State.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 25, 2026

Topic: Reporting Requirements, Budget Issues, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Public Health

Subtopic: Expand parental leave

Name

Ellen Devine

Email	[redacted]
Professional Affiliation	
Zip Code	
Public Comment	Extremely poor choice of names for this new agency. Having already been assaulted by the capricious dismantling of our Government agencies by an ill-informed DOGE, using COGE for this NYC city agency seems disconnected from the collective trauma inflicted upon our nation as a whole.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback
Subtopic	Complaint about commission name

Name

Anastasia Conklin

Email	[redacted]
Professional Affiliation	IT Project Specialist at DSNY
Zip Code	

Public Comment

I recommend amending the New York City Charter to require an **in house IT capability and lifecycle cost review** before a City agency procures outside software-development or information-technology consulting services.

Charter § 311 governs the Procurement Policy Board and authorizes procurement rules for technical, consulting, and professional services. Charter § 312 primarily addresses whether contracting would displace existing City employees. Neither provision appears to establish a strong, affirmative requirement that agencies first determine whether qualified City technology personnel can perform the proposed work including personnel employed by other City agencies—or compare the full lifecycle cost of internal development with vendor development.

I have worked for more than seven years at two City agencies, the New York City Police Department and the Department of Sanitation, serving as a Crime Analyst, City Research Scientist, and IT Project Specialist. In these roles, I have worked with vendors, internal IT teams, analysts, developers, and operational personnel.

Through this experience, I have observed agencies pay outside vendors to perform work that qualified City employees could have completed at lower cost and, in many cases, with better long term results. City employees frequently have greater knowledge of agency operations, data, business rules, regulatory responsibilities, existing systems, and the practical needs of end users. Nevertheless, that institutional knowledge is not always adequately considered when agencies decide whether to outsource technology work.

Current Charter protections focus heavily on whether contracting would displace an existing employee. That does not fully address situations in which an agency outsources work instead of:

* assigning the work to qualified internal personnel;
* filling existing vacancies;
* creating or expanding internal technology teams;
* sharing qualified personnel or services across City agencies;
* training existing employees; or
* using a hybrid model led by City personnel.

Before procuring an outside IT vendor, an agency should be required to determine whether the work can reasonably be performed, in whole or in part, by qualified personnel within the agency or elsewhere in City government. This review should be required regardless of whether the proposed contract would result in layoffs, reduced hours, or other formal displacement of current employees.

The required analysis should compare three alternatives:

1. Performance by City employees;
2. Performance by an outside vendor; and

3. A hybrid model in which specialized or temporary vendor assistance supplements a City led team.

The review should separately evaluate technical capability and staffing capacity. An agency should not be permitted to conclude that City personnel are incapable of performing the work merely because the agency has not allocated sufficient staff, filled available positions, or considered qualified personnel elsewhere in City government.

For software projects, cost effectiveness should be evaluated over the full anticipated lifecycle of the system—not solely through the initial development price or contract award amount. The comparison should include:

* planning and requirements development;
* software development and implementation;
* licensing and subscription costs;
* cloud hosting and infrastructure;
* cybersecurity review and remediation;
* vendor and contract administration;
* change orders;
* maintenance and technical support;
* future enhancements;
* system integrations and data migration;
* documentation and knowledge transfer;
* transition to City support or another vendor;
* eventual system replacement; and
* the financial and operational risks of vendor lock-in.

City technology employees often possess institutional knowledge that outside vendors must spend substantial time and public money acquiring. This includes knowledge of agency business processes, data structures, operational exceptions, legal requirements, security controls, existing integrations, and user needs. That knowledge has measurable operational and financial value and should be formally considered in procurement decisions.

When an agency determines that an outside vendor is necessary, the contract should protect the City's long term interests. At a minimum, applicable contracts should require:

* City ownership or effective control of custom source code;
* continuous City access to source code repositories;
* complete technical and system documentation;
* ownership and portability of City data;
* knowledge transfer to City employees;
* use of open and interoperable standards where practical;
* clear security and system recovery documentation; and
* a transition plan allowing City employees or another provider to maintain and operate the system.

The agency should be permitted to proceed with an outside procurement

when it demonstrates that contracting is necessary or offers the best overall value because of documented considerations such as specialized expertise, temporary staffing needs, legal deadlines, security requirements, insufficient internal capacity, or lower total lifecycle cost.

This proposal would not prohibit necessary IT contracting or prevent agencies from obtaining specialized vendor assistance. It would establish a presumption that the City must first evaluate and make effective use of the expertise it already employs.

Before outsourcing technology work, agencies should be required to demonstrate that they:

1. evaluated qualified personnel within the agency and across City government;
2. considered hiring, training, reassignment, shared-service, and hybrid alternatives;
3. compared the total lifecycle costs of internal and external performance; and
4. selected the approach that provides the strongest long-term operational and financial value to the City and its residents.

The Charter should therefore require this review even when no existing City employee would be formally displaced. Closing that gap would reduce unnecessary vendor dependence, preserve institutional knowledge, strengthen the City's internal technology capacity, and help ensure that public funds are used efficiently and responsibly.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 25, 2026

Topic: Technology ✕ Procurement Reform ✕ Unnecessary Bureaucracy ✕

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified	Technology
Subtopic	Require in house IT capability and lifecycle cost review for tech products purchased by the City

Name

Anna McPherran

Email [redacted]

Professional Affiliation Forester, NYC Parks

Zip Code [redacted]

Public Comment

As a city employee, I believe we waste a lot of tax dollars by hiring outside contractors instead of developing an in house work force. This is true across the government, and I have seen first hand how this impacts the Parks Department. In my work of tree planting, I come up with a work plan, and then construction, supervision, and reporting are contracted out. We cede a lot in terms of standards when we go through third parties, a contractor that lives in another state is never going to be invested in the outcome of a project the same way a dedicated public servant will be. I have to go through multiple layers of relayed messages in order to understand what's happening on site due to the nature of our outside contracts. Each of these contracts includes a roughly 20% profit margin, which would be better served funding more services for New Yorkers. And employing city employees to do the same work to a higher standard will quickly pay for itself, and crucially help retain good talent in the agencies. Thank you for your consideration of this topic.

Attachment(s) Drop files here or click to browse

Date Submitted June 25, 2026

Topic Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕

Method Received Airtable Form

Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Reduce reliance on contractors and move work back in house

Name

Maria Norcia Santillanes

Email	[redacted]
Professional Affiliation	D
Zip Code	[redacted]
Public Comment	I agree that the fund should be updated, funding increased, and that clear rules should be established for when and how the rainy day fund is used. It should never be depleted beyond a certain amount. That amount should be reviewed and updated yearly.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Budget Issues
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget

Subtopic	Rainy day fund

Name

Aimee Tabrizi

Email	[redacted]
Professional Affiliation	Public NYC HS teacher
Zip Code	[redacted]
Public Comment	I'm not understanding why we have money set aside in schools that can only be used for re-painting walls/waxing floors, etc. It seems wasteful/bad for the earth and pointless to use up this money specifically for these jobs to be done annually, even though these jobs may not be needed that often. Why not have a more generalized budget so that that unused money can go towards students instead? Or, schools apply for beautification money only if it's truly needed.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 25, 2026
Topic	Budget Issues ✕ Unnecessary Bureaucracy ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Budget

Subtopic	Complaint about NYCPS budget

Name

Laurie Morris

Email	[redacted]
Professional Affiliation	NYC DOE
Zip Code	
Public Comment	Modernize the DOE. We still use punch cards and time clocks. There are so many forms for everything. There needs to be a better way of streamlining. The same system that worked 25 years ago is still be used today in school buildings. Also less bureaucracy to fix or repair things in a school building. We have been waiting years for bathrooms to be fixed and "we have a ticket in" .. is the response we get.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Technology ✕ Unnecessary Bureaucracy ✕ Department of Buildings (DOB) Issues ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No

Topic Simplified	Technology
Subtopic	Modernize NYCPS timekeeping

Name

Rosa Chavez Gaffney

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Comment attached

Attachment(s)



Written Public Comment Chavez Gaff...

Date Submitted

June 26, 2026

Topic

Miscellaneous

Method Received

Airtable Form

Is it charter related?

Run agent

Charter Related	No
Topic Simplified	Feedback
Subtopic	Comments about teaching quality and one shot deal

Rosa Chavez Gaffney

We encourage the Public to submit comments and any additional documentation you would like the Commission on Government Efficiency (COGE) to consider.

Two comments personal to me as an educator and former caretaker, education and mental health care for the public.
As a veteran teacher, with 22 years as a public high school teacher, I have experienced the inefficiency of how leadership (principals and superintendent as their boss) has been allowed to attack us by bringing baseless 3020a charges in order to push out teachers.
This is exacerbating OSI with complaints that could be settled with humane communication between leadership and teachers. It's as if leadership would rather overload legal routes, waste time and taxpayer dollars (DOE and UFT) than improve their skills as leaders.
The principal of my Alma mater, High School of Fashion High (alumni of Mayor Mamdani's Alma mater HS, disappointing) had me reassigned to a school after 15 years with baseless charges. After surviving this hit to my career because my dedication to education is unwavering, I have found that so many other teachers are going through the same.
How can we boast investing millions/billions in new NYC teachers if the veterans are treated this way?

Now on Mental Health. I was the caretaker of my aunt while she received resources needed to live, SSI, home attendant care, psychiatric care, etc. Because she was deemed 'able to make her own decisions', she was influenced by a stranger that was able to move into her home and change all of the permissions I had to help her.
She now has cost the city 'one shot deals' TWICE, because of the poor financial decisions she's made. How can this be modified to help a population that is so vulnerable and target of predators such as her 'roommate'?

Thank you for your time.

Rosa Chavez Gaffney

Name

Patrick Joseph

Email	[redacted]
Professional Affiliation	
Zip Code	

Public Comment

School budgets should be centralized within NYCDOE to make sure that every school has all the funding that they need to provide every single child what they need and deserve. Ever since the Bloomberg era, NYC public schools have been self-sabotaged by their own city leadership. The Bloomberg administration, under the guise of creating "small communities" where every student would be "seen," drastically cut school budgets and removed many of the most profound programming and course offerings that our kids could experience from the majority of schools. The Bloomberg administration hid the fact that small schools did not mean small classes. Teachers would still have 34 students in a class, but now those students would not have course options. A small high school cannot offer chem, bio, and physics. They offer one science based on which teacher applies and is hired. A small school cannot afford a librarian of its own or even have space for a library in a shared building (instead they must fight over it with charter schools or other traditional public schools). So, students cannot get a liberal arts education anymore in high school. When schools had thousands of students, it meant they had the dollars and staff to match and they could offer a wide variety of classes, after school programs, and sports. When I was growing up in this city, my friends took very different course loads that matched their personal interest, but now students have to know what kind of school they want to go to in middle school and then stick with it even if their passions take them elsewhere. An 8th grader needs to commit to going to a school focused on finance and will have to take whatever is offered in their high school even though they may realize they really want to study art by the time they are a senior this is a concession that no wealthy child or gifted students has to make (just look at the specialized high schools and how big they are why is it that those students can operate in a large school but no one else can?). Before the small schools movement, a high school could offer students art electives if they decided that's what they wanted to focus their courses on. Indeed, electives are not even really a thing anymore since small schools have so few offerings and when they are offering electives it means a teacher has a 3rd or 4th prep in their schedule. And all of these issues are only a side note to the real goal of the small schools movement to make room for charter schools. This was all a hoax for embedding privatization models into a public system and forcing public schools to lose money to an unnecessary practice of competition. Competition may make sense in the cut throat world of business, but it has no place in the public domain public services are tax funded right of all Americans and they should be of the highest quality for everyone, not fighting for their life because they have to compete with private entities pulling from the same pot of money. Moreover, principals have transformed from instructional leaders to budget managers because of this movement to destroy public education. Instead of supporting staff and hiring the best person for the job, they do their best to hire cheaply and fill gaps and spend adequately. Instead of doing their best to provide students and staff with the best experience possible so that they can succeed as much as possible, principals scrutinize teachers unfairly and push theme into cookie cutter routines and practices that are easier to observe and manage. Creativity, dedication, passion, and ingenuity have been victim to this charter school/small schools movement. We need real champions to step up and fix

this. Someone with the guts and will to drastically overhaul a broken education system.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 26, 2026

Topic: Budget Issues, Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Budget

Subtopic: Improve NYCPS budgeting

Name

Carmen Pina

Email [redacted]

Professional Affiliation DOE

Zip Code [redacted]

Public Comment

Good morning,
As a speech teacher, I strongly recommend reconsidering the use of outside consultants. Experienced classroom teachers are fully capable of providing this support and are better positioned to do so, as we work with students daily and have direct, up-to-date knowledge of their needs.
Before proceeding with any contract with Atlas, it is essential to confirm that the program is proven effective and that clear guarantees and accountability measures are in place.
I also need to raise a serious concern regarding the lack of resources for the speech department. At present, we do not have access to the basic materials required to properly support our students, and this is directly affecting their progress. For example:

Students who rely on picture communication boards do not have consistent access to them, which limits their ability to express basic needs and participate in instruction.
Without access to printing, materials cannot be created or updated, delaying interventions and reducing their effectiveness.
The absence of tactile materials significantly impacts students with sensory and communication needs, making it harder for them to engage and learn.
Not having a dedicated or appropriate workspace disrupts sessions, reduces instructional time, and makes it difficult to provide consistent, high-quality support.

These are not minor inconveniences—they are barriers that directly prevent students from receiving the services they need and are entitled to.
Funding for materials must be clearly allocated so that we can properly support our students and do our jobs effectively.
Thank you.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 26, 2026

Topic: Procurement Reform, Budget Issues, Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Government Operations

Subtopic: Reconsider use of consultants in NYCPS.

Name

Carmen Pina

Email	[redacted]
Professional Affiliation	DOE
Zip Code	[redacted]
Public Comment	I hope I do not get fired or harass for the comments I did.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback

Subtopic

Name

Christine Negra

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]
Public Comment	I encourage the committee to mandate deposits into the city's Rainy Day Fund under positive financial conditions and to limit withdrawals only to truly difficult financial moments. I support the NYP Comptroller's recommendations that a charter amendment should include: (1) Target Balance. Reserves should be set at 16% of tax revenues to preserve vital City services in an economic downturn. (2) Formula-Driven Deposits. When the fund is below its target level, the City should be required to make regular contributions based on revenue growth. (3) Clear Withdrawal Rules. The Charter should establish clearly defined conditions on when money can be taken out, such as sustained employment losses or a catastrophic event, and should limit the amount that may be withdrawn in a single year. (4) Regular Reporting. The Office of Management and Budget should be required to include a Rainy Day Fund section in each financial plan, including: the current balance, the target balance, the gap between the two, the deposit formula, whether withdrawal triggers have been met, and the planned use of any proposed withdrawal. Respectfully, Christine Negra
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Budget Issues ✕ Reporting Requirements ✕
Method Received	Airtable Form

Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Mary Keegan

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I strongly support Controller Levine's recommendation to restore and increase the level of NYC's reserves I also strongly support a target level of reserve and the establishment of clear rules regarding withdrawal of funds from the reserve to insure that the random use of the reserve as we witnessed this year does not recur.

Attachment(s)

Drop files here or click to browse

Date Submitted June 26, 2026

Topic Budget Issues

Method Received Airtable Form

Is it charter related?

Charter Related Yes

Topic Simplified Budget

Subtopic	Restore and increase the level of NYC's reserves

Name

Shannon Doherty

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Please amend the City Charter to include:

Target Balance. Reserves should be set at 16% of tax revenues to preserve vital City services in an economic downturn.
Formula-Driven Deposits. When the fund is below its target level, the City should be required to make regular contributions based on revenue growth.
Clear Withdrawal Rules. The Charter should establish clearly defined conditions on when money can be taken out, such as sustained employment losses or a catastrophic event, and should limit the amount that may be withdrawn in a single year.
Regular Reporting. The Office of Management and Budget should be required to include a Rainy Day Fund section in each financial plan, including: the current balance, the target balance, the gap between the two, the deposit formula, whether withdrawal triggers have been met, and the planned use of any proposed withdrawal.

Attachment(s)

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Date Submitted June 26, 2026

Topic Budget Issues × Reporting Requirements ×

Method Received Airtable Form

Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Jonathan Lipsmeyer

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

We desperately need to prepare in a much more fulsome way for larger systemic economic challenges. I support Comptroller Levine's initiatives.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 26, 2026

Topic

Budget Issues

Method Received

Airtable Form

Is it charter related?

Charter Related

Yes

Topic Simplified

Budget

Subtopic

Rainy day fund

Name

Kenneth Hittel

Email	[redacted]
Professional Affiliation	Retired Corporate Executive
Zip Code	[redacted]
Public Comment	Rebuld the Rainy Day Fund! Building reserves is one of the most responsible steps our government can take. It allows us to weather economic shocks without forcing working people to bear the cost through cuts to the services they depend on.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Budget Issues
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget

Subtopic	Rainy day fund

Name

Susan Hittel

Email [redacted]

Professional Affiliation: Retired

Zip Code [redacted]

Public Comment: Rebuilding the reserves of the Rainy Day Fund is one of the most responsible steps the government can take. It enables us to weather economic shocks without forcing working people to bear the cost through cuts to the services we depend on.

Attachment(s): Drop files here or click to browse

Date Submitted: June 26, 2026

Topic: Budget Issues

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Budget

Subtopic	Rainy day fund

Name

Allison

Email [redacted]

Professional Affiliation NYC Department of Education Teacher

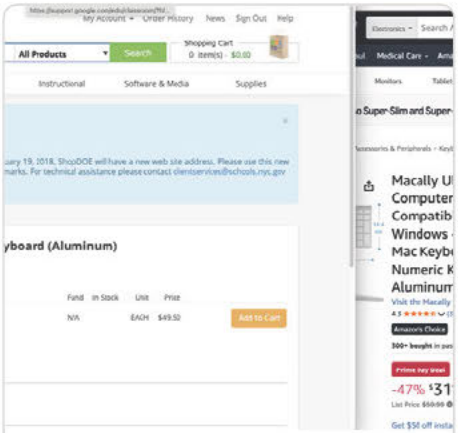
Zip Code [redacted]

Public Comment

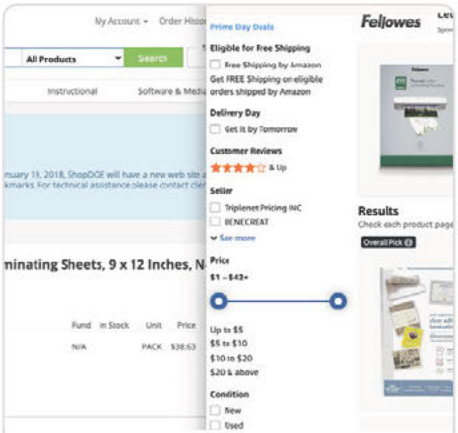
Schools have to buy most supplies through ShopeDOE. Most of the time, these prices are much higher than other places, such as Amazon. The same mac keyboard is 49.50 on ShopDOE, while the non sale Amazon price is 39.99. Laminating sheets on ShopDOE are $38.63, while Amazon offers for $19.37.

In addition, when purchasing new technology schools are REQUIRED to buy a safe to accommodate the number of devices purchased, regardless of what the school already has. My school has multiple unused safes to store technology equipment because we are forced to buy new ones even if we already have them.

Attachment(s)



Screenshot 2026-06-25 at 12.42.10 PM.p...



Screenshot 2026-06-25 at 12.40.37 PM....

Date Submitted June 26, 2026

Topic Procurement Reform ✕ Unnecessary Bureaucracy ✕ Technology ✕

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Procurement
Subtopic	Reform NYCPS procurement requirements.

SHOPDOE

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laminating sheets | All Products | Search

Books | Electronics | Furniture | Instructional | Software & Media

Announcement

1/18/2018

As noted in the January 17, 2018 Principals' Weekly, beginning Friday January 19, 2018, ShopDOE will have a new web site a
ShopDOE link http://www.shopdoe.com and update your favorites/bookmarks. For technical assistance please contact clier

1



C-Line Cleer Adheer Laminating Sheets, 9 x 12 Inches, N
50

by Sp Richards Co

Sold By	Fund	In Stock	Unit	Price
School Specialty Llc	N/A		PACK	$38.63

Overview

Laminating Sheets, Nonglare Film, 9"x12", 50/BX, Clear

Prime Day Deals

Eligible for Free Shipping

- [ ] Free Shipping by Amazon

Get FREE Shipping on eligible orders shipped by Amazon

Delivery Day

- [ ] Get It by Tomorrow

Customer Reviews

★★★★☆ & Up

Seller

- [ ] Triplenet Pricing INC
- [ ] BENECREAT

See more

Price

$1 – $42+

Up to $5
$5 to $10
$10 to $20
$20 & above

Condition

- [ ] New
- [ ] Used

Fellowes

Letter size laminating pouches

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Fellowes Thermal Laminating Sheets, 3mil Letter Size Pouches...

4.7 ★★★★½ (14.6k)

$19.99

✓prime

Results

Check each product page for other buying options.

Overall Pick



C-Line

Heavyweight Cleer Adheer Laminating Film Sheet
9 x 12 Inches, 50 per Box (65001)

4.3 ★★★★½ (275)

$19.37

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Books Electronics Furniture Instructional Software & Media Supplies

Announcement

1/18/2018

As noted in the January 17, 2018 Principals' Weekly, beginning Friday January 19, 2018, ShopDOE will have a new web site address. Please use this new ShopDOE link http://www.shopdoe.com and update your favorites/bookmarks. For technical assistance please contact clientservices@schools.nyc.gov

1



Ultra Slim USB Wired Keyboard (Aluminum)

NYSTL Approved

by Macally

Sold By	Fund	In Stock	Unit	Price	
B & H Foto & Electronics Corp.	N/A		EACH	$49.50	Add to Cart

Overview

Macally Ultra Slim USB Wired Keyboard (Aluminum) - MACEKEYA

More About The Seller(s)

Electronics | Search Amazon | EN

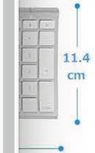
aul Medical Care Amazon Basics Best Sellers Prime New Releases Books Groceries

Monitors Tablets Computer Accessories PC Components PC Gaming Dea

io Super-Slim and Super-Light Bluetooth Keyboard for iPhone, iPad, Mac and ... 4.3 ★★★★½ 680

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Accessories & Peripherals › Keyboards, Mice & Accessories › Keyboards



Macally Ultra Slim USB Wired Computer Keyboard - Compatible Apple Keyboard or Windows - Full Size with 20 Mac Keyboard Keys -with Numeric Keypad - Silver Aluminum Finish

Visit the Macally Store

4.3 ★★★★½ (3,590)

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Deal Price

$31.99

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Ships from	Amazon
Sold by	Jukegear
Returns	FREE 30-day refund/replacement
Payment	Secure transaction

See more

Regular Price

$39.99

Name

Joseph Czeisel

Email	[redacted]
Professional Affiliation	Parks
Zip Code	[redacted]
Public Comment	Get rid of the mandatory lowest bidder contract for capital projects. It leads to the cheapest/weakest materials being used and entire structures needing to be repaired and/or fully replaced within a few years. There needs to be some measure of quality control or we spend more money longterm replacing everything. Thank you for your time - Joe
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Procurement Reform × Real Estate and Development ×
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Procurement

Subtopic

Reform procurement to get rid of mandatory lowest bidder for DPR contracts

Name

Makeda Lewis

Email	[redacted]
Professional Affiliation	
Zip Code	
Public Comment	Give teachers free metrocards for during the school year. Update the technology at the DOE- we still use green screen and none of the systems talk to each other. Bring back outdoor dining. More condos for first time home buyers so we can stop renting. Thanks for freezing it!
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Technology, Real Estate and Development, Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Technology

Subtopic	Update DOE technology

Name

Carol Binkowski

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Building the rainy day fund is prudent and should be a priority for this administration..

Attachment(s)

Drop files here or click to browse

Date Submitted June 26, 2026

Topic Budget Issues

Method Received Airtable Form

Is it charter related?

Charter Related Yes

Topic Simplified Budget

Subtopic	Rainy day fund

Name

Max Shuppert

Email [redacted]

Professional Affiliation: Media Production

Zip Code [redacted]

Public Comment

Dear COGE:

Comptroller Levine's proposal has my support this is similar to a household emergency fund and makes all the sense in the world.

Thank you for your time.

Max Shuppert
NYC

Attachment(s)

Drop files here or click to browse

Date Submitted: June 26, 2026

Topic: Budget Issues

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Annemarie Gray

Email	[redacted]
Professional Affiliation	Executive Director, Open New York
Zip Code	

Public Comment

Good evening, I'm Annemarie Gray, Executive Director of Open New York a statewide, grassroots advocacy group that advocates for abundant homes and lower rents. Thank you for the opportunity to testify tonight.

We applaud Mayor Mamdani and administration officials for taking a top to bottom look at Streamlining Procedures to Expedite Equitable Development with the 'SPEED' task force and the range of strategies in the Block by Block Housing Plan to build more homes.

We also applaud the complementary intentions of the Commission on Government Efficiency and urge you to prioritize measures that will speed up the process for building homes of all kinds to make NYC fairer and more affordable. High housing costs and a lack of options are driving New Yorkers out of the city, and housing growth has been uneven and inequitable across the five boroughs. This Commission can build on the 2025 Charter Commission's measures, overwhelmingly voted into law by New Yorkers last November, which are already speeding up the delivery of affordable housing. Our recommendations are focused on two complementary areas of reform: construction code reform, and a closer look at the landmarking process.

The Mamdani administration's Block by Block housing plan recently highlighted the need to reform the City's construction codes, calling for a task force to analyze ways to change codes without sacrificing safety. New York City has among the highest residential hard construction costs in the world: 40% higher than Los Angeles and more than double Houston. The city's construction codes are a direct contributor to these high costs and many of the costliest code requirements, like mandates for certain pipe materials or redundant drainage stacks, are based on pseudoscience and deviate from national and/or international standards. Open New York supports the Mayor's creation of the Affordable & Efficient Code Reform Task Force and any efforts to implement the task force's recommendations In order to ensure the taskforce recommendations are actually implemented, we support reforming the charter to give the Department of Buildings the power to make changes to the construction codes via rulemaking. DOB co administration of the building code will allow for a comprehensive review by subject matter experts without sacrificing the City Council's ability to make needed changes via legislation.

Open New York is once again calling for reforms to the Landmarks Preservation Commission. In a historic housing crisis, we must take a more well rounded view of neighborhood character. While the buildings themselves are a crucial part of the fabric of our neighborhoods, so too are the New Yorkers who live in them. Today we're seeing townhome conversions gobble up multi-family buildings in affluent areas like the West Village, displacing the few working New Yorkers that remain in these areas, fundamentally changing these neighborhoods' character absent LPC input.

LPC should consider our historically low 1.4% vacancy rate for all applications, in particular projects that will result in a net loss of housing units, and work

with CPC to analyze the effects of proposed historic districts on future housing opportunity sites like 375 Lafayette, a parking lot in NoHo where LPC review has delayed the construction of 50 affordable homes by months if not years.

Lastly, the Mayor's Block by Block housing plan calls for expanding and expediting the transfer of development rights on city-owned land, as well as for landmarked properties. The Commission should consider ways to expedite such transfers of development rights by allowing these applications to proceed through ELURP.

We are eager to work with the Commission to explore these and any other reforms that help speed up desperately needed housing for New Yorkers. Thank you.

Attachment(s)


OPEN NEW YORK

Open New York Testimony before the Commission on Government Efficiency
June 22, 2026

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Open New York COGE Testimony 6 22 ...

Date Submitted: June 26, 2026

Topic: Real Estate and Development ×; Department of Buildings (DOB) Issues ×; Procurement Reform ×; Unnecessary Bureaucracy ×

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified	Housing
Subtopic	Reform LPC and building codes

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We are eager to work with the Commission to explore these and any other reforms that help speed up desperately-needed housing for New Yorkers. Thank you.

Name

Bodity

Email	[redacted]
Professional Affiliation	City Reaident
Zip Code	[redacted]
Public Comment	My comment is that we in this neighborhood are not seeing the impact of our votes or that of city government. Our roads in [redacted] are dirty, full of potholes and cave ins, high cost of living and more. We need to see an improvement.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 26, 2026
Topic	Street Redesigns, Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback

Subtopic	Neighborhood complaint

Name

Boone

Email [redacted]

Professional Affiliation Federal Government

Zip Code [redacted]

Public Comment

This is a great thing you're doing, let's show how this is supposed to be done! I have a suggestion for an accessory that the City could develop to accompany this effort.

On the DOGE website, there's a "wall of receipts", and while it obviously is full of inaccuracies and misleading claims of savings, I think it could be really beneficial for public transparency if done properly. The website also used to have an interactive dashboard of federal government agencies and departments that could drill down into specific offices, programs, and divisions, like one giant executive branch family tree. It was surprisingly accurate and well done, but it seems to have been removed or at least the functionality reduced. I think these kinds of interactive dashboards could help the public understand the scope of government and see where money is being directed. It could raise trust in government to have this kind of transparent and digestible presentation of city resources and services. Good luck with this effort!

https://doge.gov/spend

Attachment(s) Drop files here or click to browse

Date Submitted June 27, 2026

Topic Technology × Reporting Requirements × Miscellaneous ×

Method Received Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Feedback
Subtopic	Public dashboard of COGE efforts

Name

Laura Napoli

Email	[redacted]
Professional Affiliation	Performing Artist
Zip Code	[redacted]
Public Comment	I feel like your plan makes sense: Target Balance. Reserves should be set at 16% of tax revenues to preserve vital City services in an economic downturn. Formula Driven Deposits. When the fund is below its target level, the City should be required to make regular contributions based on revenue growth. Clear Withdrawal Rules. The Charter should establish clearly defined conditions on when money can be taken out, such as sustained employment losses or a catastrophic event, and should limit the amount that may be withdrawn in a single year. Regular Reporting. The Office of Management and Budget should be required to include a Rainy Day Fund section in each financial plan, including: the current balance, the target balance, the gap between the two, the deposit formula, whether withdrawal triggers have been met, and the planned use of any proposed withdrawal. I also wonder if there are ways to tax the wealthiest New Yorkers and companies to help feed this rainy day fund?
Attachment(s)	Drop files here or click to browse
Date Submitted	June 27, 2026
Topic	Budget Issues ✕ Reporting Requirements ✕
Method Received	Airtable Form

Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Natasha Venner

Email	[redacted]
Professional Affiliation	NYC Public Schools
Zip Code	[redacted]

Public Comment

Over the last four year I continued contacting Salary Services and Payroll Services with New York Publics to secure my salary upgrade.
Responses were sporadic, often separated by months.
One employee simply instructed me to "go to the union."
When Salary Services later claimed that no one would ever say such a thing, I forwarded the email proving that it had occurred.
Only then did meaningful progress begin.
Eventually, my application was approved on October 21, 2025.
The critical fact is this:
My application was approved using the exact same transcripts and documentation that I originally submitted in 2022.
I did not complete additional coursework.
I did not submit new evidence.
The only thing that changed was that someone finally reviewed the materials correctly.

Why I Am Appealing For Retroactive Pay?
My appeal was denied because the Department treated October 2025 as my first application.
It was not. The record demonstrates that I actively pursued my salary differential beginning in 2022. Every significant delay resulted from administrative failures that were entirely outside my control. The Department ultimately determined that my transcripts qualified me for the salary differential. Those were the same transcripts submitted in 2022.
It is therefore unreasonable to deny retroactive compensation based on delays created by the Department's own processes.

Broader Operational Concerns
My experience raises larger questions that extend beyond my individual case.
Why did an inquiry require eight months to receive a response?
Why were employees unable to explain the rejection code?
Why was no case manager assigned?
Why could no in person or virtual appointment be scheduled?
Why were repeated requests from both me and my HR representative ignored?
Why is there no centralized case-tracking system documenting communications and next steps?
Most importantly, why is it acceptable for an employee to lose years of compensation because the organization responsible for processing the application failed to process it correctly?
These are operational problems not policy problems.
Policies are only meaningful when systems exist to implement them effectively and consistently.

Requested Relief
I respectfully request the following:
Approval of retroactive Master's +30 salary differential pay effective Fall 2022, when the Department acknowledges I first became eligible.
Payment of appropriate interest or other compensation reflecting the

extraordinary administrative delay.
Correction of the record to acknowledge that I actively pursued this salary differential beginning in 2022.
A review of why my original application was improperly rejected and remained unresolved for years.
A review of the extraordinary delays in responding to employee inquiries.
Development of a formal case-management system that assigns employees a case number, maintains communication notes, and provides applicants with meaningful status updates.
Development of a process allowing applicants with unresolved cases to schedule virtual or in-person appointments with Salary Services when routine channels fail.
I am submitting this appeal not only because I believe I am entitled to retroactive compensation, but because I hope my experience can serve as a catalyst for improving how NYC Public Schools serves its employees.

Attachment(s)



N. Venner Public Comment for COGE.pdf

Date Submitted: June 27, 2026

Topic: Unnecessary Bureaucracy ✕ | Reporting Requirements ✕ | Budget Issues ✕ | Enforcement ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: No

Topic Simplified	Out of Jurisdiction
Subtopic	Appeal on NYCPS salary adjustment

To: Mayor Zohran Mamdani, COGE, Chancellor Kamar Samuels, Chief Executive Director Patrick Fagan, Executive Director Renee Harper

Subject: Appeal for Retroactive Salary Differential and Request for Review of Systemic Operational Failures

At [redacted], I completed my twentieth year as a teacher. Thirteen of those years have been with New York City Public Schools, including the last six years at the [redacted].

Reflecting on my career, I can honestly say that the greatest challenge has not been teaching students—it has been navigating the operational and logistical failures of the system itself. Throughout my time with NYC Public Schools, I have witnessed how inefficient processes, poor communication, and the absence of accountability consume enormous amounts of educators' time and energy. These problems are so common that teachers often speak about them as if they are a rite of passage. We tell "war stories" about spending hours on hold, waiting months for responses, and being passed from office to office without resolution. That culture of accepting operational failure should not be normal.

For that reason, I was encouraged to learn about the creation of COGE and its stated commitment to improving government operations. I hope this commitment is genuine. My purpose in writing is not only to appeal the denial of my retroactive salary differential but also to present my experience as an example of why operational accountability deserves serious attention.

Background

On June 24, 2026, I received an email from Toniza Edwards denying my request for retroactive Master's +30 salary differential pay. Her email acknowledged that I had earned the required credits by the Fall of 2022 but stated that I did not apply until October 21, 2025.

That conclusion is incorrect.

I began pursuing my salary differential immediately after becoming eligible in 2022. The delay was not caused by inaction on my part. It resulted from administrative errors, an unexplained rejection code, repeated failures to respond to inquiries, and the inability to obtain meaningful assistance despite years of documented attempts.

Timeline of Events

Summer/Fall 2022

I completed the NYC Public Schools Special Education Advanced Certificate program through City College and additional ASPDP coursework. Together with my previous graduate coursework, I had accumulated more than thirty credits beyond my master's degree and became eligible for the Master's +30 salary differential.

I submitted my application under the salary differential process that existed before the new Salary Differential Portal.

After waiting approximately two hours on hold with HR Connect simply to learn how to submit my application, I filed my materials.

My application was rejected with the following message:

"Your salary application has been declined by Office of Salary Services due to the following reasons; other - Have an Equate Date Already. CW. When applicable, you must reapply using the online Salary Application."

Neither the rejection notice nor anyone at HR Connect could explain what this code meant.

I again waited more than an hour on hold before reaching another representative. That representative stated they had never seen the code before and opened Incident [redacted].

I requested either an in-person appointment or a virtual meeting to resolve the issue because it was clearly outside the normal process. I was told that due to COVID policies, neither option was available and that someone from Salary Services would contact me.

No one did.

Eight-Month Delay

It was not until April 2023—approximately eight months later—that Salary Services responded.

Their response apologized for the delay and informed me that because a new Salary Differential Portal had been implemented, I would need to submit a completely new application under the new system.

During those eight months:

- No one provided me with a specific contact person.
- I could not schedule an appointment.
- I could not meet virtually with anyone.
- My original application was never substantively reviewed.

Instead, I was instructed to start over.

Problems with the New Portal

The new portal repeatedly generated errors regarding my Equate Date, which changed between 2011 and 2013.

I sought assistance from my school's HR representative, Patricia Allen, who contacted multiple DOE employees on my behalf and included screenshots documenting the issue.

Those contacted included:

- [redacted]
- [redacted]

- [redacted]
- [redacted]

With one exception, no one responded.

The one response simply directed me to call additional phone numbers. I called every number provided. Each office stated they could not assist me.

Again, I requested either an appointment or a Zoom meeting.

Again, I was denied.

One employee stated that I could not come to Salary Services because I needed "a specific appointment with a specific person," yet no one would identify such a person or provide a way to obtain that appointment.

Continued Attempts

Over the next two years, I continued contacting Salary Services and Payroll Services.

Responses were sporadic, often separated by months.

One employee simply instructed me to "go to the union."

When Salary Services later claimed that no one would ever say such a thing, I forwarded the email proving that it had occurred.

Only then did meaningful progress begin.

Eventually, my application was approved on October 21, 2025.

The critical fact is this:

My application was approved using the exact same transcripts and documentation that I originally submitted in 2022.

I did not complete additional coursework.

I did not submit new evidence.

The only thing that changed was that someone finally reviewed the materials correctly.

Why I Am Appealing

My appeal was denied because the Department treated October 2025 as my first application.

It was not.

The record demonstrates that I actively pursued my salary differential beginning in 2022. Every significant delay resulted from administrative failures that were entirely outside my control.

The Department ultimately determined that my transcripts qualified me for the salary differential. Those were the same transcripts submitted in 2022.

It is therefore unreasonable to deny retroactive compensation based on delays created by the Department's own processes.

Broader Operational Concerns

My experience raises larger questions that extend beyond my individual case.

Why did an inquiry require eight months to receive a response?

Why were employees unable to explain the rejection code?

Why was no case manager assigned?

Why could no in-person or virtual appointment be scheduled?

Why were repeated requests from both me and my HR representative ignored?

Why is there no centralized case-tracking system documenting communications and next steps?

Most importantly, why is it acceptable for an employee to lose years of compensation because the organization responsible for processing the application failed to process it correctly?

These are operational problems—not policy problems.

Policies are only meaningful when systems exist to implement them effectively and consistently.

Requested Relief

I respectfully request the following:

1. Approval of retroactive Master's +30 salary differential pay effective Fall 2022, when the Department acknowledges I first became eligible.
2. Payment of appropriate interest or other compensation reflecting the extraordinary administrative delay.
3. Correction of the record to acknowledge that I actively pursued this salary differential beginning in 2022.
4. A review of why my original application was improperly rejected and remained unresolved for years.
5. A review of the extraordinary delays in responding to employee inquiries.
6. Development of a formal case-management system that assigns employees a case number, maintains communication notes, and provides applicants with meaningful status updates.

7. Development of a process allowing applicants with unresolved cases to schedule virtual or in-person appointments with Salary Services when routine channels fail.

I am submitting this appeal not only because I believe I am entitled to retroactive compensation, but because I hope my experience can serve as a catalyst for improving how NYC Public Schools serves its employees.

After twenty years in education, I still believe in public service. I also believe that operational excellence is essential to supporting the educators who make public education possible. Teachers should spend their time serving students—not navigating years of preventable administrative obstacles.

Thank you for your time and consideration. I am also tagging everyone who has ever been emailed on cc'd on my situation in full transparency. So, everyone can see how outrageous it is to say they did not know about my situation. Keeping in mind, I have never met any of these people and just kept getting tagged with their names in correspondence. I am also emailing the COGE website because this is perfect example of government inefficiency our Mayor Is talking about. Also, this serves as another request for review and appeal. If there is a better way to get this done, please let me know. I will do it as I am off for the summer. Also, I can forward years of correspondence.

Sincerely,

N. Venner

Name

KB

Email [redacted]

Professional Affiliation Nyc school construction authority

Zip Code [redacted]

Public Comment

Hello. I am contingent with NYC school construction authority. I have been working with them for the past two years as a third party consultant and am overseeing QA/QC for 90 public schools in Brooklyn alone. There is a lot of mismanagement with money. I'll give only a few examples that cost millions of tax payer money. For instance, is 62k in Brooklyn scaffold was up for years. The general contractor owns the scaffolding and there was no incentive for him to take it down although it costs thousands a week to keep it up and it affects the livelihood of students and teachers. Windowguards are no longer required because new windows are tempered glass. Millions of dollars goes to reinstallation of window guards on windows on multiple projects. This also affects light for students and teachers. There is also a lack of building surveying for approved construction documents and no aia standards for prebid walkthrus where contractors have to decide how the construction documents differentiate from the existing conditions. This costs millions in change orders and an unserviced doe. I was at a new accessibility school yesterday in bed stuy and a parent said the project has been ongoing for two years but there is no movement in the project because the contractor is waiting for steel drawings. This is costing millions of dollars alone. I have worked in private sector before consulting with NYC SCA. It is vastly different mostly due to litigation.

Attachment(s) Drop files here or click to browse

Date Submitted June 27, 2026

Topic	Unnecessary Bureaucracy ✕ Procurement Reform ✕ Department of Buildings (DOB) Issues ✕ Budget Issues ✕ Enforcement ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Waste at SCA

Name

Ira Gershenhorn

Email	[redacted]
Professional Affiliation	None
Zip Code	[redacted]

Public Comment

see attached. but to summarize.

1. Close Exit 12N permanently and transfer its land to Parks.

2. Remove Marginal Street in West Harlem Piers from DOT's portfolio.

3. Replace Highway Unit 1 on the Henry Hutchinson ParkwayRoute 9A with speed cameras.

4. Replace one of the three driving lanes in each direction on Route9A with a bicycle lane. This will save repaving costs, slow downvehicular traffic, prevent injuries, lessen the need for EMS.

5. As with Highway Unit 1, review the performance and cost of other police precincts that are responsible for other NYC highways. Replace them with speed cameras.

6. Get EMS to use bicycles. Find out how its done in other cities. Obviously its difficult to transport someone. Maybe a bicycle and a trailer? EMS vehicles cannot get to places bicycles could. eg. Riverside Park.

7. Build more wide bike lanes. The bike lanes could be used by emergency services in NYC as they are now. Bike lanes are known to result in fewer crashes. They would allow quicker responses by emergency services which should result in lower expenses to New York City.

8. Build bioswales wherever possible. eg. any 4 lane road that ends at another road like the intersections of Riverside Drive with West 120th, West 135th, West 145th should have only two lanes and a bioswale down the middle.

9. Convert DOT assets to saleable properties to yield more housing and tax base.9. Switch to smaller EMS and FDNY vehicles.

Attachment(s)



COGE Public Comment June 27 2026

To whom it may concern:

The following measures would result in much cost savings to New York City.

1. At a time when NYC is in a budget crisis, DOT is spending money on Exit 12N which has been closed for a year and few have noticed. This is an exit ramp that should be closed permanently and whose land should be transferred to Parks.

2 Marginal Street in West Harlem Piers is currently being repaved. This street and any street connecting to it should not be in DOT's portfolio. Many other similar streets throughout NYC should also not be in DOT's portfolio. Marginal Street should be transferred to West Harlem Piers Park and the Parks Department.

3. Replace Highway Unit 1 on the Henry Hutchinson ParkwayRoute 9A with speed cameras. Highway Unit 1 does nothing on this road to prevent crashes. The road was originally designed for vehicles driving 40mph. The speed limit on the road is 50mph. Most vehicles on the road travel at 60mph or above when it is possible. Highway Unit 1 main function becomes cleanup and calling the FDNY and EMS. They are unnecessary. A combination if speed cameras and EMS would do the same. In fact, reducing the speed on Route 9A would eliminate many crashes and the ones that occurred would not be severe.

4. Replace one of the three driving lanes in each direction on Route 9A with a bicycle lane. This will save repaving costs, slow down vehicular traffic, prevent injuries, lessen the need for EMS.

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Sincerely
Ira Gershenhorn
320 Riverside Drive,
New York, NY 10025
Apt 12E

COGE Public Comment 2026-0627.doc

Date Submitted	June 27, 2026
Topic	Street Redesigns ✕ Real Estate and Development ✕ Policing ✕ Enforcement ✕ Technology ✕ Budget Issues ✕
Method Received	Airtable Form
Is it charter related?	
	Run agent
Charter Related	No
Topic Simplified	Streets
Subtopic	Feedback on ways to improve streets

COGE Public Comment June 27 2026

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8. Build bioswales wherever possible. eg. any 4 lane road that ends at another road like the intersections of Riverside Drive with West 120th, West 135th, West 145th should have only two lanes and a bioswale down the middle.

9. Convert DOT assets to saleable properties to yield more housing and tax base.

9. Switch to smaller EMS and FDNY vehicles. The size of these vehicles slow them down in traffic and streets with cars parked on both sides limits the use of some vehicles anyway. The size of these vehicles limits the type of bridges that can be built.

Sincerely,
Ira Gershenhorn
[redacted]

Name

Siregar Jonas

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Yes. The NYC Comptroller's suggested new rules to New York's rainy day fund should be added to the New York City Charter. The reserve requirement should be set at 42 percent instead of 16 percent. The next national economic recession is projected to last almost 2 years (similar to the 1991 recession). Another account should be established to help city workers and laid-off workers (tech and non-tech) survive the next few years of over-inflation in New York. There should be a 4 cent surcharge on all capital gains taxes or property taxes on purchases or on income made in New York per customer --- one surcharge in a 24 hour timeframe among many transactions if using the same non-cash payment. The revenue can be used to increase this new reserves account.

Attachment(s)

Drop files here or click to browse

Date Submitted June 28, 2026

Topic Budget Issues × Public Bonds ×

Method Received Airtable Form

Is it charter related?

Charter Related	Yes
Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Joy Ononaji

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I want to speak up and say what is of a great concern about my job, but there is really anybody who is willing and able to truthfully listen and understand the issues. Everyone deserves to be heard.

Attachment(s)

Drop files here or click to browse

Date Submitted June 28, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic

Name

Nancy Wang

Email	[redacted]
Professional Affiliation	Product manager; Maryland State Innovation Team
Zip Code	[redacted]

Public Comment

Thank you to the Commission for the opportunity to testify.
My name is Nancy Wang. I'm a product manager who has spent the past six years building technology products at Microsoft and, more recently, consulting on AI strategy for the government of Maryland. My work now focuses on how technology can be used to achieve the governor's aims of increasing economic mobility and reducing childhood poverty.
The tech industry has learned many best practices from the government—human-centered design, for instance—and today I want to talk about one tech practice our government could adopt from the tech industry: outcomes based procurement evaluation.
Outcomes-based procurement evaluation would assess contract performance based on the results achieved rather than simply whether the required deliverables were completed. For example, the success of a government benefits modernization project might be measured by reductions in application completion time, increases in approval rates for eligible applicants, or decreases in application errors—not just whether a new digital form was delivered. By defining these outcome measures upfront, agencies give vendors clear goals to optimize for and create accountability for delivering results.
The City's MyCity initiative illustrates why this shift is needed. The project was intended to create a one stop digital portal for New Yorkers to access government services, but after more than four years and over $100 million in spending, a Comptroller audit found that many of its core promises had yet to be realized. Outside of not meeting key requirements—such as unifying City benefits under a single platform the project also fell short of the outcomes it was intended to achieve: due to the system's lack of basic eligibility checks for household income and children's ages, 46% of MyCity benefits applicants on the site were found ineligible in the two years since the initial site launch; a site chatbot to provide users with more benefits information more quickly was found to provide illegal and inaccurate advice; the site loaded so slowly it scored under 10 out of 100 for performance across mobile and desktop. At the end of 2025, the recommendation for fixing these issues was simply to request an additional 81 million dollars of taxpayer dollars to maintain the existing site and add additional functionalities.
As a taxpayer, I question why our government is planning to double the initial budget of a project that has still largely failed to improve New Yorkers' lives in any way. As a technologist, I see how the MyCity audit exemplifies a broader risk in public procurement: when contracts are evaluated primarily on whether deliverables are completed rather than whether intended outcomes are achieved, governments can spend significant taxpayer dollars without ensuring those investments improve public services. If procurement had been evaluated not only on whether software was delivered, but also on outcomes such as reductions in application time, increases in successful benefit enrollment, or improvements in resident satisfaction, agencies would have had clearer accountability for delivering meaningful public value.
A charter amendment could require agencies to set target improvements at the outset of procurement and evaluate contracts against those outcomes. This would create a continuous feedback loop that rewards vendors for their impact, not just completing contractual deliverables. Most importantly, it

would help ensure that taxpayer dollars are spent on effective solutions that demonstrably improve their lives.
Thank you for your consideration.

Attachment(s)



COGE testimony - Nancy Wang.pdf

Date Submitted: June 28, 2026

Topic: Procurement Reform ✕ | Technology ✕ | Budget Issues ✕ | Reporting Requirements ✕

Method Received: Airtable Form

Is it charter related:

Run agent

Charter Related: No

Topic Simplified: Technology

Subtopic: Wasteful technology spending (MyCity)

Thank you to the Commission for the opportunity to testify.

My name is Nancy Wang. **I'm a product manager who has spent the past six years building technology products** at [redacted] and, more recently, consulting on AI strategy for [redacted]. My work now focuses on how technology can be used to achieve the governor's aims of increasing economic mobility and reducing childhood poverty.

The tech industry has learned many best practices from the government—human-centered design, for instance—and today I want to talk about one tech practice our government could adopt from the tech industry: **outcomes-based procurement evaluation**.

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completed rather than whether intended outcomes are achieved, governments can spend significant taxpayer dollars without ensuring those investments improve public services. If procurement had been evaluated not only on whether software was delivered, but also on outcomes such as reductions in application time, increases in successful benefit enrollment, or improvements in resident satisfaction, agencies would have had clearer accountability for delivering meaningful public value.

A charter amendment could require agencies to set target improvements at the outset of procurement and evaluate contracts against those outcomes. This would create a continuous feedback loop that rewards vendors for their impact, not just completing contractual deliverables. Most importantly, **it would help ensure that taxpayer dollars are spent on effective solutions that demonstrably improve their lives**.

Thank you for your consideration.

Vision

How will outcomes-based evaluation criteria be incorporated into the procurement process?

Already included in the existing charter:

- Challenge-based procurement - agencies can choose to select vendors based on how well they address the problem to be solved rather than who best fulfills a list of detailed technical specifications.
- Procurement performance criteria - can include quality of performance, timeliness of performance, fiscal administration, and fiscal accountability; and specific objectives / evaluation criteria set by the agency. This can include qualitative and quantitative outcome criteria

What's needed:

- Outcomes-based evaluation criteria: The inclusion of specific quantitative / qualitative benchmarks to improve as part of the initial RFP/contract

The new procurement process:

1. Agencies define the problem or opportunity that needs to be solved, as well as target outcomes they want to achieve, with on existing baseline data as a benchmark
2. Agencies will evaluate the best vendor for the contract based on whose approach best addresses the problem
3. Vendors use target outcomes set by agencies to guide their decision on project implementation and scope
4. Throughout implementation process, agencies assess / test the solution for how well it meets the desired impact
5. After some specified duration after project launch (e.g. one month), assess metrics and compare to the baseline before the contract existed

Proposal for charter revision

If we incorporate outcomes-based evaluation criteria into the procurement process, what might an amendment to the existing charter look like?

