Name

# Corey Bearak

Email [redacted]

Professional Affiliation Member, Queens Community Board 13

Zip Code [redacted]

Public Comment

As part of the 2025 Queens Community Board 13 ("QCB13 ") Nominating Committee deliberations, the committee members expressed concern about the advent of term limits for Community Board members...This ill informed and misguided and UNNECESSARY change requires rescindment. Our elected Borough President and City Council Member(s) simply can deny re-appointment to any current community board member for any reason, including merit, a need for new fresh point of view, diversity, etc. The current Charter denies them the ability to retain qualified member who represent their community and provide useful, often needed experience and expertise. Please see attached file or this link: https://coreybearak.com/blogs/2025-05-19_Community_Board_Member_term_limits.pdf
Further, QCB13 passed recommendations concerning land use, budget and government organization that merit implementation (Most reflect work I developed as legislative counsel to the Bronx Borough President and later was included in the CIVIC2030 (2007 8) Platform of the Queens Civic Congress. Please see attached or this link:
https://coreybearak.com/blogs/CityCharter_2010-06-28.pdf

Attachment(s)


The Public Ought To Know

*May 19, 2025*
*By Carney Rozzuk*

***Community board membership matters; limiting members's term non-sensical.***

As part of the 2025 Queens Community Board 13 ("QCB13") Nominating Committee deliberations, the committee members expressed concern about the advent of term limits for Community Board members. As chair of the committee, I committed to its members that I would raise this concern when I made the report at the May 19 full meeting of QCB13.

Effective January 1, 2015, a change to the New York City Charter imposed limits to the terms of service of New York City Community Board members: it limits appointment of community board members to four consecutive two-year terms, starting with terms for which appointments or reappointments are made on or after April 1, 2019. However, members appointed or reappointed for a term commencing on April 1, 2020, could be reappointed for up to five consecutive two-year terms, in order to prevent a heavy turnover of community board membership in 2027 and 2028.

Most Charter recommendations, once put on the ballot, absent any strong, well-financed opposition routinely pass. This ill-informed and mis-guided and UNNECESSARY change requires rescindment. Has elected Borough President and City Council Members(s) simply can elect re-appointment to any current community board member for any reason, including merit, a need for new fresh point of view, diversity, etc. The current Charter denies them the ability to retain qualified member who represent their community and provide useful, often needed experience and expertise.

Community Boards provide an advisory role and input on land use and budget matters. In some cases, elected officials will follow the land use recommendations of community boards. On significant local development, a community board can help shape the project.

Council Members (in proportion to their district overlapping with the board) and Borough Presidents appoint Board members. Each year they appoint and re-appoint members to two-year terms.

As a member of Queens Community Board 13, and as a former aide to a council member and borough president, I developed my own standards for what qualities someone to serve on a community board. Require prospective and existing community board members to certify involvement in a community group to gain appointment or reappointment. This means community board members must maintain a relationship with one of the following their civic (or tenant or block association), senior, youth, faith-based or business organization. This change will ensure community boards include not just people with knowledge and expertise but ongoing communal involvement that ensures each community in the district a seat at the table.

I never contemplated nor would advocate limiting terms. Quite frankly, some community boards and their members, perhaps because of the matters its boards consider, get more attention from their elected when it comes to placing, replacing and re-appointing members.

The qualifications and work of board members and prospective members should matter more than mere

2025-05-19_Community_Board_Membe...