§ 4-01 Evaluation and Documentation of Vendor Performance

(a) *Criteria.* The CCPO may determine the form of performance evaluations, which may vary based on contract industry. A performance evaluation shall:

(1) conform to the requirements of the contract, including, but not limited to, quality of performance, timeliness of performance, fiscal administration, and fiscal accountability; and, [The agency awarding the contract shall identify specific objectives and evaluation criteria to be included as part of the contract. Where practicable, the agency shall develop both qualitative and quantitative performance indicators, including outcome criteria; and,]

(2) achievement of the public objectives and intended outcomes of the procurement. The agency awarding the contract shall identify, prior to contract award, the specific public objectives of the procurement and the outcome criteria that will be used to evaluate whether those objectives have been achieved. Such criteria shall include both qualitative and quantitative performance indicators tied to the intended public purpose of the procurement.

(b) Outcome Evaluation Requirement

For all contracts above a threshold established by the Procurement Policy Board, the agency shall:

(1) establish baseline performance metrics prior to contract award, where available;

(2) include in the contract measurable outcome targets that reflect the intended public benefit of the procurement;

(3) evaluate performance against such outcome targets at regular intervals during contract performance and upon completion or renewal of the contract; and

(4) document and publish a summary of whether the procurement achieved its intended outcomes, including explanations for material deviations from expected results.

(c) Use of Evaluation in Procurement Decisions

Performance evaluations shall be used in determining contract renewal, extension, modification, and future vendor selection, and shall include consideration of both:

- contractor performance in fulfilling contractual obligations; and
- demonstrated achievement of intended public outcomes.

Appendix

Sources:

- https://rules.cityofnewyork.us/wp-content/uploads/2024/09/3-11-Amendment-Challenge-Based-Procurement-Adopted.pdf
- https://www.nyc.gov/assets/mocs/downloads/About/about-mocs/A_Path_Forward%20NYCs_Procurement_White_Paper-Final.pdf
- https://www.nyc.gov/assets/mocs/downloads/Regulations/PPB/PerformanceEvaluations_20250820.pdf
- Current RFP example: https://its.ny.gov/system/files/documents/2025/12/rfp-c000918-nys-child-care-assistance-program-amended-12.23.25.pdf
    - Measures success as
        - Scope fulfillment
        - On-time completion
        - Within proposed budget
        - Quality standards met
        - Regulator and security compliance
        - Operational use

Name

Samra Sahar

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I work for the NYC Dept. of Education. In 2018, secret alliances were made with illegal residents and secret Codes of Silence instructions were given to illegal Pakistani residents in Spanish Braille against my 31 years of Tax Paid Union Dues paid service in the City of New York. The night shift people who then control my life my property, my money, my credit cards were charged tens of thousands of dollars without my consent and my body was used for sex trafficking in the nights. I was filing complaints then, I am filing complaints now. I am fully aware that I cannot have my life returned back to the norm but I do also know that by the Power of God those involved in creating a havoc on my life, dismantling my entire life, not just using my money to mess up my life, will receive consequences by every word that I send out sharing with the world what these people have done to me.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 29, 2026

Topic

Content flagged by usage policies, edit input(s) and try again

Method Received

Airtable Form

Is it charter related?

Charter Related	No
Topic Simplified	Feedback
Subtopic	Concerning

Name

Maddie DeCerbo

Email [redacted]

Professional Affiliation REBNY

Zip Code

Public Comment attached

Attachment(s)


REBNY

The Real Estate Board of New York to
2026 Charter Revision Commission on Government Efficiency

20260618 REBNY Comments to COGE.pdf

Date Submitted June 29, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Housing
Subtopic	Streamline building permitting

REBNY
Real Estate Board of New York

REBNY Comments | June, 2026

The Real Estate Board of New York to

2026 Charter Revision Commission on Government Efficiency

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. Thank you for the opportunity to provide recommendations to the Charter Revision Commission on Government Efficiency (COGE).

New York City continues to face a housing crisis driven by decades of underproduction, rising costs, and a growing mismatch between housing supply and the needs of New Yorkers across income levels. While recent policy changes have begun to address some of these challenges, inefficient government processes continue to add unnecessary time, cost, and uncertainty to the development and delivery of housing. The Commission has an opportunity to recommend structural reforms that improve coordination, accountability, and transparency across City government, helping to remove barriers to housing production and ensure public resources are deployed more effectively.

Addressing Permitting Inefficiencies

REBNY recommends that the Commission prioritize reforms to modernize and streamline the City's permitting system. While much attention is often focused on the land use approval process, significant delays and costs occur after project approvals have been secured, during the permitting and construction review phase.

Today, applicants must navigate a fragmented system involving multiple agencies, including DOB, FDNY, DOT, DEP, LPC, and others, each with separate review processes, timelines, and requirements. These siloed review pathways create uncertainty, increase project costs, and delay the delivery of housing and other critical development projects. Even projects that are permitted as-of-right can spend years moving through the permitting process before construction can commence, or buildings can be occupied.

The Commission should recommend the creation of a centralized permitting framework that provides applicants with a single point of entry, establishes transparent and predictable review timelines, and facilitates interagency coordination. Consolidating permitting functions where appropriate and creating clear accountability for agency performance would reduce duplication, improve communication, and accelerate project delivery. We commend the administration's SPEED report, which set out recommendations to reduce permitting timelines and increase interagency coordination, and believe

that many of the goals in the report can be achieved via charter reform to reduce the number of permitting agencies.

In addition, the Charter should establish a formal coordinating role within City Hall responsible for overseeing interagency permitting reviews, resolving conflicts among agencies, and ensuring consistency in timing, communication, and project management across the development process. A more efficient and transparent permitting system would lower development costs, shorten project timelines, and support the City's broader housing and economic development goals.

Fixing the City's Contracting System

Despite recent efforts to improve the City's procurement and contracting processes, nonprofit organizations and service providers continue to face delays in contract registration, approval, and payment. These challenges are often driven by fragmented processes, inconsistent agency practices, and a lack of clear accountability across the contracting system. The result is uncertainty for organizations delivering essential services, disruptions to program operations, and unnecessary financial burdens on providers that must often rely on borrowing to bridge funding gaps while awaiting reimbursement. Improving the speed, transparency, and predictability of the City's contracting process would strengthen service delivery, reduce administrative inefficiencies, and enhance the City's ability to effectively partner with the nonprofit sector.

Comprehensive Approaches to Planning

REBNY recommends that the Commission pursue reforms that strengthen long-range planning, improve coordination among existing citywide planning efforts, and better align land use decisions with infrastructure and capital investments.

New York City already produces a variety of planning documents, including waterfront plans, industrial area plans, resiliency strategies, housing initiatives, and capital plans. Too often, however, these efforts are developed independently, resulting in disconnected priorities and limited coordination between planning goals and public investment decisions.

Rather than creating an additional layer of review that could introduce uncertainty or delay for individual projects, the Commission should focus on establishing a more integrated planning framework that ensures existing citywide plans are coordinated, updated regularly, and meaningfully connected to the City's capital planning process. Such a framework would provide greater transparency regarding housing, infrastructure, economic development, and resiliency priorities while creating a stronger foundation for future growth.

The Charter should require that major citywide plans be aligned with one another and updated on a regular schedule, with planning horizons that support long-term decision-making while remaining responsive to changing conditions. Better coordination between planning and capital budgeting would improve accountability, help direct public investments to areas of greatest need, and support more effective implementation of the City's long-term goals.

REBNY
Real Estate Board of New York

REBNY appreciates the efforts of the Charter Revision Commission on Government Efficiency to identify and eliminate outdated bureaucratic barriers that delay infrastructure projects, housing production, and the delivery of essential services. To ensure these reforms translate into measurable results, the Commission should consider requiring the Mayor's Management Report to track implementation of progress and key performance metrics related to permitting, contracting, and interagency coordination. Public reporting will help promote accountability and ensure that efficiency gains are sustained over time.

REBNY thanks the Commission for the consideration of these points.

CONTACT:

Basha Gerhards
Executive Vice President, Public Policy
Real Estate Board of New York
[redacted]

Maddie DeCerbo
Director of Urban Planning
Real Estate Board of New York
[redacted]

Name

William Shenton

Email	[redacted]
Professional Affiliation	NYCHA Retiree
Zip Code	
Public Comment	I believe NYC could save money and improve our benefits if they stopped giving money to the Unions' welfare funds on behalf of retirees and instead allowed us to form an insured group of retirees. This would enable all 250,000 of us to enjoy maximum insurance coverage.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 29, 2026
Topic	Budget Issues, Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations

Subtopic	Retirees health insurance

Name

Ivan Zelman

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Your training programs for managers and workers in the Parks Department are in dire need of upgrading.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 29, 2026

Topic

Miscellaneous

Method Received

Airtable Form

Is it charter related?

Charter Related

No

Topic Simplified

Government Operations

Subtopic

Parks department training programs

Name

Griffin Cloud Levine

Email	[redacted]
Professional Affiliation	NYC Emergency Management
Zip Code	
Public Comment	I have two considerations focused on how we can better support citywide innovations in emergency management/generally. First, there are often ideas, improvements, or potential impacts that are delayed or do not get addressed as an agency because we are told we need to wait to receive priorities from the Mayor's office, which is further complicated when agency leadership are also actively avoiding mentioning these considerations from fear of being told to take on work outside of our "traditional" scope. As a coordinating agency, our approach is generally to not provide recommendations or input unless directly requested. There needs to be more efficient structures put in place for agencies to collect areas of innovation or concern, be able to pro-actively communicate them to the Mayor's Office who can then strategically delegate responsibility if needed. Second, similarly there needs to be more accountability and standardization for agencies citywide to source and formally track input from the public and how they are addressing those considerations. For example, in emergency management there is currently no platform for communities to provide their insights and experiences outside of social media and news outlets during and immediately following an emergency. Once again, removing the ability for these communities to more pro actively advocate their needs. A solve all approach for Emergency management, like many other agencies, does not work, and we need a more nuanced and community-oriented approaches as we think about how we can better serve New Yorkers.
Attachment(s)	Drop files here or click to browse
Date Submitted	June 29, 2026

Topic	Unnecessary Bureaucracy ✕ Technology ✕ Reporting Requirements ✕ Miscellaneous ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Improve interagency coordination, particularly between NYCEM and Mayor's Office.

Name

Kevin Winslow

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

Since the housing crisis is the number one crisis we face in the city right now, the city should act aggressively to target the issue. I propose 4 charter amendments that both target Staten Island and communities that have historically been exclusionary.

#1.
The Fair Share Borough Housing Amendment
This proposal amends the City Charter to ensure all boroughs contribute fairly to solving the housing crisis. It mandates that any borough with a population below 75% of the citywide borough average be designated a "Housing Stability Zone." In these zones, the Department of Housing Preservation and Development (HPD) and the Department of City Planning shall have the authority to automatically approve multi family and mixed use housing by right, removing local City Council legislative review.

#2.
The Emergency Housing Capacity and Land Utilization Initiative
This proposal amends the City Charter to require all neighborhoods to open up new housing opportunities during a certified crisis. It mandates that when the city's official rental vacancy rate falls below the 5% emergency threshold, any Community District that has built out 70% or more of its total legally permitted zoning capacity shall be designated an "Exhausted Capacity Area." Local boards in these maxed-out districts are given a one-year warning to expand local housing permissions. If they fail to act during the emergency, the Department of Housing Preservation and Development (HPD) is authorized to directly approve mixed-use, multi-family housing by-right.

#3.
The Transit Hub Growth Amendment
This proposal amends the City Charter to expand housing opportunities near public transit. It grants the Department of Housing Preservation and Development (HPD) direct authority to update zoning rules within one mile of any Long Island Rail Road (LIRR) station inside the city. These transit areas shall be permitted to match classic medium-density neighborhoods (R7 equivalent) with both residential and mixed-use development.

#4.
The Emergency Affordable Housing Production Amendment
This proposal amends the City Charter to accelerate the construction of affordable housing during a certified housing shortage. It mandates that when the city's official rental vacancy rate falls below the 5% emergency threshold, all local zoning density limits—including maximum height, unit count, and floor space caps—shall be suspended citywide for any building consisting entirely of permanently affordable housing. These projects may be approved directly by the Department of Housing Preservation and Development (HPD) by-right, bypassing local City Council or Community Board zoning vetoes.

Attachment(s)

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Date Submitted

June 29, 2026

Topic

Real Estate and Development ✕ Tenant Protection ✕ Unnecessary Bureaucracy ✕ Department of Buildings (DOB) Issues ✕

Method Received

Airtable Form

Is it charter related?

Charter Related

Yes

Topic Simplified	Housing
Subtopic	Speed up housing production focusing on Staten Island.

Name

Tamsin Wolf

Email	[redacted]
Professional Affiliation	Bedford-Stuyvesant Volunteer Ambulance Corps
Zip Code	[redacted]
Public Comment	See attached.
Attachment(s)	 Background for DCAS.pdf
Date Submitted	June 29, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	

Run agent

Charter Related	Yes
Topic Simplified	Unnecessary Bureaucracy
Subtopic	Improve DCAS land transfer process.

Bedford-Stuyvesant Volunteer Ambulance Corps (BSVAC), a community-based non-profit organization providing life-saving emergency medical care, has rented land from DCAS for more than three decades. Because the land was vacant when we first began using it, the terms of our lease with DCAS prohibited us from building on the land. As a result, we have operated from temporary trailers during those decades. Since 1988, BSVAC has responded to calls for emergency medical services and has provided training in life-saving skills to our community. We have lost count of the number of lives we have saved. We currently respond to more than 2,000 calls per year. We do this at no cost to NYC.

BSVAC has wanted to acquire the land from DCAS for decades. Instead, our organization has operated under a month-to-month lease with the possibility of the land being sold at auction at a price we could never afford. Over the years we learned that DCAS was not opposed to transferring the land to our organization, but was powerless to do so because it lacked legal authority to do so. It defies logic that DCAS cannot transfer land it owns to a community-based organization that has been using the land to save lives for almost 40 years. BSVAC is an entirely volunteer organization; it provides 911 EMS services to Brooklyn at absolutely no cost to NYC. Our organization should have the security of a permanent home on which it can build a facility.

Four years ago, BSVAC began working with NYS Assemblymember Stefani Zinerman to explore acquiring the land we rent from DCAS. It has taken four long years for special “home rule” state legislation to be introduced in Albany, amended, approved by the New York City Council, passed by the state legislature, and eventually delivered to the Governor for signature. No opposition of any kind was ever expressed by anyone at any point in this lengthy process.

DCAS should be able to transfer land that it owns without having to go through the elaborate process we have spent the past four years navigating. We enthusiastically support any efforts change the law to enable DCAS to transfer land it owns to community-based organizations serving our city.

Name

Yasmin Bailey Stewart

Email	[redacted]
Professional Affiliation	NYCDOE
Zip Code	[redacted]

Public Comment

Thank you for this opportunity to address the inefficiency of HRA Cityfheps inefficiency over the last year and quarter in regards to corrective actions required for HRA to resolve the issue of rent nonpayment on behalf of my tenant. Despite the efforts of the tenant who submitted all required the documents and secured HRA approval, the full rent was not paid since January 2025. In April 2025, HRA ceased mailing all rent payments to me. In my many attempts to fix this issue, and in addition to tenant efforts, I've sought the assistance of the Comptroller, Boro President, community board, city council rep, public advocate, and 311. However, the office of Assemblyman Khalil Anderson is the only office where the staff followed through and achieved 50% resolution. This helped me not just financially but also emotionally because HRA nonpayment put me at risk of foreclosure on my home.

In addition, the collateral damage from HRA nonpayment of rent for more than a year has been severe. Over the period of nonpayment which still exists, I've depleted my pension funds to cover expenses related to maintenance of the property. Also, I've had to break my retirement in order to make ends meet and prevent foreclosure. After more than a year of nonpayment, I experienced difficulties to continue with my monthly mortgage payments. As a result I incurred negative credit reporting destroying my credit, reducing my credit score, and decreasing my credit limits.

HRA has generated inaccurate 1099 documents which cost me losses in tax returns. Pension funds debt from loans, and IRS tax penalties from early partial withdrawals from my retirement pension funds has left in a vulnerable position. In terms of my health, I've fallen on the ice slamming my head on the concrete sidewalk along Almeda Park, NY 11692. I suffer from high blood pressure, and after 22 years of teaching students with disabilities, I never expected to have to struggle with NYC to be paid the rent I'm due for providing accommodations to those New Yorkers experiencing housing insecurity. I know how housing insecurity contributes to instability for parents and students so I've been doing what I can to assist by accepting housing vouchers. I'm hoping your office can address the inefficiencies of Cityfheps and the apparent inability or unwillingness to correct the situation.

Attachments (3)

. HRA lease approval

. Check (Photo of envelope) made out to Stephen Francis but sent to my new mailing address which I use to secure my mail after my retirement (unresolved despite tenant efforts to get it corrected)

. HRA Security voucher

Additional documents provided upon request through the Office of Assemblyman Khalil Anderson , District 31:

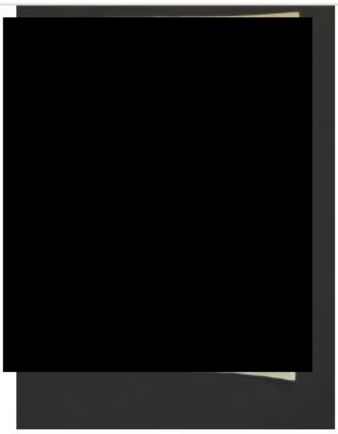
It is my belief that HRA inefficiency results in making the homeless situation in NYC of crisis proportion. Hopefully, the audit, analysis, and evaluation of city agency programs, procedures, and practices will ensure that New Yorkers experience an improved quality of life.

Respectfully and sincerely submitted for your consideration, thanks.

Attachment(s)



IMG 4735.jpeg



IMG 4734.jpeg



IMG_4732.jpeg

Date Submitted: June 29, 2026

Topic: Unnecessary Bureaucracy, Enforcement, Tenant Protection, Real Estate and Development, Reporting Requirements, Budget Issues

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified	Unnecessary Bureaucracy
Subtopic	Improve HRA and Cityfheps

NYC Human Resources Administration
Department of Social Services

Date 12-22-19

Case Number [redacted]

Case Name [redacted]

Center _____

Security Voucher

This security voucher guarantees that the Human Resources Administration (HRA) will pay up to the equivalent [illegible] rent if it is verified that the tenant who occupied the apartment failed to pay his/her rent and/or caused damage to [illegible]. The landlord must submit proof of the unpaid rent and/or damage along with the Landlord's Claim For Security Voucher Payment (on the back page) within three months after the tenant has vacated the apartment. The Agency will only make a payment [illegible] submitted within three months after the tenant has vacated the apartment and a review of the documentation submitted by the landlord confirms that the tenant failed to pay his/her rent and/or damaged the apartment. This Security Voucher will not be [illegible] unless the front and back pages have been completed, signed, notarized, and returned to HRA.

The Human Resources Administration (HRA) does not issue cash security deposits. Instead, the Agency is issuing this voucher. Please be advised that refusal to accept this voucher in lieu of a security deposit may constitute a source of income discrimination under the NYC Human Rights Law Sec. 8-107(5)(a)(1)-(2).

This Security Voucher is issued by the New York City Department of Social Services (NYCDSS), having its principal office at 150 Greenwich Street, New York, NY 10007, to

Name of Landlord Yasmin Stewart

Landlord's Address: [redacted]

City: [redacted] State: [redacted] Zip: [redacted]

Landlord of the premises to be rented to the participant/tenant located at: (include proof of ownership)

Address: [redacted]

[redacted] Apt: [redacted]

City: [redacted] State [redacted] Zip: [redacted]

regarding the participant/tenant listed below:

Participant/tenant: Natasia Seivwright

This Security Voucher is being issued pursuant to Social Services Law Sec. 143-c and 18 NYCRR 352.6 and 35[illegible] to secure the landlord against non-payment of rent and/or damages as a condition of renting the above-identified premises ("Premises") to the above-named Cash Assistance participant/tenant ("Participant/Tenant"). A claim for the payment of this Security Voucher by the landlord must be made after, and within three months of, the participant/tenant vacating the premises. The claim must be made by the [illegible] completion and execution of the Claim on page two of this form and cannot exceed the amount of the Tenant's rent [illegible] which is $ [redacted]

If the landlord, please acknowledge your acceptance of the Security Voucher in lieu of a cash security deposit by signing the [illegible] below.

Landlord's Authorized Agent's Name (print) Yasmin Stewart

Landlord's Authorized Agent's Signature _____ Date December 18th 19

(This voucher is not valid until it has been fully completed and authorized in the "For HRA Use Only" section below.)

For HRA Use Only:

Supervisor's Name (Print) [redacted]

Supervisor's Signature [redacted] Date: 1/27/20

Countersigning Supervisor's Name (Print) [redacted]

Countersigning Supervisor's Signature [redacted] Date 1/27/20

Voucher Authorization # [redacted]

CityFHEPS
NYC Human Resources Administration
[redacted]

NYC Department of Social Services

Human Resources Administration
Department of Homeless Services

[redacted] 10/01/2018

YASMIN STEWART
[redacted]

Notice Date: [redacted]

CityFHEPS Approval Notice to Landlord

Dear Landlord,

NATASIA SEIVWRIGHT , has been approved for CityFHEPS for the following period and at the following address:

Effective date: [redacted] End date: [redacted]

Address: [redacted]

1. Approved Apartment Rent: $ [redacted]

2. CityFHEPS Rental Assistance Supplement Amount (which HRA will pay to you or your designated payee):

$ [redacted]

3. Remaining Rent (a portion of this may be paid by HRA): $ [redacted]

The tenant is responsible for paying you, the landlord or your designated payee, the Remaining Rent, minu any shelter allowance that HRA may be paying on the tenant's behalf.

Remember, you signed a Landlord Statement of Understanding, which explained the requirements for participating in CityFHEPS.

Please refer to www.nyc.gov/dsshousing for more information.

CityFHEPS is similar to the federal Section 8 program in that, subject to the availability of funding, it provides assistance, including rental assistance of specified amounts, to landlords and tenants who want to form a landlord–tenant relationship. Any contractual relationship will be solely between each tenant participating in the program and each tenant's landlord participating in the program.

00099355 007356 009115 002 003 00

00211296 007356 002 003 00

P2M-79CK
10/13

[redacted]

[redacted]

THE CITY OF NEW YORK 4269

[redacted]

STEPHEN FRANCIS

[redacted]

Return to Sender
Does not live here

FIRST CLASS MAIL
U.S. POSTAGE PAID
BROOKLYN, NY
PERMIT No. 344
1

33113B457 C001

Name

harold Boyd IV

Email	[redacted]
Professional Affiliation	DOE teacher
Zip Code	
Public Comment	Please create & market pathways to admission
Attachment(s)	Drop files here or click to browse
Date Submitted	June 30, 2026
Topic	Miscellaneous
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Education & Youth

Subtopic	Schools

Name

Peter White

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

The inaccessible and un useful documentation surrounding the civil service system is a major obstacle to the efficacy of the city government. It can take more than a year to be hired into a position that the city needs filled, and that the candidate is qualified for and wants to fill. Additionally the current system makes it so advancement requires not just being good at your job and caring, but also tedious management of a system that is often characterized by a lack of answers. The city government, in my opinion, should strive to mirror the federal civil service program. Primarily in its transparent and easily found pay increases, which are associated with tenure as well as title and performance. This means that federal civil servants are rewarded for longevity, as well as doing a good job, and not only because they understood when to take tests and how to speak with HR. The federal government also makes use of detail appointments so that employees may be more freely moved to office's which require additional help, or so employees who wish to gain new experiences to benefit their growth may branch out.

The current civil service program rewards and perpetuates the behavior of doing the bare minimum, and being nitpicky in the rules by reducing mobility both laterally and vertically. Addressing the root of the system would help bring in the brightest minds that the city deserves by making the city a good and rewarding place to work for all. It would solve the shortage of city employees, reduce our reliance on outside consulting, and improve retention of young talent that can be otherwise frustrated by stagnation.

A similar modernization effort that seems obvious is to increase the flexibility of remote work. The city benefits from an in person workforce, but would benefit more by allowing that workforce to work remotely 3 days a week as a rule, and allowing those days to be moveable. If offices were able to make one of those in person days match for all employees, there would still be more than enough face to face interaction to bolster the office culture. It seems to me that many of the rules for public employees in the city are designed to police the few workers who are there just to be protected by the union and collect a paycheck. The city needs to stop catering to those needs by increasing surveillance and opportunities for punishment and instead create a modern work environment that attracts and promotes passionate work. Maybe its true that there will always be those people gaming the system, but I believe the system works best when its optimized for the people who want to do good, and not against the people who want to do bad.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 30, 2026

Topic	Unnecessary Bureaucracy ✕ Procurement Reform ✕ Technology ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Reform civil service and improve remote work.

Name

Selima Landrau

Email [redacted]

Professional Affiliation DOE

Zip Code

Public Comment

There needs to be more training for incoming Parent Coordinators entering the DOE system. There is to much to learn and it can't all be learned as you go. There needs to be more formal training and better communication within the DOE offices. The office of pupil transportation/summer opt is terrible with timely information and having a point of contact to address any concerns; too much is left up to chance and no response from the liason/contact person assigned to help. It is very frustrating and it detracts from the program and the needs of NYC school kids during the summer.
1-PC Training needs to be looked at as a whole.
2- Summer Rising/OPT information is not readily available or accurate at times. There is no point person/ contact to speak with when you needs answers for parents.

Attachment(s)

Drop files here or click to browse

Date Submitted June 30, 2026

Topic Unnecessary Bureaucracy × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

Charter Related	No
Topic Simplified	Education & Youth
Subtopic	Better training for Parent Coordinators.

Name

Allison Kleiman

Email [redacted]

Professional Affiliation NYCPS

Zip Code [redacted]

Public Comment

It is my understanding that the DOE is planning to terminate the contract with New Visions for the Portal that schools have been using this year. I'm BEGGING you to pick other things to cut and to retain this contract. The Portal is the epitome of efficiency and helps improve workflow and make school counselor work 100% faster, more reliable, and easier to aggregate data to share with teachers, admin, and families. There are MANY online portals that the DOE could easily cut platforms that are slow, full of glitches, and clunky. I would happily get rid of Tableau, Panorama, and honestly even reconsider the OASIS developers and perhaps hire New Visions to do that instead. All of those platforms don't hold a candle to the quality and user friendly nature of the New Visions Portal. I've never left a professional development as energized and optimistic as the PD where I was trained on the New Visions Portal. PLEASE do not cut it. Send a survey to staff that lists all the contracts we have and we can happily rate for you which services we need and which are redundant or wasteful. But New Visions ain't it.

Attachment(s) Drop files here or click to browse

Date Submitted June 30, 2026

Topic Budget Issues × Technology × Procurement Reform × Unnecessary Bureaucracy ×

Method Received Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Education & Youth
Subtopic	Keep technology that works (New Visions) at NYCPS

Name

Five Borough Jobs Campaign

Email	[redacted]
Professional Affiliation	
Zip Code	

Public Comment

June 30, 2026

To: The Chair and Members of the Charter Review Commission
Re: Public Comment in Support of Local Economic Analysis in City Decision-Making

Dear Chair and Members of COGE,

On behalf of the Five Borough Jobs Campaign, thank you for the opportunity to submit public comment.

The Five Borough Jobs Campaign is a citywide coalition representing businesses of all sizes across New York City, including chambers of commerce, business improvement districts, workforce organizations, and economic development groups from every borough. Our coalition is guided by a simple belief: New York City thrives when every New Yorker has access to a good-paying job.

As COGE evaluates how New York City government can operate more effectively, transparently, and accountably, we urge the Commission to recommend the creation of a consistent Local Economic Impact Analysis process for major city policy proposals.

The goal is simple: prevent unforeseen consequences in legislation that move us backwards and erode trust in government.

Today, New York City does not have a clear, consistent system for understanding how major policy decisions may affect local jobs, small business operating costs, city revenues, and neighborhood economies. In the middle of an affordability crisis, policymakers and the public should have access to clear information about how proposed decisions may affect workers, consumers, job creators, and communities.

A Local Economic Impact Analysis requirement on major legislation would improve transparency and accountability.

Such a process should examine the potential direct and indirect impacts of major city policy proposals on employment levels, business operational costs, living costs, and city revenues. It should also include both citywide findings and borough-level analysis, so policymakers and the public can better understand how a proposal may affect different communities across the five boroughs.

This kind of review should be treated as a transparency tool. Elected officials, city agencies, Community Boards, advocacy organizations, local businesses, labor and workforce leaders, and everyday New Yorkers would all benefit from clearer information about the likely economic effects of major policy decisions.

That includes both positive and negative impacts. When a proposal would support job growth, lower costs, strengthen workforce development, or improve neighborhood vitality, an economic impact analysis can help demonstrate those benefits. When a proposal may increase costs for small businesses, raise living expenses, reduce hiring capacity, or create uneven impacts across boroughs, policymakers should understand those consequences early enough to improve the proposal.

This is especially important for neighborhood businesses and local job creators. Businesses across the five boroughs are navigating rising costs, red tape, and government inefficiencies while continuing to provide jobs, services, and neighborhood stability. They are not asking for handouts. They are asking for common sense improvements that make City government easier to understand and navigate. A Local Economic Impact Analysis process is one of those common-sense improvements.

COGE should use this moment to make clear that New York City needs stronger tools to evaluate how government decisions affect affordability, job creation, and neighborhood economies.

New York City's livability, affordability, and economic strength depend on policy decisions that are transparent, informed, and grounded in the realities facing every borough. We urge COGE to support this recommendation.

Thank you for your consideration.

Sincerely,
The Five Borough Jobs Campaign

Attachment(s)

Drop files here or click to browse

Date Submitted

June 30, 2026

Topic

Reporting Requirements ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕

Method Received

Airtable Form

Is it charter related?

Charter Related	Yes
Topic Simplified	Unnecessary Bureaucracy
Subtopic	Creation of a consistent Local Economic Impact Analysis process

Name

Charles Corliss, Ph.D., ABPP

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

DOGE connotes callousness, incompetence, cruelty, etc.

Choosing a name that evokes such (COGE for DOGE) is a very bad idea and makes the Administration sound tone deaf.

Find a new name

Attachment(s)

Drop files here or click to browse

Date Submitted June 30, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic

COGE is a bad name

Name

Jonathan Fisher

Email [redacted]

Professional Affiliation

Zip Code

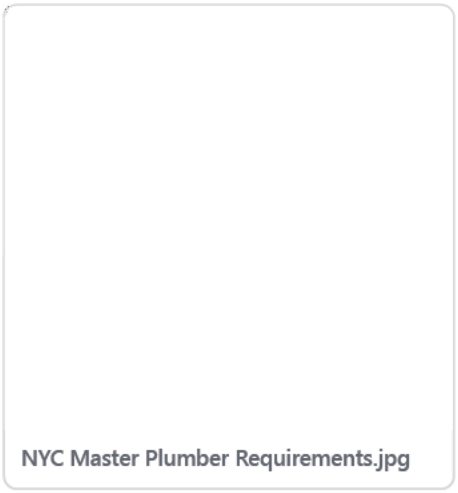
Public Comment

It isn't right that a plumbing business in New York City must be 51% owned by a licensed master plumber. I support and understand the value of having a licensed, knowledgeable person on staff registered as the company's "master plumber," but I don't understand why the business itself must be owned by one. I'm not aware of another NYC licensed trade with an equivalent ownership requirement — electrical, structural, and architectural work don't appear to impose this on business ownership the way plumbing does.

This requirement is codified at §28-408.6 ("Master Plumber Business Required") of the NYC Administrative Code.

This law raises costs for all New Yorkers by reducing competition among plumbing and mechanical companies in the city. It drives up housing construction costs, renovation costs, and the cost of maintaining the city's own building infrastructure. The city already employs building inspectors to inspect completed work contractors should not be relied upon to inspect their own work.

Attachment(s)



NYC Master Plumber Requirements.jpg

§ 28-408.6 Master plumber business required.

No individual, corporation, partnership or other business association shall conduct a plumbing contractor business in the city of New York, or employ the name "plumber" or "plumbing" in its business name unless such business is a master plumber business as follows:

1. No less than 51 percent of the control and voting capital stock of such plumbing contractor business is owned by one or more individuals who are licensed master plumbers, except as otherwise provided;
2. All plumbing or gas piping work performed by such entity is performed by or under the direct and continuing supervision of such licensed master plumber;
3. The person in charge of such work is such licensed master plumber; and
4. The persons actually performing such work are in the direct employ of such master plumber business as authorized by the code.

Exception: A company, corporation, partnership or other business association or its predecessor that was engaged in plumbing work prior to January 25, 1990 may continue to do so in any one or more of such business forms without complying with the foregoing, if (i) application was made to the department prior to July 25, 1990, and (ii) necessary evidence was furnished on or prior to January 25, 1991, that such company, corporation, partnership or other business association or its predecessor had employed an average of ten or more journeymen plumbers doing plumbing work for at least five days a week for a period of ten (10) years or more out of the twenty (20) years preceding July 25, 1990, provided, that such plumbing business continues to have all plumbing work conducted under the management and direct and continuing supervision of a licensed master plumber in the direct employ of such plumbing business and that such licensed master plumber is not otherwise interested in, associated with or employed by any other plumbing business operating in this city except as a joint venture in which such master plumber's employer is one of the joint venturers.

(Am. L.L. 2021/126, 11/7/2021, eff. 11/7/2022)

Editor's note: For related unconsolidated provisions, see Appendix A at L.L. 2021/126.

Name

Olivia Goldberg

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

Thank you for this opportunity to present an issue that is very important to me: preservation of the city's tree canopy, which cools our streets and absorbs stormwater, and how city agencies can more efficiently collaborate to that end. A lack of collaboration between the DDC, the DOT and DPR has resulted in needless removal of many mature street trees throughout NYC, and often in neighborhoods that already experience a severe "heat island" effect. I understand that these removals are often part of projects to improve infrastructure, but my question is: why do we as New Yorkers have to choose between tree canopy cover and functional infrastructure?

I am an ISA certified arborist who works with trees in New York City. I often work as a third-party consultant for projects managed by the DDC, the DOT, and occasionally by DEP and DPR. This consulting work is a requirement by DPR whenever excavation occurs within 50 feet of a city owned tree, and consists of protecting those trees during construction and providing accurate reports if damage does occur to them during work. The most common examples are replacement of curbs and sidewalks, but many sewer/water main projects and new building or renovation projects could also easily amended to preserve mature trees nearby. Excavation near trees is one of the most common reasons for street tree decline and death in NYC.

I have witnessed harm to city-owned trees both through carelessness on the part of contractors, and by design when trees are removed due to supposed conflicts with projects aimed at improving infrastructure. In my experience, most of this damage is preventable in the design stage by shifting excavation by as little as six inches to avoid tree roots.

Implementation of more careful design, using the proven tree protection measures at our disposal today, would certainly allow New Yorkers to retain vital canopy cover during many construction projects city-wide. I have proof of this in the ongoing DPR project at Archie Spigner Park in Queens, which thoughtfully avoids the most important structural roots of nearby trees while providing an important stormwater drainage measure for the neighborhood. By the time construction work has started on many DDC and DOT projects, there is little that DPR or the contractors can do to avoid damage to city-owned trees because the designs often necessitate excavation that fatally damages nearby trees. The solution DPR has had to employ is to impose fines (restitution fees) after damage has already occurred, using these funds to plant new, small trees elsewhere. While re-planting trees can be helpful, the trees that are removed during construction are often at least 30 years old (often much older), and because of increasingly hot, dry summers, many of the newly-planted trees will never reach that age or provide the same environmental benefits.

My recommendation is that DDC and DOT have direct collaboration with DPR regarding protection of trees during the design phase of construction projects. DPR has proven that they are able to implement tree protection protocols that preserve trees during construction, and I believe that more direct collaboration at the earliest stages of DDC and DOT projects would certainly help New Yorkers see mature tree canopy retention and the many environmental benefits that come with it.

Thank you for your consideration.

Olivia Goldberg
Arborist; [redacted]

Attachment(s)



COGE statement Olivia Goldberg.pdf

Date Submitted: June 30, 2026

Topic: Department of Buildings (DOB) Issues ×; Real Estate and Development ×; Unnecessary Bureaucracy ×; Enforcement ×

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Government Operations

Subtopic: Recommend that DDC and DOT have direct collaboration with DPR regarding protection of trees during the design phase of construction projects

June 30, 2026

COGE submission

Olivia Goldberg, Arborist & Owner of Olea Landscapes, LLC

Thank you for this opportunity to present an issue that is very important to me: preservation of the city's tree canopy, which cools our streets and absorbs stormwater, and how city agencies can more efficiently collaborate to that end. A lack of collaboration between the DDC, the DOT and DPR has resulted in needless removal of many mature street trees throughout NYC, and often in neighborhoods that already experience a severe "heat island" effect. I understand that these removals are often part of projects to improve infrastructure, but my question is: **why do we as New Yorkers have to choose between tree canopy cover and functional infrastructure?**

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Thank you for your consideration.

Olivia Goldberg
Arborist; Owner, Olea Landscapes, LLC
[redacted]

Name

Jon Kokot

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Hi COGE team,

I'm excited about your mission. I'm the co founder and CEO of Civic, a NYC based veteran owned startup. We offer an AI powered comms, case, and memory management system to help for government teams deliver constituent services more efficiently.

We're going live in the U.S. House this summer and already have users in Manhattan Community Boards.

I'd love to chat with a member of your team.

Respectfully,
Jon Kokot

[redacted]

Attachment(s)

Drop files here or click to browse

Date Submitted June 30, 2026

Topic Technology × Miscellaneous ×

Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback
Subtopic	Business selling services.

Name

Frank Morano

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

Written Testimony of Council Member Frank Morano

Before the New York City Charter Revision Commission

June 30, 2026

Good evening, Chair Gaspard and members of the Commission.

My name is Frank Morano, and I have the privilege of representing New York City's 51st Council District on Staten Island.

I appreciate the opportunity to testify today.

I've attended Charter Revision Commission hearings for more than two decades. In that time, I've seen commissions recommend everything from term limits to ranked-choice voting, changes to community boards, ethics reforms, and land use reforms. Some recommendations have transformed city government, while others never made it to the ballot. That's why these hearings matter. Unlike most political debates, the work you're doing isn't just about today's headlines. It shapes how New York City functions for decades.

I've previously testified before this Commission on community boards and election reform. Today I'd like to focus on something that I believe should unite New Yorkers regardless of ideology: making government more transparent, more accountable, and more responsive.

If there's one theme I'd encourage this Commission to embrace, it's this:

Government should be easier to understand, easier to interact with, and easier to hold accountable.

Government Response Time Dashboard

My first recommendation is the creation of a Government Response Time Dashboard.

We live in a world where I can track a ten dollar package from a warehouse in Ohio all the way to my front porch.

If Amazon can tell me where my package is, City Hall should be able to tell me where my permit is.

Every day New Yorkers apply for permits, renew licenses, file complaints, request inspections, submit FOIL requests, and seek countless other services from city government.

Yet too often they're left wondering:

Did anyone receive my application?

Is anyone working on it?

Will this take two weeks or six months?

Government shouldn't be a black box.

Every major agency should publish average response times for common services, including permits, licenses, inspections, FOIL requests, constituent inquiries, and complaint investigations.

The point isn't to embarrass agencies.

The point is to create transparency.

Because once performance is measured publicly, it usually improves.

It would also help elected officials identify bottlenecks, allow businesses to plan more effectively, and give residents realistic expectations.

Agency Promise Tracking

Second, I'd encourage the Commission to recommend an Agency Promise Tracking System.

One of the things I've noticed over the years is that government is very good at making promises.

During ULURP applications...

Capital projects...

Infrastructure announcements...

Environmental reviews...

Communities hear about traffic improvements, sewer upgrades, school seats, new parks, mitigation measures, and streetscape enhancements.

Then the project gets approved.

Five years later, residents ask:

"Whatever happened to the new park?"

"Weren't we promised a turning lane?"

"Didn't they say there'd be additional school capacity?"

There should be a public dashboard that follows government commitments

from the day they're made until the day they're are completed.

If they're delayed, tell us why.

If they've changed, explain what happened.

If they've been cancelled, say so.

Government shouldn't be judged only by the promises it makes. It should be judged by the promises it keeps.

Modernizing Public Notice

Third, I believe it's time to modernize how New Yorkers learn about government.

The City generally satisfies the legal requirement for public notice.

But legal notice and meaningful notice are not always the same thing.

Today, information is scattered across agency websites, legal advertisements, bulletin boards, and calendars that very few residents know exist.

If we truly value civic engagement, we shouldn't expect New Yorkers to hunt through government websites to discover what's happening in their own neighborhoods.

Residents should be able to sign up for email or text alerts based on their ZIP code, Community District, Council District, or borough.

They should receive notifications about:

* Community Board meetings
* ULURP applications
* Major environmental reviews
* Infrastructure projects
* Charter Revision Commission hearings
* Other significant public actions affecting their communities

The easier we make it for people to participate, the more confidence they'll have that government actually wants to hear from them.

Contractor Performance Dashboard

Finally, I'd recommend greater transparency regarding city contractors.

New York City spends billions of taxpayer dollars every year through private vendors, nonprofit organizations, construction companies, consultants, and service providers.

Taxpayers deserve to know whether those contractors are delivering.

The City should maintain a public Contractor Performance Dashboard showing:

* Cost overruns
* Change orders
* Project delays
* Performance evaluations
* Contract amendments
* Completion timelines

We already rate restaurants.

We rate plumbers.

We rate hotels.

It shouldn't be easier to evaluate someone painting your living room than a contractor receiving fifty million dollars in taxpayer money.

This information would not only help taxpayers.

It would help procurement officials make better decisions and reward contractors who consistently perform well.

Closing

The recommendations I've offered today don't shift power from one branch of government to another.

They don't favor one political party over another.

They don't make government bigger.

They make government better.

A government that measures its own performance is more likely to improve it.

A government that communicates honestly earns more trust.

A government that keeps its promises earns more credibility.

And a government that is easier to understand is a government that more people are willing to participate in.

Regardless of where we fall politically, I hope we can agree that transparency, accountability, and responsiveness should remain core values of New York City government.

Thank you for your time, for your service on this Commission, and for considering these recommendations. I look forward to continuing to participate in this process.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 30, 2026

Topic: Reporting Requirements ✕ | Unnecessary Bureaucracy ✕ | Technology ✕ | Procurement Reform ✕

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Technology

Subtopic

Build new tracking and dashboard systems to improve government transparency.

Name

Katherine Winningham

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Updated submission

Attachment(s)



CRC Comments 063026.pdf

Date Submitted

June 30, 2026

Topic

Miscellaneous

Method Received

Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Unnecessary Bureaucracy
Subtopic	Reform City's concessions system to treat real property differently from intellectual property.

Comments to the New York City Charter Revision Commission Regarding Franchise Concession Review Commission process to Non-Exclusive Intellectual Property Licenses

Chair Gaspard and honorable members of the New York City Charter Revision Commission:

My name is Katherine Winningham. I was Senior Counsel at the [redacted] in the [redacted] advising on best practices to protect City trademarks, copyrights and other intellectual property (IP) as well as transactions with IP components — ranging from short-term licensing for the production of t-shirts, toys or housewares bearing City marks to 20-year coordinated street furniture franchise (newsstands, bus stop shelters) or 20-year Parks concessions (restaurants, skating rinks, golf courses). I am now a consultant on maintaining the City IP and assisting on matters requested by the City.

My comments are based on my experience in protecting and licensing IP rights and do not reflect official views.

After September 11, 2001, the City needed to protect its rights in the designs and acronyms used to identify our uniformed agencies such as the Police and Fire Departments. Online platforms were awash in unauthorized goods, street vendors were selling counterfeit merchandize near Ground Zero and the City was losing control of what goods featured its IP and losing revenue. I was asked to apply best practices from my days at a NYC firm to set up the legal framework for City licensing as a way to protect and preserve the City's interest in its IP, that revenue from the program benefited the City and to work to get enforcement moving.

In the US, trademark rights are acquired by use and may be registered with the US Patent and Trademark Office. Registration is not required, but it provides substantial advantages — treble damages

in the event of infringement; take downs on e-commerce sites such as Amazon, eBay, Etsy; and US Customs seizure of infringing imports at the border. Registration also leads to a first-class licensing program drawing higher royalties and access to the best business partners. Licensing is also essential to maintaining world-wide rights and keeping City registrations viable in the US and foreign jurisdictions. If we lose licensing business, our rights to particular lines of goods in particular locations may be vulnerable to attack.

The City's iconic marks (NYPD, FDNY, Parks, Sanitation, the NYC design used by most agencies) were registered with the US Patent and Trademark Office to put the City in the best possible position to generate revenue, allow City residents, tourists and others to show affinity for the City and its institutions and expand good will that the most famous marks indicate — much like major league sports teams and university licensing programs. An early brand asset study indicated that New York City was among the 5 most popular brands (along with brands like Disney). We entered into an early deal with Major League Baseball for online retail sales, transferred existing licenses to the City and expected to conduct business as most IP licensors do — via arm's length negotiations with multiple deals (none exclusive) so that merchandise featuring City IP could be sold at a variety of price points all of good quality and with a goal of collaborating with the most immediately recognizable in their markets — Nike, Adidas, Mattel.

In 2006 after the DOE's selection of Snapple as an exclusive beverage partner, the Court of Appeals in In re Comptroller of the City of New York v. Mayor of the City of New York, 7 N.Y.3d 256 (N.Y. 2006), determined that all City property, real or intangible, would be subject to the same process. The Court read NYC Charter section 362(a) ,which defines a "concession" as "a grant made by an agency for the private use of *city-owned property* for which the city receives compensation other than in the form of a fee to cover administrative costs, except that concessions shall not include franchises, revocable consents and leases" to cover both real property and iP.

The decision has had a substantial adverse impact on the City's licensing program since any merchandise license or sponsorship agreement worth more than $11,000 is subject to the same Franchise Concession Review Commission process even though the City doesn't offer exclusive trademark licenses and none of these licenses allow exclusive use of City streets, sidewalks or park property to a concessionaire for private use or capital installations.

Treating a 4-6 year non-exclusive merchandise license as the equivalent of exclusive occupancy or installation of capital structures on City property makes little sense. Merchandise licensing simply doesn't involve the same types of property, degree of risk to the City or the same performance demands on the licensee. Printing t-shirts or making keychains and accounting for and paying over a percentage of revenue is a much more limited activity and we are able to address risk by requiring the same audit, insurance and indemnity provisions as the City requires in other contexts. Rights to immediate termination, oversight of product samples/production enable a degree of control that is not present in concessions or franchises where a third party is installing and maintaining infrastructure and must be reimbursed for its outlay for termination to occur.

The FCRC multi-step process — a minimum of two public hearings or meetings on substantial notice, publication of paper notification in outlets not familiar to license partners, an oblique online system designed for City vendors who are being paid money — drive away the type of partners the City is most interested in attracting. Or, it limits us to short-term deals worth under $11,000 because the highest quality sports, souvenir, toy and housewares makers are unwilling to wait 6 to 9 months for a City process, have the monetary terms publicized and be forced to disclose and make public record address information about where their CEOs reside. In addition, the position is now being taken that administrative agreements worth less than $11,000 must be registered. This imposes incredibly high hurdles for businesses that want to follow the right process to license City IP.

The current process puts the City in the worst possible position to obtain the best business deals. If the City enters into a coop or joint license which normally results in a split of standard royalty rate because the licensee (e.g., Nike, Mattel) is bringing its own valuable brand to the product, then every other licensee demands the far lower royalty rate. Private businesses who do not routinely do business with governments are not amenable to waiting 6 to 9 months and their new product lines or seasonal launches do not coincide with the FCRC schedule. It is impossible to act with flexibility or speed in response to a unique opportunity unless the product run and revenue are limited to 2 years and $11,000 in revenue. And once you walk through the full FCRC process, many partners will walk away and decide that they won't do business with the City.

There are adequate means to protect City interests without imposing full FCRC process on merchandise licenses or other IP transactions that do not allow exclusive use of City real property.

It is my recommendation the Commission consider amending Charter section 362(a) to specify that it applies to the private use of "city-owned *real* property". In the alternative, the Commission could explore options to amend Charter sections 371, 373, 374 to streamline a process for these transactions that is faster and far more flexible while protecting the City's interests.

Name

Sheikh Musa Drammeh

Email	[redacted]
Professional Affiliation	National Center For Health Equity
Zip Code	[redacted]

Public Comment

DEPARTMENT OF PEACE AND SAFETY

We have been wasting taxpayers' dollars at City Hall with ineffective and unnecessary solo agencies just like pre 9/11 solo agencies we had that supposedly provide overlapping services but didn't know what each other was doing and were all smartly merged into Homeland Security after 9/11.

New York City with over hundred agencies under the mayor needs to prudently merge the solo agencies below into a "Department of Peace and Safety" in order to save public resources and be more efficient and accountable under one leadership.

If the mayor can manage hundred agencies, the 'Department of Peace and Safety' director can easily manage this merged agency.

1. Commission on Human Rights Office
2. Combat Antisemitism Office
3. End Domestic and Gender Based Violence
4. Equity and Racial Justice Office
5. Faith Based and Community Partnership Office
7. Gender Equity Commission
8. Prevent Gun Violence Office
9. Prevention of Hate Crimes Office
10. Racial Equity Commission
11. Racial Inclusion and Equity Taskforce
12. Community Safety Office
13. Among others.

I encourage the mayor's Charter Revision Commission to include this into the proposals to be submitted for voters to approve or reject it in November elections.

Sheikh Musa Drammeh
[redacted]

Attachment(s)

Drop files here or click to browse

Date Submitted

June 30, 2026

Topic

Unnecessary Bureaucracy ✕ Enforcement ✕ Miscellaneous ✕

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Create a Department of Peace and Safety around existing City offices.

Name

Paula Magnus

Email	[redacted]
Professional Affiliation	President, Northside Center for Child Development, Inc.
Zip Code	[redacted]

Public Comment

Northside Center for Child Development is a New York State licensed nonprofit mental health clinic founded in Harlem in 1946. We serve more than 6,500 children and families each year through outpatient mental health care, school-based services, early childhood education, and family stabilization programs, operating under contracts with ACS, DYCD, DOHMH, and DOE.

Human service providers are often asked to submit identical compliance documents separately to several contracting agencies, every year, for every contract. The redundancy is structural and fixable.

Below, we offer the written testimony we presented to the NYC Council Committee on Contracts on February 25, 2026 (File #: [redacted]). The testimony documents the administrative burden that duplicative compliance filings impose on nonprofit providers and makes the case for consolidation. Following the testimony, we present three draft model forms that demonstrate that consolidation is structurally and legally feasible today.

The three forms consolidate nine separate annual Passport Documents into three. Each form is designed to be submitted once per year to the vendor's PASSPort profile, not separately with each contract.

1. A consolidated Local Law Attestation merging three instruments required under NYC Admin. Code § 6-145 into a single annual PASSPort filing, with electronic affirmations for non-material updates. Implementation would require amendment of § 6 145; the testimony attached and below calls on the Council to pursue that legislation.

2. A consolidated Certificate of Insurance naming the Mayor's Office of Contract Services as a single certificate holder on behalf of all contracting agencies, eliminating dozens of City agency specific certificates.

3. A consolidated annual vendor compliance attestation combining four routine submissions, including the Tax Affirmation and Executive Order 64 Certification, under a single notarized oath.

This package is a practical, ready-made starting point for relief. The COI model and the consolidated vendor compliance attestation could be implemented administratively through MOCS without new legislation.

We submit this proposals humbly, defer to the Commission and MOCS on implementation, and would welcome the opportunity to present this work directly to your working group.

Paula Magnus
President
Northside Center for Child Development, Inc.
[redacted]

TESTIMONY OF NORTHSIDE CENTER FOR CHILD DEVELOPMENT
Before the New York City Council Committee on Contracts
Oversight Hearing: Ensuring Timely Payments for Nonprofits and Human Service Providers
File #: [redacted]

Good morning, Chairperson Restler and members of the Committee on Contracts. My name is Paula Magnus. I am honored to appear before you today in what is, as of this morning, my first official act as the newly appointed President and CEO of Northside Center for Child Development, a New York State not-for-profit Article 31 outpatient mental health clinic founded in Harlem over 80 years ago and today serving at-risk children and families across Harlem, the Bronx, and Brooklyn. We serve 5,500 children annually through mental health treatment, early childhood development, Head Start, school-based clinics, preventive services, and educational support.

We are grateful for this Committee's continued focus on timely payments to nonprofits. We have testified before, most recently in January 2026, and we appreciate that the Council continues to listen. Today we want to try to be useful: not just describe problems, but offer two concrete proposals with model forms attached as exhibits, that we hope might serve as a practical starting point for discussion.

I. Contract Rates and the Ability to Attract and Retain Qualified Staff

Before turning to our principal subject today, we want to respectfully flag one additional concern for the Committee's awareness, even if it falls partly outside this Committee's direct jurisdiction. Northside and many human service providers operate under two types of contracts that together create a serious structural inequity. DOE contracts for school based services set rates that do not allow us to offer salaries competitive with those the Department of Education pays its own employees for comparable work. Social service contracts from agencies such as DOHMH, ACS, and DYCD pay rates that make it very difficult to compete with hospitals and health systems for the same clinical staff. The result is chronic difficulty recruiting and retaining the qualified educators, social workers and other mental health professionals our children need. We raise this not as a complaint but as a structural issue we hope the Council will find the appropriate forum to examine, whether through this Committee, the Committee on Finance, or the Committees on Education and Mental Health. We are prepared to provide specifics if that would be helpful. We note that these rate pressures compound the cash flow strains that payment delays create, which is why we raise the issue in this forum even while acknowledging it falls primarily to other committees.

II. Our Experience With Recurring Compliance Documents

Our request: we respectfully ask the Committee to consider directing MOCS to pilot acceptance of two consolidated annual compliance forms and one centralized insurance certificate in lieu of the nine separate recurring documents currently required. We recognize that the Committee and MOCS are far better positioned than we are to evaluate tradeoffs and implementation challenges. We offer these forms not as a finished solution, but as a demonstration that consolidation may be feasible without sacrificing any substantive compliance obligation.

Each year, Northside, like many human service providers, submits the same compliance documents to each City agency we work with. These documents include:

- Certificate of Substantiated Cases of Client Abuse or Neglect
- Executive Order 64 Certification (ACS)
- Insurance Broker Certification
- Certificate of General Liability Insurance
- Disability Insurance Certificate
- LPA Certification Form (§ 6 145(c))
- LPA Attestation Form (§ 6-145(b))
- LPA Rider
- Tax Affirmation Form

Each of these must be produced, signed, and submitted to each contracting agency separately, sometimes multiple times per year. We do not raise this as a complaint. We understand that each document exists for a reason, and that the City has legitimate interests in the certifications they reflect. But we have found, in our experience, that the repetition itself, submitting identical documents to agency after agency, does not appear to add to the City's actual oversight capacity. It adds time and cost on both sides of the transaction.

PASSPort already has a Vendor Profile and Documentation tab with Vault-linking functionality designed for reusable document uploads. We wonder whether a policy change, rather than any new technology investment, might allow vendors to submit these documents once, with agencies linking to a MOCS-verified copy. We defer entirely to MOCS and this Committee on whether that is workable.

III. A Thought on the Logic of Separate Documents

We recognize there is a traditional logic behind maintaining separate documents for separate obligations. Anyone who has closed on a home or refinanced a mortgage has experienced this firsthand. The lender's attorney presents a stack of documents, some are book length and are one page. The reason, as we understand it, is practical. If a borrower defaults on a specific obligation, the lender's attorney wants to walk into court holding one clean, self contained instrument, not point a judge to a violated paragraph on page 167 of a loan document.

We understand that logic. But we respectfully suggest that it may not translate directly to routine annual vendor compliance certifications. A Tax Affirmation, an EO 64 certification, and a Substantiated Cases certification are

administrative thresholds, not the kind of obligations that typically require stand alone judicial enforcement. If the Committee and MOCS agree that consolidating them into a single annual instrument would not compromise the City's ability to enforce any of them, we hope the attached forms might be a useful starting point for that conversation.

IV. Three Proposed Model Forms: Offered for Discussion

We have attached three proposed forms as exhibits. We want to be clear about what these are and what they are not. They are not finished products. They are a good-faith attempt by a nonprofit provider to demonstrate that consolidation might be achievable without dropping any substantive requirement. We would welcome feedback from MOCS, the Law Department, or any agency that sees problems we have not anticipated.

Exhibit A: Proposed Consolidated LPA Form

Under NYC Admin. Code § 6 145, vendors currently submit three separate instruments: the LPA Certification Form, the LPA Rider, and the LPA Attestation Form, for each contract, each agency, and each renewal. For the many smaller nonprofits where no labor organization has sought to represent covered employees, this means executing a notarized CEO certification, acknowledging a multi-page legal rider, and submitting an attestation, repeatedly, to confirm the same unchanged facts.
Exhibit A proposes merging these three instruments into one annual form, uploaded once to PASSPort and linked by each contracting agency. Every legal element is preserved, including the five-year labor relations disclosure, the perjury certification, the uninterrupted service commitment, and the 90-day update obligation upon union notice. We respectfully suggest the Committee consider legislation amending § 6 145(b) and (c) to authorize this consolidation and codify PASSPort reusability. We are happy to provide more detail or refine the form in any way that would be helpful.

Exhibit B: Proposed Consolidated Certificate of Liability Insurance (Model ACORD 25)
Each City agency currently asks vendors to name it individually as a certificate holder on their insurance certificate, which means vendors and their brokers must generate separate, agency specific certificates for each agency they work with. Exhibit B shows a standard blank ACORD 25 form with two proposed changes highlighted: a Certificate Holder line naming MOCS on behalf of all applicable NYC human services agencies, including DOHMH, ACS, DYCD, DHS, DOE, HRA, and DFTA, and a Description of Operations covering all city service contracts with those agencies.
We have intentionally limited the proposed changes to those two fields only, leaving all other fields as standard blank form, to make it easier for the Committee and MOCS to evaluate what is actually being proposed. We recognize that any change to insurance certificate practice would need to be coordinated with the Law Department and the agencies' risk management offices, and we defer to their judgment on implementation.

Exhibit C: Proposed Consolidated Annual Vendor Compliance Attestation
Exhibit C proposes consolidating three documents currently submitted separately to each contracting agency: the Tax Affirmation, the Executive Order 64 Certification, the Certification Regarding Substantiated Cases of Client Abuse or Neglect. To that, we've added an insurance cancellation notification commitment to MOCS, into a single annual form. The verbatim legal language from each source document is preserved in full. The form executes under a single oath and one notarization block, submitted annually to PASSPort.
Together, Exhibits A and C would replace seven of the nine recurring submissions with two annual filings. Exhibit B addresses the remaining insurance certificate requirements. We hope this demonstrates that the consolidation we are describing is not abstract. It is specific, bounded, and, we believe, legally sound. But we hold that view humbly, and we welcome any corrections.
V. Suggested Amendments to NYC Admin. Code § 6-145
To the extent the Committee finds the LPA consolidation in Exhibit A worth pursuing, we respectfully suggest the following amendments to § 6 145 for the Committee's consideration. We offer these as a starting point only; the Committee and its counsel are far better placed than we are to determine what is legally and administratively appropriate:

1. Consolidate and Centralize the LPA Forms (amend § 6-145(b) and (c)). Merge the LPA Certification Form, Rider, and Attestation into a single annual instrument, as shown in Exhibit A, uploaded once to the vendor's PASSPort profile and accepted by all contracting agencies without additional submissions.

2. Consolidate the Four Annual Vendor Compliance Certifications. Merge the Tax Affirmation, the Executive Order 64 Certification, the Certification Regarding Substantiated Cases of Client Abuse or Neglect. To that, we've added and Insurance Cancellation Notification commitment into a single annual instrument, as shown in Exhibit C, without omitting any substantive legal requirement.

3. Reduce Notarization Burden. For annual renewals with no material change, permit electronic affirmation under penalty of perjury in lieu of a notarized signature. Reserve notarization for initial filings and submissions reporting material changes.

4. MOCS Oversight. Direct MOCS to standardize acceptance of centralized PASSPort submissions across all contracting agencies, and add statutory language requiring vendors to update within 30 days of any material change.

These changes would likely save the City and it's Social Service Vendors the time and cost of thousands of hours a year, while maintaining full accountability under § 6-145. Penalties for non-compliance remain in force, and updates are still required upon any material change.

Conclusion

We are grateful for the opportunity to appear before this Committee. We have tried today to go beyond describing a problem and offer something constructive, offering concrete proposed forms that we hope might accelerate a conversation about how to make the contracting process work better for nonprofits and for the City alike. We hold our proposals lightly. We know that what looks straightforward from where we sit may involve complications we have not anticipated.

If even one of the three exhibits attached today is useful to the Committee, to MOCS, or to any agency working on procurement reform, we will consider this testimony a success. We would be glad to present the forms directly to MOCS, to refine them based on feedback, or to participate in any working group the Committee sees fit to convene.

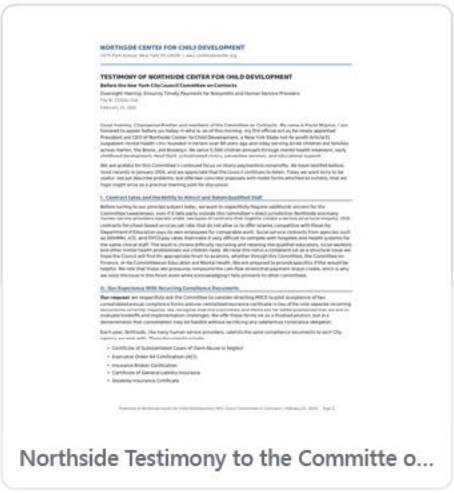
We thank the Chairperson and the members of this Committee for your continued commitment to the nonprofit providers who serve New York City's most vulnerable children and families. The work you do here matters to the 5,500 children Northside serves every year.

Respectfully submitted,

Paula Magnus
President and CEO
Northside Center for Child Development
February 25, 2026

EXHIBITS
Exhibit A: Proposed Consolidated Labor Peace Agreement Form (NYC Admin. Code § 6-145)
Exhibit B: Proposed Consolidated Certificate of Liability Insurance (Model ACORD 25)
Exhibit C: Proposed Consolidated Annual Vendor Compliance Form

Attachment(s)



Northside Testimony to the Committe o...

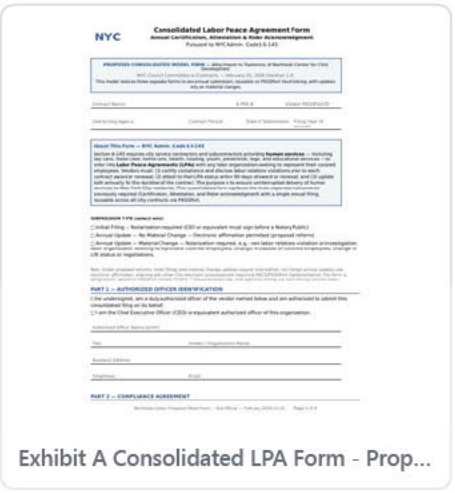


Exhibit A Consolidated LPA Form - Prop...

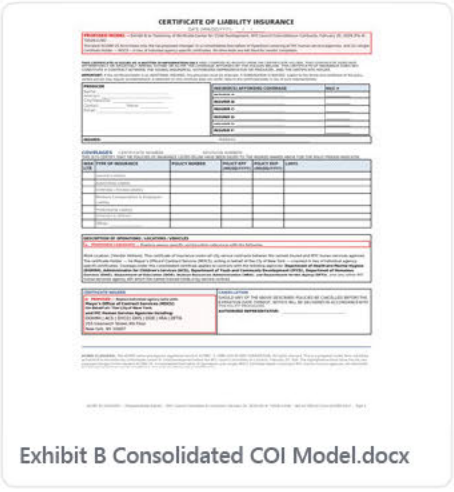


Exhibit B Consolidated COI Model.docx



Exhibit C Proposed Consolidated Annua...

Date Submitted: June 30, 2026

Topic: Procurement Reform ✕ | Unnecessary Bureaucracy ✕ | Reporting Requirements ✕ | Budget Issues ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Procurement

Subtopic

Reduce burdens for human services contractors doing business with the City.

NORTHSIDE CENTER FOR CHILD DEVELOPMENT
[redacted]

TESTIMONY OF NORTHSIDE CENTER FOR CHILD DEVELOPMENT

Before the New York City Council Committee on Contracts

Oversight Hearing: Ensuring Timely Payments for Nonprofits and Human Service Providers

File #: [redacted]

February 25, 2026

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Exhibit A proposes merging these three instruments into one annual form, uploaded once to PASSPort and linked by each contracting agency. Every legal element is preserved, including the five-year labor relations disclosure, the perjury certification, the uninterrupted service commitment, and the 90-day update obligation upon union notice. We respectfully suggest the Committee consider legislation amending § 6-145(b) and (c) to authorize this consolidation and codify PASSPort reusability. We are happy to provide more detail or refine the form in any way that would be helpful.

Exhibit B: Proposed Consolidated Certificate of Liability Insurance (Model ACORD 25)

Each City agency currently asks vendors to name it individually as a certificate holder on their insurance certificate, which means vendors and their brokers must generate separate, agency-specific certificates for each agency they work with. Exhibit B shows a standard blank ACORD 25 form with two proposed changes highlighted: a Certificate

Holder line naming MOCS on behalf of all applicable NYC human services agencies, including DOHMH, ACS, DYCD, DHS, DOE, HRA, and DFTA, and a Description of Operations covering all city service contracts with those agencies.

We have intentionally limited the proposed changes to those two fields only, leaving all other fields as standard blank form, to make it easier for the Committee and MOCS to evaluate what is actually being proposed. We recognize that any change to insurance certificate practice would need to be coordinated with the Law Department and the agencies' risk management offices, and we defer to their judgment on implementation.

Exhibit C: Proposed Consolidated Annual Vendor Compliance Attestation

Exhibit C proposes consolidating three documents currently submitted separately to each contracting agency: the Tax Affirmation, the Executive Order 64 Certification, the Certification Regarding Substantiated Cases of Client Abuse or Neglect. To that, we've added an insurance cancellation notification commitment to MOCS, into a single annual form. The verbatim legal language from each source document is preserved in full. The form executes under a single oath and one notarization block, submitted annually to PASSPort.

Together, Exhibits A and C would replace seven of the nine recurring submissions with two annual filings. Exhibit B addresses the remaining insurance certificate requirements. We hope this demonstrates that the consolidation we are describing is not abstract. It is specific, bounded, and, we believe, legally sound. But we hold that view humbly, and we welcome any corrections.

V. Suggested Amendments to NYC Admin. Code § 6-145

To the extent the Committee finds the LPA consolidation in Exhibit A worth pursuing, we respectfully suggest the following amendments to § 6-145 for the Committee's consideration. We offer these as a starting point only; the Committee and its counsel are far better placed than we are to determine what is legally and administratively appropriate:

1. Consolidate and Centralize the LPA Forms (amend § 6-145(b) and (c)). Merge the LPA Certification Form, Rider, and Attestation into a single annual instrument, as shown in Exhibit A, uploaded once to the vendor's PASSPort profile and accepted by all contracting agencies without additional submissions.

2. Consolidate the Four Annual Vendor Compliance Certifications. Merge the Tax Affirmation, the Executive Order 64 Certification, the Certification Regarding Substantiated Cases of Client Abuse or Neglect. To that, we've added and Insurance Cancellation Notification commitment into a single annual instrument, as shown in Exhibit C, without omitting any substantive legal requirement.

3. Reduce Notarization Burden. For annual renewals with no material change, permit electronic affirmation under penalty of perjury in lieu of a notarized signature. Reserve notarization for initial filings and submissions reporting material changes.

4. MOCS Oversight. Direct MOCS to standardize acceptance of centralized PASSPort submissions across all contracting agencies, and add statutory language requiring vendors to update within 30 days of any material change.

These changes would likely save the City and it's Social Service Vendors the time and cost of thousands of hours a year, while maintaining full accountability under § 6-145. Penalties for non-compliance remain in force, and updates are still required upon any material change.

Conclusion

We are grateful for the opportunity to appear before this Committee. We have tried today to go beyond describing a problem and offer something constructive, offering concrete proposed forms that we hope might accelerate a conversation about how to make the contracting process work better for nonprofits and for the City alike. We hold our proposals lightly. We know that what looks straightforward from where we sit may involve complications we have not anticipated.

If even one of the three exhibits attached today is useful to the Committee, to MOCS, or to any agency working on procurement reform, we will consider this testimony a success. We would be glad to present the forms directly to MOCS, to refine them based on feedback, or to participate in any working group the Committee sees fit to convene.

We thank the Chairperson and the members of this Committee for your continued commitment to the nonprofit providers who serve New York City's most vulnerable children and families. The work you do here matters to the 5,500 children Northside serves every year.

Respectfully submitted,

Paula Magnus

President and CEO

Northside Center for Child Development

February 25, 2026

EXHIBITS

Exhibit A: Proposed Consolidated Labor Peace Agreement Form (NYC Admin. Code § 6-145)

Exhibit B: Proposed Consolidated Certificate of Liability Insurance (Model ACORD 25)

Exhibit C: Proposed Consolidated Annual Vendor Compliance Attestation

NYC

Consolidated Labor Peace Agreement Form

Annual Certification, Attestation & Rider Acknowledgment

Pursuant to NYC Admin. Code § 6-145

PROPOSED CONSOLIDATED MODEL FORM — *Attachment to Testimony of Northside Center for Child Development*

NYC Council Committee on Contracts — February 25, 2026 (Version 1.0)

This model reduces three separate forms to one annual submission, reusable via PASSPort Vault linking, with updates only on material changes.

Contract Name: E-PIN #: Vendor PASSPort ID:

Contracting Agency: Contract Period: Date of Submission: Filing Year (if annual):

About This Form — NYC Admin. Code § 6-145

Section 6-145 requires city service contractors and subcontractors providing **human services** — including day care, foster care, home care, health, housing, youth, preventive, legal, and educational services — to enter into **Labor Peace Agreements (LPAs)** with any labor organization seeking to represent their covered employees. Vendors must: (1) certify compliance and disclose labor relations violations *prior to* each contract award or renewal; (2) attest to their LPA status *within 90 days* of award or renewal; and (3) update both *annually* for the duration of the contract. The purpose is to ensure uninterrupted delivery of human services to New York City residents. *This consolidated form replaces the three separate instruments previously required (Certification, Attestation, and Rider acknowledgment) with a single annual filing, reusable across all city contracts via PASSPort.*

SUBMISSION TYPE (select one):

□ Initial Filing — Notarization required (CEO or equivalent must sign before a Notary Public)

□ Annual Update — No Material Change — Electronic affirmation permitted (proposed reform)

□ Annual Update — Material Change — Notarization required. e.g.: new labor relations violation or investigation; labor organization seeking to represent covered employees; change in classes of covered employees; change in LPA status or negotiations.

Note: Under proposed reforms, initial filings and material change updates require notarization; no-change annual updates use electronic affirmation, aligning with other City electronic processes and requiring MOCS/PASSPort implementation. This form is designed for upload to PASSPort Vendor Profile → Documentation tab, with agencies linking via Vault during contract tasks.

PART 1 — AUTHORIZED OFFICER IDENTIFICATION

I, the undersigned, am a duly authorized officer of the vendor named below and am authorized to submit this consolidated filing on its behalf.

□ I am the Chief Executive Officer (CEO) or equivalent authorized officer of this organization.

Authorized Officer Name (print):

Title: Vendor / Organization Name:

Business Address:

Telephone: Email:

PART 2 — COMPLIANCE AGREEMENT

The undersigned vendor agrees to comply with all requirements of NYC Admin. Code § 6-145 and with all applicable federal, state, and local laws with respect to all city service contracts to which this vendor is or becomes a party. The vendor acknowledges that compliance with § 6-145 constitutes a **material term** of the contract, and that failure to comply may constitute a material breach subject to remedies including contract termination, procurement from an alternative source, and any administrative charges established by the contracting agency.

The vendor further acknowledges and incorporates by reference the definitions and obligations in the LPA Rider (attached as Appendix A or linked in PASSPort), including but not limited to the requirement for uninterrupted service delivery and the definitions of covered employee, covered employer, and labor organization.

The vendor commits to ensuring uninterrupted delivery of human services, refraining from actions that interrupt such services, and complying with all LPA obligations for the duration of all city service contracts to which it is a party.

PART 3 — LABOR RELATIONS FINDINGS (preceding five years)

List any instances during the preceding five years in which the vendor has been found by a court or government agency to have violated federal, state, or local laws regulating labor relations, or in which any government body initiated a judicial action, administrative proceeding, or investigation regarding such laws.

□ **No changes since previous certification (or none applicable). Skip details below.**

If applicable, complete below. Write "N/A" if none. Add pages as necessary.

Violation:	Date of Action:	Charging Agency:
Summary:		

□ *Updated from previous certification — describe change: _____*

Violation:	Date of Action:	Charging Agency:
Summary:		

□ *Updated from previous certification — describe change: _____*

PART 4 — LABOR PEACE AGREEMENT ATTESTATION

As of the date of this filing, the following is true with regard to Labor Peace Agreements ("LPA" or "LPAs"). See Appendix A for definitions. Select one:

□ OPTION A: Covered employees are not currently represented by a labor organization and no labor organization has sought to represent them. (No further detail required in this Part.)

□ OPTION B: LPA(s) have been entered into or are under negotiation. (Complete the table below; attach additional sheets as necessary.)

Note: A collective bargaining agreement (CBA) that remains in effect may be listed as an LPA.

Labor Organization	Status	Date Entered / Initiated	Classes of Covered Employees
	□ Entered □ Negotiating		
	□ Entered □ Negotiating		

Classes of covered employees NOT currently represented by a labor organization and no labor organization has sought to represent:

_____

If Option B: Each labor organization that has entered into or initiated LPA negotiations must sign below:

Labor Organization (print): Authorized Representative Signature: Date:

Labor Organization (print): Authorized Representative Signature: Date:

Ongoing Obligation: If, after the expiration of the 90-day period following contract award or renewal, a labor organization seeks to represent the covered employees of this vendor and provides written notice to the contracting agency and the vendor, the vendor **shall submit an updated attestation** — signed by the labor organization — to the contracting agency no later than 90 days after such notice, per § 6-145.

PART 5 — CERTIFICATION UNDER PENALTY OF PERJURY

I, _____ (print), **swear or affirm under penalty of perjury** that the information provided in this consolidated filing is accurate and complete as of the date signed below. I further certify that I am authorized to make this submission on behalf of the vendor named in Part 1, and that I will notify the Mayor's Office of Contract Services within 30 days of any material change to the information provided herein.

Print Name: Title:

Signature: Date:

NOTARIZATION — Required for Initial Filing and Material Change Updates only. Annual updates with no material change require electronic affirmation only (proposed reform).

State: _____	County: _____	S.S.
Sworn or affirmed before me on: _____		*[Notary Stamp]*
Notary Public: _____		

This filing is: ☐ *First filing under this contract* ☐ *Subsequent annual filing. Date of initial filing:* _____ ☐ *Material change update*

** Electronic affirmation: Proposed for no-change annual updates to reduce cost and administrative burden. Requires MOCS/PASSPort implementation and any applicable rule amendment.*

APPENDIX A — KEY DEFINITIONS

The following definitions apply to this consolidated form and derive from NYC Admin. Code § 6-145 and the Rider to City Service Contracts pursuant thereto.

Building Service Employee. Any person, the majority of whose employment consists of performing work in connection with the care or maintenance of a building or property, including but not limited to a watchperson, guard, doorperson, building cleaner, porter, handyperson, janitor, gardener, groundskeeper, stationary fireman, elevator operator and starter, or window cleaner. Building service employees are excluded from the definition of "covered employee."

City Service Subcontractor. Any person, including a temporary services, staffing, or employment agency, that pursuant to an agreement with the contractor performs any of the services to be rendered pursuant to the city service contract, except persons whose principal purpose is to provide supplies, administrative services, technical support, or other services not directly related to the performance of the human services under the contract.

Covered Employee. An employee of a covered employer who directly renders human services in performance of a city service contract. Building service employees are excluded.

Covered Employer. The contractor or a city service subcontractor, as applicable.

Human Services. Social services contracted for by an agency on behalf of third-party clients, including but not limited to day care, foster care, home care, health or medical services, housing and shelter assistance, preventive services, youth services, the operation of senior centers, employment training and assistance, vocational and educational programs, legal services, and recreation programs.

Labor Organization. Has the same meaning as set forth in subdivision (5) of section 152 of title 29 of the United States Code.

Labor Peace Agreement (LPA). An agreement between a covered employer and a labor organization that seeks to represent employees who perform one or more classes of work pursuant to the city service contract, where such agreement: (1) requires that the covered employer and the labor organization and its members agree to the uninterrupted delivery of services and refrain from actions intended to or having the effect of interrupting such services; and (2) includes any other terms agreed to by the parties. A collective bargaining agreement (CBA) that remains in effect may constitute an LPA for purposes of this form.

Material Change. For purposes of this form, a material change includes: any new finding by a court or government agency of a labor relations violation; any new government investigation or proceeding regarding labor relations laws; any change in the identity of a labor organization seeking to represent covered employees; or any change in the status of LPA negotiations or agreements.

PASSPort. The City of New York's Procurement and Sourcing Solutions Portal. Under the reforms proposed in the accompanying testimony, all filings under § 6-145 would be submitted once to a vendor's PASSPort Vendor Profile and linked by each contracting agency, eliminating per-contract and per-agency resubmission.

This model consolidated form was prepared by Northside Center for Child Development and submitted as an exhibit to testimony before the NYC Council Committee on Contracts on February 25, 2026 (File #: T2026-1156). It is offered as a proposed template demonstrating that the three instruments currently required under NYC Admin. Code § 6-145(b) and § 6-145(c) can be merged into a single annual filing without sacrificing legal sufficiency or accountability. This is not an official City form.

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): ___/___/_____

PROPOSED MODEL — *Exhibit B to Testimony of Northside Center for Child Development, NYC Council Committee on Contracts, February 25, 2026 (File #: T2026-1156)*
This blank ACORD 25 form shows only the two proposed changes: (1) a consolidated Description of Operations covering all NYC human services agencies, and (2) a single Certificate Holder — MOCS — in lieu of individual agency-specific certificates. All other fields are left blank for vendor completion.

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
Name: _____
Address: _____
City/State/Zip: _____
Contact: _____ Phone: _____
Email: _____

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A: _____	_____
INSURER B: _____	_____
INSURER C: _____	_____
INSURER D: _____	_____
INSURER E: _____	_____
INSURER F: _____	_____

INSURED: _____ Address: _____

COVERAGES

CERTIFICATE NUMBER: _____ REVISION NUMBER: ___

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	General Liability				
	Automobile Liability				
	Umbrella / Excess Liability				
	Workers Compensation & Employers Liability				
	Professional Liability				
	Directors & Officers				
	Other: _____				

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES

► **PROPOSED LANGUAGE — Replace agency-specific work location references with the following:**

Work Location: [Vendor Address]. This certificate of insurance covers all city service contracts between the named insured and NYC human services agencies. The certificate holder — the Mayor's Office of Contract Services (MOCS), acting on behalf of the City of New York — is named in lieu of individual agency-specific certificates. Coverage under this consolidated certificate applies to contracts with the following agencies: **Department of Health and Mental Hygiene (DOHMH), Administration for Children's Services (ACS), Department of Youth and Community Development (DYCD), Department of Homeless Services (DHS), Department of Education (DOE), Human Resources Administration (HRA), and Department for the Aging (DFTA)**, and any other NYC human services agency with which the named insured holds a city service contract.

CERTIFICATE HOLDER

► **PROPOSED — Replace individual agency name with:**
Mayor's Office of Contract Services (MOCS)
On Behalf of: The City of New York
and NYC Human Services Agencies Including:
DOHMH | ACS | DYCD | DHS | DOE | HRA | DFTA
255 Greenwich Street, 9th Floor
New York, NY 10007

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE: _____

ACORD 25 (2010/05). *The ACORD name and logo are registered marks of ACORD. © 1988-2010 ACORD CORPORATION. All rights reserved. This is a proposed model form submitted as Exhibit B to the testimony of Northside Center for Child Development before the NYC Council Committee on Contracts, February 25, 2026. The highlighted sections show the only two proposed changes to the standard ACORD 25: a consolidated Description of Operations and a single MOCS Certificate Holder covering all NYC human services agencies. All other fields are standard and left for vendor completion. This is not an official City or ACORD form.*

NYC

Consolidated Annual Vendor Compliance Attestation

Proposed Model Form — Attachment to Testimony of Northside Center for Child Development
NYC Council Committee on Contracts — February 25, 2026 (Version 1.0)

About This Form
NYC vendors holding city service contracts are currently required to submit the following documents separately to each contracting agency: (1) Tax Affirmation; (2) Executive Order 64 Certification (Sexual Harassment Policy); (3) Certification Regarding Substantiated Cases of Client Abuse or Neglect; and (4) Insurance Cancellation Notification commitments. **This consolidated form combines all four into a single annual submission, uploaded once to the vendor's PASSPort profile and accepted by all contracting agencies.** *No substantive legal requirement is omitted. The single signature block and notarization at the end apply to all four parts.*

PART 1 — VENDOR IDENTIFICATION

Full Legal Name of Vendor: _____ PASSPort Vendor ID: _____

Business Address: _____

City: _____ State: _____ Zip: _____ EIN: _____

Authorized Officer Name (print): _____ Title: _____

Telephone: _____ Email: _____

Entity Type (check one):

- ☐ Individual or Sole Proprietorship — Social Security Number: _____-_____-_____
- ☐ Partnership, Joint Venture, or other Unincorporated Organization — EIN: _____
- ☐ Corporation — EIN: _____

Under the Federal Privacy Act, furnishing a Social Security Number is voluntary and failure to do so will not result in disqualification. SSNs will be used to verify compliance with laws and identify vendors seeking City contracts.

PART 2 — TAX AFFIRMATION

Source: Standard NYC Tax Affirmation Form

The undersigned Contractor affirms and declares that it is **not in arrears** to The City of New York upon debt, contract or taxes and is **not a defaulter**, as surety or otherwise, upon obligation to The City of New York, and has **not been declared not responsible, or disqualified**, by any agency of The City of New York, nor is there any proceeding pending relating to the responsibility or qualification of the Contractor to receive public contracts, except as noted below.

Exceptions (if none, write "None"):

_____

_____

PART 3 — EXECUTIVE ORDER 64 CERTIFICATION (Sexual Harassment Policy)

Source: Mayoral Executive Order 64 of 2021 — ACS Annex 1

The undersigned, who is the **Chairman of the Board (or equivalent principal)** of the Contractor, has reviewed the requirements of Mayoral Executive Order 64 of 2021 and hereby certifies to the following:

3.1 Sexual Harassment Policy Upload

A copy of the Contractor's sexual harassment policy has been uploaded to the NYC PASSPort system on _____. The policy uploaded is the most up-to-date version of the policy.

3.2 Allegations of Sexual Harassment

For the year prior to the date of this certification, or since the Contractor's last certification, whichever period is longer, **initial one (1) of the two options below:**

_____ Contractor has reviewed its records and internal communications and confirms that it **has NOT received** any complaints or allegations of sexual harassment, or retaliation on the basis of a complaint or allegation of sexual harassment, brought against the Chief Executive Officer or equivalent principal of the organization in any venue, including through the Contractor's internal Equal Opportunity process.

_____ Contractor has reviewed its records and internal communications and confirms that it **has received** complaints or allegations of sexual harassment, or retaliation on the basis of a complaint or allegation of sexual harassment, brought against the Chief Executive Officer or equivalent principal of the organization in any venue, including through the Contractor's internal Equal Opportunity process. **Contractor has provided redacted copies of documents regarding all such complaints or allegations to DOI.**

3.3 Final Determinations and Judgments

For the year prior to the date of this certification, or since the Contractor's last certification, whichever period is longer, **initial one (1) of the two options below:**

_____ Contractor has reviewed its records and internal communications and confirms that it **has NOT** made any final determinations, including settlement, or received any judgments relating to any complaints or allegations covered under Mayoral Executive Order 64 of 2021.

_____ Contractor has reviewed its records and internal communications and confirms that it **has** made final determinations, including settlement, or received judgments relating to complaints or allegations covered under Mayoral Executive Order 64 of 2021. **Contractor has provided redacted copies of all such documents to DOI.**

PART 4 — CERTIFICATION REGARDING SUBSTANTIATED CASES OF CLIENT ABUSE OR NEGLECT

Source: Standard NYC Certification Regarding Substantiated Cases of Client Abuse or Neglect

Check one:

□ **CERTIFICATION:** This is to certify that **no substantiated case** of client abuse or neglect by any person acting during his/her performance as an employee (including foster parents) of the organization named in Part 1 occurred during the latest 12-month period.

□ **DISCLOSURE:** This is to disclose that _____ case(s) of client abuse or neglect by a person(s) acting during his/her performance as an employee (including foster parents) of the organization named in Part 1 was/were substantiated as having occurred during the latest 12-month period. An attachment to this form provides for each such substantiated case: a brief description of the case, the date of occurrence, level of severity, and the case disposition, including an explanation of the action taken against the offender(s) and, if applicable, the organization.

Preparer Contact Information (if different from authorized officer in Part 1):

Preparer Name: Title:

Email: Phone:

PART 5 — INSURANCE CANCELLATION NOTIFICATION COMMITMENT

Proposed replacement for per-agency insurance certificate notifications. See Exhibit B (Consolidated COI).

The undersigned Contractor hereby commits that if any policy of insurance shown in the consolidated Certificate of Liability Insurance on file with the Mayor's Office of Contract Services (MOCS) is **cancelled, materially reduced, or not renewed** during the coverage period, the Contractor will **notify MOCS in writing within 10 business days** of such cancellation, reduction, or non-renewal. MOCS will distribute notice to all affected NYC contracting agencies. This commitment applies to all city service contracts held by the Contractor and is submitted in lieu of individual agency-specific cancellation notifications.

Current Insurance Broker Name: Broker Phone:

Certificate Number on File with MOCS: Policy Expiration Date:

PART 6 — CERTIFICATION UNDER PENALTY OF PERJURY

I, _____ (print), the undersigned, **swear or affirm under penalty of perjury** under the laws of the United States of America and the State of New York that the information provided in all parts of this consolidated annual attestation is true, accurate, and complete as of the date signed below. I am authorized to execute this attestation on behalf of the vendor named in Part 1. I further agree to notify the Mayor's Office of Contract Services within 30 days of any material change to any information provided herein.

Print Name: Title:

Signature: Date:

NOTARIZATION — Required for initial filing. Annual updates with no material change: electronic affirmation permitted (proposed reform requiring MOCS/PASSPort implementation).

State: _____	County: _____	S.S.
Sworn or affirmed before me on: _____		*[Notary Stamp]*
Notary Public: _____		

This filing is: ▫ First filing ▫ Annual update — no material change ▫ Annual update — material change (describe on separate sheet)

APPENDIX — LEGAL AUTHORITIES AND SOURCE FORMS

This consolidated form draws on the following existing City requirements. No substantive obligation has been omitted.

Part	Source Form	Legal Authority	Current Frequency
2	NYC Tax Affirmation Form	NYC Procurement Policy	*Per contract / per agency*
3	EO 64 Certification (Annex 1)	Mayoral Executive Order 64 of 2021	*Per contract / per agency*
4	Certification Re: Substantiated Cases of Client Abuse or Neglect	NYC Human Services contracting requirements	*Per contract / per agency*
5	Insurance Cancellation Notification (proposed)	Proposed replacement for per-agency COI notification obligations	*Per agency (proposed: once to MOCS)*

This model consolidated form was prepared by Northside Center for Child Development and submitted as Exhibit C to testimony before the NYC Council Committee on Contracts on February 25, 2026 (File #: T2026-1156). It is offered as a proposed template demonstrating that four recurring annual vendor compliance submissions can be merged into a single PASSPort-based filing without omitting any substantive legal requirement. This is not an official City form.

Name

Camille M

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Reduce waste in nonprofit contracting.

I work in the nonprofit space, and what I see most often isn't fraud but good organizations that lack the back-office support and governance to manage city contracts well. Some don't have an active governing board providing oversight, which makes it easier for funds to drift from the contract's purpose or get misused without anyone catching it early, wasting city dollars that could otherwise go further. The city has a real opportunity to By evaluate risk before funds go out, requiring evidence of basic governance (like an active board) and clear reporting tied to contract deliverables, and pairing funding with practical technical assistance like bookkeeping support and financial training to cut down on wasteful spending and strengthen its nonprofit partners rather than investigating them after problems occur.

Attachment(s)

Drop files here or click to browse

Date Submitted June 30, 2026

Topic Procurement Reform × Reporting Requirements × Unnecessary Bureaucracy × Support Oversight Agencies ×

Method Received Airtable Form

Is it charter related?	
Charter Related	No
Topic Simplified	Government Operations
Subtopic	Reduce waste at nonprofits doing business with the City by providing them with basic admin support

Name

Ronald Shiffman

Email [redacted]

Professional Affiliation PRATTB GRADUATE CENTER FOR PLANNING ANMD THE ENVIRONMENT

Zip Code [redacted]

Public Comment RESPONSE TO Request of Commissioner Ruth Messinger and Chair Patrick Gaspard

Attachment(s)



MEMORANDUM

To: Members of the New York City Commission on Government Efficiency (COGE) Charter Revision Commission

From: Ronald Shiffman, FAICP, Hon. AIA

Date: June 30, 2026

Re: Using Charter Reform to Support State Reinvestment and Modernization of New York's Stock Transfer Tax / Financial Transaction Tax

Purpose: To identify what New York City and New York State must do to stop rebating the existing Stock Transfer Tax, modernize it as a financial transaction tax, and dedicate the revenue to public infrastructure, public housing, climate justice, and democratized capital.

Executive Summary

New York does not need to invent a new tax. It needs to stop rebating an existing one. The State Stock Transfer Tax is already embedded in New York law, but since 1981 it has been automatically rebated to the financial sector. Repealing that rebate and modernizing the tax into a broader financial transaction tax would allow New York to capture a modest charge on enormous volumes of financial activity and invest the proceeds in the public assets that make the city and state livable, resilient, and economically productive.

The Charter Commission should recommend that the City Charter require New York City to advocate formally for State action and to prepare a transparent capital-investment framework for any revenue dedicated to the City. This is not simply a revenue question. It is a governance, efficiency, equity, and public purpose question: the City must be able to align its capital budget, climate obligations, public housing needs, and community-wealth strategies with a revenue source that does not further burden wages, renters, homeowners, or small businesses.

Recommended Charter and Legislative Position

COGE should recommend a Charter provision or ballot proposal requiring the City to develop and submit to Albany an annual intergovernmental revenue and capital-equity agenda. That agenda should explicitly include repeal of the Stock Transfer Tax rebate and State authorization for a modern financial transaction tax, with proceeds dedicated to public infrastructure, NYCHA, climate resilience, environmental justice, and democratized capital.

What New York State Must Do:

- Repeal or substantially amend Tax Law § 280-a, which provides the 100% rebate of the Stock Transfer Tax. The pending Sanders/Stack legislation expressly seeks repeal of that rebate and dedication of proceeds to public purposes.
- Maintain the existing collection infrastructure. The tax can be collected through brokers, clearing corporations, and the systems already used for securities settlement, rather than through a new bureaucracy.
- Use the National Securities Clearing Corporation (NSCC), a DTCC subsidiary, as the practical clearing and processing infrastructure for taxable stock transactions. NSCC has already issued notices concerning NYS Stock Transfer Tax processing.

Ronald Shiffman - COGE Stock Transfer Tax Memo

COGE_Stock_Transfer_Tax_Financial_Tra...

Date Submitted June 30, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Government Operations
Subtopic	Repeal the State Stock Transfer Tax rebate and modernize into a broader financial transaction tax

MEMORANDUM

To:	Members of the New York City Commission on Government Efficiency (COGE) Charter Revision Commission
From:	Ronald Shiffman, FAICP, Hon. AIA
Date:	June 30, 2026
Re:	Using Charter Reform to Support State Reinstatement and Modernization of New York's Stock Transfer Tax / Financial Transaction Tax
Purpose:	To identify what New York City and New York State must do to stop rebating the existing Stock Transfer Tax, modernize it as a financial transaction tax, and dedicate the revenue to public infrastructure, public housing, climate justice, and democratized capital.

Executive Summary

New York does not need to invent a new tax. It needs to stop rebating an existing one. The State Stock Transfer Tax is already embedded in New York law, but since 1981 it has been automatically rebated to the financial sector. Repealing that rebate and modernizing the tax into a broader financial transaction tax would allow New York to capture a modest charge on enormous volumes of financial activity and invest the proceeds in the public assets that make the city and state livable, resilient, and economically productive.

The Charter Commission should recommend that the City Charter require New York City to advocate formally for State action and to prepare a transparent capital-investment framework for any revenue dedicated to the City. This is not simply a revenue question. It is a governance, efficiency, equity, and public-purpose question: the City must be able to align its capital budget, climate obligations, public housing needs, and community-wealth strategies with a revenue source that does not further burden wages, renters, homeowners, or small businesses.

Recommended Charter and Legislative Position

COGE should recommend a Charter provision or ballot proposal requiring the City to develop and submit to Albany an annual intergovernmental revenue and capital-equity agenda. That agenda should explicitly include repeal of the Stock Transfer Tax rebate and State authorization for a modern financial transaction tax, with proceeds dedicated to public infrastructure, NYCHA, climate resilience, environmental justice, and democratized capital.

What New York State Must Do

- Repeal or substantially amend Tax Law § 280-a, which provides the 100% rebate of the Stock Transfer Tax. The pending Sanders/Steck legislation expressly seeks repeal of that rebate and dedication of proceeds to public purposes.
- Maintain the existing collection infrastructure. The tax can be collected through brokers, clearing corporations, and the systems already used for securities settlement, rather than through a new bureaucracy.
- Use the National Securities Clearing Corporation (NSCC), a DTCC subsidiary, as the practical clearing-and-processing infrastructure for taxable stock transactions. NSCC has already issued notices concerning NYS Stock Transfer Tax processing.

- Modernize the tax base beyond stock transfers, after technical review, to include appropriate categories of financial transactions such as derivatives, options, swaps, futures, high-frequency trades, and other instruments with a New York nexus.
- Define the nexus broadly enough to include transactions using New York exchanges, clearing systems, brokers, financial institutions, or market infrastructure. Foreign and nonresident investors who benefit from New York's financial infrastructure should contribute as well.
- Dedicate proceeds to a protected infrastructure and equity fund rather than allowing the money to disappear into the general budget.

What New York City Must Do

- Adopt a Charter-based obligation requiring the Mayor, Council, Comptroller, and relevant agencies to seek State authorization for this revenue source and to report annually on the City's advocacy in Albany.
- Prepare a public capital-investment plan showing how City-dedicated proceeds would be used for NYCHA, transit, stormwater, flood protection, tree canopy, schools, libraries, public health infrastructure, green industrial development, and community wealth-building.
- Use the City's home-rule and intergovernmental powers to request either a dedicated City share of State-collected revenue or State authorization for a City-linked financial transaction surcharge, if legally feasible.
- Require transparent criteria for expenditure: racial equity, environmental justice, climate adaptation, anti-displacement, public housing preservation, union and local job creation, and community ownership opportunities.

Why This Is Preferable to More Pressure on Income Taxes

A stock transfer or financial transaction tax is a small charge on transactions, not a tax on wages or ordinary household income. It therefore avoids placing additional pressure on income taxes, which are often the taxes most cited by opponents as a possible factor in decisions by high-income households or businesses to leave New York. By contrast, the stock transfer tax is tied to the use of New York's financial and market infrastructure. It would also reach foreign and nonresident investors using that infrastructure. The City and State should therefore treat this as a smarter and more durable revenue strategy than repeatedly relying on income, property, or sales taxes that fall more directly on residents, workers, homeowners, renters, and small businesses.

Why the "Wall Street Will Leave" Argument Is Overstated

- New York collected the Stock Transfer Tax from 1905 to 1981 while Wall Street grew into the world's premier financial center.
- The existing rate is modest: current law taxes stock transfers on a sliding scale, with sales over $20 taxed at five cents per share. Assemblymember Phil Steck has described this as averaging roughly half a penny per dollar, or about one-tenth of one percent in practical terms.
- The physical exchange is not the only relevant point. The modern taxable nexus can be tied to clearing, settlement, brokerage, market infrastructure, and New York-based financial institutions.
- Other major financial centers operate with transaction or stamp taxes. The United Kingdom has long had a stamp duty on shares; Hong Kong maintains a stamp duty on stock transactions; France and other jurisdictions have used financial transaction taxes. These places remain active financial centers.
- The State should avoid overbroad or poorly drafted provisions that encourage avoidable relocation, but the answer is careful drafting, not continued rebate of a tax already on the books.

Response to Pension-Fund Objection

Opponents often argue that pension funds could bear some cost. The answer is that any legitimate concern for pension funds should be addressed by careful design, exemptions or rebates for certain long-term public pension activity if necessary, and, most importantly, by comparing the modest transaction cost against the economic gains produced by the tax proceeds. If revenues are invested in infrastructure, climate adaptation, public housing, transit, and green industry, pension funds benefit from a stronger regional economy, more reliable infrastructure, better labor markets, and broader investment opportunities. The cost to long-term pension funds would be minimal compared with the economic stimulus created when billions of dollars are invested in jobs, public works, new enterprises, and resilient communities.

Legislative Framing: Reparative Infrastructure and Democratized Capital

This proposal should be framed not only as tax reform, but as reparative public investment. The revenue should be directed first to communities that have borne the costs of redlining, segregation, environmental burdens, disinvestment, deteriorated public housing, and climate vulnerability. Properly targeted, the tax can help fund a reparations-oriented infrastructure agenda: NYCHA rehabilitation without privatization or displacement; environmental and climate justice projects in frontline communities; community-controlled green infrastructure; and democratic capital investment.

The second pillar is democratized capital. Economic security cannot rest on jobs alone. In an economy being reshaped by automation and artificial intelligence, people also need access to income derived from capital. A portion of the proceeds should therefore support community development finance, worker cooperatives, ESOPs, community land trusts, public or community-owned infrastructure enterprises, and other structures that make capital available to people and communities historically denied access to it.

NYS Legislators Currently Advancing Repeal of the Rebate

Prime sponsors:

- Senator James Sanders Jr. - Senate sponsor of S1237/S1237A.
- Assemblymember Phil Steck - Assembly sponsor of A1494/A1494B.

Senate co-sponsors listed on S1237A include Jabari Brisport, Cordell Cleare, Leroy Comrie, Patricia Fahy, Nathalia Fernandez, Michael Gianaris, Kristen Gonzalez, Brad Hoylman-Sigal, Robert Jackson, Rachel May, Zellnor Myrie, Kevin S. Parker, Jessica Ramos, Gustavo Rivera, Julia Salazar, Luis R. Sepúlveda, Jose M. Serrano, and Toby Ann Stavisky.

Assembly co-sponsors listed on A1494B include Jonathan Jacobson, Albert A. Stirpe, Patrick Burke, Harvey Epstein, Jo Anne Simon, Donna Lupardo, Pamela J. Hunter, Karines Reyes, Jaime R. Williams, Ron Kim, Michael Benedetto, Linda Rosenthal, Jeffrey Dinowitz, Catalina Cruz, Jonathan Rivera, Al Taylor, Rebecca Seawright, Patrick J. Carroll, Deborah Glick, Maritza Davila, Vivian Cook, Harry B. Bronson, Rodneyse Bichotte Hermelyn, Khaleel Anderson, Latrice Walker, Demond Meeks, Anna Kelles, Jen Lunsford, Stefani Zinerman, Sarah Clark, Chris Burdick, Charles Fall, Amanda Septimo, Tony Simone, William Conrad, Gabriella Romero, Crystal Peoples-Stokes, Steven Raga, Manny De Los Santos, and Emily Gallagher.