**Community Board 13Q Resolution on Charter Revision, June 28, 2010**

Whereas the Mayor appointed a Commission to review the entire Charter of the City of New York, and issue a report outlining findings and recommendations to streamline various the Charter;

Whereas NYC should be recognized as a region;

Whereas the boroughs and local communities should be meaningfully involved in decisions on the delivery and effective allocation of municipal services and City resources;

Whereas the City budget never reflects the need to allocate resources and services to reflect different neighborhood priorities as represented and identified by Community Boards;

Whereas the NYC should explore regional modes for funding agencies;

Whereas there should be a greater role for the borough presidents in land use planning for their boroughs, allocation of agency resources within the boroughs, overseeing local implementation of the capital budget and oversight of delivery of local services;

Whereas a need exists to strengthen the role of Community Boards and the Offices of the Borough Presidents and empower these institutions with the resources to carry out their responsibilities under the City's Charter;

Whereas a need exists to correct the 1989 mistakes that removed legislative review of decisions of the Board of Standards and Appeals, and the failure to include rules for major concessions;

Whereas New York City's policies wrongly subsidize extra illegal occupancies that crowd schools and overburden services;

Whereas a frenzy on non-partisan elections, distracts from the need to focus on structural governmental reforms that empower City residents, their communities and their boroughs;

Therefore Community Board 13 makes the following recommendations that address how to make the city of New York work better for its residents and urges the CRC to include each in its proposal to reduce to the voters:

*Land Use Items*

- Provide the Community Boards, Borough Presidents and the Public Advocate with the resources to empower each to carry out their charter functions and help New York City weather the current fiscal crisis: use the IBO/OMB analogy to assess each of the offices adequate funding by base-lining funding for those offices and setting funding for each office against a set percentage of the overall expense budget.
- Subject all residential, commercial, industrial and public (agency) developments that occupy a city block or more, and all public agencies' projects to ULURP public review (which includes Community Board, Borough President and City Council review and oversight and approvals).

CityCharter_2010-06-28.pdf

Date Submitted: June 2, 2026

Topic: Unnecessary Bureaucracy ✕ Budget Issues ✕

Method Received: Airtable Form

Created By: 6/2/2026 3:18pm

# The Public Ought To Know

***May 19, 2025***
***By Corey Bearak***

***Community Board membership matters; limiting members term non-sensical.***

As part of the 2025 Queens Community Board 13 ("QCB13 ") Nominating Committee deliberations, the committee members expressed concern about the advent of term limits for Community Board members. As chair of the committee, I committed to its members that I would raise this concern when I made the report at the May 19 full meeting of QCB13.

Effective January 1, 2019, a change to the New York City Charter imposed limits to the terms of service of New York City Community Board members: it limits appointment of community board members to four consecutive two-year terms, starting with terms for which appointments or reappointments are made on or after April 1, 2019. However, members appointed or reappointed for a term commencing on April 1, 2020, could be reappointed for up to five consecutive two-year terms, in order to prevent a heavy turnover of community board membership in 2027 and 2028.

Most Charter recommendations, once put on the ballot, absent any strong, well-financed opposition, routinely pass. This ill-informed and mis-guided and UNNECESSARY change requires rescindment. Our elected Borough President and City Council Member(s) simply can deny re-appointment to any current community board member for any reason, including merit, a need for new fresh point of view, diversity, etc. The current Charter denies them the ability to retain qualified member who represent their community and provide useful, often needed experience and expertise.

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Council Members (in proportion to their district overlapping with the board) and Borough Presidents appoint Board members. Each year they appoint and re-appoint members to two-year terms.

As a member of Queens Community Board 13, and as a former aide to a council member and borough president, I developed my own standards for what qualifies someone to serve on a community board. Require prospective and existing community board members to certify involvement in a community group to gain appointment or reappointment. This means community board members must maintain a relationship with one of the following: their civic (or tenant or block association), senior, youth, faith-based or business organization. This change will ensure community boards include not just people with knowledge and expertise but ongoing communal involvement that ensures each community in the district a seat at the table.

I never contemplated nor would advocate limiting terms. Quite frankly, some community boards and their members, perhaps because of the matters the boards consider, get more attention from their electeds when it comes to placing, replacing and re-appointing members.

The qualifications and work of board members and prospective members should matter more than mere

longevity.

If electeds find a community board member wanting, they can simply impose term limits by not re-appointing a member. This makes more sense than this current mandate to automatically remove dedicated community members.

As a result, since the Mayor and City Council currently established Charter Revision Commissions, I recommend Queens Community Board 13, as well as every one of the other 59 Community Boards throughout the City recommend that each commission recommend removing the existing term limits mandate. Further, I recommend all voters to press all candidates for city office this year to commit to seeking the removal of community board member term limits, which can also be achieved by the City Council passing a local law.

***Corey Bearak** can be reached at [redacted] Find his ebook, The Public Ought To Know, at Kindle, Nook and Apple iBooks.* ***This commentary was presented to Queens Community Board 13 May 19, 2025 as part of Mr. Bearak's report as chair of the QCB13 Nominating Committee.***

# Community Board 13Q Resolution on Charter Revision, June 28, 2010

Whereas the Mayor appointed a Commission to review the entire Charter of the City of New York, and issue a report outlining findings and recommendations to amend or revise the Charter;

Whereas NYC should be recognized as a region;

Whereas the boroughs and local communities should be meaningfully involved in decisions on the delivery and effective allocation of municipal services and City resources;

Whereas the City budget never reflects the need to allocate resources and services to reflect different neighborhood priorities as represented and identified by Community Boards;

Whereas the NYC should explore regional models for funding agencies;

Whereas there should be a greater role for the borough presidents in land use planning for their boroughs, allocation of agency resources within the boroughs, overseeing local implementation of the capital budget and oversight of delivery of local services;

Whereas a need exists to strengthen the role of Community Boards and the Offices of the Borough Presidents and empower these institutions with the resources to carry out their responsibilities under the City Charter;

Whereas a need exists to correct the 1989 mistakes that removed legislative review of decisions of the Board of Standards and Appeals, and the failure to include rules for major concessions;

Whereas New York City's policies wrongly subsidize extra illegal occupancies that crowd schools and overburden services;

Whereas a focus on non-partisan elections, distracts from the need to focus on structural governmental reforms that empower City residents, their communities and their boroughs;

Therefore Community Board 13 makes the following recommendations that address how to make the city of New York work better for its residents and urges the CRC to include each in its proposal it makes to the voters:

*Land Use Items*

● Provide the Community Boards, Borough Presidents and the Public Advocate with the resources to empower each to carry out their charter functions and help New York City weather the current fiscal crisis; use the IBO/OMB analogy to assure each of the offices adequate funding by base-lining funding for those offices and setting funding for each office against a set percentage of the overall expense budget.

● Subject all residential, commercial, industrial and public (agency) developments that occupy a city block or more, and all public agencies' projects to ULURP public review (which includes Community Board, Borough President and City Council review and oversight and approvals),

whether or not a zoning or permit change is required.

● Create distinct borough-based planning and zoning offices under supervision of each borough president;

● Maximize community participation in City approval of major concessions for private use of public spaces, including parkland, by involving the Borough Presidents, Council Members and Community Boards in formulating rules defining and governing major concessions.

● Empower the City Council to review all Board of Standards and Appeals dispositions.

● Provide for Council oversight of all decisions by the City Planning Commission.

*Government Structure*

● Expand the role of borough presidents in local land use planning for their boroughs, allocation of agency resources within the boroughs, overseeing local implementation of the capital budget and greater oversight of the delivery of city services in their boroughs.

*Budget*

● Budget for the delivery of city services where appropriate by borough and community district.

● Set up a mechanism that devolves resources and service delivery to the appropriate borough or local level that directs City resources to address community needs such as precinct staffing, code enforcement, tree pruning/ removal, traffic studies and signal installation, and programs for youth and seniors.

● Make elected officials accountable by barring mayoral rate-setting boards and authorities from imposing budget allocations unless the Council grants such authority, as in the example of the Water Board setting rates after, rather than, as it does now, before the budget's adoption.

*Oversight*

● Shift responsibility for preparation of the Mayor's Management Report (MMR) to the Independent Budget Office and renaming the document the Independent Management Report.

● Create an independent CCRB by base-lining its funding as a percent of the NYPD budget, and establishing a mechanism to make the appointed CCRB members more reflective of the City and controlled less by the administration.