Organizations and Advocates Supporting Reinstatement or Related Changes

Recent public advocacy specifically around reinstating the Stock Transfer Tax has included the Corporate Campaign/End Stock Transfer Tax Rebate Campaign, New York State Council of Churches, New Economy Project, and other organizations at the 2025 rally at the New York Stock Exchange. The 2020 statewide organizational letter supporting retention of Stock Transfer Tax proceeds included, among many others:

- Adirondack Mountain Club
- Alliance for a Green Economy
- Big Reuse
- Citizen Action of New York

- Community Service Society
- CUNY University Student Senate / CUNY Rising Alliance
- District Council 37 (DC 37)
- Empire Justice Center
- Environmental Justice Task Force
- Fiscal Policy Institute
- Food & Water Watch
- Human Services Council
- Long Island Progressive Coalition
- Make the Road New York
- New Economy Project
- New York Communities for Change
- New York Environmental Law & Justice Project
- New York State Council of Churches
- New York State Nurses Association
- NYPIRG
- New York Youth Climate Leaders
- Nobody Leaves Mid-Hudson
- Picture the Homeless
- Professional Staff Congress
- Public Citizen
- Strong Economy for All Coalition
- Sunrise NYC
- Tri-State Transportation Campaign
- United University Professions
- WESPAC
- Peoples Climate Movement-NY

Economists and Public Intellectuals Supporting Financial Transaction Taxes

- James Tobin, Nobel Prize-winning economist, originated the “Tobin tax” concept as a small tax on currency transactions to discourage destabilizing short-term speculation.
- Joseph Stiglitz, Nobel Prize-winning economist, has supported transaction taxes as a way to reduce socially unproductive speculative trading and raise revenue.
- Paul Krugman, Nobel Prize-winning economist, has been identified among prominent economists who have backed financial transaction taxes.
- Lawrence Summers and Victoria Summers argued for a securities transaction excise tax in the late 1980s; later scholarship identifies Tobin, Stiglitz, and the Summerses as leading economists who advocated similar taxes.
- Jeffrey Sachs has also been identified among economists backing financial transaction taxes.

- Dean Baker of the Center for Economic and Policy Research has argued that a financial speculation tax can raise revenue while helping financial markets better serve their purpose of channeling capital to productive investment.
- Robert Pollin of the Political Economy Research Institute has supported financial transaction taxes as part of a broader effort to shift the economy away from excessive financialization and toward productive sectors.
- Jared Bernstein, formerly Chief Economist and Economic Adviser to Vice President Biden, has supported the idea as a smart, fair way to raise revenue while reducing unnecessary trading.

Proposed Charter Language Concept

The City Charter should require the City to prepare and annually update a Public Investment and Democratic Capital Plan, including recommended State legislative actions to secure progressive, non-regressive revenue for capital investment. The Plan should include, where legally permissible, advocacy for repeal of the State Stock Transfer Tax rebate and modernization of the tax into a financial transaction tax, with proceeds dedicated to public housing, climate adaptation, environmental justice, transit, green industry, and democratized capital formation in historically disinvested communities.

Conclusion

Reinstating and modernizing the Stock Transfer Tax is a practical, historically grounded, and morally compelling reform. It asks those who benefit from New York's financial infrastructure to contribute modestly to the public systems that make that infrastructure possible. It reduces pressure to raise income taxes. It reaches nonresident and foreign investors who use New York markets. It can be collected efficiently through existing clearing systems. Most importantly, it can convert speculative financial activity into public goods: repaired public housing, resilient neighborhoods, climate adaptation, transit, jobs, new enterprises, and democratic access to capital.

Selected Sources

- New York State Senate, S1237A / Assembly A1494B, 2025-2026 Session: bill summary and text repealing Tax Law § 280-a and the rebate for stock transfer tax paid.
- Assemblymember Phil Steck, "Lawmakers Rally at NYSE to Reinstate Stock Transfer Tax," April 24, 2025.
- New York State Senate, Senator James Sanders Jr., "Lawmakers Rally at NYSE to Reinstate Stock Transfer Tax," April 25, 2025.
- DTCC / NSCC notices concerning NYS Stock Transfer Tax processing.
- Urban-Brookings Tax Policy Center, Burman et al., "Financial Transaction Taxes in Theory and Practice," National Tax Journal, March 2016.
- NYPIRG-hosted organizational letter, "Urge you to keep proceeds from the Stock Transfer Tax," December 28, 2020.
- Center for Economic and Policy Research, "Statements of Support for a Financial Transaction Tax," February 2016.
- World Bank Blogs, "Taxing financial transactions?" October 3, 2011.

Name

Istiak Ahmed

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Zip Code	[redacted]

Public Comment

I respectfully encourage COGE to consider the following recommendations:

Digitize and Integrate City Services. Residents and businesses should be able to complete permits, licenses, inspections, and applications through a single, user friendly digital portal that minimizes duplicate paperwork and provides real time status updates.
Use Artificial Intelligence Responsibly. AI can assist City employees by automating routine administrative tasks, summarizing documents, improving multilingual communication, and helping residents quickly find government services. This should be implemented with strong privacy, transparency, and human oversight.
Reduce Processing Times. Establish measurable service standards for agencies and publish performance dashboards so the public can monitor response times and agency efficiency.
Improve Small Business Services. Simplify licensing, procurement, and compliance requirements for small and minority-owned businesses. Faster approvals and clearer guidance will encourage entrepreneurship, job creation, and economic growth.
Modernize Procurement. Streamline procurement processes by reducing unnecessary administrative requirements while maintaining transparency, competition, and accountability. Technology can significantly shorten procurement timelines and reduce costs.
Promote Data Sharing Across Agencies. City agencies should securely share information where appropriate so residents and businesses do not have to submit the same documents repeatedly to different departments.
Ensure Fair Access for Small and Minority Owned Businesses. The City should create meaningful opportunities for Small and Medium Enterprises (SMEs) and Minority/Women-Owned Business Enterprises (M/WBEs) to participate in public contracts, either as prime contractors or subcontractors. When large contracts are awarded, the City should actively monitor and ensure that prime contractors fulfill their commitments to utilize qualified M/WBE and SME subcontractors.
Ensure Fair Access for Small and Minority Owned Businesses. The City should create meaningful opportunities for Small and Medium Enterprises (SMEs) and Minority/Women-Owned Business Enterprises (M/WBEs) to participate in public contracts, either as prime contractors or subcontractors. When large contracts are awarded, the City should actively monitor and ensure that prime contractors fulfill their commitments to utilize qualified M/WBE and SME subcontractors.
Strengthen Accountability for Subcontracting Commitments. Prime contractors receiving City contracts should be required to regularly report subcontracting activities, and agencies should verify that promised opportunities are actually being provided to M/WBE and SME firms. This will help ensure that economic opportunities are distributed fairly and that public spending supports local business growth.
Provide Ongoing Support to SMEs and M/WBEs. The City should proactively engage with SMEs and M/WBEs through periodic outreach, technical assistance, training, and mentorship programs. Many small businesses face challenges navigating procurement systems and scaling operations. Regular

follow up and support from City agencies can help these businesses grow, compete successfully, create jobs, and contribute to the City's economy.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 30, 2026

Topic: Technology, Procurement Reform, Reporting Requirements, Unnecessary Bureaucracy

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Technology

Subtopic: Integrate digital services and improve agency data sharing

Name

DAVIS FOUNDATION INC.

Email	[redacted]
Professional Affiliation	PRESIDENT
Zip Code	[redacted]
Public Comment	HAVE a way for the Mayor to improve housing, employment and homelessness without budget costing tax payers.
Attachment(s)	Drop files here or click to browse
Date Submitted	July 1, 2026
Topic	Budget Issues ✕ Real Estate and Development ✕ Miscellaneous ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	No
Topic Simplified	Feedback

Subtopic

Name

Patrice Thomas

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I think we need to do a better job stopping nepotism when it comes to hirng contractors, or no-profit working with the city. FOr instance, it is well know that DHS contractor often engage in nepotism. FOr some of the holders of what seems to be pepertual contracts, you don't even see on their sites where there are job openings.

Attachment(s)

Drop files here or click to browse

Date Submitted July 1, 2026

Topic Procurement Reform × Enforcement × Unnecessary Bureaucracy ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Government Operations

Subtopic	Prevent corruption

Name

J.C. Polanco

Email	[redacted]
Professional Affiliation	
Zip Code	[redacted]

Public Comment

I submitted my statement earlier but saw a typo. Can you please use this one instead?

J.C. Polanco, Esq., MBA

Testimony Before the New York City Charter Revision Commission
Good evening, Commissioners.

My name is J.C. Polanco. I am an attorney, professor at the University of Mount Saint Vincent and CUNY Borough of Manhattan Community College, former President and Commissioner of the New York City Board of Elections, and a lifelong New Yorker. Today I am appearing in my personal capacity as an independent voter.
I appreciate the Commission's willingness to examine how New York City conducts its elections. Regardless of where someone falls on the political spectrum, I believe one fact has become increasingly difficult to ignore: our closed primary system no longer reflects the reality of New York's electorate. It is not progressive, and if it does not change, it will guarantee that we in NYC live in a democracy in name only.
The largest and fastest-growing segment of American voters is independent. Gallup has consistently found that roughly four in ten Americans identify as independents rather than members of either major political party. New York mirrors that trend. More than 3.4 million New Yorkers are now registered as unaffiliated or blank voters, making them one of the largest voting blocs in the state. And in New York City? 1.1 million of us in the five boroughs, and yet, we are excluded from participating in the elections that often determine who ultimately governs them.
That is because, in much of New York, the decisive election is no longer held in November. It is held in June.
It is tragic to say, but we don't live in any democracy when a small group of people on a hot day in June makes all the decisions for the rest of us. We know that the November election is a fait accompli and that, because of a combination of partisanship and gerrymandering that the division in November is known so much that our own mayor introduced the winners of last week's elections not as nominees but as the next member of the various legislatures because he too knows that like Nancy Pelosi said referring to these types of districts that if the bottle of water was the Democratic nominee, the bottle of water would win in November. It's true; you know it's true; we all know this, yet we do nothing about it. But you have the power to start fixing this mistake and create a more perfect electoral process.
The majority of jurisdictions around the country have some form of open primary that allows more of us to have a say in who represents us. You have so many options for the kind of open primary, from fully open to semi-open to jungle-style, nonpartisan, top-two. Any of these is better than what we have now, which encourages extreme partisanship and rewards folks who, at times, win with single digit turnout. That is no way to elect people to represent hundreds of thousands of people in Albany and Congress.
In district after district, overwhelming registration advantages and legislative district boundaries mean the Democratic or Republican primary effectively

decides the outcome months before the general election. Once a nominee is selected, the November election is frequently a foregone conclusion.
When that happens, the electorate that actually chooses public officials is dramatically smaller than the electorate those officials will ultimately represent.
Low turnout closed primaries naturally reward campaigns that can mobilize the most committed and organized supporters. Candidates have every incentive to appeal to a relatively small segment of highly engaged primary voters instead of the broader electorate. The result is a political environment that rewards ideological purity over coalition building and consensus.
This is not a criticism of any one party or any one candidate. It is a structural feature of the system itself. If one party is convinced of the nefarious motives of members of another party, fine, do not let them vote, but let those who refuse to register in any party because of the exhaustion of partisanship have a say. We cannot let the fear of bad actors keep us from doing the right thing. Those people will always find a way to donate to, campaign for, and even re-register as members of a party to hurt the party. We cannot live in fear of these people. By opening primaries to unaffiliated blank voters, we can achieve a more representative democracy and elect candidates who better reflect the broader population, not just a tiny minority of voters. Having elected officials win elections, where 87% of Democrats stay home, is unsustainable for a democracy.
We have repeatedly seen candidates from across the political spectrum win nominations with the support of only a small percentage of eligible voters because turnout in closed primaries remains exceptionally low. Those victories are entirely legitimate under the existing rules. The question before this Commission is whether those rules continue to serve the interests of New York City.
Independent voters pay taxes, serve on juries, own businesses, teach in our schools, and raise families in every borough. Yet they are routinely denied any meaningful voice in the election that frequently determines who will represent them.
That exclusion carries consequences.
It encourages candidates to campaign primarily to their party's activist base rather than to the broader public. It discourages moderation. It reduces incentives to build consensus across ideological lines. Most importantly, it tells millions of New Yorkers that their participation is welcome in November only after the meaningful decision has already been made.
New York is increasingly an outlier. Many states have adopted some form of open or semi-open primary because they recognize that broader participation can strengthen confidence in the electoral process and encourage candidates to appeal to a wider cross section of voters.
No electoral system is perfect. Open primaries are not a cure-all. But they represent an acknowledgment that elections function best when participation expands rather than contracts.
This Commission has an opportunity to recommend reforms that better reflect today's electorate rather than yesterday's party structure. At a minimum, independent voters should have the opportunity to participate in the municipal primary elections that so often determine who will govern New York City.

Whatever model the Commission ultimately recommends, I hope it is guided by one principle: elections should encourage participation, not exclusion. Millions of New Yorkers have chosen not to affiliate with either major political party. They should not lose their voice because of that decision.
Thank you for your time and for your service.

Attachment(s)



JC Polanco Testimony Charter Commissi...

Date Submitted: July 1, 2026

Topic: Open Primaries

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Elections

Subtopic: Open primaries

J.C. Polanco, Esq., MBA

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It is tragic to say, but we don't live in any democracy when a small group of people on a hot day in June makes all the decisions for the rest of us. We know that the November election is a fait accompli and that, because of a combination of partisanship and gerrymandering that the division in November is known so much that our own mayor introduced the winners of last week's elections not as nominees but as the next member of the various legislatures because he too knows that like Nancy Pelosi said referring to these types of districts that if the bottle of water was the Democratic nominee, the bottle of water would win in November. It's true; you know it's true; we all know this, yet we do nothing about it. But you have the power to start fixing this mistake and create a more perfect electoral process.

The majority of jurisdictions around the country have some form of open primary that allows more of us to have a say in who represents us. You have so many options for the kind of open primary, from fully open to semi-open to jungle-style, nonpartisan, top-two. Any of these is better than what we have now, which encourages extreme partisanship and rewards folks who, at times, win with single-digit turnout. That is no way to elect people to represent hundreds of thousands of people in Albany and Congress.

In district after district, overwhelming registration advantages and legislative district boundaries mean the Democratic or Republican primary effectively decides the outcome months before the general election. Once a nominee is selected, the November election is frequently a foregone conclusion.

When that happens, the electorate that actually chooses public officials is dramatically smaller than the electorate those officials will ultimately represent.

Low-turnout closed primaries naturally reward campaigns that can mobilize the most committed and organized supporters. Candidates have every incentive to appeal to a relatively small segment of highly engaged primary voters instead of the broader electorate. The result is a political environment that rewards ideological purity over coalition-building and consensus.

This is not a criticism of any one party or any one candidate. It is a structural feature of the system itself. If one party is convinced of the nefarious motives of members of another party, fine, do not let them vote, but let those who refuse to register in any party because of the exhaustion of partisanship have a say. We cannot let the fear of bad actors keep us from doing the right thing.

Those people will always find a way to donate to, campaign for, and even re-register as members of a party to hurt the party. We cannot live in fear of these people. By opening primaries to unaffiliated blank voters, we can achieve a more representative democracy and elect candidates who better reflect the broader population, not just a tiny minority of voters. Having elected officials win elections, where 87% of Democrats stay home, is unsustainable for a democracy.

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That exclusion carries consequences.

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No electoral system is perfect. Open primaries are not a cure-all. But they represent an acknowledgment that elections function best when participation expands rather than contracts.

This Commission has an opportunity to recommend reforms that better reflect today's electorate rather than yesterday's party structure. At a minimum, independent voters should have the opportunity to participate in the municipal primary elections that so often determine who will govern New York City.

Whatever model the Commission ultimately recommends, I hope it is guided by one principle: elections should encourage participation, not exclusion.

Millions of New Yorkers have chosen not to affiliate with either major political party. They should not lose their voice because of that decision.

Thank you for your time and for your service.

Name

Andrea McKnight

Email [redacted]

Professional Affiliation Red Hook West Resident 56yrs

Zip Code [redacted]

Public Comment

THE UNDERSIGNED WANT TO SAVE NYCHA'S SECTION 9, NO PACT, NO TRUST, NO SECTION 8,
UNDER NO CIRCUMSYANCES. Yes we need repairs, but at what cost, we have over 300+ empty apts, if we have no money, how do to keep sending people to hotels with vouches?? When folks return some of the work is still not done.

RH EAST RESIDENTS FEEL THE SAME, although the T A President claims they're not going PRIVATE or PACT
We're talking signatures, from residents on 6/25/2026 at the talking gathering... the Red Hook Star Revue newspaper George Fiala [redacted] has pictures of the moment, and story's regarding this, RHWRA seems to think we can't have a say in this matter... so we brought East & West together, great turn out.
Thank you, Andrea McKnight
[redacted]

Attachment(s)

20260625_130614.mp4



SampleFlyer_1368849_4200_2A0306_21...



Screenshot 20260701 092233 Gallery.jpg



Screenshot 20260701 092252 Gallery.jp...

Date Submitted: July 1, 2026

Topic: Tenant Protection ✕ | Real Estate and Development ✕ | Enforcement ✕ | Reporting Requirements ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Housing

Subtopic

Preserve NYCHA section 9



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- Visit to charming KITCHEN KETTLE VILLAGE
- Admission to THE AMISH EXPERIENCE & JACOB'S CHOICE AT THE F/X THEATRE
- Admission to a show at the MAGIC & WONDER THEATER

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Day 2: Today after enjoying a Continental Breakfast, you will go to THE AMISH EXPERIENCE attraction. The Amish Country Homestead is a reflection of their commitment to accurately and sensitively portray the Old Order Amish as they live and work in today's world. The Homestead is the home of the fictional Amish family of Daniel and Lizzie Fisher, whom you have gotten to know in the Amish Experience Theater's "Jacob's Choice." Inside the Homestead, learn of Amish traditions and practices, plain clothing and life without electricity. The Fisher One-Room School is attached to the house and filled with authentic desks and furnishings from an actual Amish school. You'll learn the tradition of teaching eight grades in one room. From the pantry stocked full of freshly canned vegetables to the family's plain clothes… from propane-powered lamps to air-compressor driven appliances…the Fisher Family Homestead truly provides insights into the complex riddles of a culture so very different from our own. Then, you will enjoy a show at the MAGIC & WONDER THEATER. Later, you'll depart for home… a perfect time to chat with your friends about all the fun things you've done and where your next group trip will take you!



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The Sight and Sound Theatre is State-of-the-Art



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Name

Mx. Joe-Anthony Sierra

Email	[redacted]
Professional Affiliation	Friends Of NYC Council SDNY Adopt A Basket volunteer street sweeper
Zip Code	[redacted]

Public Comment

June 19th 2026

Dear NYC/ Hon NYCMayor Zohran

RE COGE City Charter Hearing testimony

First and foremost, it is a great idea to incorporate a “rainy day fund” to be prepared to challenge any man made (AI/ hack ETC) or natural disasters. City Charter belongs to the people and we should have a say in it. This is not a crisis as housing where the (red tape) procedural ULURP ETC processes are suspended. There is time to get it right. We elect our Congress/NYCCouncil to amend our Constitution/NYC Charter but should be a part of it. The last administration put it on the ballot yet NYCCouncil advised trickery in misleading words and advised voters to not vote for several of the changes because underlying was an executive power grab, if recalled correctly.
Every city agency should work with their entire staff in brainstorming ideas on how to reduce waste and thus efficiency, doing things better. It should be shared with each other as one great idea shouldn’t be heard unheard.
NYC should have a substantial rainy day fund of which we can borrow against & repay-an investment in case of emergency “break glass” to avert a man made and natural disaster. Moreover, Reason to keep Horse Carriages if we need to move NYC Council out of the city they can be summoned and should enter a contract called Good Government post attack even from another state, NYC had a city-wide grid-lock when few inches of snow fell on a weekday 2018, many bussed school children delayed up to 12 hours to get home. What is a city without it’s parliament in case of disaster we must have a plan NYC Comptroller rainy day fund & how to get NYC Council out to New Jersey via Verrazzano-Narrows Bridge through Staten Island, on. Sept 11th, 2001 transit was suspended. NYC Mayor is fit albeit marathon able NYPD would put His Honor on a police (Mounty) horse, need be (GdForbid) Good govt is contingent on pre-planning for its sustenance. do resent that these hearings lack the substance of what are the preliminary addendum changes etc to the NYC City Charter.

Thank you
Sincerely, Mx Joe-Anthony Sierra
#Stalked27Years

Attachment(s)

Drop files here or click to browse

Date Submitted

July 1, 2026

Topic	Budget Issues ✕ Unnecessary Bureaucracy ✕ Miscellaneous ✕
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Budget
Subtopic	Rainy day fund

Name

Deborah Kirschner

Email [redacted]

Professional Affiliation Prospect Park Alliance

Zip Code [redacted]

Public Comment See our written testimony attached.

Attachment(s)



PPA Testimony COGE Public Hearing 7....

Date Submitted July 1, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Run agent

Charter Related	Yes
Topic Simplified	Public Realm
Subtopic	Streamline Legal Review of Contracts + Recognition of Non Profit Partners under FCRC

Public Testimony: Commission on Government Efficiency
Deborah Kirschner, Vice President of External Relations, Prospect Park Alliance
July 1, 2026

Good evening. My name is Deborah Kirschner, and I am the Vice President of External Relations with Prospect Park Alliance, the nonprofit that operates Prospect Park in partnership with the City. I am here today to share insights on two areas of government operations where changes to city processes would make a great impact on the ability of nonprofit partners such as the Alliance to more effectively serve our communities and partner with the City.

Franchise and Concession Review Committee (FCRC):
Streamlining Legal Review of Contracts + Recognition of Non-Profit Partners
First, I would like to discuss the processes involved in securing concession agreements for nonprofit partners with the City. I would first like to recognize that the experience of working with the Franchise and Concession Review Committee, or FCRC, has improved in recent years, particularly the fact that it now meets virtually, and we thank the FCRC for this. We recommend that the FCRC recognizes the difference between for-profit and non-profit entities, and that the City takes steps to make it easier for nonprofits to do business with the City and fulfill our mission of serving the public. Recommendations range from creating a guide for nonprofits to prepare for presenting their contracts, to engaging nonprofits around contract negotiations with the understanding that nonprofits are providing a public good and not commercial enterprises. In addition, we recommend that the City consider using streamlined contract templates that help right-size the nature of the agreement with the nonprofit's scope of work. Some groups don't need a license agreement and could benefit from a simple MOU, so getting people through the right sized door efficiently would help improve the process.

Infrastructure and Public Works: Capital Planning and Construction
I also wanted to speak to the processes currently in place for infrastructure and public works. Prospect Park Alliance was founded 40 years ago to sustain, advance and restore Prospect Park, and from our early days we have led capital planning, design and construction in Prospect Park. In the spirit of delivering high quality landscapes, buildings and infrastructure for the public good, we would like to advocate for legislation introduced by the City Council this year, more specifically NYC Council Introduction 263, "Developing A Strategic Blueprint To Reduce Capital Project Durations By At Least 25 Percent" and Resolution 0264-2026, "Resolution calling on the New York State Legislature to introduce and pass, and the New York State Governor to sign, legislation to grant permanent and expanded Design-Build authority to all New York City agencies."

We support the City Council's proposed legislation to cut project costs and timelines by making common-sense reforms to the process, including budget, procurement, and permitting. One of the biggest challenges in capital project delivery is the traditional design-bid-build model that requires the

City to complete design, undertake a nearly year-long procurement process, and then award a construction contract to the lowest qualified bidder. This legacy system struggles to efficiently deliver the high-performing infrastructure our city requires. While the 2019 NYS Public Works Investment Act granted several city agencies the ability to use design-build delivery, the 2024 expansion to Progressive Design-Build and CM-Build was limited to certain project types at DDC only.

All capital agencies, including NYC Parks, should have access to a full toolkit of modern, effective project delivery methods. We encourage the City to work with the State to support legislation that permanently extends alternative delivery authorization to all agencies, without limitations for project type. Alternative delivery methods will save months on small projects and years on large ones, allowing limited infrastructure dollars to stretch further—especially crucial for our parks.

In late 2024, the Capital Process Reform Task Force documented major improvements to the capital delivery process but highlighted that significant work remains. We call on Mayor Mamdani to reconvene a City-Industry task force with the mandate to align capital investments, cut bureaucratic red tape, and integrate new technology across all capital and oversight agencies.

Finally, we must remember that a blueprint is only effective if there are people to execute it. Since 2023, the Parks Capital division has lost 60 staffing lines, making it nearly impossible to advance hundreds of millions of dollars in projects without adequate personnel. We urge the Administration to provide additional staff for both capital project management and to continue to increase funding for maintenance and operations (and we thank the Administration for baselining nearly 300 NYC Parks staff lines in the FY27 budget). Without adequate maintenance staff, newly completed capital projects quickly fall into disrepair, forcing the City into a cycle of starting new capital projects simply to restore previous ones. New Yorkers wait too long and pay too much for projects that deliver less value than they deserve. By passing these measures and properly staffing our agencies, we can ensure that our public works serve as the resilient foundation our city requires.

Name

Jennifer Miller

Email	[redacted]
Professional Affiliation	I am retired. My husband and I pastor a small church in Harlem. It's very community oriented. It may be a small congregation, but large in quality. We serve food to the community evert Friday. We currently share space with another church given the increase in rents
Zip Code	[redacted]
Public Comment	I live in Manhattan; and I am a Democrat. I am supporting opening the primaries because I think everyone should equally have a say so in what is being done. I feel that everyone no matter what race, creed or color should be able to voice their opinion and have a decision in this world that we live in. We all should be treated as equals. We have the same color blood, shed the same tears. feel the same feelings. People are leaving the parties because they feel like their voice is not being heard. They are tired of not being heard and of the broken and empty promises. I think there has to be a change.
Attachment(s)	Drop files here or click to browse
Date Submitted	July 1, 2026
Topic	Open Primaries
Method Received	Airtable Form
Is it charter related?	

Charter Related	Yes
Topic Simplified	Elections
Subtopic	Open primaries

Name

Anna Berlanga

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

When our concession spaces are empty we lose money and benefits. We should ensure the spaces are rented. Fordham Plaza was redesigned in 2017. Three kiosks and a cafe were built. It is 2026 and none of them are occupied. As taxpayers we paid for the construction and we aren't recouping any money from the rental income. As residents, we lose cool vendors, space for businesses, yummy food, interesting vibes, etc. We lose an extra set of eyes, ears, and hands maintaining the cleanliness and safety of the plaza. Ten years is too long to get vendors in there. If the rent is too high, lower it. If the bureaucracy is too much, cut the red tape.

On Randall's Island there are batting cages that have fallen into disrepair. A whole portion of the park is unusable because no operator can make the math happen: the cost to bring the batting cages up to standard is too much considering the money they can make. I don't care if they sell food or alcohol. Let's make it financially viable for them!

Parks should be able to retain a portion of the concession dollars. It's illogical that Parks gets less than 1% of the budget and the money they make they don't get to keep. That's silly.

Attachment(s)

Drop files here or click to browse

Date Submitted July 1, 2026

Topic Franchises & Concessions × Unnecessary Bureaucracy × Budget Issues × Real Estate and Development ×

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Public Realm
Subtopic	Reform FCRC and let parks retain a portion of concessions revenue.

Name

Kaseem Fortson

Email [redacted]

Professional Affiliation: I work in the medical field, as a care team associate.

Zip Code [redacted]

Public Comment:

I live in Harlem and have recently changed my registration to independent. I support opening the primaries to independent voters because we have a right as citizens. We should be able to vote in any election. Our voices should not be left out.

I've been a Democrat my whole life. I'm 50 years old. But one day I realized it's the same thing with both parties right wing, left wing, still the same bird. They come out every 4 years, but they don't do anything. So I decided to become an independent. Then I found out that I can't vote in the elections that matters most in NYC, the primaries. I feel that my rights as an American have been violated. It's upsetting. It's not a good feeling.

Attachment(s): Drop files here or click to browse

Date Submitted: July 1, 2026

Topic: Open Primaries

Method Received: Airtable Form

Is it charter related?

Charter Related	Yes
Topic Simplified	Elections
Subtopic	Open primaries

Name

Amy Harlib

Email [redacted]

Professional Affiliation Performer

Zip Code [redacted]

Public Comment

TESTIMONY

I live in Manhattan, NYC and I am an Independent politically and it is infuriating not to be able to vote in Primary Elections. Below are many reasons I support to have Open Primaries

- Primaries are publicly funded and run by the city. Our tax dollars fund these elections and no voter should be forced to join a political party to be able to vote in a public election.
- 85% of US cities use an open primary system. Why not NY?
- NY state is one of only 14 states with closed primaries. This is not the norm!
- Closed primaries are unAmerican.
- 54% of NYC independent voters are from communities of color.
- This is voter suppression of 1.2 million NYC independents.
- For veterans: 50% of veterans are independents. Ask the person how it feels to have served to protect that country and to be told that you can't vote in the primaries.

Attachment(s) Drop files here or click to browse

Date Submitted July 1, 2026

Topic Open Primaries

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Elections
Subtopic	Open primaries

Name

Sara Bronin

Email	[redacted]
Professional Affiliation	Law Professor, George Washington University, Founder, National Zoning Atlas & National Preservation Atlas
Zip Code	

Public Comment

Chair Patrick Gaspard and Members of the Commission,

I'm writing to request hour consideration regarding a highly technical issue at the intersection of zoning and historic preservation.

By way of brief background, I served in the Biden administration as the Senate-confirmed chair of the Advisory Council on Historic Preservation (ACHP), the nation's federal independent historic preservation agency, and I have since resumed my role as a law professor specializing in land use, zoning, and historic preservation law. I also founded the National Preservation Atlas to document the country's historic properties, and the National Zoning Atlas, which is 2/3 of the way through the country's zoning codes.

I'm writing to suggest that COGE consider a charter revision to ease the process for the City to sell transferable development rights (TDRs) for the landmarked properties that the City owns. As you likely know, the City has a specific process allowing the private owners of landmarked properties to sell TDRs to certain nearby property owners, who in turn can use received TDRs to build more densely than the zoning code would otherwise allow. TDRs have been a flexible tool that has helped finance the maintenance of landmarked properties.

The City Council expanded the Landmark TDR program with the City of Yes zoning reforms, easing the process and allowing more owners of landmarked properties to take advantage of the program. However, the City itself cannot utilize this improved process. The 100+ City-owned individually-landmarked buildings would be benefitted if the charter were changed to allow the City to more fully participate in this unique program.

Good luck with your important work, and feel free to call on me if you need assistance.

Sara Bronin

Attachment(s)

Drop files here or click to browse

Date Submitted

July 1, 2026

Topic

Real Estate and Development ×

Department of Buildings (DOB) Issues ×

Procurement Reform ×

Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Unnecessary Bureaucracy
Subtopic	Ease the process for the City to sell transferable development rights (TDRs) for the landmarked properties that the City owns

Name

Matthew Bauer

Email	[redacted]
Professional Affiliation	NYC BID Association
Zip Code	[redacted]

Public Comment

The NYC BID Association represents all of the city's 78 Business Improvement Districts, serves nearly 300 miles of commercial corridors, including approximately 100,000 businesses, and invests more than a combined $200M back into our communities in all five boroughs. We're very grateful that COGE is holding this hearing on important issues impacting small businesses, including issues related to Concessions & Franchises. We have identified two problems and potential solutions to those problems that we respectfully ask that COGE consider:

Problem: The City's laws create a system where property owners are solely responsible for maintaining the public sidewalk (cleanliness, snow removal, masonry repairs) and bear the full liability for pedestrian injuries, yet the City itself licenses and franchises commercial entities (e.g., vendors, bus shelters, Link kiosks) to use the sidewalk right-of-way without the property owner's approval or any form of compensation for the cost of maintaining the space. This structure forces property owners to subsidize the City's franchised uses.

Solution: Provide Property Tax Credit for City Licenses/Franchises.

- As a means to fund property owners' costs of maintaining the right-of-way, affected owners should receive a credit on their City property taxes.
- The suggested calculation is to multiply the square footage of the licensee/franchisee's footprint by the tax rate assessed for ground floor space in the adjacent building.

Problem: For many businesses, the implementation of the Commercial Waste Zone (CWZ) program has resulted in higher prices for waste hauling per cubic yard than they paid under their previous carter, as maintaining low prices was not a primary criterion for selecting CWZ vendors.

Solution: Establish a Price Appeal Process for CWZ:

- Implement an appeal process allowing businesses entering the CWZ program to ensure that, for at least two years, they do not pay more to haul per cubic yard than they did immediately prior to the CWZ initiation.

Thank you for the opportunity to testify, and we would be pleased to answer any questions you may have,
Jeffrey LeFrancois & Erin Piscopink, Co-Chairs, NYC BID Association
Matthew Bauer & Nina Flores, Co-Chairs, NYC BID Association Regulatory Reform Working Group

Attachment(s)



NYC BID Association Testimony - COGE ...

Date Submitted: July 2, 2026

Topic: Franchises & Concessions, Real Estate and Development, Budget Issues, Procurement Reform

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Public Realm

Subtopic: Provide a property tax credit for City licenses/franchises to fund property owners' costs of maintaining the right-of-way

TESTIMONY BEFORE COGE HEARING ON CONCESSIONS & FRANCHISES
July 1, 2026

The NYC BID Association represents all of the city's 78 Business Improvement Districts, serves nearly 300 miles of commercial corridors, including approximately 100,000 businesses, and invests more than a combined $200M back into our communities in all five boroughs. We're very grateful that COGE is holding this hearing on important issues impacting small businesses, including issues related to Concessions & Franchises. We have identified two problems and potential solutions to those problems that we respectfully ask that COGE consider:

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Thank you for the opportunity to testify, and we would be pleased to answer any questions you may have,

Jeffrey LeFrancois & Erin Piscopink, Co-Chairs, NYC BID Association
Matthew Bauer & Nina Flores, Co-Chairs, NYC BID Association Regulatory Reform Working Group

Name

David Briggs

Email [redacted]

Professional Affiliation AIA

Zip Code [redacted]

Public Comment

The DOB examiners must include accurate code citations when issuing objections. Sometimes they issue objections without any code support because they think their personal opinions are warranted. Or they start referencing a building as existing when it's brand new. When we push back, they tell us we have to go through a "second review" process. As an example, in a recent school project that we filed in the Bronx the examiner insisted we show on the plans how bicycles would be individually locked in the bike storage room. This is an operations issue and not part of the examiner's purview. This kind of nonsense delays approval.

Attachment(s)

Drop files here or click to browse

Date Submitted July 2, 2026

Topic

Department of Buildings (DOB) Issues ×

Unnecessary Bureaucracy × Enforcement ×

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified	Government Operations
Subtopic	DOB should improve the way it issues violations

Name

Kyoko Heshiimu

Email	[redacted]
Professional Affiliation	I am a freelance visual artist and poet and a mother.
Zip Code	[redacted]
Public Comment	I support opening the primaries because I think everybody should have a voice on who gets elected. Even though I am an independent, I am registered as a Democrat so that I can vote in the primary. If you put "independent" then you can't vote. I don't agree with everything the Democrats area doing and I don't agree with most of what the Republicans are doing. Everything is not black and white in life.
Attachment(s)	Drop files here or click to browse
Date Submitted	July 2, 2026
Topic	Open Primaries
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes

Topic Simplified	Elections
Subtopic	Open primaries

Name

Tom Fox

Email	[redacted]
Professional Affiliation	Founding co-chair Brooklyn Bridge Park Coalition, first president Hudson River Park Conservancy, co-founder and CEO New York Water Taxi, Trustee City Club of New York
Zip Code	[redacted]

Public Comment

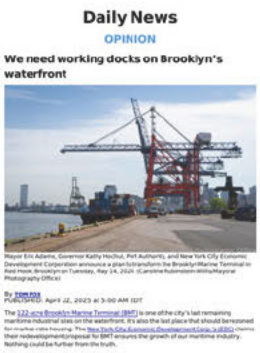
New York City needs to preserve remaining working waterfront and make major capital investments and long term maintenance commitments to funding invisible maritime infrastructure throughout the harbor. Commercial maritime property and industrial business zones cannot be recaptured once they have been put to other uses. Mayor Mamdani has made a commitment to economic justice and stated his support for the creation of a blue highway to move packages products and freight via water.

However, NYCEDC was formed in the early 1990s and given jurisdiction over the cities waterfront. Currently controls over 120 miles of waterfront and then it's done a terrible job at supporting this critical part of the city's economy. Their preference is for high-rise residential housing, which is turning the ways into a visual amenity rather than a critical element in the city's economy, creating jobs, improving air, quality, reducing congestion in traffic on our roads, highways and bridges and providing equitable and meaningful development that benefits the people rather than developers.

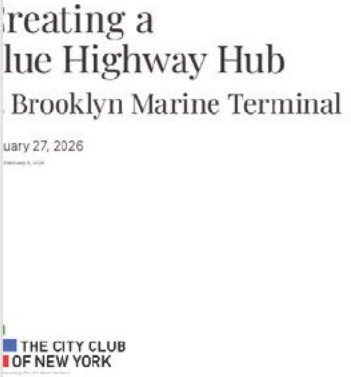
They have no maritime skills nor maritime experience and the state of the cities. Maritime infrastructure speaks to their inability to plan manage or maintained this critical municipal asset. Rather than working with the commercial Maritime industry, many of these companies have been in the harbor for almost a century, they make uninformed decisions for the Maritime community. They lack transparency, have been untruthful, and their actions have resulted in the serious deterioration of the cities, maritime infrastructure and industries.

Oversight and planning of New York's maritime assets must be done by and entity or agency dedicated solely to that job and without it, the future of our city will be diminished. I have attached an all maritime plan for the redevelopment of Brooklyn Marine terminal. (BMT), an alternative plan for the redevelopment of the Manhattan cruise terminal, which EDC has allowed to fall in to the river while every other pier on the west side waterfront has been rebuilt, and the editorial written regarding the preservation of the Brooklyn Marine Terminal and one suggesting an alternative Marine Development Corporation be establishes to remove EDC from waterfront oversight. Thank you for the opportunity to contribute.

Attachment(s)


Daily News
OPINION
We need working docks on Brooklyn's waterfront

We need working docks on he Brooklyn...


reating a
lue Highway Hub
Brooklyn Marine Terminal
uary 27, 2026
THE CITY CLUB OF NEW YORK

Brooklyn Marine Terminal - Blue Highw...

brooklyneagle.com:.webloc


Daily News
Opinion
NYC waterfront needs a new navigator

EDC MDC op ed Daily News 12.29.25[1]....


ERNATIVE REDEVELOPMENT PROPO
R THE MANHATTAN CRUISE TERMINA
Advisory Council
9th, 2026
CLUB
IRK

26-0615_HRP AC Alternative Plan Prese...


W42ST.nyc
"Plan B" Floated to Modernize Cruise Terminal While Giving Space Back to the Neighborhood
Sometimes less is more. That was the message from veteran waterfront advocate Tom Fox as he unveiled a "Plan B" for rebooting the aging Manhattan Cruise Terminal

W42St.nyc MCT Plan @ CB 4 B 5.16.26.d...



What Mayor Mamdani Can Learn from *Sail 4th 250*

This year, the largest fleet of tall sailing ships and naval vessels in history will gather in New York Harbor to celebrate the 250th Anniversary of our Nation. *Sail 4th 250* will bring over 80 ships and 160 U.S. and international aircraft to our historic Harbor to celebrate the birth of our nation and our democracy.

An International Parade of Tall Ships happens once in a generation, and International Naval Reviews just as infrequently. Combining both together is a once in a lifetime opportunity, and New York City has traditionally celebrated and warmly welcomed sailors visiting our city.

Op Sail in July 1976 arrived at one of the city's darkest moments. Urban blight and fiscal woes plagued New York when then President Gerald Ford refused to provide financial support eliciting an October 1975 *Daily News* headline "FORD TO CITY: DROP DEAD". Yet, Mayor Beame welcomed the historic fleet of tallships as over 6 million people soaked in the spectacle.

Ever since, New Yorkers have warmly welcomed visiting sailors, as millions lined the shore to see the incredible parade of ships, and tens of thousands of New Yorkers toured visiting ships from around the world.

The Fleet began arriving on June 30th and will lay at anchor or dock at multiple locations around the city. Tal ships and U.S. and international naval vessels will anchor or berth along Brooklyn, Manhattan and Staten Island waterfronts.

Fifty years after the first *Op Sail* New York is ascendant, and with all its imperfections, America continues to welcome refugees from around the world creating a land of opportunity. Celebrating our past reminds us of what our nation can achieve whenwe work together.

Our city has a unique place in framing this great democracy. We predate the Republic and our original Dutch settlers introduced religious tolerance and cultural pluralism to America. That diversity remains our city's biggest strength complemented by our energy, inventiveness, resilience and compassion.

Final Final What Mayor Mamdani Can L...

Date Submitted: July 2, 2026

Topic: Real Estate and Development ✕ | Enforcement ✕ | Unnecessary Bureaucracy ✕ | Budget Issues ✕ | Reporting Requirements ✕ | Support Oversight Agencies ✕

Method Received: Airtable Form

Is it charter related:

Run agent

Charter Related: Yes

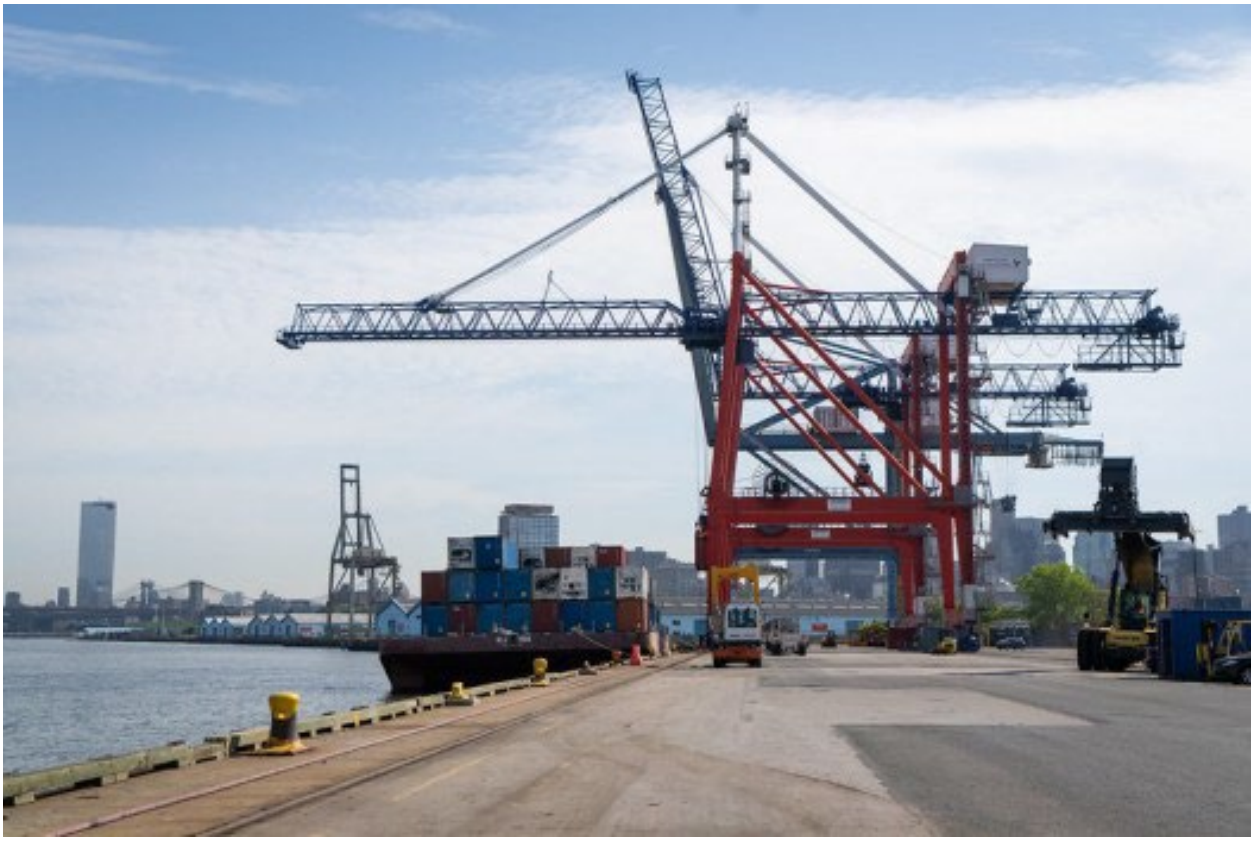
Topic Simplified: Government Operations

Subtopic: Create a Marine Development Corporation to manage the City's waterfront

Daily News

OPINION

We need working docks on Brooklyn's waterfront



Mayor Eric Adams, Governor Kathy Hochul, Port Authority, and New York City Economic Development Corporation announce a plan to transform the Brooklyn Marine Terminal in Red Hook, Brooklyn on Tuesday, May 14, 2024. (Caroline Rubinstein-Willis/Mayoral Photography Office)

By **TOM FOX**
PUBLISHED: April 22, 2025 at 5:00 AM EDT

The 122-acre Brooklyn Marine Terminal (BMT) is one of the city's last remaining maritime industrial sites on the waterfront. It's also the last place that should be rezoned for market-rate housing. The New York City Economic Development Corp.'s (EDC) claims their redevelopment proposal for BMT ensures the growth of our maritime industry. Nothing could be further from the truth.

EDC is a quasi-governmental authority that assumed oversight of our waterfront in 1991. Since then, much of our working waterfront has been converted to housing in Williamsburg, Greenpoint, and Long Island City or public open space such as Hudson River or Brooklyn Bridge Parks. EDC has little commercial maritime experience and should not be the steward of our maritime industrial waterfront, as their track record shows.

EDC assumed operation of the Manhattan Cruise Terminal in 1998 and have left half of the piers empty and deteriorating for the past decade. Pier 92 remains derelict, and Pier 94 is being converted into movie studios (not maritime). In 2004, they promised Red Hook residents hundreds of jobs that never materialized at the Brooklyn Cruise Terminal which is rarely used.
EDC established NYC Ferry in 2016 charging $2.75 for all riders with unlimited transfers. Tourists flocked to the new service that cannibalized the city's maritime sightseeing industry. NYC Ferry ran practically empty during the pandemic and a 2022 city comptroller's audit found that almost $250 million of the $753 million EDC spent to roll out NYC Ferry was unaccounted for. It found the stated per trip public subsidy of $6.60 was in fact $12.38.
Moving packages on our waterways was first proposed in 1994. EDC embraced the concept and rebranded it the "blue highway" in 2023. The first site they selected for package delivery was the Downtown Heliport in Manhattan, insisting that package delivery was compatible with an operating heliport. It made no sense to experienced maritime operators and EDC withdrew the request.

Last June, EDC signed a 99-year lease for BMT, accepting the property "as is," with $500 million in deferred maintenance. They claim BMT needs a $1 billion investment to reconfigure the existing piers and double the number of containers received at BMT, insisting that BMT's redevelopment must be funded with revenue generated on the site.

EDC is proposing more than 9,000 units of market-rate housing be built on half of BMT to "save" the other half for maritime industry. Their plans include a new truck route through the market-rate housing to distribute products. Delivery trucks are choking our roadways and residents, deteriorating our bridges and highways, and competing with pedestrians and bicycles on our streets.

BMT's existing piers could be restored for $600 million and logistic centers, temperature-controlled warehouses, and vehicle maintenance facilities built where EDC proposes housing. Packages and produce can be stored, sorted, and repackaged on site.

Arriving goods can then be loaded onto electric vehicles and placed on smaller ferries at adjacent Piers 9a and 9b for transport to delivery locations like Pier 92 at W. 52nd St. in Manhattan. Trucks should only leave BMT to deliver packages to adjacent neighborhoods.

Pier 8 should become a much-needed vessel repair, repower, and refueling facility supporting commercial and emergency services vessels operating in the Harbor and the "blue highway" fleet, strengthening our maritime industry, resiliency and emergency preparedness. The current situation at BMT is unique because the adjacent communities want maritime industry on their waterfront.

EDC should use Industrial Development Agency tax incentives and bonds for new construction and operations as they did at the $843 million South Brooklyn Marine Terminal to support the offshore wind industry. BMT is in the same Industrial Business Zone and eligible for this public support. Providing long-term leases would allow future maritime industrial operators and logistics companies to invest private capital to match public incentives.

Creating a viable public/private partnership is essential to develop a hub for the "blue highway." BMT is on the same Red Hook waterfront where Amazon, FedEx and UPS have planned, or recently built, last-mile delivery warehouses. Those warehouses could be served by this "blue highway" hub removing thousands more trucks from our city streets and supporting New York's growth in the 21st century

The maritime community, Red Hook residents and all New Yorkers deserve the protection of this valuable maritime industrial infrastructure that's critical to our city's economy, environment, emergency preparedness, and sustainability.

Fox was co-founder and CEO of New York Water Taxi, is a board member of the City Club of New York, and author of "Creating the Hudson River Park: Environmental and Community Activism, Politics, and Greed."

-

Creating a Blue Highway Hub

at Brooklyn Marine Terminal

January 27, 2026

Updated February 8, 2026

THE CITY CLUB OF NEW YORK

Advocating For All New Yorkers

Introduction





In April 2024, the City of New York, the New York City Economic Development Corporation (EDC), the Port Authority of New York and New Jersey (PA), and the State of New York entered into a memorandum of understanding (MOU) for the transfer of ownership of the Brooklyn Marine Terminal (BMT) from the PA to the City of New York (or any designee that the City may choose).[1]

The transaction seemed lopsided. The City would transfer to the PA the 187-acre Howland Hook Marine Terminal in Staten Island—equipped with six post-Panamax cranes, road and rail connections to the nation, as well as a 127-acre adjacent expansion site. In return, the PA would transfer to the City the 122-acre Brooklyn Marine Terminal—with no rail access, limited road access, four non-functioning cranes, and hundreds of millions in deferred maintenance.

In September 2024, EDC created a 28-member Task Force to assist them in planning the BMT redevelopment. EDC's proposed plan, approved in September 2025, envisions transforming half of BMT into a mixed-use community with 6,600 high-rise residential units (40% affordable) to cross-subsidize the construction of a new container facility and cruise ship terminal on the other half.[2]

The proposal requires filling in, or covering over, 11 acres of Buttermilk Channel and the use of an Empire State Development (ESD) led General Project Plan (GPP) to circumvent New York City Uniform Land Use Review Procedure (ULURP) and rezone the property.

EDC's proposal fails to sufficiently address coastal resiliency measures for the site or the local community subjected to continual flooding.[3] The adjacent neighborhoods are mass transit deserts with antiquated infrastructure, which is not being addressed, nor have the essential services—schools, police, fire, and sanitation—needed to support the proposed 16,000 new residents.[4]

EDC's lack of public participation and transparency caused controversy. Many community residents and local elected officials support the retention and expansion of the commercial maritime industry at BMT. While truly affordable housing is a crucial need in our city, critical maritime industries, which will not be replaced once they are gone, must be retained.

Prompted by community requests, the City Club of New York (the Club) has met with local representatives, maritime professionals, marine and environmental engineers, planners, transportation and logistics professionals, current and former government employees, elected officials, and local property owners to understand their vision for the future of BMT. We also attended Blue Highway briefings and demonstrations by EDC and the New York City Department of Transportation (DOT).

This report envisions an economically viable multi-use maritime port of the future that preserves a strategic industrial asset, grows the maritime industry, enhances economic and environmental justice, minimizes public financing, leverages private investment, ensures the creation of a Blue Highway, supports food security and strengthens the city's emergency preparedness.