●Establish a two-term limit for the offices of Mayor, Public Advocate, City Comptroller, Borough President and City Council Member that may be not amended except by a referendum of the voters in the year before the mayoral election.

● Make recommendations for approval by the electorate on a subject matter basis that empowers voters to vote separately and distinctly on each item for their consideration and approval.

Name

# Sergii Kultyshev

Email [redacted]

Professional Affiliation: Urban Development

Zip Code [redacted]

Public Comment: I made multiple attempts to share a pilot concept for reducing city bus mobility costs. Unfortunately, I had no chance to be heard. I would appreciate any communication channel that would allow me to discuss the project with the mayor.

Attachment(s)




Free Pilot .png

Date Submitted: June 4, 2026

Topic: Unnecessary Bureaucracy

Method Received: Airtable Form

| | | |
|---|---|---|
| Created By | 6/4/2026 | 9:46pm |


CITYNODE
Free Mobility Pilot
DROP OFF
PICK UP

Name

## Catherine Barnes

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | New Yorker |
| Zip Code | [redacted] |
| Public Comment | Especially during the expected influx of visitors for theWorld Cup, we need to provide pedestrian safety for all.<br>The intersection of 42nd Street and Fifth Avenue there is a constant bottleneck causing pedestrians' need to thread through the vehicles caught in the intersection blocking the crosswalks. Large trucks get stuck on the crosswalks.<br>One simple solution could be to have a one minute of only pedestrians crossing any which way by rRED lights for all vehicles and then resume the N S/E-W . This would allow tourists with luggage, baby carriages, disabled and elderly to cross safely. thanks! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 5, 2026 |
| Topic | Street Redesigns × Tenant Protection × |
| Method Received | Airtable Form |
| Created By | 6/5/2026 1:34am |

Name

# kelly kreth

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

For NYPD - there needs to be a person or team responsible for reviewing all police reports NYC- wide each week and see connections. For example, two years ago I was spit on by an aggressive stranger wielding a baby carriage. I filed a police report and even though he was just walking down the block, NYPD refused to take pics of him or drive to speak to him. Anyway, days later I saw on an neighborhood Facebook group a woman posted that a man wielding a baby carriage knocked down her elderly mother on purpose. Again, cops took a police report but refused to ask for street video footage. I recognized the pic of the man as the man who attacked me. I am a journalist so I wrote a story about it. I posted on all neighborhood groups and compiled 60 other poeple throughount NYC in those past two months attacked by this man. I interviewed each one. I begged NYPD (local precinct) to connect all these. (I finally found out the attackers name and saw he was arrested 6 mons prior to attacking an elderly man in my area as well and that case was still pending.) My investigation ultimately got NYPD's 19th Precinct head to issue a CrimeStoppers. Tips came pouring in about more attacks and within days NYPD arrested him. The ADA said they didn't have a cohesive list or police reports -- I presented it to them. There needs to be someone in the NYPD who curates all police reports and figures out patterns. While one person being spit on may not be enough to warrant an arrest or search, 60 people being attacked by the same person does. It also seems that the only time NYPD does this sort of things is AFTER THE FACT when people take to Social Media and post about their attacks. As a result of my efforts connecting all this, writing publicly about it and getting it on the local news, he was ultimately held ON BAIL (!) and then sentenced to five years in prison.

https://eastsidefeed.com/nypd_fdny/this_stroller_wielding_man_has_been_menacing_upper_east_siders_for_months/

Attachment(s)

Drop files here or click to browse

Date Submitted: June 5, 2026

Topic: Policing

Method Received: Airtable Form

Created By: 6/5/2026 11:35am

Name

## Mario De La Ossa

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | NYC resident/former NYC Gov advisor |
| Zip Code | [redacted] |

Public Comment

The NYC Charter distributes authority for capital project delivery and energy procurement across multiple agencies including the Department of Environmental Protection, the Department of Design and Construction, the Department of Citywide Administrative Services, and the Office of Management and Budget. Each agency exercises that authority well within its defined scope. The Commission may wish to consider whether the Charter's allocation of authority by function and agency, designed in an earlier era of city government, would benefit from amendments that strengthen end-to-end accountability across functions, specifically for capital projects and energy commitments where outcomes depend on coordinated execution by multiple agencies.

This testimony from MDO Energy Insight Inc., a New York based, NYC SBS Certified MBE and Veteran Owned advisory firm, draws on the firm's experience across energy markets, the principal's extended advisory engagement inside NYC government, and clean technology venture development. Three related opportunities for Charter consideration are summarized below; the attached full testimony develops each with relevant Charter citations.

Item 1 End to end accountability for capital project delivery. Capital projects at operating agencies with major capital portfolios distribute authority across at least four points: the sponsoring bureau, an internal engineering or construction division, DDC (Charter §1202 and §1205), and OMB. Each function operates well within its defined scope. No Charter provision designates a single officer accountable for end to end delivery across these entities, a structural pattern with implications for schedule, scope, and cost benchmarking on complex multi-agency projects. The Commission may wish to consider whether the Charter should designate, for capital projects above a defined threshold, a single accountable delivery officer with statutory authority spanning these entities — drawing on the consolidated-accountability model used by federal program management and SCA.

Item 2 — Coordination between citywide energy procurement and operating-agency consumption. Charter §814 vests DCAS with citywide energy procurement authority. The operating agencies that consume the energy carry the load, the Local Law 97 obligations, and the capital that retrofits demand. The Charter does not currently require coordinated procurement-and-efficiency planning between the two. Major oil companies have addressed analogous structures by centralizing distributed procurement responsibilities to capture portfolio offsets and supply optimizations a comparable the Commission may find informative. The Commission may wish to consider whether the Charter should establish a statutory joint-planning function, or alternatively a dedicated coordinating function staffed by personnel assigned from existing agencies rather than new headcount.

Item 3 — Integration of energy and decarbonization commitments into capital planning. The Ten Year Capital Strategy (Charter §215) and the Capital

Commitment Plan are the city's central capital planning instruments. Neither is required by the Charter to integrate the city's Local Law 97 compliance, decarbonization commitments, fleet and facility electrification, or demand-side resource planning into capital prioritization. The Commission may wish to consider whether the Charter should require these instruments to incorporate a binding energy and decarbonization element.

These three observations share a common structural pattern: the Charter, as currently written, assigns authority by function and agency rather than by outcome. Charter amendments that designate accountable officers for end to-end delivery, require coordinated planning between procurement and consumption, and integrate energy and decarbonization obligations into capital prioritization would strengthen the city's capacity to deliver against the commitments New Yorkers depend on.

MDO is available to provide additional operational detail, case examples, and technical input at the Commission's request. The full testimony is attached.

Attachment(s)



MDO_COGE_Testimony_June9_FINAL (1)...

Date Submitted: June 5, 2026

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

Method Received: Airtable Form

Created By: 6/5/2026 12:25pm

## MDO Energy Insight Inc.

## Written Testimony to the Commission on Government Efficiency June 9, 2026

**Submitted to:** Chair Patrick Gaspard and Members of the Commission
**Subject:** Charter Reforms to Strengthen Capital Project Delivery and Energy Procurement
**Submitted by:** Mario De La Ossa, President, MDO Energy Insight Inc.
The NYC Charter distributes authority for capital project delivery and energy procurement across multiple agencies — including the Department of Environmental Protection, the Department of Design and Construction, the Department of Citywide Administrative Services, and the Office of Management and Budget. Each agency exercises that authority well within its defined scope. The Commission may wish to consider whether the Charter's allocation of authority by function and agency, designed in an earlier era of city government, would benefit from amendments that strengthen end-to-end accountability across functions, specifically for capital projects and energy commitments where outcomes depend on coordinated execution by multiple agencies.

MDO Energy Insight Inc. is a New York-based, NYC SBS-Certified MBE and Veteran-Owned advisory firm. The observations below draw on the firm's experience across energy markets, the principal's extended advisory engagement inside NYC government, and clean technology venture development. Three related opportunities for Charter consideration are proposed.