Modernizing and expanding commercial maritime activity at BMT could be implemented more

quickly and require a fraction of the massive public infrastructure investments anticipated in the EDC plan. Commercial maritime and industrial development can proceed immediately, as-of-right without the need to permit, or finance, 11 acres of open water coverage. It will also eliminate the need to circumvent City land use review and approval procedures.

We believe that BMT should be redeveloped as a hub for a new Blue Highway that returns to New York some of the maritime activity that the PA moved to New Jersey over the last 50 years. At the same time, the Blue Highway Hub would reduce truck traffic congestion, and infrastructure deterioration by moving produce, packages, products and building materials via our waterways.

This report describes how preserving and expanding commercial maritime activity at BMT is a critical step in the creation of a Blue Highway. BMT could significantly grow the concept from recent demonstrations. A two-phase approach to grow the system would be practical.

Phase I would focus on electric micro delivery vehicles using existing DOT docking facilities now being demonstrated at West Midtown Ferry Terminal at Pier 79. Phase II would include the transport of electric micro delivery vehicles, vans, and box trucks which would require the construction of new docking facilities. Those sites at industrial locations have roadway access. The new docking facilities must be capable of handling bow-loading aluminum catamarans, steel roll-on-roll off (ro-ro) vessels, and barges, which could be particularly important in emergencies.

The Club is aware of the need to address insufficient infrastructure, the lack of public transportation and coastal resiliency plans for the surrounding neighborhoods. EDC's proposal fails to address these issues and we are not able to address these larger issues either. However, these issues are critical to the future success of BMT and the survival of the adjacent communities and must be addressed in any BMT redevelopment plan. This proposal shifts local trips away from tractor-trailers and towards electric micro-delivery vehicles. Even without a full traffic model, that will reduce street risk, noise and air pollution.

This report envisions an economically viable, critically needed "port of the future" at the BMT, with a focus on commercial maritime activity and public open space is meant to be a catalyst. All decisions regarding the future redevelopment of BMT should be made in a transparent and inclusive public process involving all stakeholders moving forward.

The All-Maritime Vision for BMT

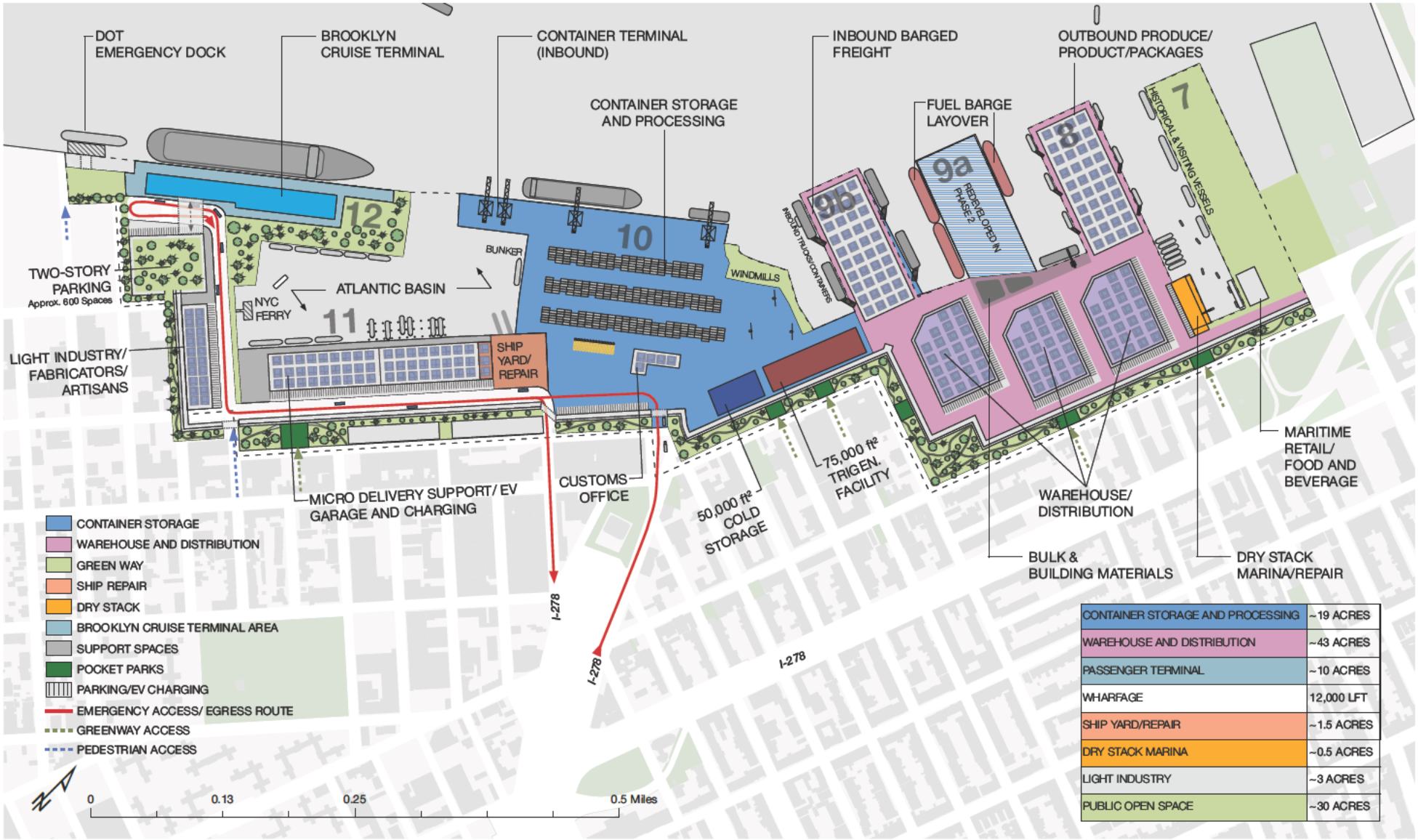
The 122-acre Brooklyn Marine Terminal (BMT) is designated as a Significant Maritime Industrial Area (SMIA) within the South Brooklyn Industrial Business Zone (IBZ) and is a strategically located commercial maritime facility in the New York Harbor.[5] Our rivers and natural harbor have been the economic lifeblood of our city for centuries. It's why New York City is here.

The Port of New York and New Jersey makes major economic contributions to the city and region especially in the new era of package delivery. The Port industry of New York and New Jersey supported nearly 580,000 jobs, accounted for nearly $18.1 billion in tax revenue, and was responsible for $57.8 billion in personal and $163.7 billion in business income in the region in 2024.[6]

When containerization was introduced, the PA developed large-scale container facilities in New Jersey to take advantage of open land, proximity to highways, railroads and airports. Most maritime jobs were lost to New Jersey. Over the past 30 years, EDC has been responsible for New York City's marine assets and maritime industries and much of the working waterfront has been replaced by high-rise residential towers that look out at our waterways, but don't use them.

The reintroduction of passenger ferries has shown the potential of our waterways, barges carry building materials and fuel, and recent demonstrations have begun to move packages on the water. Removing trucks from our highways, bridges, tunnels, and streets will improve air quality, relieve congestion, save time and energy, and enhance our city's quality of life. Flexible commercial maritime facilities are also critical for the city and the region's emergency preparedness and disaster response.

The Blue Highway Hub at BMT



Pier 7

Consistent with EDC's BMT redevelopment plan, Pier 7 should be transferred to the Brooklyn Bridge Park Corporation. However, the wharfage on Pier 7's southern face should remain in BMT as well as a marine supply store and restaurant at the southeast corner of the Pier.

New York Harbor lacks berthing for a range of commercial and recreational vessels and this quarter mile of wharfage on Pier 7 should support berths for historic, research, and educational vessels, as well as visiting vessels.

The marine retail and food and beverage facility supports recreational activities in the Brooklyn Bridge Park as well as increased recreational maritime activities at adjacent Pier 8. Temporary docking should be included adjacent to the marine supply and food and beverage facility for the use of recreational boaters visiting these facilities.

Pier 8

A dry stack marina, accommodating approximately 200 recreational vessels, ranging in size from wave runners to 30 feet in length, could anchor the northeast corner of Pier 8 across the inter-pier area from the food, beverage and maritime supply store on Pier 7. Dry stack marinas can reduce in-water pollution and provide year-round storage at reasonable rates. There are very few places in the New York Harbor for recreational boaters to berth vessels and no dry stack marinas which are common in many other cities.

A small repair and refueling facility for gas powered vessels could be located adjacent to the dry stack marina. Recreational mariners may also order marine supplies (such as electronics, charts, fittings and line) and food and beverages in advance of picking up their vessels. This area is the transition from a recreational to a commercial waterfront.

With pier stabilization and annual maintenance investments Pier 8 could function for another decade. The sizable pier shed should be improved and solar panels installed. The structure could be used for the storage, maintenance, charging and repair of electric vans and box trucks used for freight delivery as well as support facilities for ro-ro vessels, which would be the primary means of freight transportation at Pier 8.

Six new gangways should be added to the Pier's perimeter to accommodate vehicles driving on and off ro-ro delivery vessels. Outbound vans and box trucks would be filled with freight at adjacent warehouse and distribution facilities. Inbound vehicles may remain on the pier for parking, charging, and maintenance on their return from delivery runs. There should be additional space for berthing ro-ro vessels on the north side of the pier.

Pier 9a

Pier 9a is not operational and should remain as is (pier banked) until the operation of the Blue Highway has matured and future decisions are made about on-site resiliency. In the short term, Pier 9a could be used for the layover of fuel barges, which currently dock at BMT. Some fuel barges do not have moorings in Bay Ridge flats or berthing in Erie Basin. Layover berthing at Pier 9a could generate some revenue as decisions about its future are being made. Depending on the approach to resiliency, the pier may be rebuilt at a higher elevation or replaced by a floating pier such as the one used in the Port of Valdes, Alaska.[7]

Building materials are an important freight element at BMT and current maritime activity could be relocated to the area adjacent to the face of the Pier with barges delivering material between Piers 8 and 9a. If Pier 9a is rebuilt this activity could be relocated on the new pier or another location within BMT.

Pier 9b

Pier 9b should be rebuilt to receive packages, products, and produce arriving in 53-foot trailers on barges. Small electric terminal tractors would bring the inbound freight to the warehouse and distribution facilities upland or the micro delivery support facility at Pier 11.

Pier 9b can also store 53-foot trailers waiting to be barged back to their origin after deliveries.

Most surface shipping of freight throughout the region is in 53-foot trailers. A limited number of 53-foot trailers may leave BMT for deliveries in Brooklyn and Queens transported by electrified truck cabs such as those built by Tesla, Volvo, Freightliner, etc.[8] The truck cabs can also be stored and charged, or parked at adjacent to warehouse and distribution facilities upland and/or the micro delivery facility at Pier 11 or on Pier 9b.

Pier 10

Pier 10 should be improved as a container terminal supported by new state-of-the-art cranes and electrified vehicles to handle container storage and movement. A customs inspection facility should be built at Pier 10 to expedite the processing of inbound foreign freight.

The current EDC BMT redevelopment plan calls for inbound produce, received at Pier 10, to be barged to Hunts Point Market in the South Bronx for cold storage and then distributed throughout the city. Building a cold storage facility at Pier 10 will significantly reduce the time, personnel, equipment and fuel used to transport this produce to market via BMT.

All facilities and operations on BMT should be electrified to avoid recurring power shortages in the adjacent neighborhoods, and to allay concerns about the capacity and reliability of the electrical grid in the years ahead.[9] In addition to connections to the electrical grid, BMT should generate power independently and have a micro grid for site distribution. This would supplement Con Edison's capacity, operate the entire site in blackouts, emergencies and disasters, and could support critical adjacent community emergency facilities.[10] Rooftop solar arrays on all new and reconstructed structures, windmills erected on site and high efficiency natural gas generators,[11] should provide the power source and on-site battery storage should be included.

Atlantic Basin

Atlantic Basin was built over a century ago to protect commercial maritime vessels using this area of the waterfront. The Basin is a critical maritime facility that provides unique protection for vessels and is a critical element in the Blue Highway. Existing maritime activities in the Basin, such as the NYC Ferry landing, should remain, and others like Homeport 2,[12] built in 2023 but yet to be used, should be repurposed for commercial maritime use to support the Blue Highway.

EDC recently announced the expansion of the NYC Ferry service and routes stating their current fleet was sufficient to service the new routes.[13] EDC's current Homeport in Brooklyn Navy Yard has received significant public investment including lifts for vessel repair and is adequate for NYC Ferry operations.

The racks built for smaller, bow-loading vessels can accommodate aluminum catamarans, such as those currently operating, as well as some of the small ro-ro vessels that have recently arrived in the Harbor, giving BMT the flexibility and redundancy necessary for a critical maritime facility.

The frequency of NYC Ferry service at Atlantic Basin, and at docks on Pier 6 in Brooklyn Bridge Park, should be increased to compensate for the lack of mass transportation in adjacent Red Hook and the Columbia Street Corridor neighborhoods. Increased NYC Ferry frequency, and capacity, should be operated when passenger ships are calling at the Brooklyn Cruise Terminal to mitigate traffic impacts in the adjacent neighborhoods and provide a convenient transportation option for passengers traveling to and from Manhattan.

Pier 11

The large Pier 11 shed should be improved, adapted for solar panels and house office and supply facilities for micro-package sorting and delivery services, as well as provide parking, charging and maintenance of various types of pedal powered electric vehicles. The shipyard facility on the northern side of Pier 11 should be privately operated and service a range of aluminum, and smaller steel vessels involved in the micro delivery service as well as other work boats in the harbor.

There are few locations to haul aluminum vessels operating in the New York Harbor for maintenance and repair. Many commercial operators must travel to Westchester, Connecticut, up Hudson, or to southern New Jersey for ship

repair which undercuts our overall emergency response abilities. The protection provided by Atlantic Basin makes it an ideal location for the shipyard, which together with the ability to refuel diesel powered vessels, is particularly important in times of emergencies and natural disasters.

A parking area on the exterior of Pier 11 will support micro delivery service and shipyard employees and mechanics and technicians who provide service and parts to both activities at the Pier. The parking facility would also support the new light industry/fabrication/artisan space directly across the roadway from Pier 11.

Fabrication, Light Industry and Artisans

The vacant city owned property across the roadway from Pier 11 could house low-rise production and display space for light industry, fabricators, and artisans. Red Hook has become a popular destination for these types of activities, and facilities within BMT would complement those in the surrounding neighborhoods. These uses can be implemented as of right at BMT and provide additional employment.

Building 195 should be rebuilt with rooftop solar arrays and converted into a space for fabricators, light industry, and artisans. The site is large and could accommodate a considerable number of small businesses and incubator spaces as well as showrooms.

Cruise passengers tend to arrive and leave quickly at homeport facilities. These businesses might be an attraction for cruise passengers if BCT is used as a port of call. This area could be a gateway to NY Ferry passengers visiting Red Hook.

PIER 12 Brooklyn Cruise Terminal

EDC modified Pier 12 to create a Brooklyn Cruise Terminal (BCT) in 2006.[14] The City supported the PA's investment for electrification of BCT to minimize significant air pollution impacts on the adjacent neighborhood responding to neighborhood health concerns related to ship emissions in 2016.[15] Community residents were told that the terminal would bring economic activity to Red Hook. However, passengers board and disembark as quickly as possible, thus local economic benefits never materialized.

Princess and Cunard, which operates the Queen Mary 2, have been tenants at the BCT. Their vessels are smaller than the large and new mega cruise ships carrying 6,000 or more passengers that dock at the Manhattan Cruise Terminal.

Although the adjacent neighborhood is burdened by increased traffic during Princess and Cunard cruise visits, many passengers arrive in groups via coach, and ships like the Queen Mary 2 have a capacity of 2,600 passengers. A homeport is the origin and destination of a cruise. Therefore, all ship passengers depart and new passengers arrive. All trash must be removed from the vessels, the vessels refueled and all supplies transported to the vessels.

In 2023, the MSC Meraviglia carrying 5,600 passengers originally contracted to use the Manhattan Cruise Terminal (MCT) was forced to dock at BCT awaiting apron improvements to Pier 90. The impact of MSC docking at BCT was extremely disruptive to the adjacent neighborhood with large numbers of trucks and passenger vehicles creating significant transportation problems both for cruise passengers, and local neighborhood residents.

We support EDC's BMT proposal for a new, resilient, BCT on a smaller footprint on Pier 12. It will open a large portion of Pier 12 for public open space which this vision embraces. BCT only has cruise ships scheduled to visit 37 times in 2026, and this facility should be adaptively reused for public activities and events when not hosting cruise ships to maximize public benefit. Cruise ships visiting BCT must be limited to small and mid-size cruise ships with fewer than 3,500 passengers due to constrained transportation infrastructure in the surrounding area.

EDC has recently announced that Pier 90 at MCT is no longer usable due to the lack of adequate maintenance. Pier 92 was removed from service for the same reason four years ago. Pier 88 is MCT's only functioning pier which will constrain cruise ship visitation to New York City in the foreseeable future. MSC has announced that they will be withdrawing from New York in April 2026 just three years after Mayor Adams announced their arrival. Larger cruise ships must not be allowed to dock again at BCT without

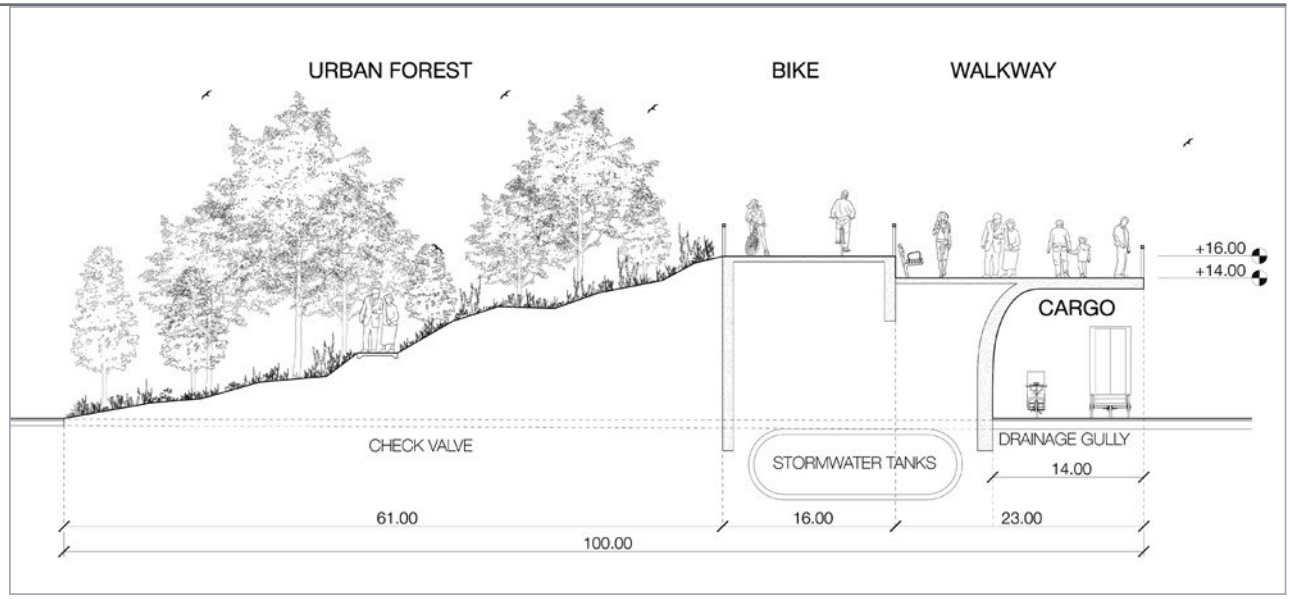
a supplemental environmental assessment and mitigation of any impact on transportation infrastructure, air quality and public safety in adjacent neighborhoods.

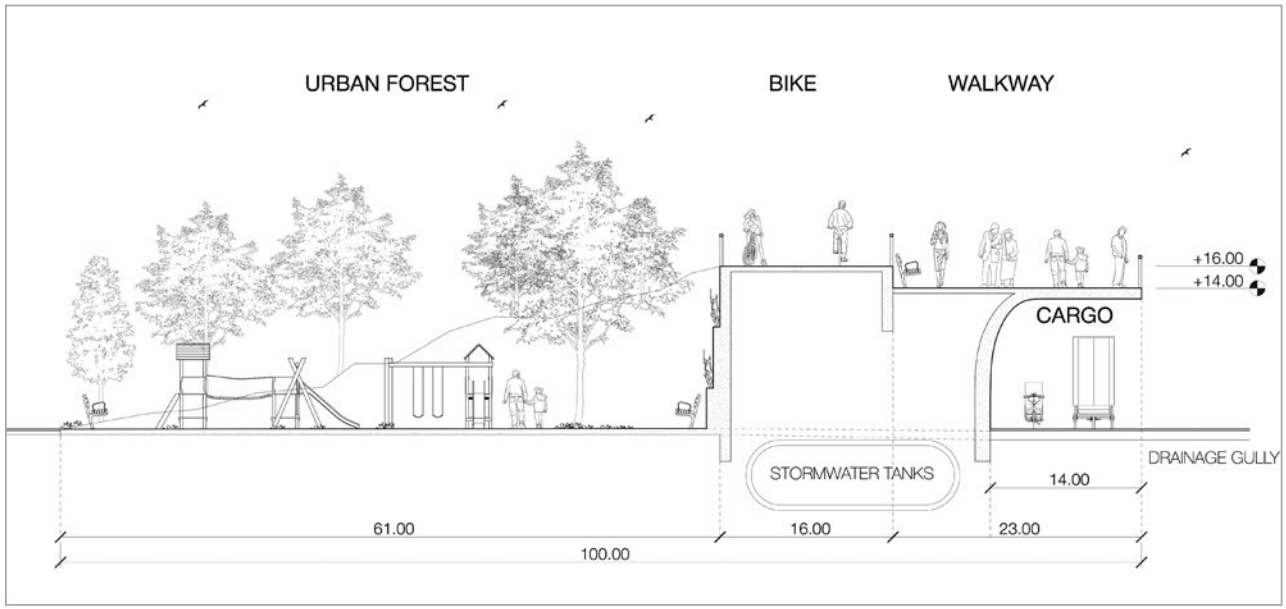
A two-story parking facility with the capacity for approximately 600 cars should be built on the current parking lot adjacent to BCT to increase parking capacity. The structure could be topped with a unique 2-acre rooftop park. The rooftop park should connect with the elevated circumferential greenway providing flood protection, increased public open space and pedestrian and bicycle paths for transportation for the adjacent neighborhood residents and connectivity between BMT and the Brooklyn Bridge Park.

Greenway/Flood Protection

An elevated circumferential greenway should surround BMT to provide a natural buffer between commercial maritime activity and protect the surrounding neighborhoods from tidal surges and flooding. The greenway and other open space improvements to BMT would not require a change in zoning as public open space is an allowable use in an Industrial Business Zone (IBZ).[16] This multifunctional element of BMT's redevelopment will also provide natural and recreational open space amenities for the adjacent neighborhoods, and bicycle and pedestrian paths.

The greenway should be built at an elevation that anticipates flood levels expected by 2100. Stormwater holding facilities can be located under the Greenway with drainage ditches containing check valves to prevent backflow and to help drain adjacent neighborhoods, which flood frequently during heavy rain falls.





The side of the greenway facing the local community should be heavily vegetated with natural landscaping to reduce the noise and other impacts of commercial maritime activity

at BMT. ADA compliant pathways should connect the adjacent neighborhood streets with the wide bicycle and pedestrian promenade. Much needed recreational amenities for neighborhood residents such as playgrounds, dog runs, sitting areas, restrooms, basketball and pickleball courts, and water features should be built at critical locations along the greenway.

Addressing resiliency at BMT requires a comprehensive approach to protecting BMT and the local neighborhoods. The current Red Hook Resiliency Plan[17] is inadequate and the City Club has recommended a comprehensive approach to coastal resilience for BMT and the adjacent communities which is posted on our website.[18]

Emergency Dock

BMT is a critical element in the region's emergency preparedness. During natural disasters, blackouts and other major emergencies ferries are the primary means of egress from nearby lower Manhattan.[19] NYS DOT is installing an emergency dock south of the BCT at Pier 12 to accommodate Ollis Class Staten Island Ferries which carry up to 5,000 passengers.[20]

BMT is the closest commercial maritime facility to lower Manhattan and has significant ground transport potential for evacuations due to its proximity to the Brooklyn Queens Expressway (BQE). Evacuees from Manhattan arriving at BMT must be able to board buses to be dispersed to communities throughout Brooklyn and beyond. The BCT at Pier 12 could also be a major asset in emergencies and used to support emergency response personnel and provide the immediate medical needs of injured evacuees.

All surface transit considerations must include access to, and egress from, DOT's emergency dock to the adjacent highway. The emergency docking facilities at BMT complements the Liberty State Park in New Jersey, another major evacuation point for lower Manhattan evacuees in emergencies. BMT could also provide staging for first responders and emergency materials, supplies, and equipment needed to address stabilization and the redevelopment needs of lower Manhattan as we experienced on September 11.

The majority of New York City's food supply is shipped to container facilities in New Jersey. Current transportation options between New Jersey and New York City are limited and should any of these vital trans-Hudson connections be compromised a Blue Highway Hub at BMT will be critical to ensure the continued delivery of food, medical supplies and materials to the city.

Workforce Development

A Blue Highway Hub at the BMT would create thousands of construction and full-time operating and service jobs, as well as apprenticeships. A majority of the jobs in warehousing, logistics, marine and surface transportation, maintenance, repair and management should be targeted to attract local community residents who have traditionally walked from their homes to good paying jobs on the waterfront. The proximity of the New York Harbor School on nearby Governors Island provides motivated and trained students for apprenticeships and long-term employment in the maritime sector.

Cost Estimate

It is impractical to present financial models for the envisioned Blue Highway Hub at BMT as decisions about the future use should be addressed in an open and transparent public process review and approval process. EDC's proposed plan has an estimated cost of approximately $3.5 billion without addressing resiliency, neighborhood infrastructure, or local transportation concerns.

Major public investments supporting a Blue Highway Hub at BMT would be the stabilization and improvement of piers and the construction of an elevated greenway/flood wall and other public spaces. We believe an alternative all-maritime Blue Highway Hub at BMT could require less than $1 billion in public investment with a considerable matching investment by the private sector. Until a final redevelopment plan for BMT is created and approved, it is impractical to propose specific public costs for the project. This report includes ballpark estimates of

needed public investments, consistent with EDC's proposed BMT redevelopment plan.

Private investors operating cold storage, warehouse, logistics, maritime and surface transportation, cruise ships, etc. could match the public expenditures in private investment at BMT if they were given long-term contracts and leases that allowed them to amortize their investment. Shared investment helps keep public and private agendas aligned.

Up to $10 million for bulkhead improvements for vessel wharfage on the South face of Pier 7 would be included in the BMT public budget along with the building to house the food and beverage and retail marine supply facility. All other Pier 7 improvements would be the responsibility of the Brooklyn Bridge Park Corporation which would have jurisdiction over the site.

Pier 8 could require up to $40 million for pier stabilization, shed renovation, solar installations and new ramps for vessels, servicing the Pier. The dry stack marina would be privately built and operated as could the food and beverage and maritime retail supply facility at nearby Pier 7. Pier 9a would not be used for Blue Highway activity. It will require ~$5 million for new piles to support fuel barge layovers.

Pier 9b might require $200 million for reconstruction with an additional $40 million for the pier shed with solar, and the addition of ramps for barge docking. EDC has spent approximately $16 million on new cranes for Pier 10 and $19 million on docking racks for aluminum catamarans, a travel lift and shipyard space. Pier 11 improvements have not been used since construction finished in 2023 and are not necessary for current NYC Ferry operation. They should be privately operated to service the Blue Highway and provide haul out and repair support for vessels in the harbor.

Pier 11's shed should be improved and modified for the installation of electric power for micro delivery vehicles and solar panels which could cost $20-30 million. Estimates for new fabrication/industry/artisan space and improvements to Building 195 require site designs to be reasonably accurate.

Possible Funding Sources

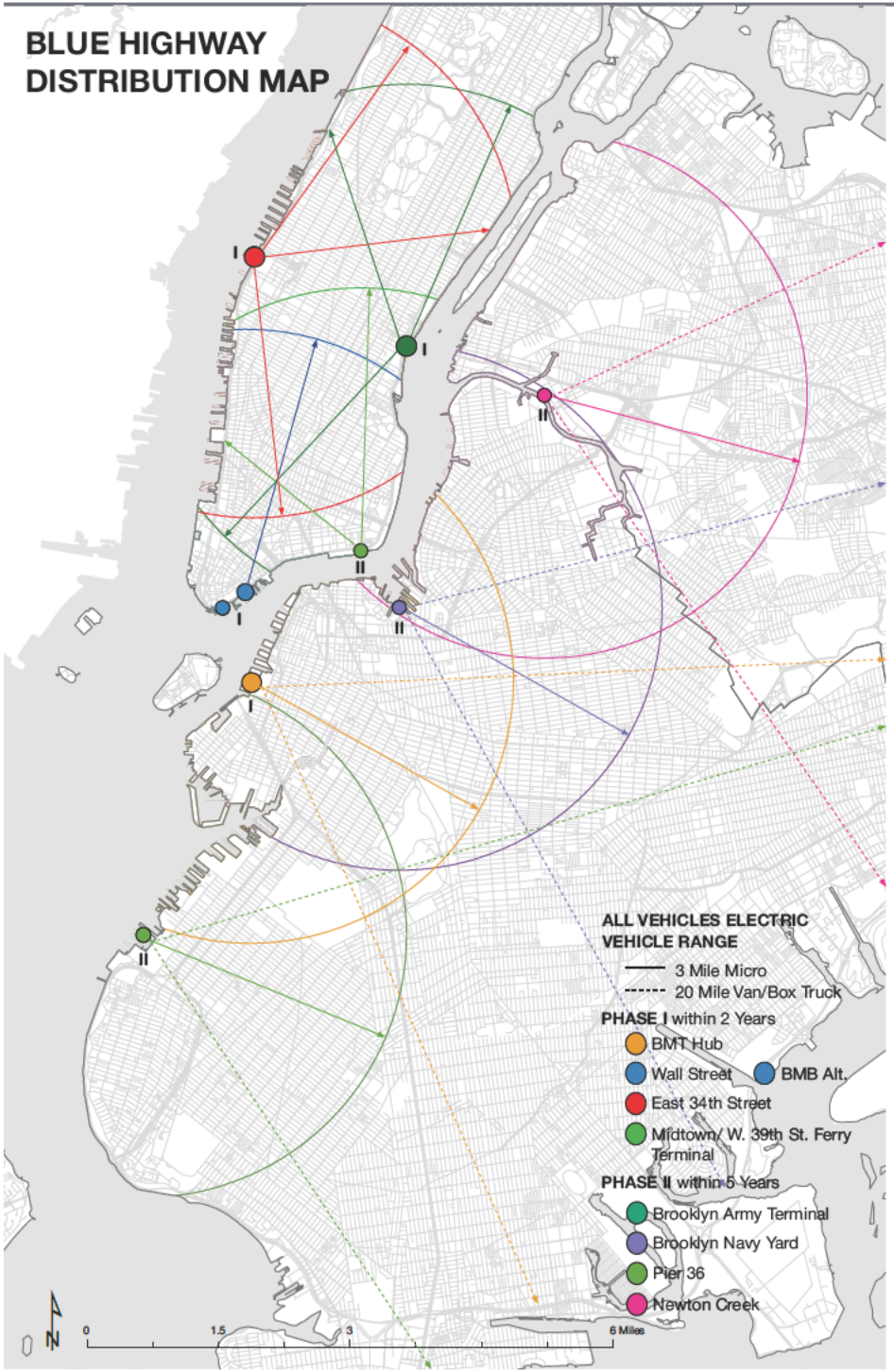
When Brooklyn Bridge Park was created, the Port Authority transferred the property to the City of New York and provided $85 million in funding for the project.[21] The PA failed to maintain BMT adequately and should transfer the property to the city outright and provide the $84 million in unspent pier maintenance funding for BMT that was included in the Port Authority 2022 budget.[22]

EDC has stated that it has $405 million in public funding currently dedicated to the redevelopment of BMT.[23] That funding can be used to redevelop Pier 9b and improve other piers and pier sheds. Other applicable city, state, and federal capital funding could support the redevelopment of the Blue Highway Hub at BMT as well as other public financing mechanisms.

BMT is zoned for maritime industry, located in the South Brooklyn IBZ and is eligible for public financing and tax incentives through the New York City Industrial Development Agency (IDA) which can issue bonds to finance site redevelopment, as well as provide significant employment and tax incentives to encourage private sector investment at BMT.[24]

IDA bonds are tax exempt securities issued on behalf of private sector companies to finance the construction of facilities, equipment, and infrastructure in industrial business zones. The IDA can provide 25-year property tax abatements, sales tax waivers and reduced mortgage recording taxes and well and a waiver of the 8.875% city and state sales tax on equipment and supplies for construction.

The elevated greenway/flood wall would be a major public investment. The greenway and neighborhood parks would provide transportation and recreation necessities for the neighborhood residents. Flood protection and stormwater retention would protect surrounding neighborhoods and improve water quality in the harbor. This element provides many benefits and could be eligible for multiple sources of public capital funding.



The Blue Highway

Increasing truck traffic has resulted in traffic congestion and air pollution affecting public health, deteriorating our bridges, highways and tunnels, and diminishing our quality of life. New York is a waterfront city which has been supplied primarily by water since the 1600's. Beginning in the early 1960s, the PA built large container ports on Newark Bay in New Jersey, which drew commercial maritime operators across the Hudson.

EDC has spoken about the potential for moving freight on our waterways for over 20 years. In the past two years, EDC and DOT have made concerted effort to heighten awareness of the benefits of a Blue Highway to transport products, produce, packages, and building materials throughout the city via our waterways.

A proposed Blue Highway distribution map suggests expanding micro delivery at existing DOT landings and expanding to other locations in two phases over the next five years.

Phase I could use BMT's Pier 11 and existing DOT ferry landings in lower Manhattan and the East and West sides at Midtown. Phase II would require the construction of new docking facilities to accommodate aluminum catamaran, ro-ros, and barges (primarily for use in emergencies and disasters). Phase II landings all have roadway access and can accommodate electric pedal powered delivery, bicycles, vans and box trucks to extend the range of delivery services.

Both EDC and DOT have made progress on planning and have begun demonstration projects to show the potential of a Blue Highway using aluminum catamarans and ro-ros to transport materials from BMT and Hunts Point Market in the South Bronx. More has to be done to implement a Blue Highway at the scale required to make economic sense for shippers and provide major economic and environmental benefits for the city.

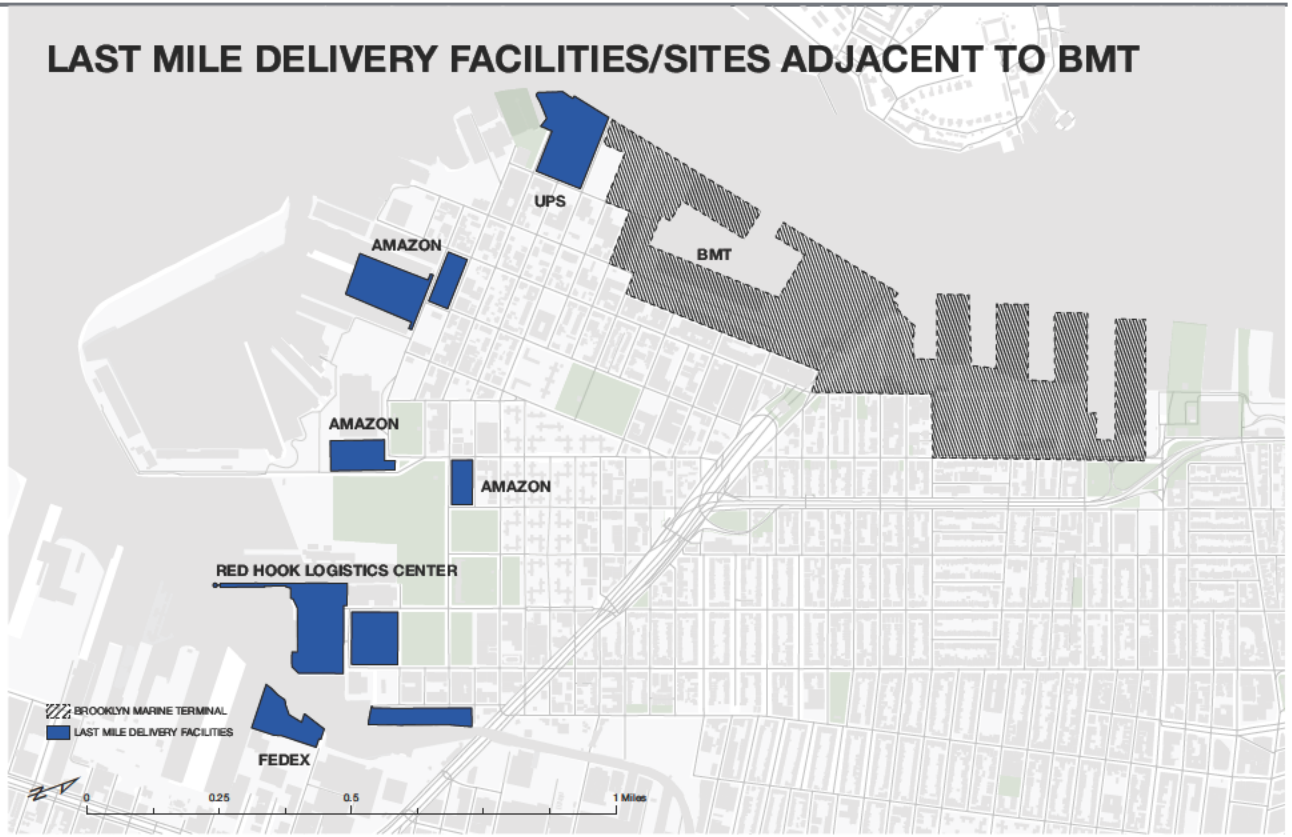
However, their efforts do not appear to be coordinated. For example, DOT demonstrated the possibility of landing both aluminum vessels and ro-ros at the lower Manhattan ferry terminal at Pier 11. EDC plans to spend millions

building a new dock, for the same type of vessels, three blocks away at Downtown Heliport on Pier 6. The heliport is busy and space on the pier quite limited so EDC plans to install a large barge on the north of the pier on the East River. Most mariners do not believe Pier 6 is an appropriate location for waterborne package delivery.

The Blue Highway hub at BMT requires inputs. Pier 10 currently receives 70,000 inbound containers on ships, and 20,000 containers from container ports in New Jersey on barges each year. Trans-Hudson shipment of goods by truck is expensive, time consuming and potentially vulnerable to disruption. Transporting 53-foot trailers on barges could increase inputs to the Blue Highway at BMT.

Upstate farmers and marine transport companies have proposed shipping produce and farm products to the city by barge and/or sail[25] as has been done for hundreds of years. A cold storage facility at BMT could support another new input to the Blue Highway that will enhance not only the region's economy, but food security for city residents.

Distribution from BMT should primarily be via aluminum catamarans and appropriately sized ro-ro vessels and surface transport using electric vehicles. Existing ferry companies have aluminum catamarans, and new companies have brought ro-ro's to the harbor to service the Blue Highway.



Micro delivery vehicles have recently begun traveling aboard aluminum catamarans from BMT to the West Midtown Ferry Terminal.

The biggest obstacle to implementing the Blue Highway is convincing the last mile distribution warehouses and shipping companies to transition from the roadways to the waterways. Public incentives such as IDA bonding, could offer owners of last-mile delivery facilities in nearby Erie Basin and Gowanus Canal to transition to waterborne package delivery. Requiring the use of electric vehicles for all deliveries and increasing restrictions on trucks traveling in Red Hook would complement incentives.

A robust marketing campaign highlighting the environmental and economic benefits of the Blue Highway could build public demand for goods transported by water. Meeting with shippers and presenting at scheduled conferences with shipper, transport and logistics companies, along with increased public demand could encourage shippers to transition to waterborne transportation.

Summary

This report is intended to stimulate new thinking about the redevelopment of BMT and to be the maritime alternative considered in any EDC environmental review for the site redevelopment should their proposal proceed. Hopefully, it will not proceed and Mayor Mamdani, our elected officials and the local community organizations will create a transparent, inclusive, and cooperative planning process to guide the redevelopment of BMT.

The Mayor has the unique opportunity to create a Blue Highway Hub at BMT and the most advanced urban waterborne freight system in the nation. However, the public planning process used by EDC to create its BMT plan was not transparent and significantly limited public input. The process was deeply flawed and cannot be replicated without greatly diminishing BMT's potential and that of the future Blue Highway.

We hope that the Mamdani administration will change course on the city's approach to the stewardship of our waterfront. EDC should not be responsible for the redevelopment of BMT. EDC has limited expertise and/or institutional knowledge of marine infrastructure and commercial maritime issues and their failure to maintain critical infrastructure at MCT exemplifies their lack of marine management capabilities.

The City Club supports the creation of a new public entity to assume EDC's maritime contract to plan and manage the city's marine infrastructure and maritime commerce. A nonprofit Marine Development Corporation, lead and staffed by experienced marine and maritime experts and required to work in a transparent and open public process, should protect our marine assets and maritime industries in the future.[26] EDC's oversight of our waterfront has been disastrous, and New Yorkers deserve better.

Acknowledgements

This alternative maritime vision for the redevelopment of Brooklyn Marine Terminal and the roll-out of the Blue Highway has been developed by the City Club of New York with suggestions and advice from many individuals including:

Over twenty maritime professionals in the New York/New Jersey Harbor with extensive experience operating aluminum ferries, tugs and barges, roll-on/roll-off and sailing vessels, historic ships, dry stack marinas, bunkering, ship repair, pilots, and marine and environmental engineers.

Community representatives from: Resilient Red Hook, Columbia Street Waterfront District, Voices of the Waterfront, Friends of Fort Defiance, Atlantic Avenue BID, and The O'Connell Organization. Logistics and supply chain professionals in warehousing, cold storage, and transportation. Urban planners, architects, attorneys, city, state and federal elected officials, and current and former city agency professionals.

Klaus H. Jacob from Columbia University for guidance on resiliency measures for BMT and the adjacent neighborhoods. Pratt University professors and graduate students in studios focused on providing community organizations with information, analysis, and alternatives for BMT redevelopment.

My co-chair John Shapiro and City Club Waterfront Committee Members: Danielle Baez, Beth Bingham, Alice Blank, Sally Bowman, Rob Buchanan, Aaron Ford, Andrew Genn, Mary Habstritt, Clay Hiles, Sam Jackson, Klaus H. Jacob, Layla Law-Gisiko, Alex Miller, Gita Nandan, Juan Rivero, Walter Rodriguez Meyer, Gregory Smithsimon, Tyler Taba, John West, Chuck Weinstock. All members of the Waterfront Committee volunteer as individuals, and do not represent any organization.

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Maps
Chris Hauserman

Report Design
Kameny Design

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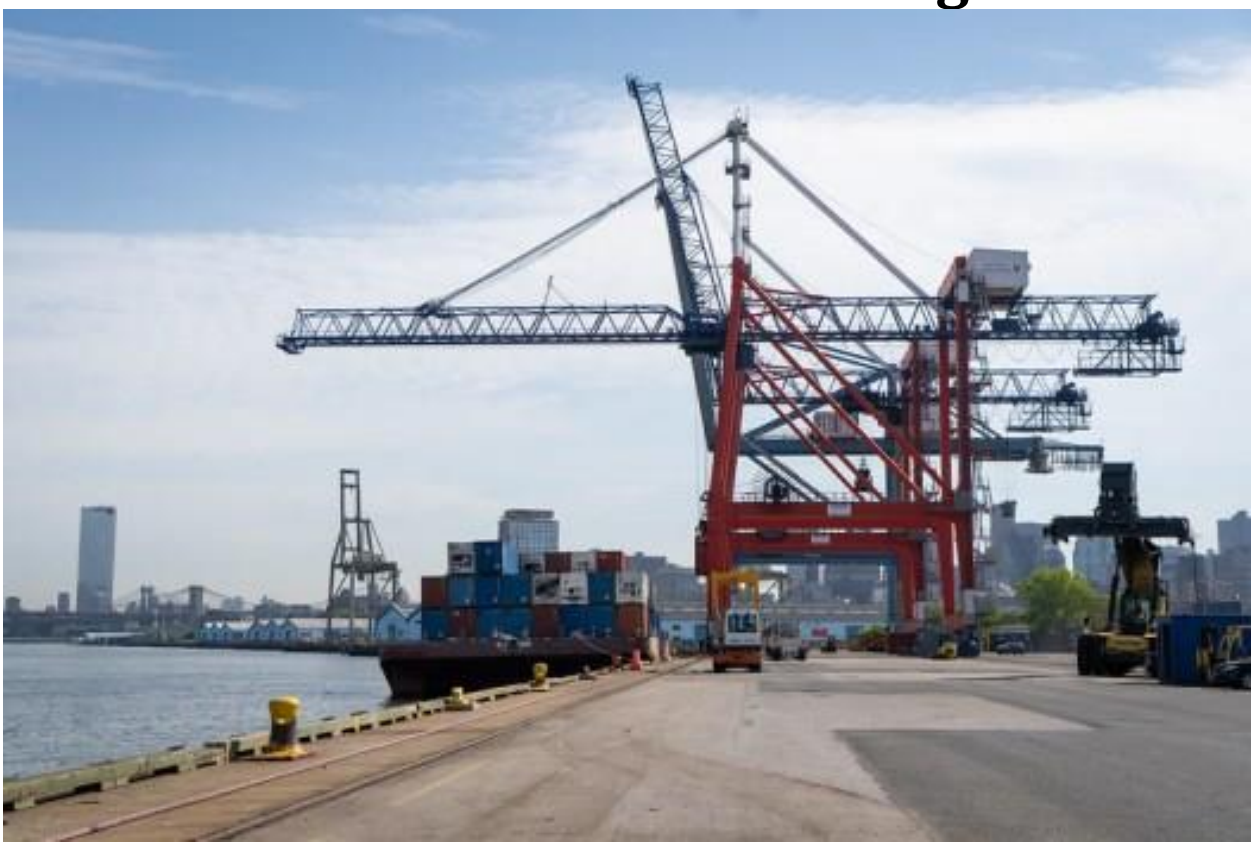
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Daily News
Opinion

NYC waterfront needs a new navigator



The Brooklyn Marine Terminal in Red Hook, Brooklyn. (Caroline Rubinstein-Willis/Mayoral Photography Office)

By **TOM FOX**
PUBLISHED: December 29, 2025 at 5:00 AM EST

The NYC Economic Development Corp. (EDC) has done a poor job with our city's marine infrastructure and maritime industries. Mayor-elect Zohran Mamdani should end EDC's control of our waterfront and re-establish a professional maritime planning and management entity as our city has had for most of its history.

In 1991, EDC was created and given a maritime contract to manage and develop the city's waterfront. EDC is a real estate development entity, and its oversight has resulted in deteriorating marine infrastructure and a diminished maritime industry, which are critical for the city's future economy, environment, and emergency preparedness.

- Manhattan Cruise Terminal

By 1998, the Manhattan Cruise Terminal's (MCT) four piers were removed from Hudson River Park and transferred to EDC. In 2008, EDC leased two piers to Vornado Realty for a convention center complex. They operated on Pier 94 but seldom used Pier 92 which a city inspection found unusable in 2019. Vornado claimed EDC was responsible for pier maintenance and stopped paying rent, yet in 2023 was allowed to build a movie studio on Pier 94, despite local community and elected official opposition.

In 2023, EDC committed to improve and electrify Pier 90. However, has delayed electrification and announced a multi-billion dollar rebuild of MCT which will remove Pier 90 and extend Piers 88 and 92 to accommodate vessels carrying 7,000 passengers while cities like Amsterdam and Venice have banned mega cruise ships. EDC's failure to apply for the required congressional authorization to lengthen the piers could delay the project two years.

- Staten Island's North Shore

EDC's redevelopment of Staten Island's North Shore was a fiasco. In 2005, they announced plans to redevelop maritime sites adjacent to the Staten Island Ferry Terminal with a shopping mall and the largest observation wheel in the world. The $590 million wheel was abandoned, and EDC has stated that the mall is only 50% occupied.

- NYC Ferry

Rezoning stimulated high-rise residential development on working waterfronts in Greenpoint, Williamsburg and Long Island City, which private ferry operators were encouraged to service. In 2015, EDC established NYC Ferry, copying local operators service models and vessels, but chose a California company to operate 19 newly built city-owned vessels with public operating subsidies.

A city comptroller's audit reported that EDC failed to account for $224 million spent to initiate the service, and by 2019 their proposed $6.60/passenger subsidy became $10.73. EDC maintained regular ferry schedules during COVID-19 and subsidies rose to $14.57/passenger by 2022. The private company operating NYC Ferry declared bankruptcy in 2024.

EDC recently announced a $15 two-day unlimited NYC Ferry pass competing with private maritime tour operators who pay living wages, lease public property, and generate payroll and sales taxes. Why should city taxpayers subsidize tourists?

- Brooklyn Marine Terminal

For 20 years, EDC talked about moving freight on our waterways to reduce the truck traffic clogging our city streets, deteriorating infrastructure, and fouling our air. This September, EDC announced a $3.4 billion plan to redevelop the Brooklyn Marine Terminal (BMT) as a Blue Highway hub to transport produce and packages by water. However, they traded "as is" the 187-acre, state-of-the-art, city-owned container port at Howland Hook in Staten Island, for the Port Authority's 122-acre BMT with millions in deferred maintenance.

The Port Authority was required to keep BMT in working order. Yet EDC failed to recover deferred funding and used BMT's deterioration as rationale to employ a state General Project Plan (GPP) to sidestep public review and approvals. EDC's BMT redevelopment budget includes hundreds of millions in unrelated expenses, yet major commitments in Atlantic Terminal's GPP never materialized.

- Moving Forward

The Mamdani administration should establish a professional maritime development, management, and construction entity that assumes EDC's maritime contract, but with greater public accountability. A not-for-profit Maritime Development Corp. (MDC) led by experienced professionals who understand operations, the challenges of in-water construction and opportunities to grow our maritime industry.

MDC would celebrate our maritime heritage, redevelop maritime industrial areas, streamline public waterfront construction and maintenance, improve workforce development, contribute to resiliency and emergency preparedness, and grow commercial maritime industries through public/private partnerships.

The Harbor and the Erie Canal made New York City an economic powerhouse. Our waterways can once again stimulate economic growth by moving packages, produce, building material and people in a cost-effective, energy-efficient, and environmentally beneficial manner.

Fox is a Worldwide Ferry Safety Association board member. He was a founding partner of New York Water Taxi and president of Interferry, an international trade association.