### Item 1: End-to-end accountability for capital project delivery

Capital projects at operating agencies with major capital portfolios are routinely structured across three or more entities: a sponsoring bureau within the operating agency that defines the project, an internal engineering or construction division that manages contractor relationships, and DDC under Charter §1202, which expressly extends the DDC commissioner's authority to "sewers and sewage disposal plants, water supply and distribution" among other categories of city construction projects. The Charter's delegation mechanism in §1205 governs how functions move between the construction-managing entity and operating agencies. OMB controls capital commitments and modifications. No Charter provision designates a single officer accountable for end-to-end project delivery across these entities.

In practice, the resulting structure distributes capital project authority across four points: operating bureau sponsors define scope and outcomes; an internal engineering or construction division manages contractor execution; DDC, where involved, manages a parallel contractor relationship under its own Charter authority; and OMB controls the capital ledger. Each function operates well within its defined scope. The Charter does not, however, designate a single officer with end-to-end authority across them, creating a structural pattern with implications for schedule, scope, and cost benchmarking on complex multi-agency capital projects, including estimating practices that anchor on prior project costs rather than independent benchmarking.

The Commission may wish to consider whether the Charter should designate, for capital projects above a defined threshold, a single accountable delivery officer with statutory authority spanning the sponsoring bureau, the construction-managing entity, DDC, and the relevant OMB capital line. The model is not new; federal program-management practice and the construction-authority model used by SCA both rest on consolidated accountability, but the Charter currently does not provide for it at the operating-agency level.

### Item 2: Coordination between citywide energy procurement and operating-agency consumption

Charter §814 vests DCAS with authority over "the provision of automotive, communication, energy, and data processing services" for city government, the statutory basis for citywide energy procurement. The operating agencies that use the energy — the largest single municipal electricity consumer is an operating agency, not DCAS — carry load, demand response, efficiency obligations under Local Law 97 and citywide decarbonization commitments plus the capital that retrofits demand. The Charter does not currently require a coordinated procurement-and-efficiency planning function linking the two. This pattern creates missed opportunities for portfolio-based optimization. Major oil companies have addressed analogous structures by centralizing

distributed procurement responsibilities to capture portfolio offsets and supply optimizations — a comparable the Commission may find informative.

In practice, citywide energy supply procurement reflects operating-agency capital plans, demand-response capabilities, and efficiency trajectories only to the extent informal coordination produces that information. Operating agencies likewise pursue efficiency capital investments without structured procurement-side visibility into how load-shape changes affect supply contract value. The two functions operate under different Charter authorities, with no statutory requirement for joint planning.

The Commission may wish to consider whether the Charter should establish a statutory joint-planning function, or alternatively a dedicated coordinating function staffed by personnel assigned from existing agencies rather than new headcount — covering supply procurement, demand-side investment, and efficiency capital between DCAS and the largest energy-consuming operating agencies, with defined deliverables and a public reporting cadence.

## Item 3: Integration of energy and decarbonization commitments into capital planning

The Ten-Year Capital Strategy (Charter §215) and the Capital Commitment Plan are the city's central capital planning instruments. Neither is required by the Charter to integrate the city's energy obligations — Local Law 97 compliance trajectories for municipal buildings, decarbonization commitments, electrification of fleet and facilities, or demand-side resource planning — into capital prioritization.

In practice, the energy and decarbonization elements of capital projects depend on agency-level priority-setting rather than Charter-mandated integration. As capital plans evolve through commitment and execution, these elements remain vulnerable to deferral under budget or schedule pressure. The city's LL97 obligations on municipal buildings rest on a capital pipeline whose structural prioritization the Charter does not currently address.

The Commission may wish to consider whether the Charter should require the Ten-Year Capital Strategy and the Capital Commitment Plan to incorporate a binding energy and decarbonization element, with capital prioritization criteria that reflect the city's statutory and policy commitments.