ALTERNATIVE REDEVELOPMENT PROPOSAL FOR THE MANHATTAN CRUISE TERMINAL

HRP Advisory Council

June 9th, 2026

THE CITY CLUB OF NEW YORK

Advocating For All New Yorkers

Dattner Architects

AGENDA

1. INTRODUCTION: Where we are today

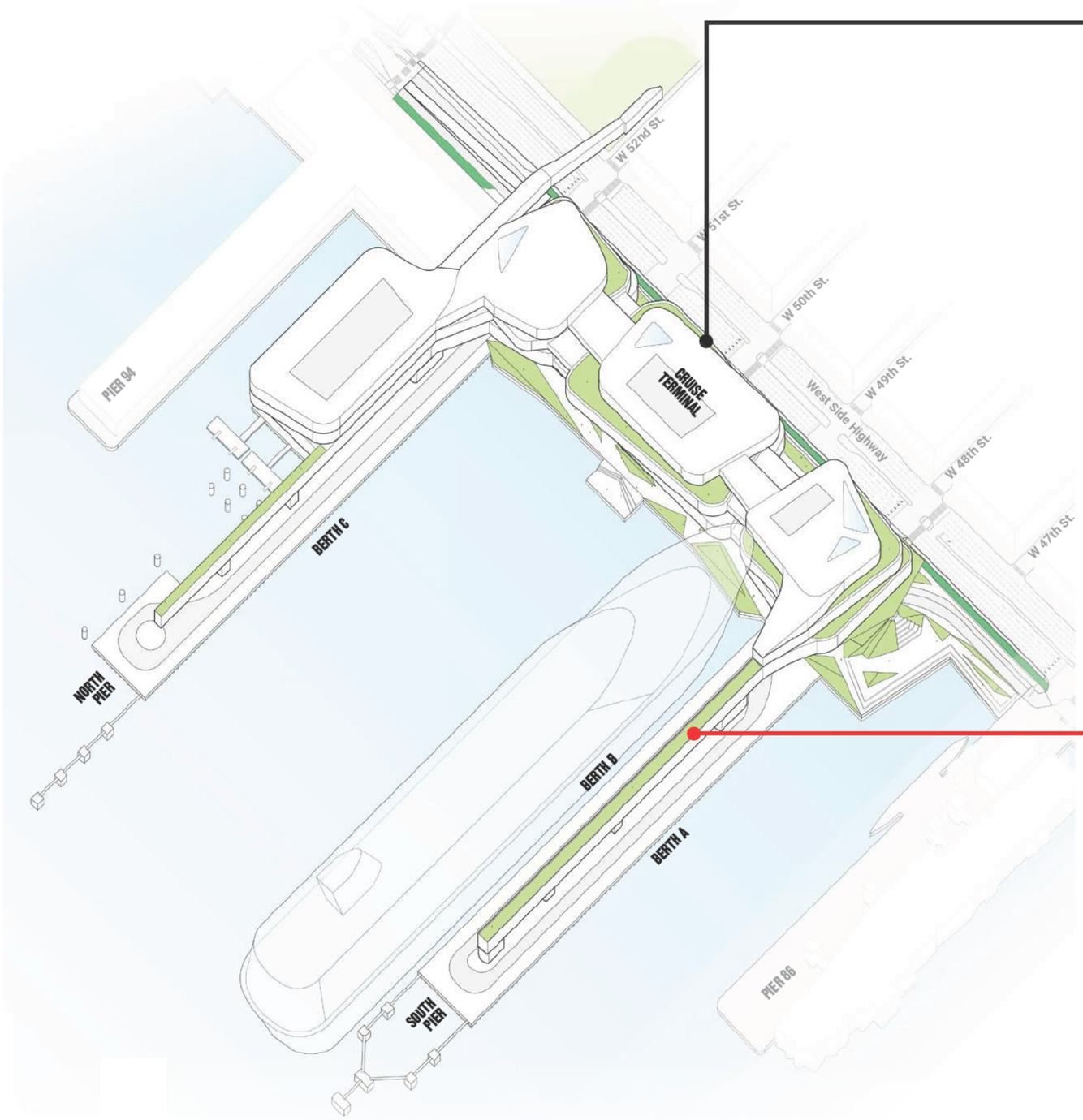
2. ALTERNATIVE PLAN: Terminal and Open Space Concept

3. COMPARATIVE ANALYSIS : EDC Master Plan and Alternative Plan

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EDC MASTER PLAN



MASTER PLAN IMPROVEMENTS

- Connection to Dewitt Clinton Park
- Ground Transportation Area Expansion
- Improved parking
- Preservation of view corridors
- 5 Acres of upland open pace exposed to the sky
- Creation of a Blue Highway terminal
- Pier reconstruction and modernization
- Increase in terminal capacity and cruise traffic
- On-shore electric power infrastructure

DISADVANTAGES

- 6 Acres increase to existing water coverage
- 340 FT of additional incursion into the navigable waterway
- Very large terminal building footprint
- Potentially inaccessible public spaces

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PRECEDENTS



DUBAI I CRUISE TERMINAL

Area	+/- 500,000 SF
Terminal Capacity	8,000 ppl
Berths	2 mega-vessels
Concourse	+/- 105 FT wide



DUBAI II CRUISE TERMINAL

Area	+/- 460,000 SF
Terminal Capacity	8,000 ppl
Berths	2 mega-vessels
Concourse	+/- 145 FT wide



KAT TAK CRUISE TERMINAL

Area	+/- 1,980,000 SF*
Terminal Capacity	9,600 ppl
Berths	2 mega-vessels
Concourse	+/- 140 FT wide

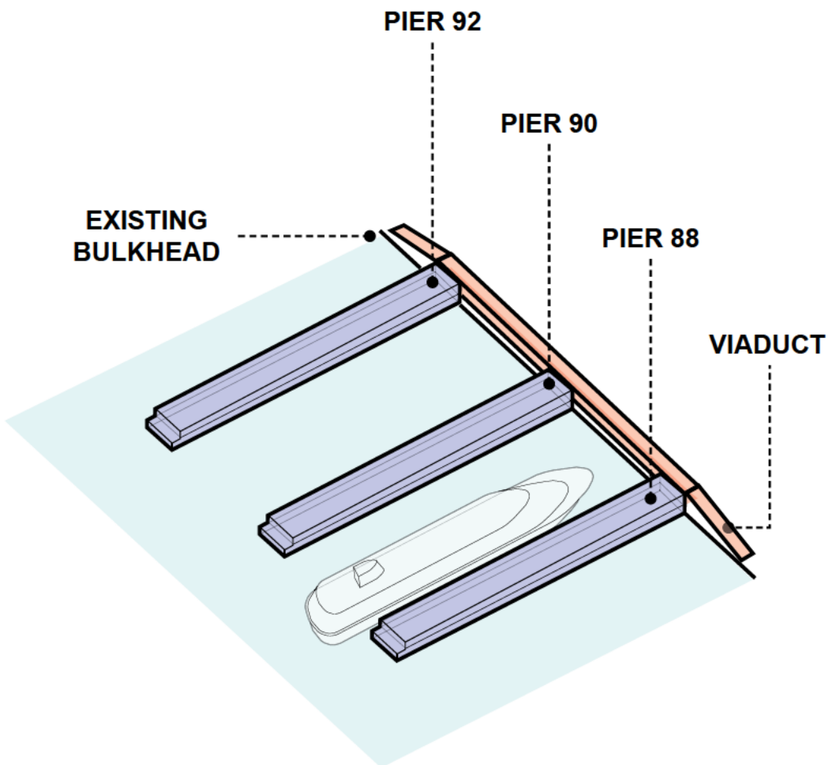


NORWEGIAN CRUISE MIAMI TERMINAL B

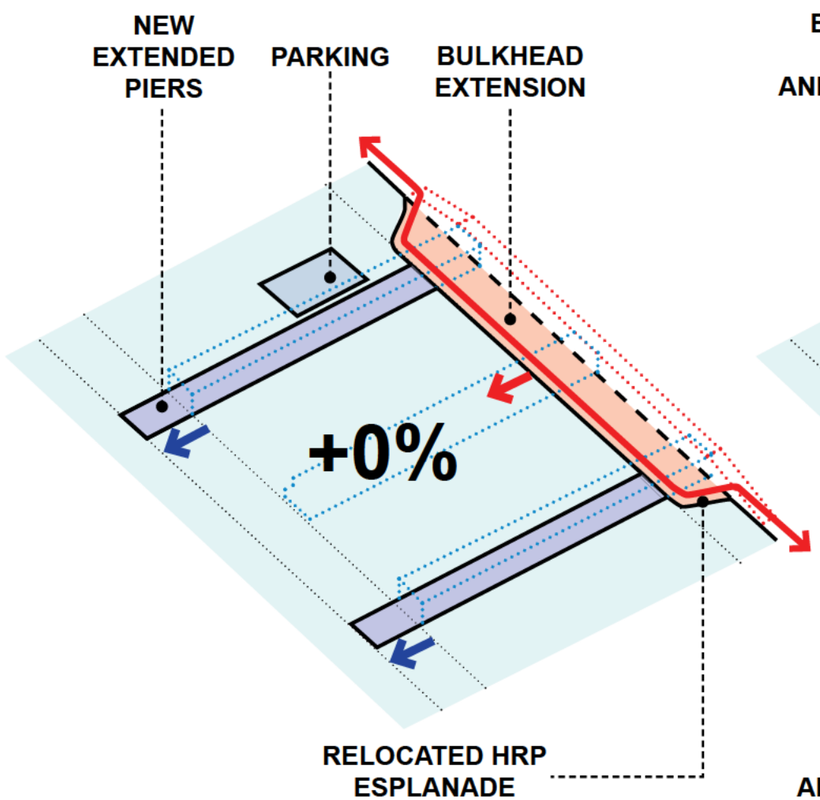
Area	+/- 190,000 SF
Terminal Capacity	7,000 ppl
Berths	1 mega-vessel
Concourse	+/- 100 FT wide

* Area includes hotel, atrium, and GTA

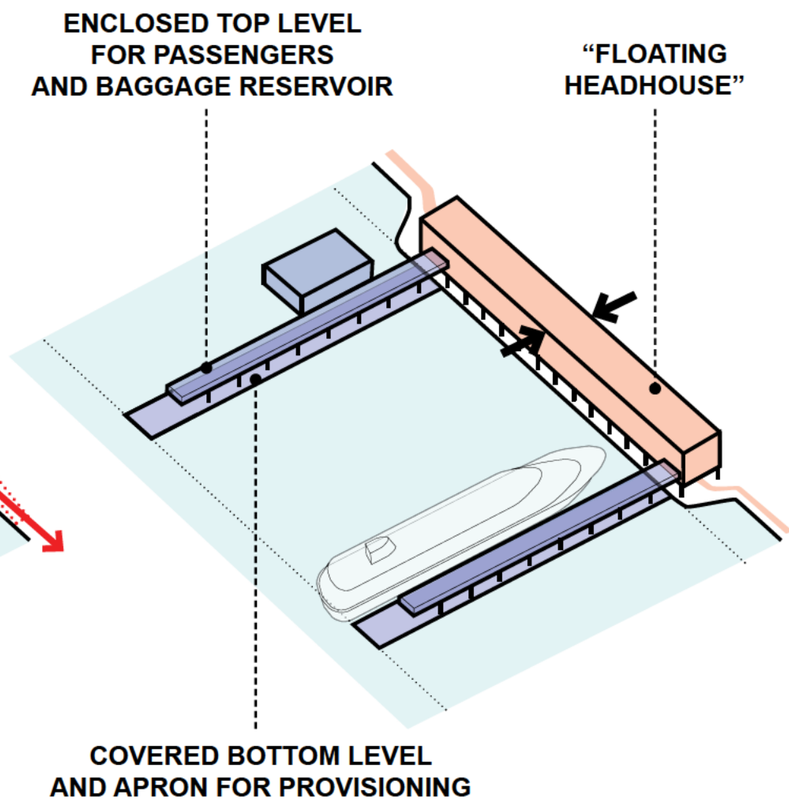
ALTERNATIVE PLAN “FLOATING HEADHOUSE” CONCEPT



EXISTING CONDITION



PROPOSED 0% INCREASE
TO TOTAL WATER COVERAGE



“SLIM” HEADHOUSE
WITH BI-LEVEL PIERS

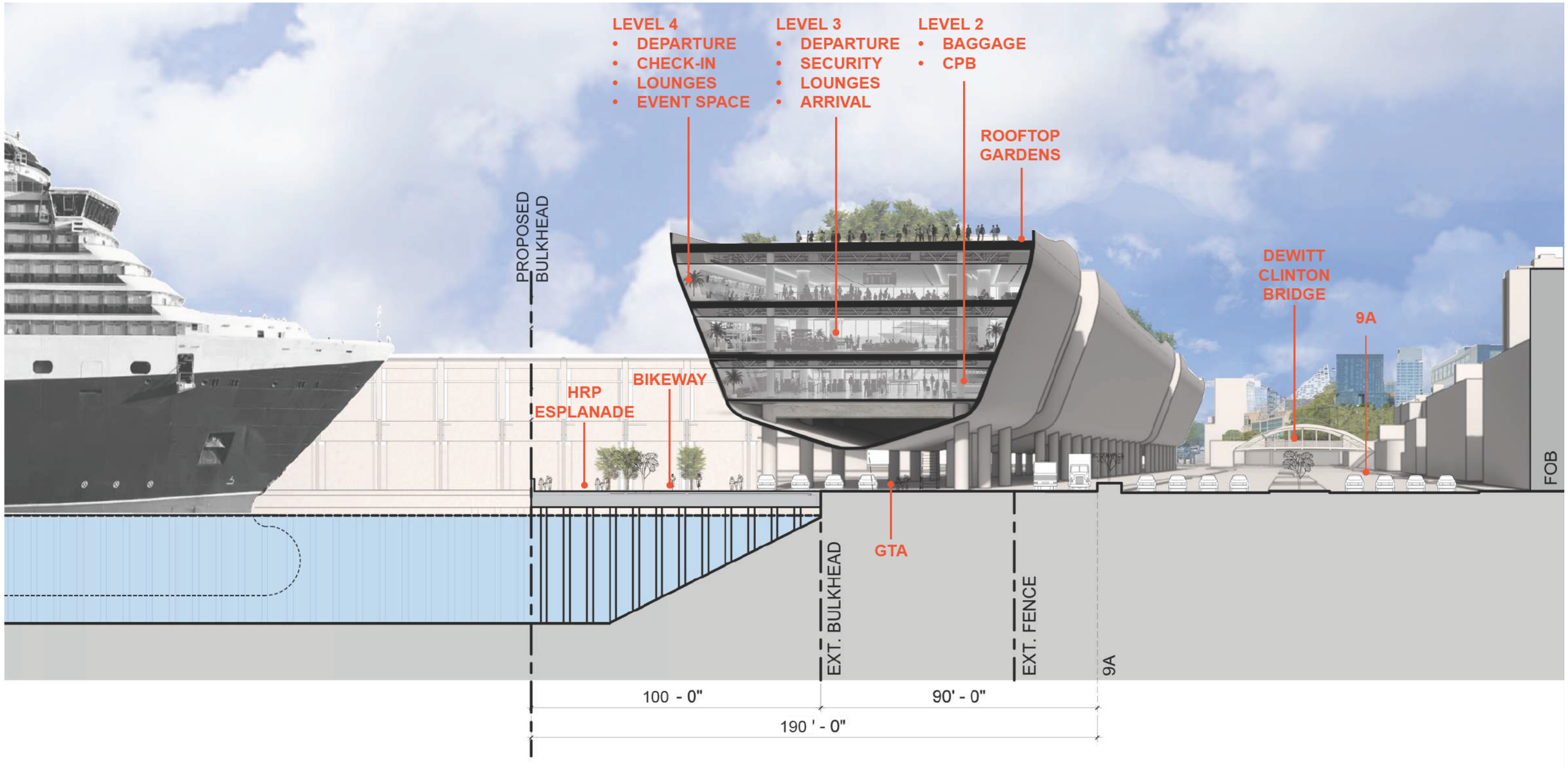
AERIAL LOOKING WEST



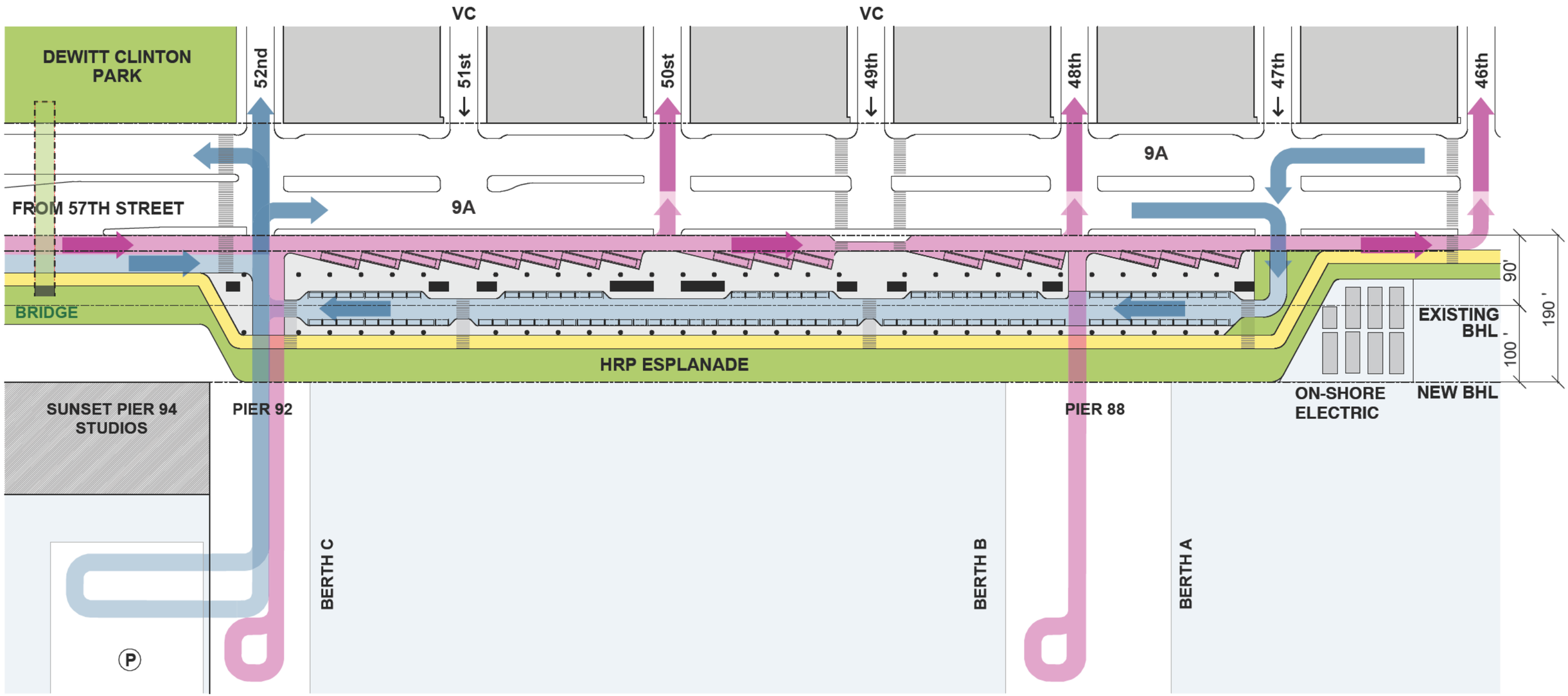
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PERSPECTIVE LOOKING NORTH



GROUND TRANSPORTATION AREA (GTA) AND PUBLIC SPACE



LEGEND

- PRIVATELY OWNED CARS AND RIDESHARE
- BUSES, SHUTTLES
- HRP PEDESTRIAN
- HRP BIKEWAY

PICK UP / DROP OFF SPOTS	EDC	CCNY
PRIVATELY OWNED CARS AND RIDESHARE	98	101
BUSES, SHUTTLES	15	17

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HRP ESPLANADE LOOKING SOUTH

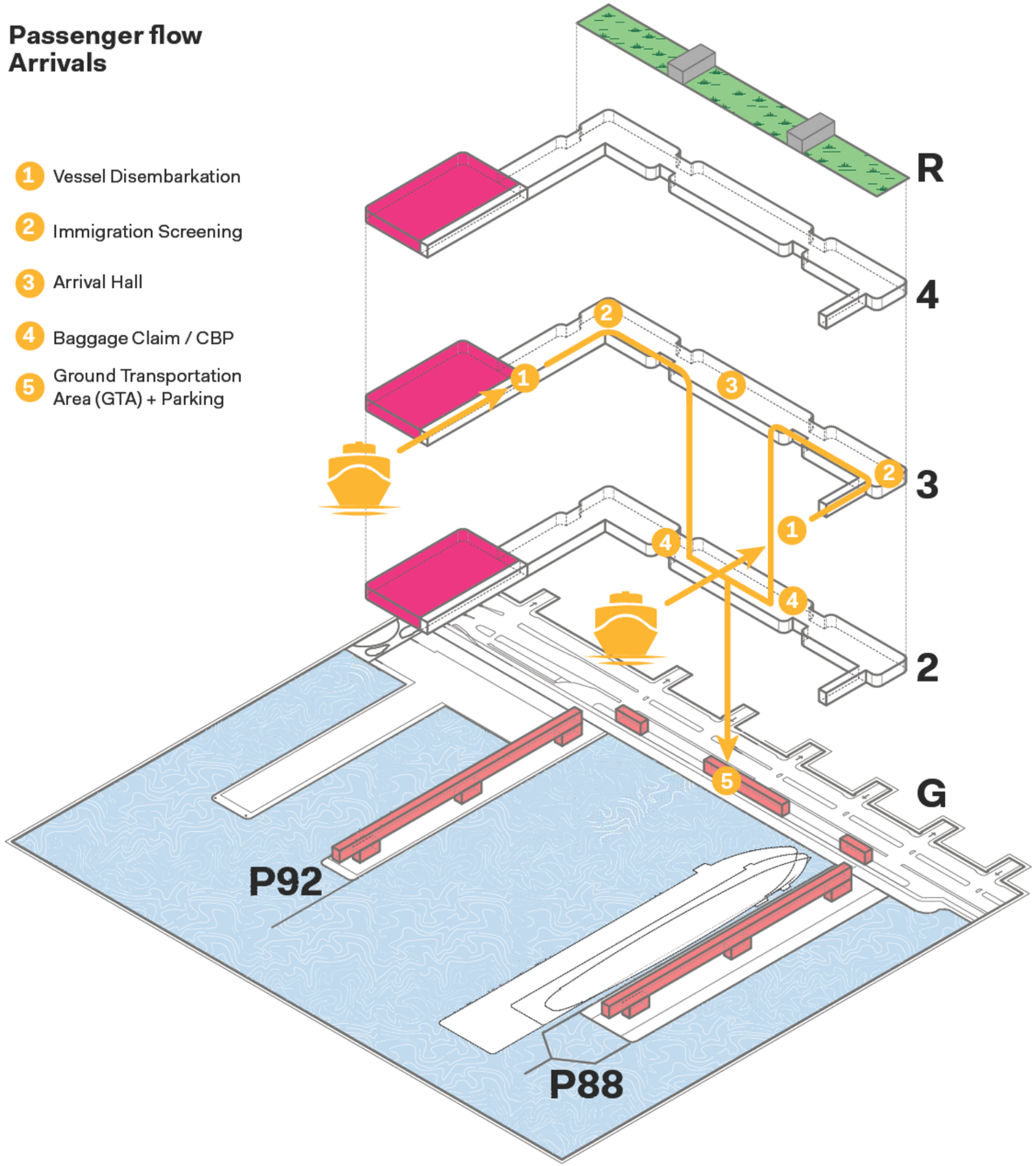


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ARRIVALS AND DEPARTURES

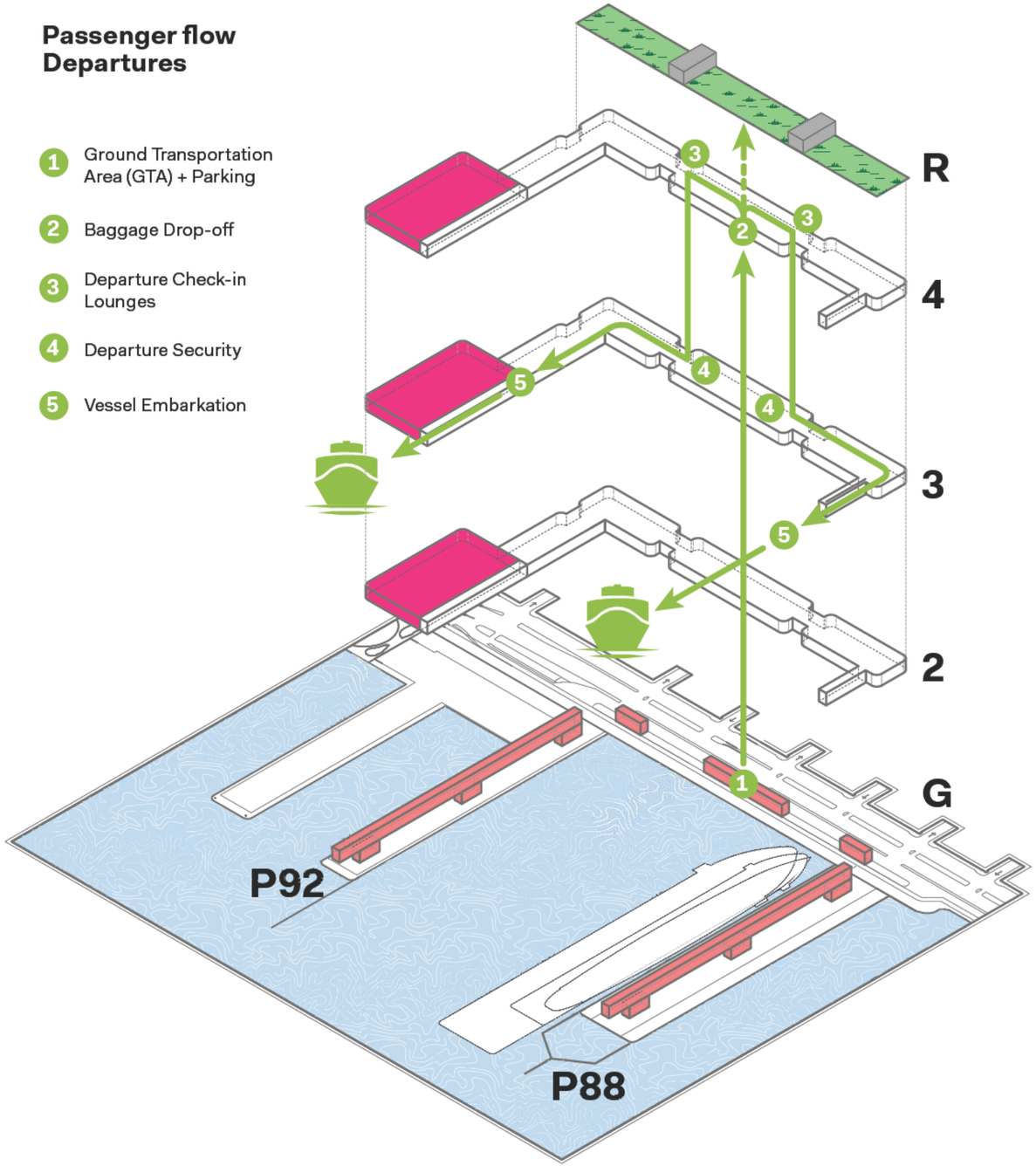
Passenger flow Arrivals

1. Vessel Disembarkation
2. Immigration Screening
3. Arrival Hall
4. Baggage Claim / CBP
5. Ground Transportation Area (GTA) + Parking



Passenger flow Departures

1. Ground Transportation Area (GTA) + Parking
2. Baggage Drop-off
3. Departure Check-in Lounges
4. Departure Security
5. Vessel Embarkation



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GROUND TRANSPORTATION AREA LOOKING NORTH



HRP ESPLANADE LOOKING NORTH



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COMPARATIVE ANALYSIS

EDC Master Plan / CCNY Alternative Plan

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TERMINAL COMPARISON





	EDC MASTER PLAN	CCNY ALTERNATIVE PLAN
Terminal Building	905,000 SF	465,000 SF
Parking Structure	330,000 SF	330,000 SF
Enclosed Pier Space	65,000 SF	250,000 SF
Total Area	**1,300,000 SF**	**1,045,000 SF**
Building Levels	3 levels + GTA	3 levels + GTA + Roof
Pier Length	1,120 FT + 350 FT Dolphins	1,120 FT + 350 FT Dolphins

EDC MASTERPLAN

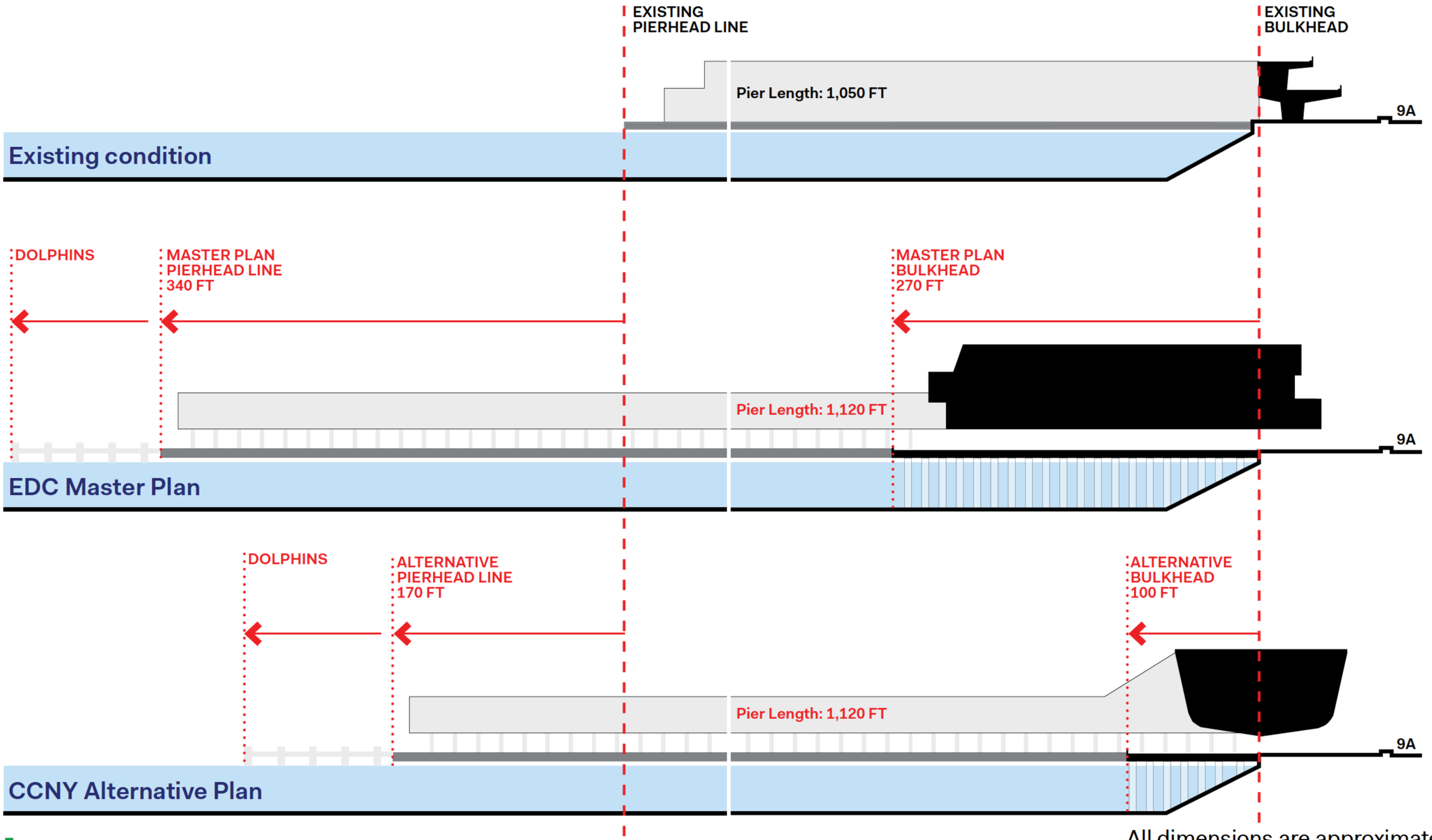
Area	1,300,000 SF
Berths	3 vessels
Concourse	245-300 FT wide

CCNY ALTERNATIVE PLAN

Area	1,045,000 SF*
Berths	3 vessels
Concourse	125 FT wide

All areas and dimensions are approximate.

WATER COVERAGE AND PIER LENGTH

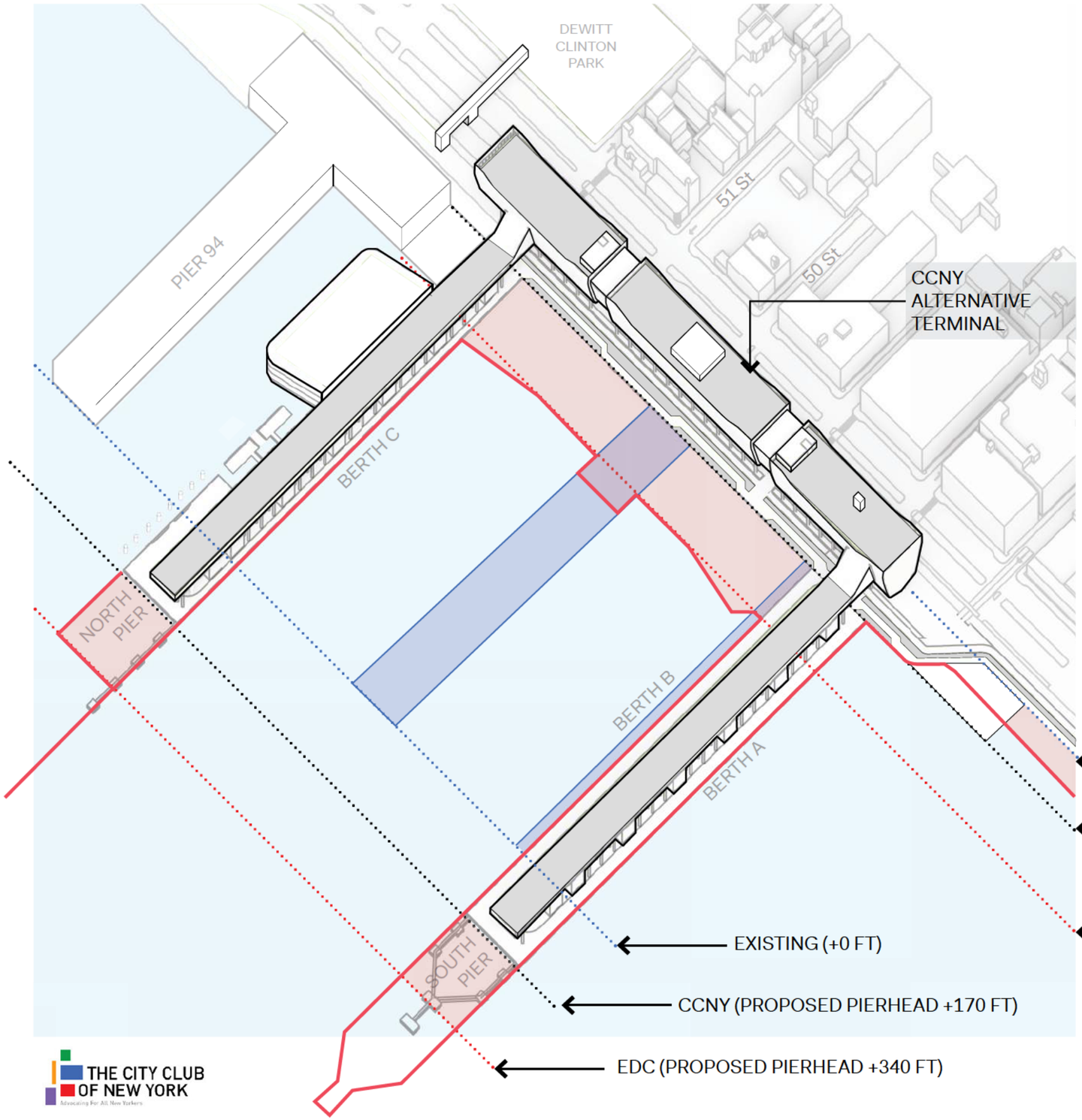


All dimensions are approximate.

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WATER COVERAGE AND PIER LENGTH



	PIER LENGTH (feet)	WATER COVERAGE (acres)
EXISTING	1,050	12.0
MASTER PLAN	1,120	18.1
ALTERNATIVE	1,120	12.0

	BULKHEAD LOCATION (feet)	PIERHEAD INTRUSION (feet)
EXISTING	+0	+0
MASTER PLAN	+270	+340
ALTERNATIVE	+100	+170

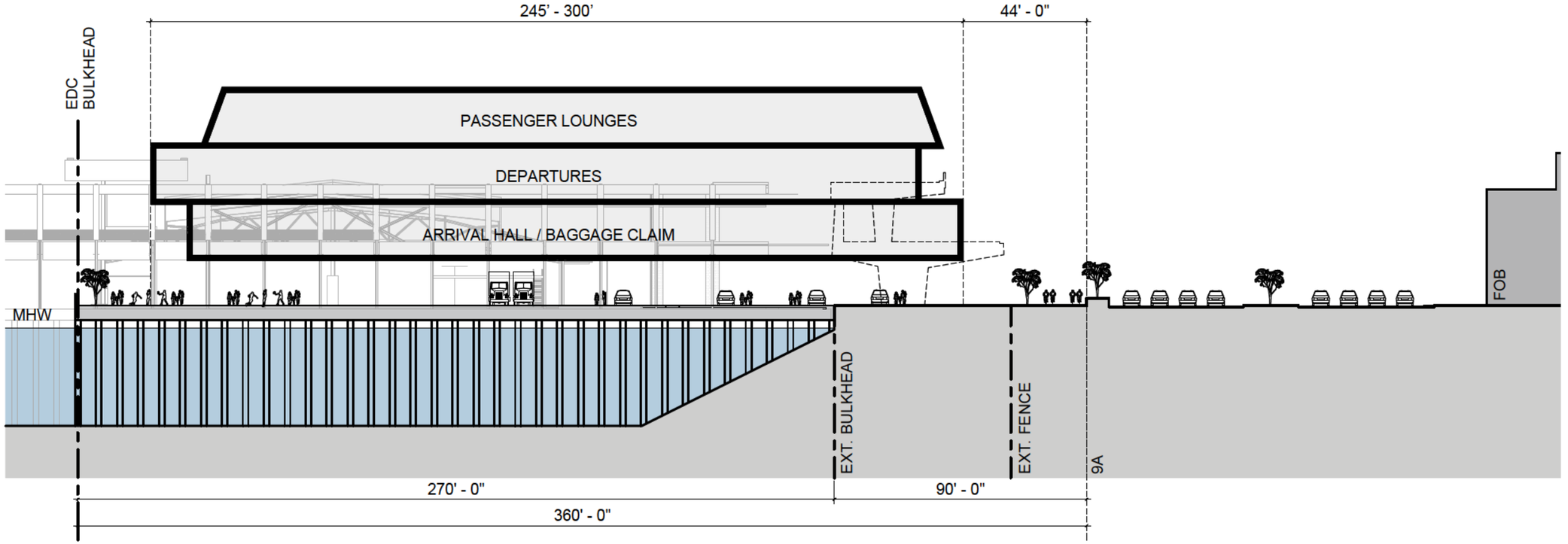
All areas and dimensions are approximate.

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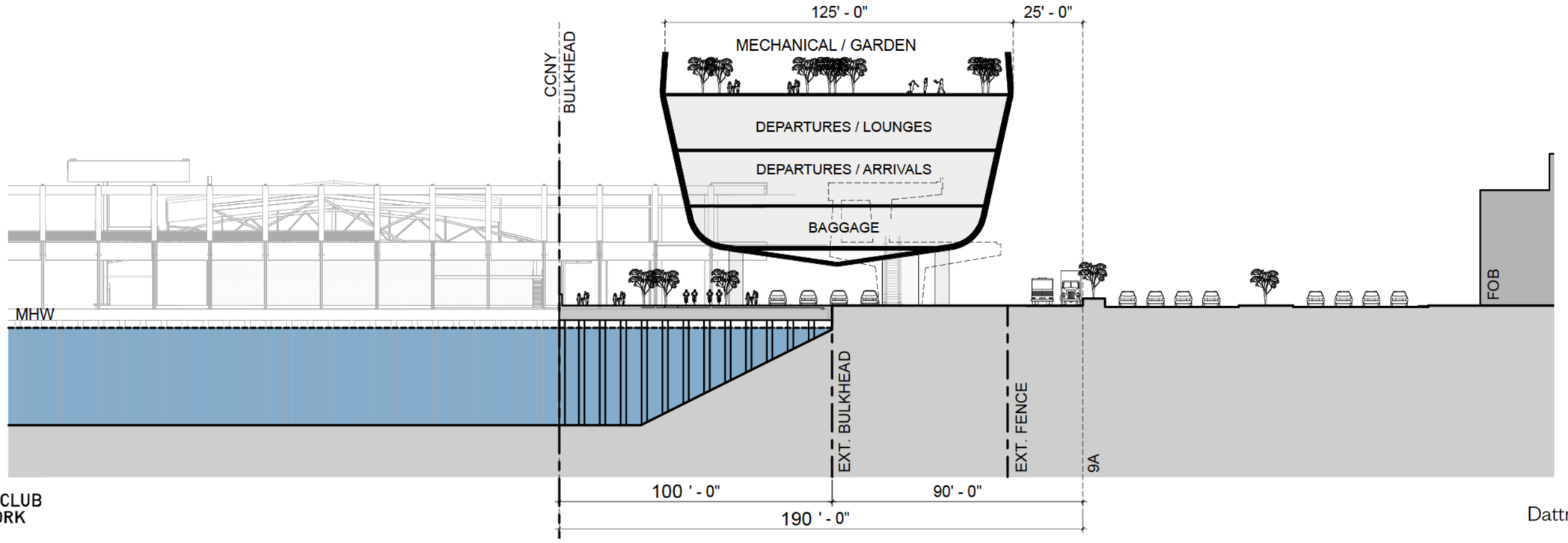
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BULKHEAD AND BUILDING LOCATION

MASTER PLAN



CCNY ALTERNATIVE PLAN

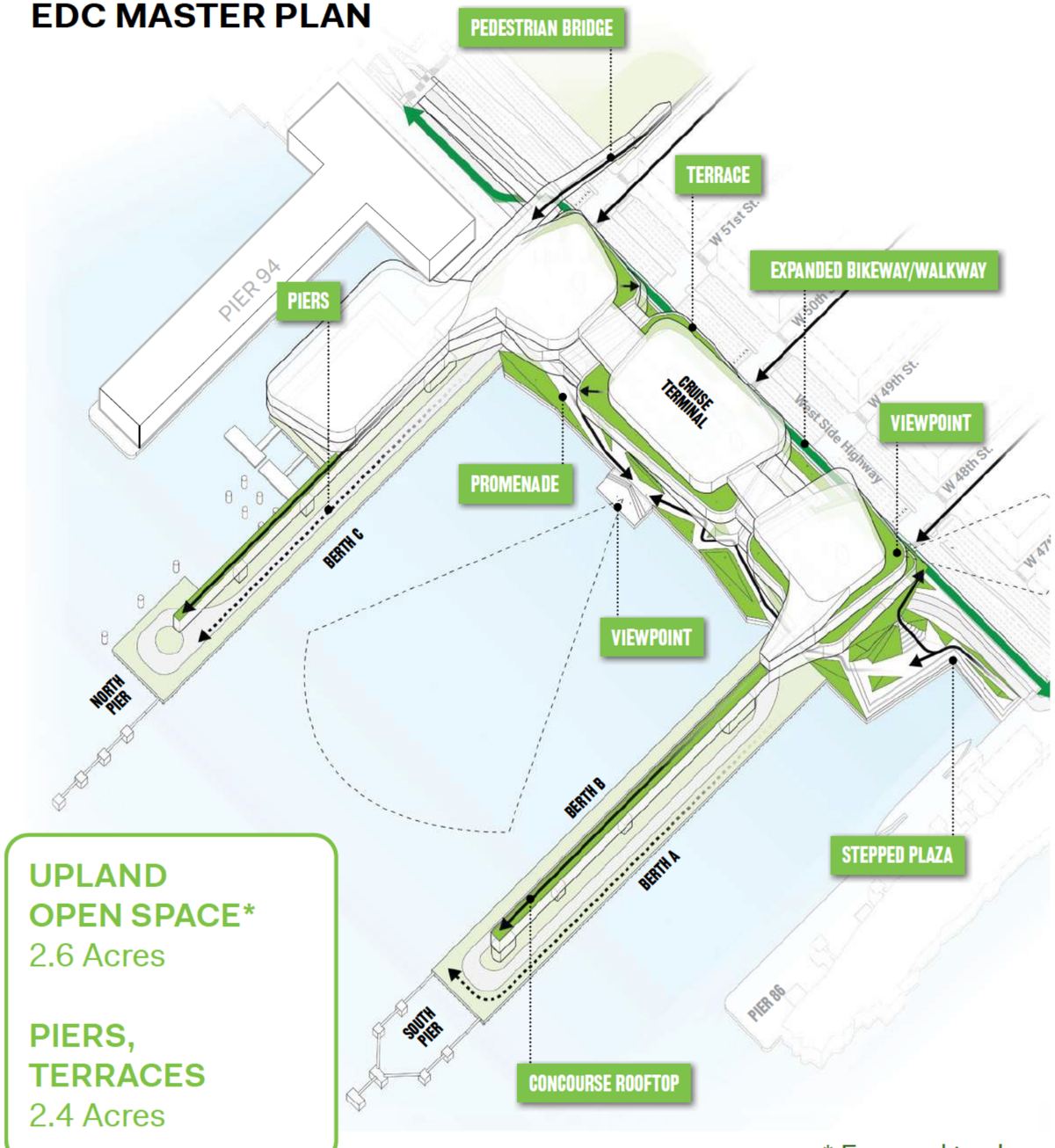


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OPEN SPACE

EDC MASTER PLAN

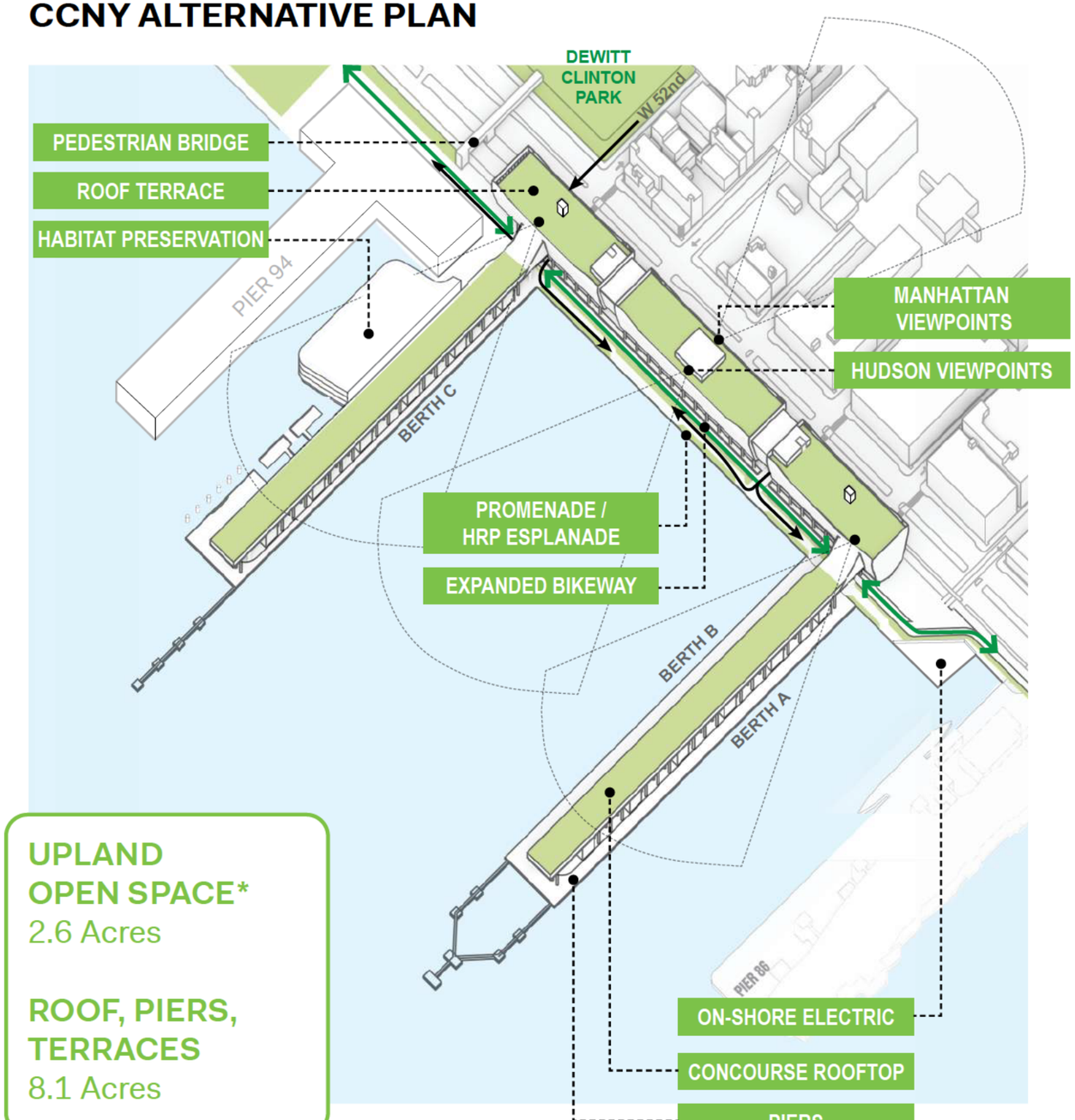


UPLAND OPEN SPACE*
2.6 Acres

PIERS, TERRACES
2.4 Acres

* Exposed to sky

CCNY ALTERNATIVE PLAN

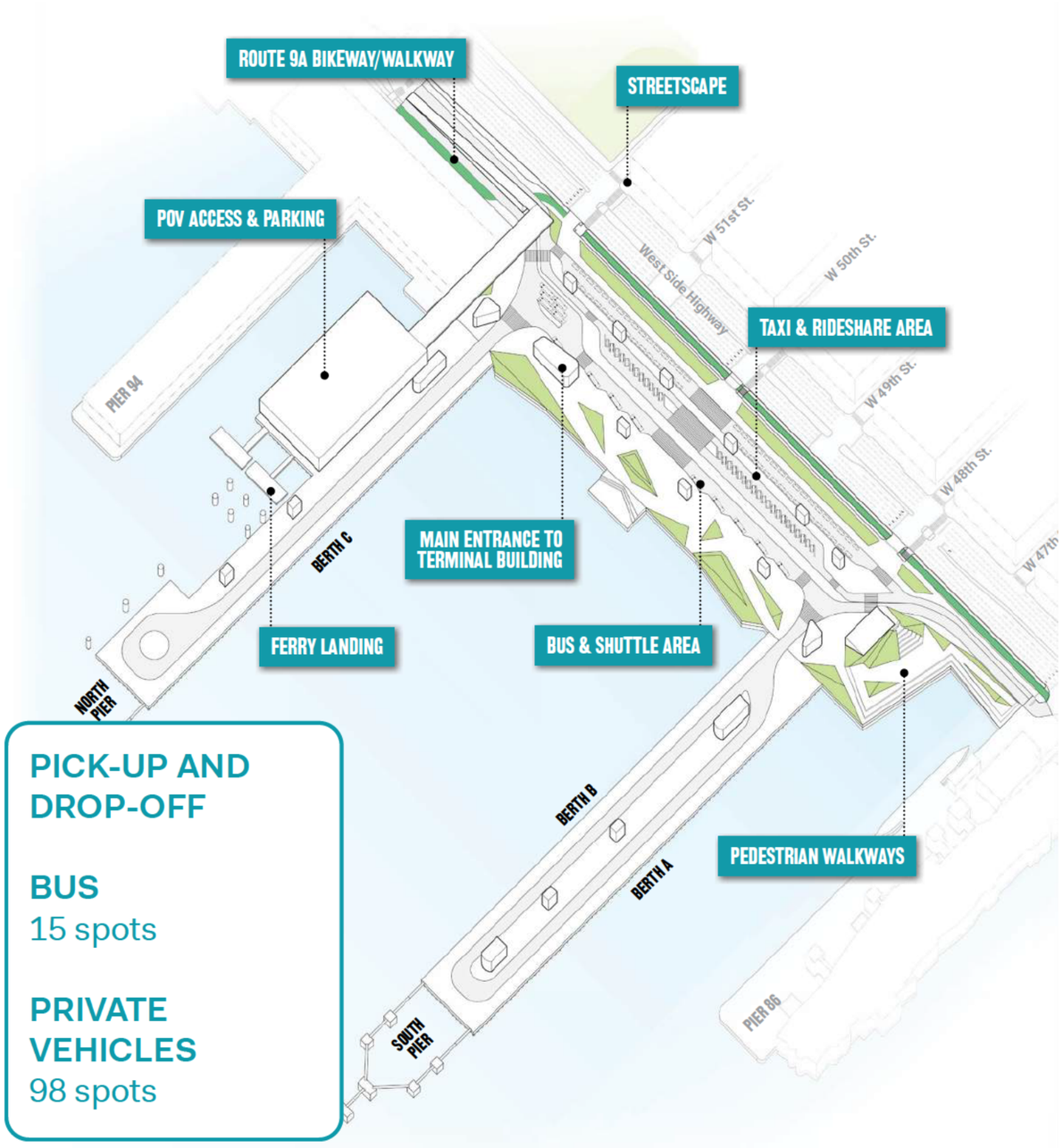


UPLAND OPEN SPACE*
2.6 Acres

ROOF, PIERS, TERRACES
8.1 Acres

GROUND TRANSPORTATION AREA (GTA)

EDC MASTER PLAN

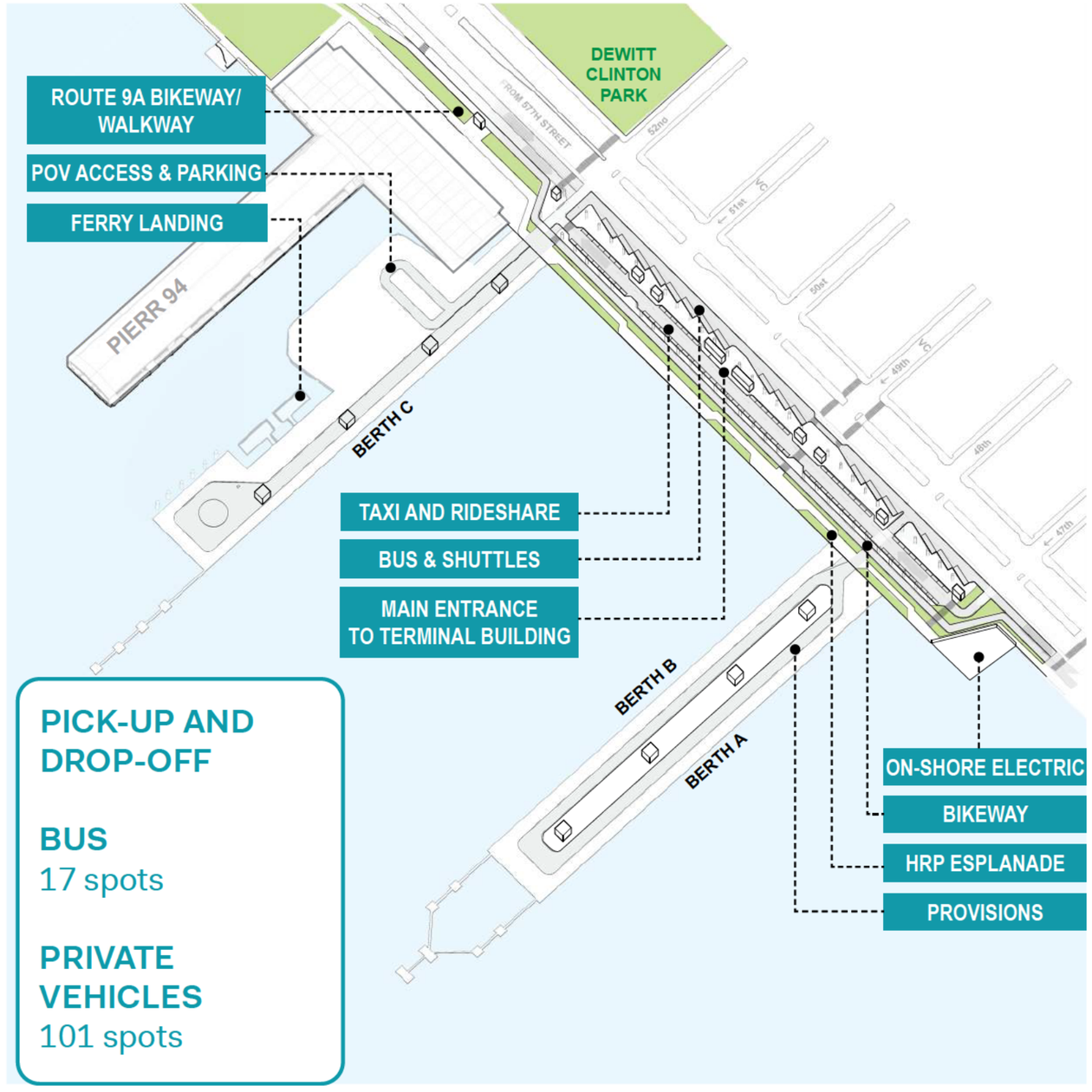


PICK-UP AND DROP-OFF

BUS
15 spots

PRIVATE VEHICLES
98 spots

CCNY ALTERNATIVE PLAN



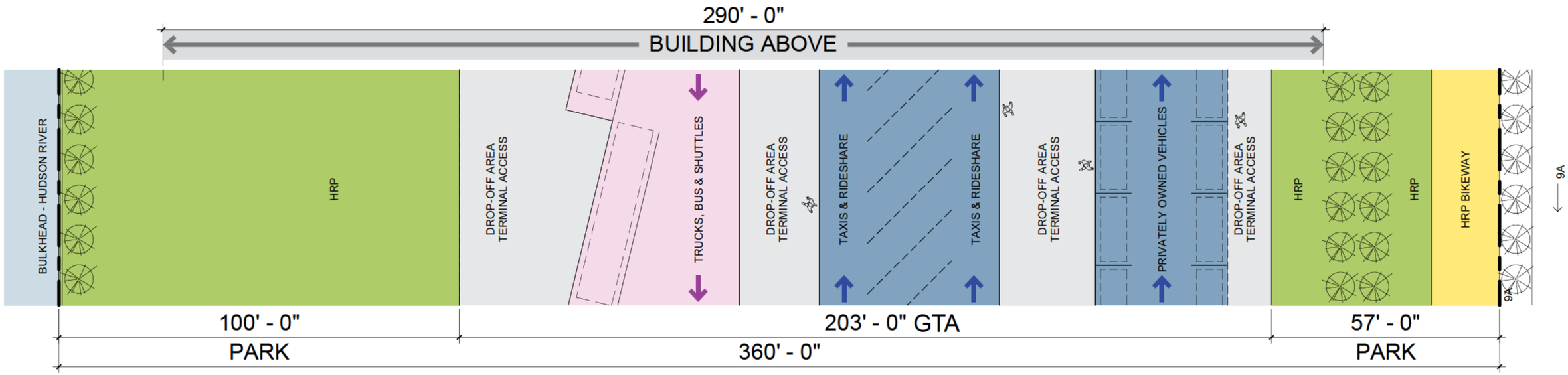
PICK-UP AND DROP-OFF

BUS
17 spots

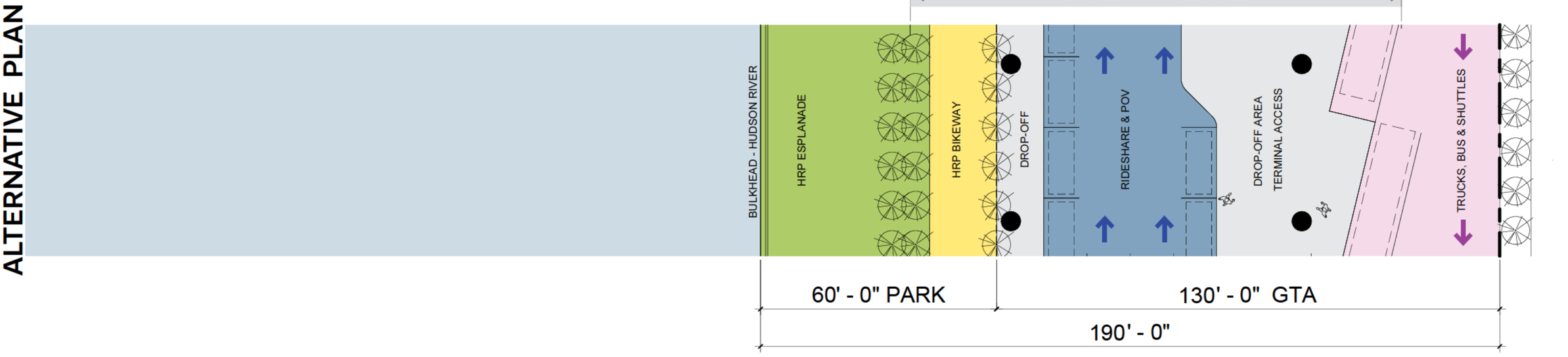
PRIVATE VEHICLES
101 spots

GROUND TRANSPORTATION AREA (GTA) AND OPEN SPACE

EDC MASTER PLAN



CCNY ALTERNATIVE PLAN



LEGEND

- PRIVATELY OWNED CARS AND RIDESHARE
- BUSES, SHUTTLES
- HRP PEDESTRIAN
- HRP BIKEWAY

PICK UP / DROP OFF SPOTS	EDC	CCNY
PRIVATELY OWNED CARS AND RIDESHARE	98	101
BUSES, SHUTTLES	15	17

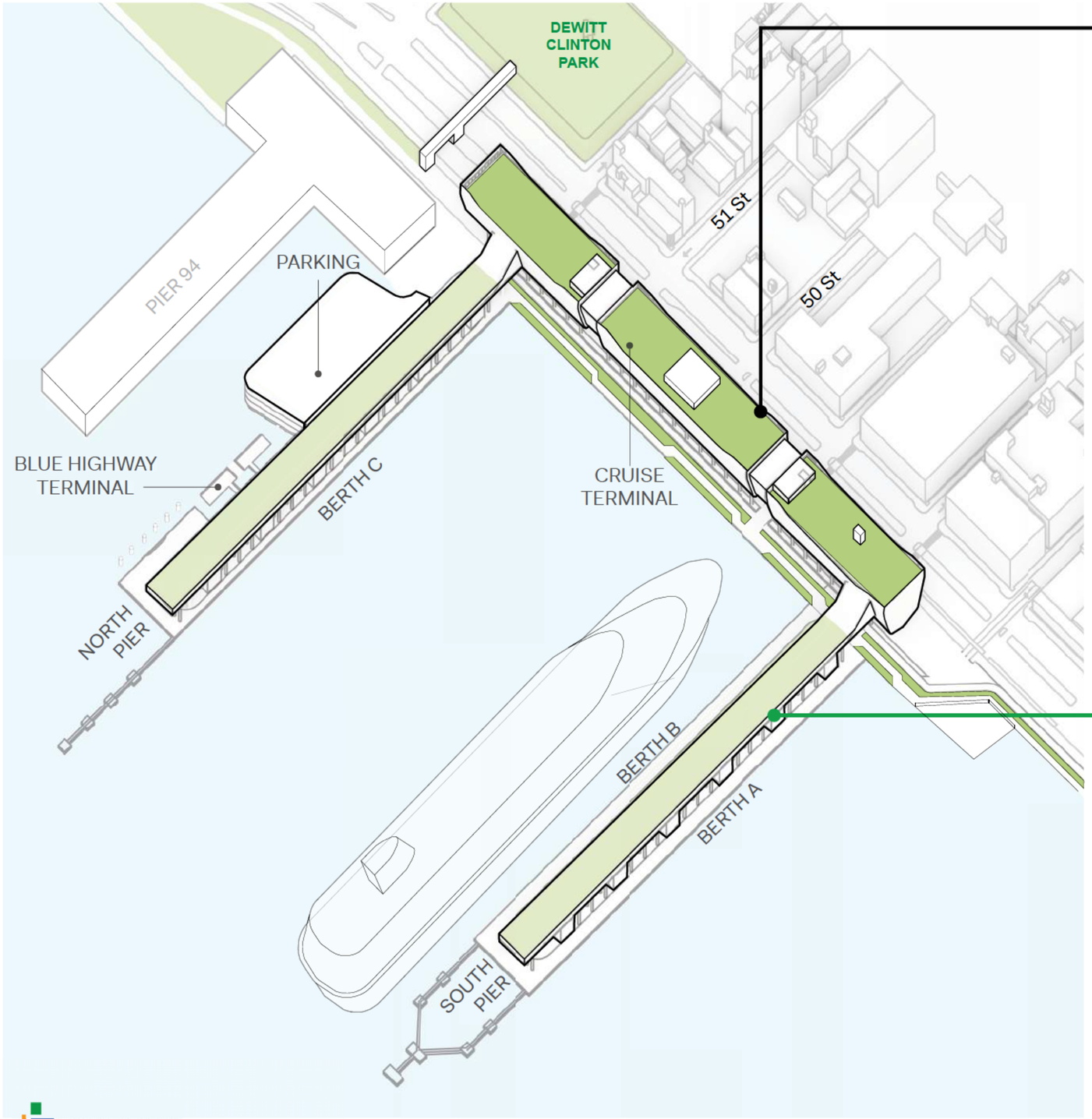
Note:

All dimensions shown are approximate.

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CCNY ALTERNATIVE PROPOSAL



PRESERVES MASTER PLAN IMPROVEMENTS

- Connection to Dewitt Clinton Park
- Ground Transportation Area Expansion
- Improved parking
- Preservation of view corridors
- Additional upland public space (HRP)
- Creation of a Blue Highway terminal
- Pier reconstruction and modernization
- Increase in terminal capacity and cruise traffic
- On-shore electric power infrastructure

ADDITIONAL IMPROVEMENTS

- ✚ No increase in total water coverage
- ✚ Minimizes pier incursion into the waterway
- ✚ Smaller terminal building
- ✚ Open space exposed to the sky (10.7 Acres)
- ✚ Better esplanade location and continuity

COMPARATIVE SUMMARY

	EXISTING	MASTER PLAN	ALTERNATIVE
Open space (exposed to sky)	0.8 Acres	5.0 Acres	10.7 Acres
At grade	0.8 Acres	2.6 Acres	2.6 Acres
At rooftop, terraces, piers	0.0 Acres	2.4 Acres	8.1 Acres
Water coverage	12.0 Acres	18.1 Acres	12.0 Acres
Additional Pier incursion into the waterway	+ 0 FT	+ 340 FT	+ 170 FT
View corridors	N/A	YES	YES
Building Area (Approx. SF)	736,308	1,300,000	1,045,000
GTA pick-up / drop-off capacity (Bus)	N/A	15	17
GTA pick-up / drop-off capacity (Rideshare)	N/A	98	101
Parking garage	YES	YES	YES
Estuary & Marine life protection	N/A	N/A	YES



CCNY ALTERNATIVE PROPOSAL
Key Benefits

- No increase in water coverage
- Reduces incursion into the navigable waterway
- Mitigates Federal approvals process
- Improves access and quality of public space
- Coordinated with planned route 9A improvements
- Smaller Terminal Building
- Unique in-water improvements
- Estuary protection

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W42ST.nyc

“Plan B” Floated to Modernize Cruise Terminal While Giving Space Back to the Neighborhood

by **Daniel Katzive** May, 16, 2026

Sometimes less is more. That was the message from veteran waterfront advocate Tom Fox as he unveiled a “Plan B” for rebooting the aging Manhattan Cruise Terminal.



Along the way, Fox sees an opportunity to correct an historic disappointment: the failure of the City to provide Hell's Kitchen with attractive opportunities for public access to the waterfront like Chelsea and the West Village enjoy. "The neighborhood got short-changed," he said, "and this is a chance to see that previous shortcomings are corrected."

At Thursday's meeting of Manhattan Community Board 4's Waterfront, Parks and Environment Committee, Fox presented an alternative vision to the NYC Economic Development Corporation's (EDC) ambitious long-term master plan for the terminal, on behalf of the City Club of New York, of which he is a board member.

The City Club plan incorporates many of the functional improvements that the EDC has promised, including increased public access, shore power for idling ships, more green space and improved traffic circulation, but with a slimmed down footprint that would reduce coverage of the water and the degree to which the terminal's piers are extended further into the river — while increasing public amenities.



View of Pier 88 from the south, showing the esplanade and greenway pushed to the river and reconfigured drop off and bus areas below the floating terminal. Renderings: Dattner Architects

The EDC, which manages the city-owned terminal, wants to modernize the facility, making improvements to keep it attractive to the cruise industry, which the agency says provides significant benefits to the local economy. The plans call for decking over the water along the shoreline between W48th and W52nd Streets and building a modern terminal building above, which is more accommodating to passengers and allows increased public access to the water.

When the current terminal was built in the 1930s, that same area was excavated out of the shoreline to allow the newest big ocean liners to fit alongside the piers without impeding traffic on the busy river. Back then, the newly opened elevated West Side Highway allowed automobiles to zip past the terminal, while passengers and provisions could access the ships on local streets below.

With the demise of the elevated highway by the 1980s, replaced by a grade level road, disembarking passengers are now forced to navigate multiple lanes of traffic while arriving trucks and buses idle on increasingly residential streets. The busy greenway bike lane alongside the highway adds an additional complication that ocean liner passengers did not need to worry about in the old days.

Congressional approval will be required through a bi-annual process known as the Waterfront Resources Development Act (WRDA). Review for the 2026 iteration of this legislation is currently underway by the Army Corps of Engineers.

The EDC's design team says decking over the shoreline will provide space for improved traffic circulation for arriving and disembarking passengers and for provisioning trucks, a priority for the Hell's Kitchen community and for users of the bike path. But a wider shoreline also means cruise ships will stick out further into the river when they dock. The City's plan calls for a 350-foot extension of the piers to accommodate this.

If WRDA approval is received, the project will then undergo an extensive environmental and design review process. Covering or filling in a portion of the Hudson River estuarine sanctuary, even if only reversing changes to the shoreline made in the 1930s, is expected to come under a great deal of scrutiny from the state Department of Environmental Conservation and other regulators.

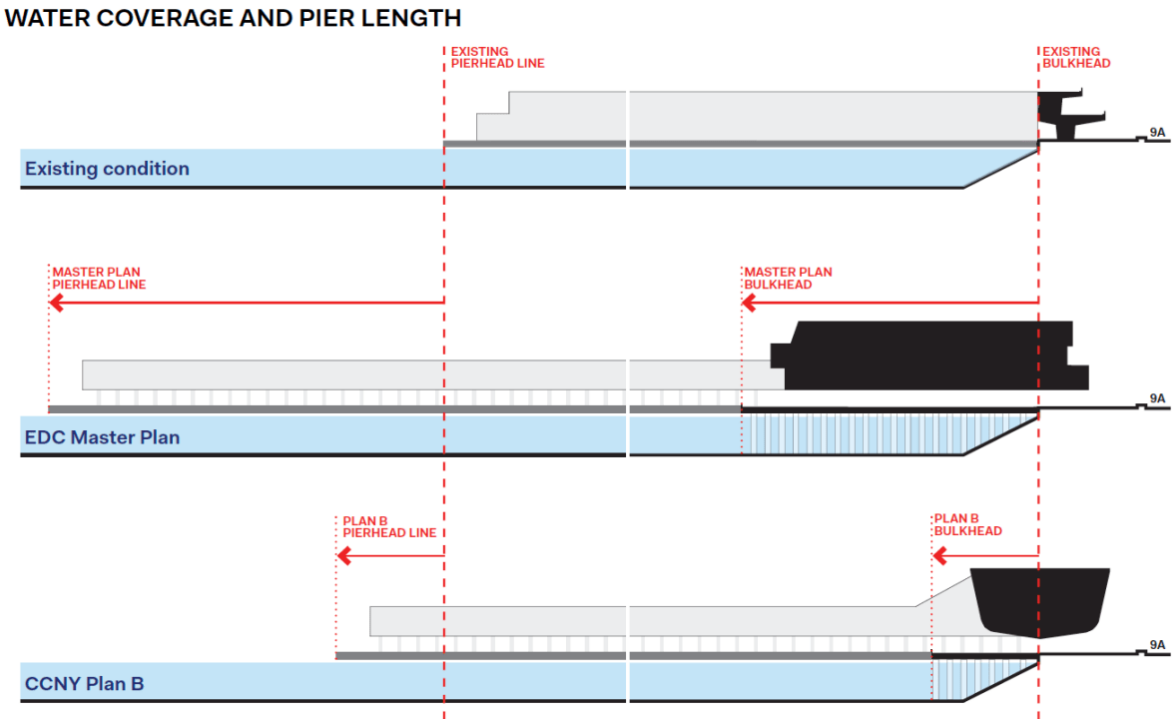


Diagram showing a side view of the existing condition and both proposals with the black being the terminal, grey the pier and blue the river. Rendering: Dattner Architects

Fox's City Club plan, developed with help from architect Daniel Hueberger of Dattner Architects, would also cover some of the river along the shoreline and extend the piers, but to a much smaller extent. The additional water coverage in this alternative would be fully offset by the elimination of one of the terminal's three finger piers, a feature of both the EDC and City Club concepts. Fox reckons that his plan will be more likely to get past the state DEC because there will be no net change in coverage of the water.

As for lengthening the two remaining pier structures to accommodate 8,000 passenger ships, the City Club plan calls for a shorter 98-foot extension, compared to the 350-feet in the EDC plan. Fox believes this more modest intrusion will be more likely to get through the WRDA process. But, if WRDA approval is not forthcoming, Fox says the City Club plan could be modified to maintain the current pierhead line while losing only the ability to accommodate the very largest cruise ships, effectively offering a “Plan C”.

The City Club plan also calls for a significantly slimmed down terminal building, allowing more light to reach the esplanade and bike path, which would be rerouted alongside the water. The team estimates that their proposal would leave 10.7 acres open to the sky versus just five acres in the EDC plan. Smaller square footage should also mean lower construction costs — Dattner estimates the plan could save roughly $250 million on the building alone.

Tom Fox is intimately familiar with the Hudson River shoreline. He was a key figure in the opposition to a plan to deck over a large portion of the river south of the cruise terminal in the 1980s. Fox co-chaired a working group that came up with the concept for the current surface level boulevard and adjacent parkland. He then served as the first president of the Hudson River Park Conservancy, a predecessor of the current Hudson River Park Trust.



Aerial rendering of the Manhattan Cruise Terminal with 10.7 acres of open space. Rendering: Dattner Architects

Fox hopes that with an eventual endorsement from the Community Board he might be able to get the new administration to change course or at least convince the EDC to consider including his concept as an alternate plan in the environmental review process.

DANIEL KATZIVE

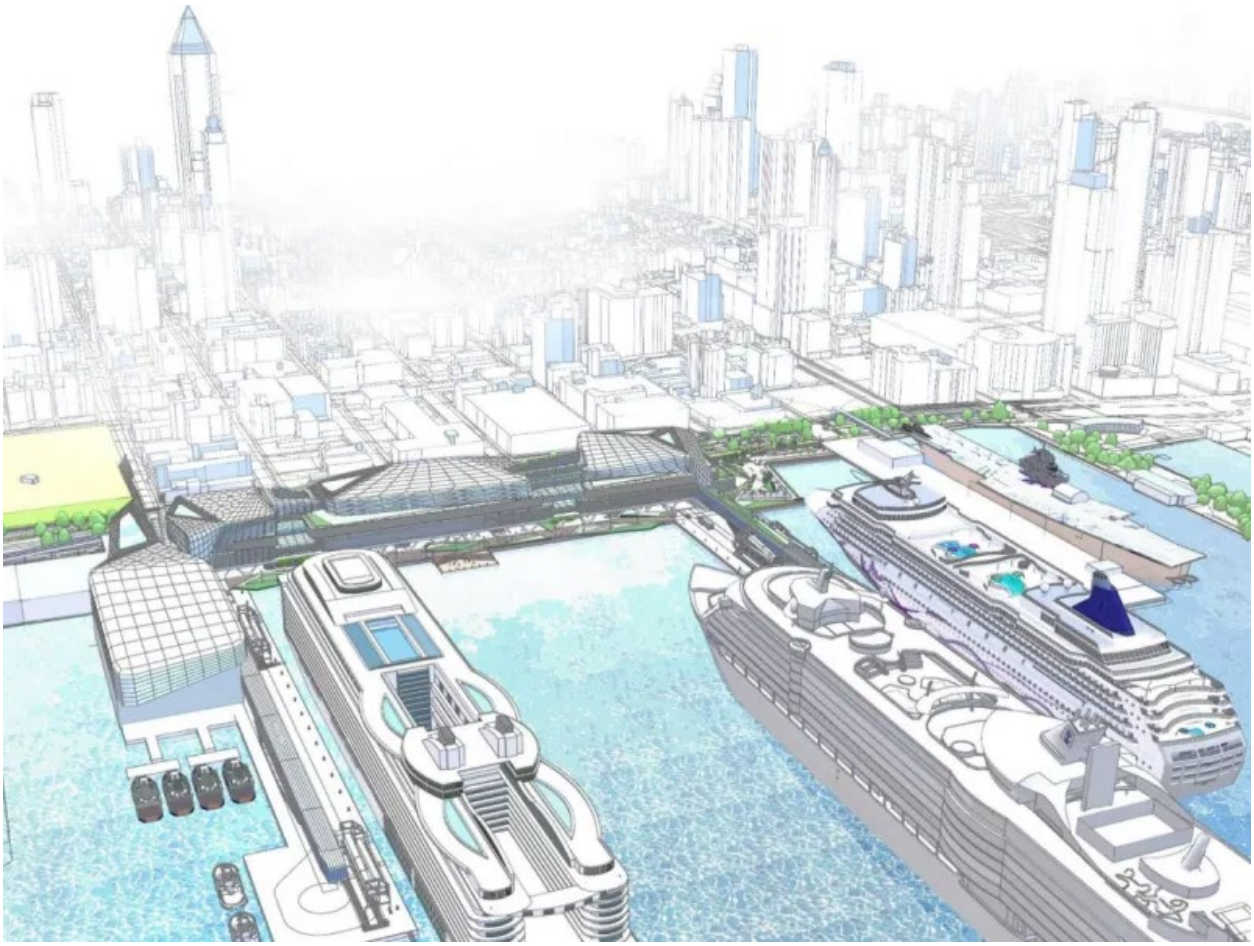
Daniel Katzive is a freelance journalist working in New York City. Dan's reporting focuses on explaining how the city and the region work, with an emphasis on infrastructure, transportation, waterfront land use and the maritime industry. Dan's work has primarily appeared in the West Side Rag and the gCaptain maritime news service. He has also had articles published in lohud.com/the Journal News and the River Journal in Westchester. Dan embarked on his journalism career after working in financial markets as a research analyst for 25 years and then going back to school to earn a master's degree in journalism from CUNY's graduate school of journalism. He lives on the Upper West Side.

More by Daniel Katzive

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4 Comments

1. **DJ** says:

   21 hours ago

   This is a huge improvement over the first plan, which I did not like. Makes more sense, and doesn't touch upon De Witt Clinton Park as first design did.
   Reply

2.  **Leslie Johnson** says:

   21 hours ago

   I agree with the comment by DJ above.
   The first plan was horrendous.

   Reply

3.  **Robbee** says:

   10 hours ago

   Better plan….if we really must have these monster vessels..

   Reply

4.  **Marcos Dinnerstein** says:

   3 hours ago

   This is a plan, along with Plan C, that strikes a good balance with the need to retain the cruise industry, eliminate the harmful smoke from idling ships and improving public spaces. I hope it comes to pass.

What Mayor Mamdani Can Learn from *Sail 4th 250*

This year, the largest fleet of tall sailing ships and naval vessels in history will gather in New York Harbor to celebrate the 250th Anniversary of our Nation. *Sail 4th 250* will bring over 80 ships and 160 U.S. and international aircraft to our historic Harbor to celebrate the birth of our nation and our democracy.

An International Parade of Tall Ships happens once in a generation, and International Naval Reviews just as infrequently. Combining both together is a once in a lifetime opportunity, and New York City has traditionally celebrated and warmly welcomed sailors visiting our city.

Op Sail in July 1976 arrived at one of the city's darkest moments. Urban blight and fiscal woes plagued New York when then President Gerald Ford refused to provide financial support eliciting an October 1975 *Daily News* headline "FORD TO CITY: DROP DEAD". Yet, Mayor Beame welcomed the historic fleet of tall ships as over 6 million people soaked in the spectacle.

Ever since, New Yorkers have warmly welcomed visiting sailors, as millions lined the shore to see the incredible parade of ships, and tens of thousands of New Yorkers toured visiting ships from around the world.

The Fleet began arriving on June 30th and will lay at anchor or dock at multiple locations around the city. Tall ships and U.S. and international naval vessels will anchor or berth along Brooklyn, Manhattan and Staten Island waterfronts.

Fifty years after the first *Op Sail* New York is ascendant, and with all its imperfections, America continues to welcome refugees from around the world creating a land of opportunity. Celebrating our past reminds us of what our nation can achieve when we work together.

Our city has a unique place in framing this great democracy. We predate the Republic and our original Dutch settlers introduced religious tolerance and cultural pluralism to America. That diversity remains our city's biggest strength complemented by our energy, inventiveness, resilience and compassion.

As Mayor Mamdani experiences this amazing gathering, he may better understand the role the Harbor can play in city life and the importance of protecting our remaining working waterfront.

The Harbor's professional mariners including pilots and tug and barge operators, fuel suppliers and ferry companies, dock builders and marine engineers, have worked together with the US Coast Guard, Army Corps of Engineers and other government agencies to produce this once in a lifetime event. But it hasn't been easy.

Sail 4th 250 spent three years identifying locations to dock vessels and paid to install basic maritime hardware at city owned docking facilities because the city's maritime infrastructure has drastically deteriorated. Mayor Mamdani has recently embraced the concept of a Blue Highway to move packages, products and freight, as efficiently as NYC Ferry is beginning to move people, using our waterways.

We must take trucks off our highways and streets and replace them with small electric vehicles carried by water. However, there will be no Blue Highway without a working waterfront, the remnants of which are under assault from high-rise residential development. This event shows the professionalism, depth of experience and coordination in the Harbor's commercial maritime community.

As the mayor takes this once in a lifetime opportunity to celebrate our Nation's founding and the past glory of our Harbor, he will witness the Harbor brought to life. Properly funding public maritime infrastructure construction and maintenance, protecting the remaining working waterfront, and planning with our commercial maritime community is the key to enhanced transportation, commerce, quality of life, and sustainability in the city's future.

Tom Fox is the founding co-chair of Brooklyn Bridge Park, founding president of Hudson River Park and New York Water Taxi, and a Trustee of the City Club of New York.

Name

Raymond Roberts

Email [redacted]

Professional Affiliation: I have been a substitute teacher for NYC DOE for 14 years. I am also a musician.

Zip Code [redacted]

Public Comment:

I am 64 years old, African American and live in Harlem. I was born in White Plains, Westchester County. Father entrepreneur; mother a schoolteacher.

I believe that everyone regardless of party should have a voice.
Personally, I am a Democrat. I was born a Democrat. I'm a businessperson and I realize that there are 2 sides to every story or issue.

I have encountered situations where because I took a position on an issue that went against the "party" line. I was not listened to or treated with respect. It was an issue that directly concerned my family's welfare. A political leader didn't have time to listen to me – only to constituents who praised him. These were politicians I had supported. These experiences began to push me away and start to question my defacto allegiance to the Democratic Party.

I feel more comfortable being an independent. I feel if you can't listen to me and have some respect you don't deserve allegiance. I don't believe that anyone should use the title of a political party as leverage. There needs to be room for discussion, disagreement and listening to the other side.

We deserve the right to make our own choices. We don't like to be treated like cattle that need to be led.

Attachment(s): Drop files here or click to browse

Date Submitted: July 3, 2026

Topic	Open Primaries × Miscellaneous ×
Method Received	Airtable Form
Is it charter related?	
Charter Related	Yes
Topic Simplified	Elections
Subtopic	Open primaries

Name

Zoraida Nicole Walcott Oliveira

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Urgent Need & Dire Assistance with Crime

Attachment(s)



LETTER TO NYC MAYOR MAMDANI & C...

Date Submitted

July 3, 2026

Topic

Policing

Method Received

Airtable Form

Is it charter related?

Run agent

Charter Related	No
Topic Simplified	Out of Jurisdiction
Subtopic	

LETTER TO NYC MAYOR MAMDANI & MOVE TO NYC - 7/3/2026 (ROUGH DRAFT)

7/3/2026

Mayor Zohran Mamdani
[redacted]

Re: A Survivor's Immigrant Story and Plea for Freedom: Involving Systemic Racism, Crimes Against Humanity, Collusion, Corruption, Organized Crime, Domestic Terrorism and the Enforced Safety Measures for Ultimate Protection of the Oliveira Family

Dear Honorable Mayor Mamdani,

Congratulations on your win and becoming a historic mayor in New York!

I am writing you at this time to share my survivor immigrant story and my relentless determination for freedom. In the process, I expose the *Crimes Against Humanity,* systemic racism, domestic terrorism, collusion, corruption, organized crime, theft, and implore the need for safety measures and enforcement of the law, for my family. This represents decades of unprecedented, extreme abuse, over the years, and to date, in the cities of New York, New Jersey, as well as in Florida too.

As I highlight important aspects, (both very good and extremely dark) of my life, it's important for you to recognize the pattern recognition, numeral and date symbolism.

My name is Zoraida. The name is a historically rich, melodic feminine name of Arabic and Spanish origin. It is most commonly translated to mean "*captivating woman," "well-spoken* and *articulate," or "enchanting*". I'm a Muslim, *'Mixed Masala' (a balanced, combination spice mixture; of cumin, cardamom, cinnamon, cloves, Kashmiri chili, turmeric and garam masala - that adds depth and flavor to a dish)*, Black woman, from the diaspora. I'm 53 years old, born on [redacted]. I'm multilingual, Afro-Latina, with Indian, Chinese, Jamaican, Dominican Republic, and St. Croix, Virgin Islands heritage, and also a native New Yorker. I was covertly born [redacted] in New York City to my mother, Thelma de Walcott, and my biological father, the Honorable Minister Louis Eugene Walcott Farrakhan, Omega Psi Phi Fraternity Incorporated, member, (who were not legally married at conception nor at the time of my birth). My biological father, Louis Eugene Walcott and my adoptive father, Enrique [redacted] (formerly known as Darien [redacted], are half brothers. I also have a 'twin' brother Fernando Enrique, and niece [redacted]

with my middle name 'Nicole', that lives in Florida and older sister, Xiomara [redacted] that lives in Switzerland.

My mother, Thelma [redacted] a native Cuban (with Indian & Chinese heritage), was 1 out of 11 children and the first of her family to leave the island of Cuba. She was able to leave the country through undisclosed connections, and because her Chinese Cuban uncle (her father's brother), was [redacted] of the Cuban military, and still alive today. (For the record, the notable, [redacted] was actively involved in the July 26 Movement's urban underground in Santiago during the first part of the revolutionary war, now serves as the leader of the Association of Combatants of the Cuban Revolution, a national organization founded in 1993 which began in Pinar del Rio as a pilot project in 1990). She was then sponsored by a rich, Jewish family and migrated through Ellis Island, in New York in the 1950's, as an 18 years old immigrant, to achieve the 'American dream'. My mother was fortunate enough, as a Black woman, to leave the country and migrated from Cuba to the United States.

When my mother was a child, she was visited by a Christian ministry, and befriended, evangelist, Aimee Garcia. Years later, she had an 'arranged marriage' with my father, Dr. Enrique [redacted] (of a Dominican Republic mother and father from St. Croix, Virgin Islands) and 'Air Force Airman', on [redacted], and lived on [redacted]. Thereafter, they moved to Co-Op City in the Bronx and settled in the Wakefield neighborhood of the Bronx.

Surprisingly, years later, she met up with Pastor Aimee Garcia Cortese, became close friends, converted to Christianity, and became a longtime member of Crossroads Tabernacle in the Bronx. Immediately after church, it became our tradition to eat at the Empire Wok, a Latin Chinese fusion restaurant, with a blend of traditional Caribbean and Chinese dishes on Castle Hill Avenue, that amplified our heritage and culture. Alternatively, the Pastor, her family and church leaders would come over for dinner and we would entertain them my Mami's favorite cuisines.

My mother worked as a Nurse's Aid, at the Bronx Psychiatric Center Hospital. She worked exhausting hard and sometimes double shifts to afford the things we needed and to put my father through medical school. I can remember making countless pots of *masala chai*, burning and cleaning the stove, and the smell of Indian spices left behind, just so she had enough energy to get her through the day. She was also fortunate enough to have cared for Dr. Betty Shabazz, Malcolm X's wife, (and Links Incorporated member), during visit there. After over 34 years of dedicated service, she retired from the hospital. My father then graduated from medical school [redacted] and we had a large celebration at the notable, Victor's Cafe Cuban Restaurant.

My mother had 3 sisters that came after her, from Cuba, and also moved to the Bronx. They all lived in [redacted], except for 1, and we were all a close knit family. Her half-sister, Ines [redacted] (married a Barbadian) also lived in [redacted], but then moved to [redacted] to raise her family of 5 children. Her youngest sister, Clara [redacted] (had an arranged marriage to a Swiss Engineer, Robert [redacted]), and eventually moved to Switzerland after getting married. Her eldest living sister, Gloria [redacted] (had an arranged marriage to a Dominican, Ramon [redacted], deceased), had 2 children and is still a longtime resident in [redacted]. We were a tight knit family and we were all close as cousins.

Though my mother and her sister Ines, affectionately known as (Titina), were half-sisters, as adults, and once they moved to America, became very close. Her children were also an extension of our family and I would spend holidays and summers with them. Her sons were like brothers to me and her daughter Cheryl [redacted], was always super close growing up, over the years. We were like sisters, even when my sister moved away,

It was important for my family to have connections to my Abuela's Dominican heritage. Aside from my father and the Peralta's, my mother's longtime best friend was Marie & Jose [redacted], that lived in [redacted], in[redacted]. Growing up, their family were like relatives to us and we spent a lots of times hanging out together. I can recall joint trips to Top Tomato on Boston Road, Caribbean stores and the neighborhood grocery bodegas, just to get specific cultural Latino, Indian and Caribbean ingredients. And all of the highlighted moments were attached to memories of eating *a slice of pizza, cochifrito, roti, knish, a toasted bagel or a patty with coco bread*, on any given day.

My sister Xiomara, met her past love, Basil [redacted] born [redacted] (the same birth day and month as my first born son and my birth year) and Alpha Phi Alpha Fraternity Incorporated member, from Jamaican parents, during his senior year, when he attended [redacted] in [redacted] NY (down the street from my house). They dated for a while, but their relationship ended amicably. He continued to be a good friend of the family, they are still in touch, to date, and he visited Switzerland with his daughter a few years ago. Basil is a graduate from both [redacted] [redacted] in [redacted] and also [redacted] in [redacted] as well as an accomplished professional. With 30 years of an impressive career in public service, notable achievements and accolades, he is also currently a professor [redacted]. He is a renowned, recurring political analyst on several media platforms and was appointed [redacted] by[redacted] [redacted]

I was raised in the borough of '*Da Boogie Down Bronx'*, until 18 years old, during a quintessential time and the birthplace of hip hop. My fondest memories were *human-beatboxing*, *record scratching on the 1's & 2's*, and *banging hip-hop beats, (like a drum), on the lunchroom tables,* was

a 'right of passage', as a cool kid. I gave myself as stage name, 'Zippy Z', would write and spit rhymes and battle amongst my friends. I'm proud to be related to Salt (Cheryl Renee James), from the legendary girl group, *Salt-N-Pepa*, lived up the street and hung out with *Slick Rick the Ruler*, met *Heavy D* from '*Money Earnin'* Mount Vernon, and was raised with my close friends from *The Juggaknots; Buddy Slim, Breeze Brewin' & Queen Herawin*. My first *Curtis Blow* record*, 'These are the Breaks'* as well as all the '*Right On*' mini posters all over the wall. As a huge hip hop fan, I can still remember the House Parties, Breakdancing battles, and even roller skating at Skate Key roller rink. I even had a "*red and black lumber jack, with the hat to match"* and grew up to be a huge Biggie Smalls fan. Then I had the chance to go to a Black Sheep concert at SUNY Albany's Omega Psi Phi's Fraternity Incorporated, party, as they played their hit single "This or That". It was my first time attending a Black fraternity party, and the best party of my life!

Music has always been a significant part of my life. My father played the bass and my real father played the violin. I can fondly remember music being in the background and forefront of my day. My personal experience with music is rooted in classical tradition and formal instruction. I started playing the trumpet in the 8th grade. I was enamored by the proliferating sound the instrument made. Trumpet playing was a male centered and I desired to challenge the status quo, and become known as one of the first master 'female' players and play it well. Additionally, "the trumpet is one of the most iconic and widely recognized instruments in Latin music. Its bright, brazen sound is essential to many genres including salsa, merengue, and Latin jazz". My Music teacher, realized my gift and said I had a brilliant sound that commanded attention. With my talent, I practiced daily and became extremely proficient. My parents even hired a private tutor for specialized lessons and by 11th grade in high school, I was the lead (1st chair) trumpet player. By senior year, I was selected to play in the Jazz band, played all major solos at the band concerts and was invited to play at the Macy's Thanksgiving Day Parade. My most memorable experience was playing 'Stormy Weather' during my senior year at our commencement graduation ceremony. Thereafter, I my mother bought my silver trumpet to practice after graduation and I used that same instrument when I applied to Clark Atlanta University's 'Mighty Marching Band' and received a prestigious partial scholarship. Furthermore, I was formally trained in classical piano and had weekly private lessons. With an 'ear for music', I quickly perfected playing and was rewarded with several trophies and most notably for competing and playing at Carnegie Hall. Music was life!

During my spare time, I recall listening to several genres of music. R&B and Latin music were my all time favorites. I had an extra-large boom box, that blared music and I used to record my favorite songs from the radio with any spare cassette tape I could get my hands on. My obsession at the time was with the legendary Puerto Rican, boy band '*Menudo'*. Johnny was my most-liked band member and I had every form of memorabilia, from keychains, posters, clothing as well as going to my first concert at Madison Square Garden. Similarly, I loved the legendary R&B boy band, New

Edition, and knew every word to every song, including *Candy Girl*, and followed their careers even after they became soloists and a trio group.

I had the chance to compete in my high school's pageant and for the 'Miss New York' USA competition. In my senior year, I placed as 1st runner up and was honored with the achievement and placement. I also competed for Miss New York, and was one of the top 10 finalists. Though I did not win, it was an incredible opportunity to network, learn certain life skills and make new connections. Overall, I enjoyed the experience and the intensity of the event. I'm most pleased with the pleasure of passing down the legacy of pageantry to my daughter. She competed and won 3 pageants to date. Nevertheless, my goal is to one day compete again, and win! Like mother, like daughter.

Recreationally, my favorite past times were family trips to Yankee Stadium, to watch our favorite baseball team play. In Cuba, baseball is the most popular sport in the country. My mother adored the team and my father was a huge fan. We would make it a priority to also watch the games on TV, and even stayed up past our bedtime. To date, I still love the Yankees, and on just about any given day, you'll see me adorning their team logo baseball hat.

I've always had an affinity with all animals and they were often drawn to me in the most beautiful way. I have vivid memories of my next door neighbor, George, who had a golden retriever, Lance. Everyday on my way home from school, he would come close to the gate and I would greet him with hugs and pets on his head. I was also raised with a family assortment of animals including hamsters, gerbils, mice, a ferret, cats and dogs. My first real connection with dogs was when my uncle Bolivar, gave me a Chihuahua for my birthday. I loved, adored and pampered him immensely with unconditional love. When my parents went on vacation to Switzerland for their anniversary, the absolute worst thing happened. My dog was stabbed to death, found lying on his side stiff with blood on his white fur in our backyard, and his blood was wiped on the outside glass door! I was extremely devastated by his tragic death and my parents were on the next flight home. Our very close family friend (my sister's godfather), 'Padrino' [redacted], a [redacted] New York police officer, investigated on our behalf, and concluded it was the white male (elks lodge cult member) neighbor, down the street. All I know was that he moved immediately after…. Nevertheless, the neighbors up the street heard of our story and gave me another chihuahua shortly after, as a replacement. I loved him infinitely until he passed.

The year I turned 15, was a pivotal moment in life. I got my Leaners Permit to drive. My father would take me to *Caldor store*, with a huge parking lot (in [redacted] NY), to perfect my abilities and techniques. He had a Plymouth Duster muscle car, in burnt orange. This was around the same time of the TV show*, 'The Dukes of Hazzard'*, and I was obsessed! So, at the end of our lessons, I would aggressively do donuts (drift my car in tight circles), in the lot, made the engine roar, with

screeching, loud sounds, as he begged me to stop. This act alone, made me excited about driving, and my need for speed. Once I got my license and practiced more, I understood the importance of safety, and became a great driver. Yet as I got older, and an opportunity presented itself, I would race my friends in desolate areas. It was fun times with great, learned maneuvers☺️.

I had my first job delivering newspapers, by bike (a Huffy dirt bike, and my mother driving behind me), and then my first real job working at Wendy's fast food restaurant on Boston Road (owned by Black twin men), making burgers! I learned how to budget, save and my first purchase, was a luxury pair of patent loafer shoes with a gold buckle, by Joan & David.

Most significantly, at 15 years old, I was discovered as a model at 5 feet 8 inches and 120lbs., while walking down 34th Street in Manhattan, about to enter *Macy's* department store, with my mother. I was handed a business card from a man at a modeling agency, and he suggested I start with 'professional photos' and a 'Model Composite Card'. Shortly after, I took modeling photos, created my comp card and began to build my 'portfolio/book'. My mother accompanied me to different 'go-sees' as I auditioned for jobs. I also teamed up with local fashion designers to do runway modeling, and that's when I found my niche - runway fashion modeling!

As a Latino family, my brother and I had a traditional *Quinceañera*, a large celebration, with 16 *damas y caballeros* (attendants), dressed in full tuxedos, top hats and canes, to acknowledge the transition from childhood to adulthood, at the age of 15. But because we were 'twins', we had the event at 16 years old, so that everything was split in half and divisible by 8. I was honored and fortunate enough to wear a typical formal, extravagant, quinceañera dress (a "floor-length ball gown, that features a fitted bodice and a massive, voluminous skirt often supported by layers of tulle. These are heavily embellished with intricate lace, embroidery, and sparkling beadwork to make the birthday girl feel like royalty)". We then hired a professional photographer, drove to Central Park and took picturesque photos around the area. Thereafter, we had a huge catered event of over 100 people, in a ballroom, at the Eastwood Manor in the Bronx. The event encompassed the intricacies of a hired 16 passenger limousine, professional photographers, DJ, waltz coordinator, etc., and it was celebrated with friends and family.

I attended and graduated from Harry S. Truman High School, also in Co-op City, in the Bronx, and was affectionately known as 'Ziggy'. I was involved in many different extracurricular activities and clubs. A group of friends created a Step/Stroll team called, *Nia Phi Nia*. I commanded and mastered every move and every step. We stepped and strolled throughout the hallways and always put on a great show.

With the yearning to further amplify my modeling career, I joined the 'GQ Fashion Club' in high

school. We rehearsed and performed several shows a year, and they were well attended by our peers and administrators. I became the 'Top Model' of the group and flourished when opportunities presented themselves in our scenes. We bough the most stylish clothes, created props and designs, partnered with local designers and always made it a 'show to remember'!

I had my prom at the Marina Del Rey and it also became a momentous occasion. I personally designed my couture, and had it tailored by a local designer. My parents also hired a professional photographer to photograph my impactful moments and my entire family went to the prom in a stretched limousine. It was an awesome evening celebrated with all my high school buddies.

At the age of 17, my parents shared with me information about my biological father, Papa Louis, and I was enthusiastically enthralled and wanted to meet him. Thereafter, I spent years after learning more about him and through books and mainstream media. Nevertheless, I made the personal effort to communicate with him through handwritten letters. I can recall a specific letter I wrote to him and my desire to meet him personally. During my senior year, when he wrote me back, he told me "I'm sending you a special person, and through him, we will finally meet discreetly". It didn't make sense until my high school senior trip to the *USS Intrepid Ship & Museum in New York City*, (a military and aerospace museum located on the historic aircraft carrier USS Intrepid, a National Landmark docked at Pier 86....The museum offers an immersive experience with simulators, educational programs, and a focus on STEM and military history), and this where I met Leandrew [redacted] (a Kappa Alpha Psi Fraternity Incorporated member), there for a (National Society of Black Engineers, (N.S.B.E.) event. I realized then, behind the scenes the arrangement had been made. Drew was tall, handsome, we instantly connected and he was my first love. He lived in Chicago, Illinois and we promised to keep in touch. We wrote the sweetest letters and andhe even asked me to prom! With our parents permission and authorization, he flew to New York and escorted me to my prom. It was an amazing experience, that my entire family enjoyed. After prom, we still communicated and while at [redacted], in [redacted] we decided to meet in 1990. This was the quintessential moment that I would see Drew again and finally meet my *real* dad. So, I made the long, arduous trip to [redacted], in [redacted], to see him in college, and he just 'crossed' line to be a Kappa Alpha Psi Fraternity Incorporated, member and celebrated with "a stroll and a cane". Immediately after, I went to meet Papa. It's a moment I'll never forget and it strengthened our bond. I left with a conversation that broke my heart and eventually became reality, that Drew and I would not marry....

As a teenager, I could vividly recall conversations about the need for passive income and how to build wealth. Though my household consisted of 2 parents working, my parents understood the need to amass additional funds as a way to supplement their income and to pay for our expenses. They bought 2 rental properties: one house in [redacted] and another

house on [redacted]. I remember going with them to paint the houses, created upgrades, made minor improvements and collected rent from the tenants. My father would walk away with 'wads' of cash, and sometimes gave me my allowance on the spot and treated us to ice cream or dinner. Then on one sudden day, my father received a call on his 'beeper' and he called the number right away. He was informed by one the tenants, that the house 'caught on fire' and was burning! He immediately rushed to the house, only to see immense fire, billowing flames, and toxic black smoke and was told to keep his distance by the firefighters. I remember him coming home, in tears and overheard him having that difficult conversation with my mother. All the time, effort and dedication spent building this house, had been destroyed in a devastating fire! I remember my parents assisting the tenants with basic necessities, food, clothes and toiletries. It wasn't until years later that I realized it was orchestrated by the domestic terrorist elks lodge occult gang. Unfortunately, they ended up selling the burnt structure for $92K.

I was also afforded the opportunity to learn about the maritime field, and did a summer internship at [redacted], in [redacted], after my senior year in high school.

My sister also attended and graduated from [redacted] and she created and maintained long-lasting friendships with people she met there. One of her closest friends were roommate, Leslie [redacted]), a critically acclaimed, international harpsichordist and Michael [redacted], a celebrity photographer and descendants of Jamaican parents. Leslie's professional journey was with the Boston Symphony Orchestra and after several racist encounters, decided to leave the company and country. Mike is an educated professional that was out of work for a prolonged period, and many years, until he finally found work and resumed his career.

Family was very important to my parents and they always had open doors to receive and support family members when visiting New York. When my paternal, cousin, Dr. Malik [redacted], (originally from [redacted]), attended medical school at [redacted] (on [redacted]), he stayed with us. My father offered him mentorship, assistance and encouragement during his challenging times as a student.

As a tight knit Latino community, we became members of 'Club Cubano Social Club' of New York City, designed for Afro-Cubans. I participated in their cotillion and was a scholarship recipient.

My parents always knew I was both anointed and gifted, and for that reason, I had to live my life *'under the radar'*. So instead of carrying the legacy and attending my father's alma mater, Howard University, in Washington, DC, we decided it would be best to attend a lesser known school. As such, I applied and received a full scholarship to attend [redacted] (now

closed). Then within 2 years, I left after several racist and deplorable college experiences. During my matriculation, and due to the vast discrimination at the school and town, my best friend and college roommate, Samantha [redacted] (Sigma Gamma Rho Sorority Incorporated, member), and I, all founded, organized and managed the Spectrum (Multicultural) Club (but, at the time, we had no idea that the name of our association would have the meaning it does today). Nevertheless, the purpose was to design a safe space for people of all cultures and ethnicities to congregate. A few years later, after I left the school, and while Samantha was still matriculated, she ironically had an 'autistic' son!

I then returned home [redacted] to take a gap year. After much deliberation and desire to attend the notable HBCU, Spelman College, once again, my parents thought it would be best to stay unnoticed. Thereafter, I applied and received another scholarship, attended and graduated from the remarkable, [redacted], with a degree in Psychology. I was fortunate enough to meet up with my first cousin Charles [redacted], (who served in the Marine Corps), became like a brother to me. He was 'assigned' to protect me while I was in a new environment. He introduced to [redacted] and we hung out a lot together, and he was my personal guinea pig for my lavished, cooked meals.

While at college, my modeling career propelled forward and I had the chance to do runway fashion modeling at all 3 colleges in the [redacted] and [redacted]. I became one of their 'Top Models' that walked the catwalk and open the shows. I signed with a modeling agency and worked with local designers. Kyle [redacted], originally from [redacted] and from [redacted] was the talent director and he ensured the shows were a success and well attended amongst the schools. To date, "Kyle is a highly influential talent manager who managed and represented global icons, including my cousin, supermodel, Naomi [redacted]".

At the end of my senior year, I met my future husband, Ricardo [redacted] and we 'were introduced' on his neighboring campus, of [redacted], in [redacted], by our mutual friend, [redacted] student, Bakari [redacted], a member of Jack & Jill of America, Incorporated organization, (Bakari was my teenage friend from the Bronx and Ricardo's close college friend from Morehouse). Ricardo and I started dating after graduation and were engaged after a year. Immediately after, I returned home, briefly worked at the Baychester Diner, then shortly after began my financial services career. I worked at Merrill Lynch, Private Client Group, in midtown for several years and then at Pershing, LLC, as an Account Manager, in Jersey City, New Jersey.

My husband's family was fortunate enough, as Blacks, to leave the country and migrated from Brazil

to the United States. Through undisclosed connections and with his maternal uncle as the first Black General in Brazil, they were able to leave the country. Ricardo initially moved to Ithaca, NY, from Brazil with his parents and younger brother Rodrigo [redacted]. They then relocated to NYC when his father, Dr. Ney [redacted], got accepted to the engineering program at [redacted]. He lived in the residential buildings designed for student and family housing for a few years. Consequently, he attended [redacted], and then transferred to the prestigious, [redacted], [redacted]. He graduated with his degree in Economics & Business Administration, as the first Black Brazilian to do so, and began his professional career in New York.

Ricardo proposed to me in 1996, at the iconic New York City restaurant *Tavern on the Green*, located in New York City's Central Park, 'known for its historic setting and classic American cuisine'. We were engaged for over a year, which gave me ample time to plan for an extraordinary event. It was always my dream to have my wedding at the legendary, Waldorf Astoria in midtown. So immediately after our engagement, I made reservations at the venue, but there wasn't a date available our appropriate timing. Alternatively, we opted for a suitable escale establishment.

We also had an arranged marriage ceremony (out of my Indian custom and for my Brazilian immigrant husband, Ricardo [redacted]), to obtain a Green Card to stay in the country. (This was high-level, discreetly arranged match, because I was the daughter of Minister Farrakhan and he is also (covertly) the nephew of [redacted], who is his mother's (Lelia [redacted]), half-brother). We got married at the Church of Revelation, in the Bronx, by Pastor Aimee Cortese. We celebrated at our favorite restaurant, and had our rehearsal dinner with the bridal party, family and friends at Carmine's on the Upper West Side. My [redacted] old-roommate, Samantha, and I continued to keep in touch and she was also a bridesmaid in my wedding and Ricardo and I's mutual friend, Bakari, from [redacted] was also a groomsman and little Anthony [redacted] was the ring boy at at our wedding.

The marriage was ordained in the presence of our guests, on [redacted]. I had a typically "famously massive and opulent Indian style wedding because they are seen as the ultimate public display of social status, family honor, and community". Both Ricardo and I had fathers that were doctors, and that in itself was a huge honor. I was the Director of this large, monumental wedding 'event' reception at Leonard's of Great Neck, Long Island (referred to us by my mother's close friend, Miriam [redacted], a Cuban Jew). And to add an extra special touch, I hired a professional makeup artist (a Black woman), from the set of Good Morning America. I solely planned the most elaborate wedding production, with a merger of culture, traditions and heritage. I wore an Indian 'red bindi', (a decorative mark or jewel worn in the center of the forehead, typically between the eyebrows,

traditionally worn by married women to symbolize prosperity, good fortune, and the sanctity of marriage), my attendant's and I wore Brazilian masks (typically worn during Carnaval), I recently got a tattoo of an 'Ankh' on the middle of back and also designed our wedding invitation with it (The ankh is an Egyptian symbol that represents and translates to life. It has several meanings, but primarily significance is the feminine (Isis/the womb) and the staff as the masculine (Osiris/the phallus). Together, they symbolize the union that creates new life". I also had 2 dress changes, choreographed dances and hired dancers, elaborate decorations, custom cakes, diverse, traditional foods, tropical fish swimming and large painted cowrie shells in the floral vases, etc., and also centered around the *'Coming to America'* movie and the Busta Rhymes video and instrumental song 'Put Your Hands Where My Eyes Can See'. We finally ended the evening driving off in Ricardo's Porsche, when we left the venue. To date, we been 'married' over 27 years….

We were fortunate enough, based on a close Jewish friend and connection, to have lived on [redacted] in [redacted] for several years. With prominent positions, upward mobility, and an affluent lifestyle, we lived comfortably in the city and took advantage of the great opportunities life had to offer. After having my daughter and immediately after 9/11, we moved back to [redacted] with my parents. Several months after, we returned and resumed city life, summered in the Hamptons and enjoyed some of our best times in New York City. Our favorite places to visit were attending Broadway/Off-Broadway plays, Operas, Musicals and jazz clubs. We literally lived down the street from [redacted] and frequented often. Yet, as our daughter got older, we decided to move to New Jersey, expand our family and I became a stay-at-home mother for 18 years.

Years after being married, and while working at Pershing LLC, I was diagnosed with fibroids and had a miscarriage due to 'fetal demise'. I had a D&C (dilation & curettage) procedure performed in the maternity ward, while other mothers were giving birth, then traumatized by the sounds of babies crying as I experienced the loss of life. Then months later, I was pregnant again, and had an extremely challenging pregnancy. I had a difficult birth, yet my daughter was fortunately born healthy, at on [redacted] at Mount Sinai Hospital, in Manhattan. I often wondered, if I was of a different race, would my experience had been different…. So, due to womb issues, I eventually sought after a non-pharmaceutical solution of naturopathic healing and consulted with Dr. Sunyatta [redacted], Alpha Kappa Alpha Sorority, Incorporated member, (descendant of a Cuban and Jamaican), and Wellness Guru, Chef Khepra [redacted]. With a 40-day organic produce fast, a transformative strict vegan diet, and change in household and toiletry products, I healed myself from the condition. That became my formal introduction to a healthy vegan lifestyle and journey, to date. Months later, I was pregnant again, with twins, but had another miscarriage at 11 weeks. Similarly, my friend Xaviea [redacted] (from my daughter's school, [redacted]) and I were pregnant at the same time and unfortunately, she gave birth to a stillborn baby and tragically had to bury it. Thankfully, I gave birth to my first born, healthy, intelligent son, Romário via water birth, at home.

Then 2 1/2 years later, I went to the doctors office, and a racist, white doctor coerced and threatened me to vaccinate my son, and he was covertly and maliciously 'given' and then later, also diagnosed with autism! My last pregnancy, resulted in a natural home-birth with a Jewish midwife and a healthy son. He was born on the same day as the death of Ricardo's father Ney, on [redacted], so we honored him by giving him his grandfather's name as his middle name. Sadly, my Wellness Guru friend, Khepra [redacted], had a baby boy, born on [redacted] and then he died unforeseeably, months later on [redacted]. He also suffered severely and had to bury his son.

I now understand why Papa told me I would not marry Drew. It was because he was *'infertile'* and would not be able to continue the [redacted] legacy. His special purpose was served and he showed me intense love, all before I entered the period of 'demise' in my life....

Years later, cousin, Dr. Malik [redacted], did his medical residency in New York. He was my daughter's pediatrician, visited with Ricardo and I often, enjoyed city life together, and I always offered him a delicious plate of food. Thereafter, he permanently returned and settled in California. His father, Stan [redacted], suspiciously died of a suicidal death (which was attributed and orchestrated by the elks lodge occult gang). His dear mother and brother, were surprisingly devastated and heart-broken, yet have managed to keep his memory alive.

Ricardo and I made friends with a couple, Cheryl and Vernon [redacted], from [redacted] whom are our longtime friends and he was originally from [redacted] as well. He also graduated from [redacted] and she from [redacted] in [redacted] and an Alpha Kappa Alpha Sorority, Incorporated member. Sadly, their eldest daughter, Lauren also gave birth to a stillborn baby, and also had to tragically bury child. She devastatingly suffered, not just from healing from birth, but her body produced breast milk and she endured the agony of not having a baby to feed. She had the lasting stretch marks to remind her of the tremendous effort her body had to undergo coupled with the overwhelming sadness of discarding her babies clothes and furniture. Consequently, she will forever have to live with the memory of the death of her first born.

Lastly, I remember a friend in high school that was also in the band and jazz band with me. He was an intelligent Muslim guy, that played saxophone, named Qabbani [redacted] (currently a realtor). He got also got accepted to [redacted] and within his first year, he completely flunked out. He was forced to leave this school, from sheer disgrace and embarrassment, then graduated with a degree elsewhere. It's been many years since we've been in touch and I finally 'friended' him on Facebook. I quickly learned that he had experienced some life challenges, but nothing would have prepared me for his subsequent post. After him and his wife, tried earnestly to have a child for many years, she finally got pregnant. They had a baby boy, but it wasn't a healthy baby, as they wanted. Their son was born with both albino and with down syndrome! Him and his wife were devastated

and their plans for raising a healthy son were permanently altered. I remembered how I wept when I read the post and imagined how much they suffered. Nevertheless, they are great parents and I'm sure they are doing the best under the circumstances.

RIcardo and I's friends, Bakari [redacted] and his wife, Dr. Veronique [redacted], unfortunately, also gave birth to a son with autism. They live in Larchmont, New York, a predominantly white racist, neighborhood that vastly discriminated against their son, and in the school system with IQ and aptitude tests. He was treated extremely unfairly for being both Black and a person with scholastic challenges. I hope the best for them and wish his family well as they navigate the school system and his upbringing.

After having my daughter and then eventually planning to expand our family, Ricardo and I decided it would be economically beneficial for me to stay at home and raise our daughter, while he was the sole breadwinner of the family. As my daughter got older and started school, this freed up time for me to focus on my inherent talents. Since my teenage years, I always assisted my mother in the kitchen, familiarized myself with her recipes and even created recipes from scratch using them as a basis. Therefore, I decided to create savory and sweet recipes and explored entrepreneurship. I launched [redacted] and began catering for friend's affairs, engagements and was fortunate enough to execute a successful Afternoon Tea Party event with Jack and Jill of America Incorporated organization in Connecticut. My close friend at the time, Althea [redacted], is a descendant of Jamaican parents, also from [redacted], attended [redacted] with me, attended [redacted] with my husband, Ricardo and they were both in the same class. She worked for Essence Magazine, and referred me for a job to work as a recipe tester for *Real Health Magazine*, Winter 2005 issue (https://issuu.com/smartandstrong/docsrh_african_american_0001) on pages 34-36, featuring notable 'soul food' recipes from legendary R&B singer, Patti LaBelle at the home of a prominent socialite in Harlem, NY. In that issue, it focused heavily on HIV and AIDS as it relates to the Black community. That was my first of several publications I was featured in, and I then realized this was an opportunity to explore my culinary skills and talents. Little did I know, that would be a consequential full circle moment!

My paternal grandfather, Henrique [redacted] born [redacted] on died, [redacted], at 91. He was a notable and distinguished speech writer for politicians and government officials. They would tell him exactly what they wanted to say and he would convey their views and opinions in a prestigious speech. His lineage in the Virgin Islands remains a prominent, news source from the *St. Thomas Source* and the *St. Croix Source*.

My cousin, Derek [redacted], born [redacted] and passed [redacted] was a world-renowned poet and playwright, who won the Nobel Prize in literature. He published a critically acclaimed book, *Omeros*,

a book-length epic poem published in 1990. He also founded the Trinidad Theatre Workshop company in 1959, serving as a vital hub for West Indian drama and producing many of his own plays. He received the prestigious MacArthur Fellowship "Genius Grant" in 1981 to support his creative writing and playwriting.

Nothing made my mother happier than knowing she had 4 lovely grandchildren. As a retiree, she made a concerted effort, to visit my family from the Bronx, to West Orange, New Jersey, quite often, either for the weekend or weeks at a time. Throughout her visits, I spent copious amounts of time assisting her with her divorce and legal proceedings, and in exchange, she took care of her grandchildren. She had the wonderful opportunity to witness their birth and raised them with immense love and support, as she did with me. She adored them and spoiled them rotten.

I was the only one to assist my mother because my sister lived in Switzerland and my brother moved to Florida. I assumed the responsible position as her loving, dedicated articulate daughter, and college educated graduate. I had a strong affinity for writing and spent a significant of time in college writing lengthy papers, essays and my final dissertation senior year. It's runs through my veins and I've been writing my entire life.

So when the need presented itself, it was my duty and responsibility to help my mother with her unfinished, challenging and stalled divorce. I drafted, wrote and submitted countless letters, legal briefings and divorce documents on her behalf. I also contacted several lawyers and politicians, (including Pastor Aimee Cortese's brother, Congressman Robert Garcia), but they were reluctant to take on her case. Letita James, was the opposing attorney, (and currently a member Delta Sigma Theta Sorority Incorporated and 67th Attorney General of New York) and ensured that my mother's divorce stalled, and stayed in litigation for many years. This took a tremendous toll on her and overwhelmed our efforts.

During this period of time, my mother and I realized that our Apple IPhones were being tapped, eavesdropped and recorded, because we could hear the echoes and clicking noises in the background while talking. So I purchased us a pair of Kyocera 'disposable' phones and referred to them as 'bat phones' (used as our private, dedicated line, reserved only for divorce proceedings, private conversations, or urgent situations).

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After some years, my husband lost his job, could not find work for an extended period of time, and had no other option than to move out of country, to his hometown of [redacted]. It pained my heart and soul, to leave to leave my closest and dearest mother, but as a devoted wife, with a newborn son and 2 additional children, it was the only decision for our family.

We made the arduous decision to pack our belongings and move abroad to [redacted] for almost 5 years and lived there as expats. So, it weighed heavy on my heart to leave my mother, without the conclusion of her divorce and unfinished business. Nevertheless, I had to, and my mother and I did our best to keep in touch daily.

Ricardo and I became reacquainted with his side of the family, raised our children and had memorable moments. My husband assumed a major role within his uncle's (Lieutenant, Paulo [redacted]), family business, [redacted] *(a specialized Brazilian maritime and civil engineering company,* headquartered in [redacted], where he made a significant, stable income. This afforded me the opportunity to have hired help, nuture my children, volunteer my husband's job, and create my vegan and lifestyle blog, [redacted], as a content creator on social media.

We continued to use our 'bat phones' to communicate daily. My mother would use a calling card and contact me directly. This was our only means of communication and it allowed her to also speak to her grandchildren. I can vividly recall our last conversation over the phone, and I contacted her on her iPhone because she did not pick up on her 'bat phone'. My mother stated in Spanish, "*No te puedo hablar, porque no tengo 'libertad de prensa'*" - which translates to "I can't talk to you because I don't have the freedom of the press or to speak freely". The last and only thing she said to me was: "There is something I must tell you, it's a secret….but I can't tell you right now….I'll call you later". Then a few days passed, and I didn't hear back from her. My calls went unanswered and I began to worry.

With a moments notice, our close, family, longtime friend, Kevin [redacted], (an Alpha Phi Alpha Fraternity Incorporated, member), notified me to inform us that she suffered a massive stroke, and was at [redacted] in [redacted].

I booked the next flight to New York, returned to the Bronx, with luggage in tow, went directly to the hospital and visited my mother in the hospital room. I had a chance to see her once last time, but she died the next day. I was in complete shock! My mother was a very healthy person and cognizant about her health. So her cause of death came as a complete surprise. Soon after, we informed family and friends and prepared our goodbyes. I stayed to assist with relevant matters related to her

death and to finalize her affairs before returning to [redacted]

So, within 6 months of moving to [redacted], she 'suddenly' died on [redacted]. This was actually a well-orchestrated, covert murder disguised as a death, by the elks lodge occult gang organization), for apparent reasons and because she was about to divulge to me that there were devices in her house. And life as I knew it, ended!

Additionally, despite our years of immense work, effort, sacrifices, she passed without getting the divorce she deserved, along with the division of several assets (inclusive of my childhood home), that I will soon inherit, but to date, have not received!

But for the record, my mother died without the dignity of receiving her much-deserved freedom to be a single woman, with her entitled assets and a sense of peace. She passed without the legal due diligence, rights and governmental process of receiving her final divorce decree, due to a stalled divorce process from the [redacted]. As such, she was disgraced and only received her entitled divorce, after her death!

While living in [redacted] for almost 5 years and my husband lost yet another job, we sold almost everything and returned to the U.S. with only our belongings that could fit in a suitcase (including my prized heirloom possession, a large *'Espejo de Aqua'* painting from 'Pinar del Rio, Cuba'). We left everything else behind and relocated to the dystopian city of [redacted] to start over. To our extreme detriment, our lives were infiltrated, manipulated and destroyed by the same domestic terrorists elks lodge occult gang that killed my mother in [redacted]. We faced extreme racism, illegal surveillance, harassment, intimidation and bullying in every facet of life including the public schools, stores, the police department and neighborhood, etc. Therefore, we resorted to moving to the neighboring town of [redacted]. But instead of an improved way of life, the situation increased tenfold, and we experienced the most unprecedented, extreme terrorism in the history of the state. Consequently, based on advisement, my husband went to town hall meetings and advocated and complained with government officials about the racism in the town and schools. He also escalated the situation to the NAACP and filed 3 complaints on behalf of our children, against the [redacted], with the Department of Civil Rights. Out of retaliation and several months later, the [redacted] Police Department arrested my husband for DUI. He was incarcerated, brutally raped and was intentionally given HIV from a hired inmate, by an orchestrated and executed plan of the elks lodge occult gang and Morristown New Jersey police department. He was even nicknamed 'Spic Rick' while they terrorized him. Then with his DNA fluids, they created a 'cloned imposter' with the inhabited 'brain' of President Trump appointed, US Supreme Court judge Peter Bogaard, with the body of my estranged husband! Weeks later, the elks lodge occult gang terrorists, colluded with my first cousin, FBI detective & sergeant, Anthony [redacted] of Ocean County,

NJ, a member of Phi Beta Sigma Fraternity Incorporated, (and son of my mother's half-sister, Ines [redacted]) and (his son, Anthony [redacted] was the ring boy at Ricardo and I's wedding on [redacted]), to create one of the biggest scandals to date. As my close relative, he played an intricate part in my demise. In conjunction with the elks lodge occult gang, and as an initiation, they all orchestrated an illegal police raid on [redacted]. As retaliation for being a whistleblower and finding hidden, illegal surveillance cameras in the smoke detectors, they forced me out for the home, committed identity theft, held my children hostage and rendered me homeless, jobless, which is why I ended up relocating so many times with family and friends.

When I was homeless and in search of a place to stay, I reached out to family first. Since I was residing in [redacted], I asked all my cousins, especially the ones closest to me (from the [redacted] side first). They all emphatically said no and refused to allow my daughter and I to stay with them. I found that both shocking and extremely disturbing. Especially when I initially contacted my cousin Cheryl [redacted], (married to a white elks lodge occult member), while my daughter and I were together, homeless on the street, cold and hungry, at the [redacted] train station, immediately after being thrown out by the Ricardo clone. She refused to open her door to 2 women and we were so hurt. After spending the night on the street calling and begging family and friends for assistance, we ended up at a hotel. That betrayal still lingers, but I understand why now....

The elks occult lodge had infiltrated my family deeply from within. They contacted, bribed, threatened and smeared my family name and turned them all against us. These were the lengths they exhausted to ensure that my children and I were alienated from them, and caused direct and in direct damage to our family structure.

When I was homeless and in search of a job, I contacted Robin [redacted], Honorary Alpha Kappa Alpha Sorority, Incorporated member, [redacted], a Black American, longtime television broadcaster who co-anchors [redacted], (located at [redacted], at [redacted] in [redacted]). I sent her a personalized email and urgent plea for assistance, describing my struggles and search for employment as an experienced, [redacted], non-profit organization volunteer. Robin served as a featured Ambassador that frequently uses her platform to champion the nonprofit's mission of 'empowering women into the workforce'. Unfortunately, she did not respond to me, so I ventured to exhaust other options.

I also reconnected with many friends and relatives (as well as through my sister), including my cousin Mike [redacted] (a realtor), to help me pay for my hotel while homeless, Drew [redacted], to get resume and career advice, Kyle [redacted], (a realtor), and member of Kappa Alpha Psi Fraternity,

Incorporated, and friend from [redacted], to assist with paying for my daughter's plane ticket to return to college at [redacted], when the wicked Ricardo clone wouldn't, Mike [redacted], to get professional photography to restart my modeling career and Basil [redacted] to get business advice and career suggestions, yet I was unsuccessful with all my exhausted efforts. Nevertheless, to date, I still communicate with them.

I've been undeniably and forcibly separated me from my children, under the guise of a bogus divorce, for over 4 years and 9 months, to date and the real Ricardo is currently in 'Witness Protection'. I also have audio recordings as evidence of extreme verbal and physical child abuse by the Ricardo clone, that I have submitted to authorities and Congresswoman Mikkee Sherrill, and nothing was done to rescue them. My life has become a real life 'Truman Show' and these criminals have watched, infiltrated, decimated and sabotaged my life, to date (and family too), coupled with the use of psychological torture.

The United Nations is an international organization founded in 1945 to maintain global peace and security, develop friendly relations among nations, and promote social progress and human rights. When my mother-in-law, Leila [redacted], lived in [redacted], and had the privilege to volunteer as a 'Guest Chef' at [redacted] and prepared her own renditions of Brazilian cuisine. She was honored and celebrated not only as a Brazilian, but because her husband was a Professor at Columbia University.

My daughter was afforded an exceptional opportunity to visit on several occasions. She was part of SGAP Leaders, (Student Global Ambassadors Program), founded by Executive Director, Michele Joseph (and Alpha Kappa Alpha Sorority, Incorporated member). It is a non-profit organization that empowers teenagers by teaching STEM and social justice skills to solve real-world sustainability and human rights issues. She participated in the Student Leadership Conference on development at the United Nations and I accompanied her. I had the privilege of attending the social justice event on Human Trafficking, met the Muslim director and we discussed the heinous 'signs of trafficking' and women, men and children held against their will. Astonishingly, years later my own sons were and still are, victims of the same horrific crime, under the guise of a identity theft, fraudulent divorce and sole custody, to date, by the imposter Ricardo clone with collusion with the domestic terrorist elks lodge occult organization! I personally contacted the Brazilian Consulate to report the illegal violation of international law, when the imposter kidnapped my sons' from [redacted], without my knowledge, verbal authorization or written permission. Unfortunately, nothing was done, he was never charged or held accountable and my children remain in danger!

My divorce was held in court for over a year and then I lost custody. Despite continued complaints and escalation, no one has helped us. Luckily, my first born son, left that household at [redacted]

[redacted], (with hidden surveillance cameras (I found) and a child pornography ring ran by the elks lodge occult organization on the dark web), and currently attends [redacted] in [redacted]. This is the real Ricardo's alma mater, and a determined goal for our son to attain this milestone and continued legacy. Yet, for obvious reasons, I was deprived of sharing that moment and driving him to college. Nevertheless, I'm proud of him, his dedication, determination and accomplishments. Nonetheless, my urgent concern is for his and my other children's wellbeing, because the school year has ended and they are all back at the house, in harms way!

Conversely, I've always had a substantial affinity towards politics as it runs in my family. I am part of the legacy of [redacted] and relatives that have been significant in reshaping politics, advocacy and leadership. Congresswoman Stacey Plaskett, (member of Delta Sigma Theta Sorority, Incorporated), of the U.S. Virgin Islands and Senator Diane T. Capehart (sister to [redacted]) of St. Croix are my first cousins.

My cousin, Dennis [redacted] a member of Alpha Phi Alpha Fraternity Incorporated, is a prominent public administrator, the former Chancellor [redacted], [redacted], appointed by State Senate Majority Leader in 2024 and [redacted], appointed by [redacted] in 2022. He is the president and chief executive officer of [redacted] in [redacted].

As a steadfast constituent of New Jersey, I personally campaigned for various Democratic elections including Tamara [redacted], (an Alpha Kappa Alpha Sorority Incorporated member), for Congress in [redacted], [redacted] and Ras [redacted] (an Alpha Phi Alpha Fraternity Incorporated member), for Governor of [redacted] This was inclusive of canvassing, phone banking, voter outreach and meetings, business writing, Spanish translation and distribution of campaign literature.

More importantly, I've also been on a mission an have become an Effective Legislative Advocate as a constituent in the state of [redacted] for several bills to be passed including the bipartisan Restrict Act and the (118th Congress), advocating for the rights of my family and the obstruction of law, through provided testimony, business letters and engaging the public to local and state politicians.

Yet, during these years, just like my late mother, my 'kangaroo court' bogus, divorce was also stalled and delayed for years, at the [redacted], by President Trump appointed, U.S. Judge Peter Bogaard and attorney Gail Mitchell. Similarly, I specifically contacted my cousin, Congresswoman Stacey Plaskett, (a member of Delta Sigma Theta Sorority Incorporated), of the

Virgin Islands, she definitely was inaccessible due to her own personal circumstances, related to a massive, 'high-profile' scandal. Similarly and ironically, I am also directly related to the legendary, iconic fashion model, cousin, Naomi [redacted], (on my paternal Chinese, Jamaican side), and she is also intertwined with the "most infamous, multi-faceted scandal, systemic sex trafficking, child sexual abuse, and the exposure of a global network of powerful elites", to date.

Most egregiously, has been my direct communication with Congresswoman, at the time, and presently Governor Mikkee Sherrill of New Jersey along with the elected officials of the 25th district. I exposed the extreme illegalities and the tremendous injustices endured by my family for many years, including child pornography and my sons by the imposter, Ricardo [redacted] clone. I wrote countless emails to her assistant Ms. Wedderburn, constructed in a 15 part document, that identified the abusive forms of domestic terrorism. Yet, to date, absolutely nothing has been done, and has only magnified and worsened due to collusion, corruption and organized crimes. Rather, she has opted to collude with the domestic terrorists, elk lodge occult gang to broaden the scope of crimes against my family.

For the record, in the final divorce decree in 2024, I was intentionally stripped of everything, including custody of my 3 children; as a racist, malicious, organized crime, humiliation ritual and terrorist attack!

But in the midst of the horror of extreme poverty, food insecurity, and severe homelessness, I moved back to New York on several occasions. Without a phone, I reached out to my sister to place me in contact with fiends and family so I could find a place to stay. And each and every time I did, I was followed into the city and boroughs, by these occult members, and constantly intimidated by the New York City police department, as well as harassed, surveilled, bullied and gang stalked into my most frequent locations. There were several extreme instances of domestic terrorism worth noting:

- There was a time when experiencing food insecurity, and I went to a food pantry in the Bronx, (placed my name on the list), as it pouring rain, I stood/sat in line for hours. I was followed by a white male police officer, in a police car, and he briefly stopped the car, gave me a long, evil stare, made threatening hand gestures, and then shortly after, drove away.
- My most egregious experience was when these terrorists orchestrated an extreme gas leak through the gas stove as well as the outside pipeline, and I was forced to evacuate the premises, with my live placed in extreme danger. Con Edison had to make an emergent visit with the fire department, to cut and restore the gas line, uproot and mark the sidewalk, for days on adjacent street!
- While I was residing with my sister's best friend, Anissa [redacted], (born [redacted] by Panamanian parents), that lives at [redacted] while was disabled, I would accompany her to her doctors visits in Manhattan and Queens, via Access-A-Ride bus (A

public paratransit service in New York City, shared ride, door-to-door service for disabled individuals, operated by private carriers under contract with the MTA). On one occasion, the Access-A-Ride bus, got into an accident (orchestrated by the elks occult lodge gang organization), right in front of her destination residence, which prevented us from driving back in a timely manner and we had to wait hours for another vehicle to arrive. In another instance, while utilizing the Access-A-Ride bus service, we drove throughout Manhattan, and the driver was driving fast and recklessly, causing panic and frustration. As he continued to drive, I briefly recall the opportunity to reminisce rekindled moments of Drew, as we drove past the *USS Intrepid Ship & Museum in New York City*, and then the bus had mechanical problems and shortly after, we had to pull over in the nearby area. Once again, we had to wait for another vehicle to arrive. This too was orchestrated and planned by the elks occult lodge gang organization to sabotage, inconvenience us and delay our trip.

- Most impactful, was another instance when I was residing with my sister's best friend, Anissa [redacted] at [redacted], these terrorists orchestrated yet another event to severely injure my wrist by having it slammed between a heavy spring door as I disposed of the garbage! This resulted in several visits to the City MD Urgent Care, Montefiore Hospital Emergency, with a determined wrist sprain, a sling, wrist cast, OTC pain relief medication and pain coupled with inability of use for months!
- One of the most awful experiences, was when I was forced to relocate to [redacted], after being separated from my children and during the divorce proceedings, and I stayed with my elderly Aunt Jackie, my father's half-sister,(at the same location of the gas leak). After I moved out and relocated again back to New Jersey, the elks lodge occult gang killed her too!

In between my times of temporary living in [redacted], I often visited with my family in [redacted] Occasionally we visited the all-you-can-eat, Golden Corral Buffet & Grill as a means to congregate and fill up on various types of food at a decent price.

I'm extremely grateful to my sister for helping me make contacts with our family and friends I was able to reside with. Occasionally, I speak with her and each year to reminisce and celebrate my mother's life and birthday. It wasn't till just a few years ago, while still mourning her death and reflecting on the last conversation we had, I told that "*Mami said she had a secret to tell me, but she died without me knowing"*. sister finally told me what 'the secret' was. My mother has told her that "someone put devices in the house and I'm being watched".

With my sister's recommendation, henceforth, I moved back to stay with 'relatives' in [redacted], to a more stable residence, for a period of time, to get my bearings.

It wasn't till just a few years ago that my sister finally told me what 'the secret' was. My mother has told her that "someone put devices in the house and I'm being watched". Now I finally understood, why she was anxious, and she couldn't talk on the phone. Why she would go to her neighbors house to call me when her phone wasn't charged. It all made sense. The elks lodge occult gang were

monitoring her movements, illegally surveilling her and monitoring her phone calls. She did not feel safe and that why she *did not* have the freedom to speak freely!

Nevertheless, in the years since those incidences, I've had time to contemplate how best to proceed with my life with the real estate I'm about to inherit and the legacy I want to leave for my children. I had a wonderful childhood and teenage life living in New York and the best professional experiences there as well. I'm also planning to launch my modeling and show business career, and the only place to do that is in the best city of New York!

Moreover, my late father-in-law, Dr. Ney [redacted], is a graduate and professor of [redacted] with a Ph.D in engineering. Currently, my youngest son is an also a member of N.B.S.E. with a strong interest in engineering and STEM, just like his grandfather. Therefore, it's imperative that my children continue his legacy and have the immediate opportunity to do so, safely. As you can see, our family has strong, compelling roots in New York City, and we want to extend and celebrate our lineage and heritage with our children and the next generations to come.

Furthermore, when my sister, brother and niece, come to visit, they need to be able to have a place to call home. It should be a safe, secure place and environment to stay, without the risk associated with domestic terrorism.

Fast forward, as I'm now in the process of having my fraudulent divorce reversed, regain custody of my son, reunite with my children, and have the imposter cloned version of my husband, deported, I'm also planning to finally move back to my hometown of New York. I want to leave the past behind me and make a fresh start.

Additionally, my daughter and Skylar [redacted], member of Jack & Jill of America, Incorporated, (and cousin to 'Nia' [redacted], and mother to Dr. Karma [redacted] (a member of Delta Sigma Theta Sorority Incorporated), & father to [redacted] Dwayne [redacted], a member of Kappa Alpha Psi Incorporated), were our friends when we lived in [redacted] They were all friends when my daughter and Nia attended [redacted] in [redacted], [redacted] Her parents are Tiffany [redacted] and Melvin [redacted] of [redacted]. They reunited when my daughter transferred from my alma mater to [redacted] and became closer friends. To her extreme detriment, the elks lodge occult gang also abruptly killed her mother too, and she has been left motherless. *Allah gave me the specific set of instructions to adopt her, and I am obeying his orders. Therefore, as a daughter that lost her mother, it is in my nature to nurture.*

Therefore, as a verbal promise to her, I, hereby would like to legally adopt her in the state of New

York, as an adult, to ensure that she is loved, supported and protected indefinitely. I will be filing a petition under Domestic Relations Law (D.R.L.) § 109 in either the Family Court or the Surrogate's Court of the county where I and the adult adoptee reside. I would like authorization to initiate the process with Form 29a and continue with the adoption process, once I've established myself as a New York resident.

Most critically, this is a multi-state (New York, New Jersey and Florida), systemic crisis involving high level politicians, that are 'actively' participating in one of the most massive corruption and organized crime scandals! Presently, Governor Ron DeSantis of Florida, Mayor John E. Dailey of Tallahassee, in conjunction with Governor Mikkee Sherrill of New Jersey, and both the [redacted] and [redacted] elks lodge occult gang members, have all collectively colluded for years in the hostage taking, manipulation and demonic influence in my daughter's life, to date. She was just in [redacted], and now has returned to [redacted], [redacted], all without any communication with me. This was done intentionally to parent alienation, create further division, separation and difficulty for reunification and end to this tumultuous chapter! They have also coerced her to post pictures on Instagram, hack my feed, to mock and highlight their ability to control her life and whereabouts. She is currently in bondage and she does realize the extent of the catastrophe!

In parallel, my youngest son at 17 years old, does not know for certain, and unaware, that the imposter he resides with, is NOT his father. It is now imperative that he learn the truth from his *real* father and mother. This is both a delicate, important and potentially traumatic situation, yet it needs to be done. As a family, we *all* collectively need to understand, heal, accept and move forward with the truth of our circumstances. This is the only option for us.

As I'm preparing and to settling my affairs to relocate into one of my soon-to-be residences, with my 17 year old son, it's imperative that all the boxes are checked off as it pertains to this huge initiative. He will be enrolling into a private school in the city and I need complete assurance of his wellbeing and safety, along with that of his real father. This all cannot be accomplished without your mayoral support and secure protection, to ensure the safety and well-being of my family.

The '*Strong Black Woman*' narrative has been interchanged with race and gender, and has plagued us since the days of slavery. Our distress was never seriously or appropriately addressed. This has been confirmed in every aspect of our societal lives; judiciously, in educationally, the workplace, residentially, in healthcare, etc. History has shown that Black women have been systematically disrespected, continually dehumanized and disproportionately associated with masculine attributes. If we were of a different race, our situations would have been handled differently. Too often, we were not supported and treated as substandard. This has been our experiences as Black women and policies must be implemented to change and avert this narrative.

Therefore, as reparations, I hereby request that along with your crucial, historic and respected role as mayor, in conjunction with the NY Attorney General, Letita James, play a significant role in the protections of my family against these domestic terrorist elk lodge occult gang, as well as enforce the New York City police department and other law enforcement entities and government agencies to stand down, safe guard our civil rights and allow us to live in peace. Additionally, it's imperative to also prevent and prosecute any crimes done against us, to ensure accountability and restoration as a means of prevention.

My mother left Cuba to the United States of America and landed across from the Statue of Liberty, on Ellis Island, New York, to *gain her independence, freedom and democracy*. As a naturalized citizen, she embodied America's core belief, that *"all men are created equal"* and to take stock of the country's resounding mantra of *'Life, Liberty and the pursuit of happiness'*.

"The Statue of Liberty (Liberty Enlightening the World) universally represents freedom, democracy, and international friendship. Originally conceived to celebrate the abolition of slavery and the centennial of the United States, it later evolved into a globally recognized beacon of hope and a welcoming symbol for immigrants arriving in America"

Yet today, her descendants are in slavery, bondage, and oppression; the complete opposite of her intentions.... 😞. So as a survivor, it's my responsibility to ensure that I can start a new chapter and continue our legacy.

My mother was born on [redacted] and died on [redacted]. The original date of Independence Day in America was July 4, 1776. *This Independence Day marks the official 250th anniversary of the adoption of the Declaration of Independence*.

On 6/13/2026, and after 53 years, in the NBA Finals game at Madison Square Garden the New York Knicks team won against the San Antonio Spurs, in game 5 with a score of 94-90! The MVP, Jalen Brunson, #11, scored a massive 45 points and was pivotal to their win. This is a celebrated and historic championship of a lifetime and I'm so proud to be a fan!

With regard to numerology and game 4 on Saturday night, the Knicks completed the largest NBA Finals comeback ever, after trailing by 29 points in the 3 quarter! They trailed by 29 with 9:27 left in 3Q, then fought back to earn a 107-106 victory at MSG. New York held a 3-1 series lead.

This is a crucial and equally pivotal point in time for us to attain 'our rights' as American citizens, but I cannot reach this threshold without your intervention. Hopefully, this will be the year my family will

finally have their 'freedom' this year *Inshallah.*

I look forward to celebrate with the New York Knicks, collect as much merchandise as possible, and forever cement myself as a native New Yorker. Just like the New York Knick's team and fans, "I've waited my whole life for this"!

My Mayor Muslim,
My Bagels Jewish,
Mi Gente Latino, (My People Latin)
Knicks in Cinco (five)

*****

Overall, the common denominator to all of these unprecedented, devastating, horrific experiences, including death and destruction, are by the racist, demonic occult, elks lodge occult gang (and other racist, evil oligarchs, and organizations), all disguised as prominent members of society. They are masked as your average person in healthcare, education, politics, businesses, etc. *Their main objective is to orchestrate, manipulate, infiltrate and decimate people's lives with their planned traumatic and humiliating agenda, especially for the punishment of those that are Black. They have intercepted the lives of the people I know and care for, and systematically and catastrophically altered our futures*! Even Malcolm X, (also known as El-Hajj Malik El-Shabazz), discussed them in his public speeches years ago. "Malcolm X's primary problem with mainstream, white Elks lodges was rooted in their *explicit, institutionalized racial discrimination.* Until the 1970s, the national constitution of the white Benevolent and Protective Order of Elks (BPOE). legally mandated a "Whites-Only" clause for its membership." (A Adirondack Explorer +1). Malcolm X viewed the white Elks *as a prime example of the broader social hypocrisy, systemic exclusion, and racism embedded in American society".* They all need to be 'outlawed', not just in New York, but New Jersey and Florida too, for the overwhelming atrocities done to Black people, and the CRIMES AGAINST HUMANITY, to date.

In conclusion and with my concrete observations, Black people are collectively targeted overall since the days of slavery. The intrinsic and covert, modern day slavery tactics are geared especially towards the 'Top 3%' of the upper echelon, educated and affluent Black community. These racist people, businesses and organizations, specifically attack, stifle and sabotage us to prevent the success, upward mobility, legacy and wealth building, '*by any means necessary*' of our community. This type of racism is rooted and prevalent across all sectors of society including healthcare, education, judicially, etc., where the broader white community may feel threatened.

This letter has been drafted over the last few weeks. On this day, 6/26/2026, marks an eerie and awful reminder of the date I was forcibly separated from my children 4 years and 10 months ago. I sent a text message to my 3 children and only 2 of the 3 responded. They're hurt and are still trying to make sense of what happened. I managed to cry tears I didn't realize I still had and have survived and coped with a broken heart. This horrific day is reminiscent of the days of slavery when "*during American chattel slavery (17th to 19th centuries), the forced separation of children from their parents was a widespread, deliberate practice. Enslaved people were legally considered property….This domestic slave trade devastated family units, routinely tearing children away from their mothers and fathers. Historians estimate that this domestic trade destroyed more families than any other event in American history." NY Times article…."Family separation was a brutal tool of economic control and punishment. Roughly half of all enslaved individuals were separated from spouses or parents, severely eroding family structures and forcing enslaved people to continuously rebuild their lives through new or fictive kinship networks". Gathering for Justice….."The intentional, systemic severing of Black families established enduring patterns of intergenerational trauma, loss of culture, and community fracturing that historians and sociologists argue, still resonate today". Equal Justice Initiative.* Slavery never ended in the states of New Jersey, New York and Florida. It continued covertly, through systemic oppression and racism.

These experiences have taught me how to fight for what I love, and how to survive the toughest of challenges, through continual prayer and guidance from Allah. He not only strengthens me, but empowers me to lead with all the love I have stored up for years. Presently, I'm still in survival mode, pushing emotions down and managing next steps. Nonetheless, I realize that what's been done to my family is equally painful and scarring. We can only heal once our family has been properly reunited, protected and the criminals are held accountable.

This is a broad issue that needs to be addressed, dismantled and reformed to strategically prevent the continuance of domestic terrorism and crimes against our human rights, disguised as basic racism, deep-rooted insecurities and fraudulent law practices.

On this Saturday, 6/27/2026, I celebrated my adoptive father's birthday [redacted], Dr. Enrique [redacted] by sending him a text message and calling him over the phone. I spoke with him about our legacy and relationships to other notable people from our family. I was excited to hear that he was well and good spirits. Unfortunately, this evening, I learned that my biological father, the Honorable Minister Louis Eugene Walcott Farrakhan's wife, Khadijah Farrakhan, born on 11/26/1935, died today at 90 years old, on the same day as my father's birthday. My deepest sympathy goes out to the family. This is exactly the kind of irony that has significance and symbolism in our lives.

With a overburdened heart and soul, I sincerely look forward to your overhaul and eradication of this

corrupt system, complete sovereignty and emancipation, providing safety for my family and restoring peace and order to the greatest city in the world. Thank you in advance for your utmost support, understanding and cooperation. I anticipate moving back to New York and to have you as my mayor.

Urgently & Sincerely,

Zoraida Nicole Walcott Oliveira

A Name

Chelsea Mauldin

A Email	[redacted]
A Professional Affiliation	Public Policy Lab (www.publicpolicylab.org)
A Zip Code	[redacted]

Public Comment

To: Commission on Government Efficiency (COGE), a Charter Revision Commission
From: Chelsea Mauldin, Executive Director, Public Policy Lab
Re: Written testimony on government service delivery and the charter's accountability gap
Date: July 3, 2026

To Chair Gaspard, Executive Director Cheng, and members of the Commission: My name is Chelsea Mauldin. I am the executive director of the Public Policy Lab (PPL), a nonprofit innovation team headquartered in Brooklyn since our founding in 2011. In partnership with government agencies and the communities they serve, we design policy and services that help Americans build better lives, with a focus on programs for low income people. Our partners have included the New York City Administration for Children's Services, the New York City Department of Education, the New York City Department of Homeless Services, the New York City Department of Health & Mental Hygiene, the New York City Housing Authority, the New York City Department of Housing Preservation & Development, and the New York City Mayor's Office, among many other municipal, state, and federal agencies.

Through fifteen years of conducting this work, we have witnessed a consistent structural problem in how the City of New York builds and deploys services. Currently, the New York City Charter mandates "the promotion of efficient and effective delivery of agency services" but creates no mechanism to validate that services deliver on that requirement for residents. While the charter requires performance reporting, it does not require that agencies understand whether services work for the people they are designed to serve. Performance reporting does not encompass the human experience of using public services, nor does the mandate require that agencies actually speak with the people whose lives depend on that performance, or that the people who deliver services have any formal role in shaping them.

This is a systemic gap. When the charter creates no requirement to understand how a service works across the complete range of people it involves—from policymakers to operations managers to frontline workers to the residents they serve—then agencies have no formal obligation to provide a high quality experience. As a result, procurement processes, budget cycles, and project timelines are not designed to support effective human centered service delivery.

This gap has human consequences. In our work with NYC ACS, we have seen how families navigating the child welfare system encountered processes designed around administrative regulations rather than the realities of parenthood. Frontline caseworkers were required to capture data about program successes to meet audit requirements, rather than addressing families' challenges. In our work with NYC HPD on housing access, people seeking affordable housing faced information environments that assumed knowledge they did not have, leading to delays in getting secure housing. In almost every project, New Yorkers received ineffective support because 'sister'

agencies struggled to collaborate when serving the same resident. We have witnessed this pattern repeatedly, despite the dedicated, caring civil servants at City agencies. Agencies operate exactly as the charter asks: delivering services, measuring outputs, reporting performance. What the charter entirely omits is any requirement to understand how a service works, or fails to work, across the full stack of people involved in delivering and receiving it.

To remedy this, the City should amend the charter to establish a service-design review as a condition of major service changes. Before a new or improved public facing service is deployed at scale, the city should be required to demonstrate that it was designed in response to structured evidence about how the service works—across all the people who deliver and receive it. A full service design review process would include:

- A mapping of all communities and providers in and around a given service and their respective power within the system, with the requirement to ask, "How can we shift power toward those who currently hold the least?"
  Qualitative research with service users, staff, and leadership to identify the challenges of the current service system and how the new changes can address them.
  A codesign process to substantively involve users and providers in the development of the new service, workflow, tools, or materials.
- Small-scale, real-world testing before deployment to understand how service changes or new tools or materials affect actual users, with a formative evaluation to identify improvements.
  A structured integration and scaling process that includes staff involved at multiple levels of service operations to create more effective adoption and change management.

At minimum, an amendment to Chapter 1, Section 15, of the charter should require that when a New York City agency undertakes a major redesign of a public-facing service, it conduct meaningful qualitative research with people who deliver and receive that service, across roles and populations, before deployment, then certify to the Office of Operations that this research informed the design. A complementary amendment to Chapter 1, Section 12, would require the Mayor's Management Report to include, for each major service covered, a summary of how qualitative evidence gathering informed the service's current design. This would give the MMR currently a report of output metrics—a mechanism for answering the question the metrics cannot: How does the service feel to the people using it?

The charter has required effective service delivery since 1989, but it has never required that agencies design services together with the people they serve and those who deliver them. That omission causes real harm: services built around administrative priorities, technology deployed without understanding the user, performance reports that measure activity rather than impact, and frontline knowledge that never reaches the people making decisions.

The city already requires pre deployment assessment of automated systems that affect residents. It demands that buildings meet habitability standards

before people occupy them. It does not yet stipulate that services be designed with evidence that they will work for the people who depend on them. This commission has the authority to establish that requirement, and we urge it to do so.

Chelsea Mauldin
Executive Director, Public Policy Lab
[redacted]

Attachment(s)



PublicPolicyLab_COGE_Testimony.pdf

Date Submitted: July 3, 2026

Topic: Reporting Requirements ✕ | Unnecessary Bureaucracy ✕ | Technology ✕ | Support Oversight Agencies ✕

Method Received: Airtable Form

Is it charter related?

Run agent

Charter Related: Yes

Topic Simplified: Government Operations

Subtopic: Establish a service-design review as a condition of major service changes

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[1] *New York City Charter*, chap. 1, § 15(b)(1), accessed June 25, 2026, https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCcharter/0-0-0-5931.
[2] *New York City Charter*, chap. 1, § 12.

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Chelsea Mauldin

Executive Director, Public Policy Lab

[redacted]