## Conclusion

These three observations share a common structural pattern: the Charter, as currently written, assigns authority by function and agency rather than by outcome. Charter amendments that designate accountable officers for end-to-end delivery, require coordinated planning between procurement and consumption, and integrate energy and decarbonization obligations into capital prioritization would strengthen the city's capacity to deliver against the commitments New Yorkers depend on.

MDO is available to provide additional operational detail, case examples, and technical input at the Commission's request.

Respectfully submitted,

**Mario De La Ossa**
President, MDO Energy Insight Inc.
[redacted]
NYC SBS NYS-Certified MBE | Veteran-Owned Business

Name

# Spencer Koehl - NYC-Based Industrial Tech Startup (Working with DEP & PANYNJ)

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

NYCHA's elevators need to improve in order to protect NYC's most vulnerable residents, and the first step is actually understanding the elevator downtime problem. NYCHA has no real time data across their 3,300+ elevators, meaning they wait until issues are reported by residents before they are notified. At Knaq, we're an NYC-based tech startup that has an IoT system for monitoring elevators and predicting failures before they occur. We're working across PANYNJ and DEP facilities to monitor elevators, pumps, and other critical assets. Our software could give NYCHA leadership and City Hall real time status and availability reporting portfolio-wide and on a per-elevator basis across all 3,300 elevators. The first step to improving this problem is understanding the data baseline, which our hardware/software system does.

Attachment(s)


CRAIN'S
NEW YORK BUSINESS
CHASING GIANTS
Knaq keeps the Port Authority's elevators and escalators on the up-and-up

Knaq CRAINS NEW YORK BUSINESS.pdf

Date Submitted June 5, 2026

| | |
|---|---|
| Topic | Tenant Protection × Reporting Requirements × |
| Method Received | Airtable Form |
| Created By | 6/5/2026 2:31pm |

Name

# Tristan Louis

Email [redacted]

Professional Affiliation President and CEO, Casebook PBC

Zip Code [redacted]

Public Comment

Casebook PBC provides SaaS software in the human services sector. As such, we believe that technology in general and technology startup specifically, can be a force for greater government efficiency. Sadly, current complex procurement rules, and approaches that force agencies to think of technology through the lens of large projects instead of iterative improvements have left many agencies with outdated technology that often does not meet the modern needs of constituents.

More specifically, in the human services sector, solutions that allow agencies to work together and share data across agency could lead to better interventions in the child welfare, juvenile justice, educational, and community services arena. The combination of easy to use agency configurable SaaS software can not only lower cost and speed up modernization but also reduce dependency on outside contractors who are more often interested in charging for change orders than figuring out how to help agencies serve their constituents.

Sincerely,

Tristan Louis

Attachment(s) Drop files here or click to browse

Date Submitted June 5, 2026

Topic Procurement Reform × Unnecessary Bureaucracy ×

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|---|---|
| Method Received | Airtable Form |
| Created By | 6/5/2026 3:15pm |

Name

## Luke Blazek

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Co-Founder, Routora / 24yo Notre Dame student entrepreneur. Building AI tools that help government agencies increase inspection and service capacity without increasing headcount. Currently working with NYC DOB, DEP, and DOT through the Partnership Fund for NYC's Innovation Labs. |
| Zip Code | |

Public Comment

My name is Luke Blazek. I am a 24 year old Notre Dame student entrepreneur and co founder of Routora: an AI, minority led startup working with NYC DOB, DEP, and DOT through the Partnership Fund for NYC's Innovation Labs.

Several years ago, I took medical leave from school because of Crohn's disease. During that time, I experienced firsthand what it means to operate with limited capacity and limited resources. That experience ultimately led me to start a company focused on helping organizations do more with the teams they already have.

One of the biggest challenges facing government today is not a lack of commitment from public servants. It is a growing gap between the amount of work that needs to be done and the number of people available to do it. Cities are facing increasing demands for inspections, infrastructure maintenance, permitting, and public services while also dealing with workforce shortages, retirements, and budget constraints.

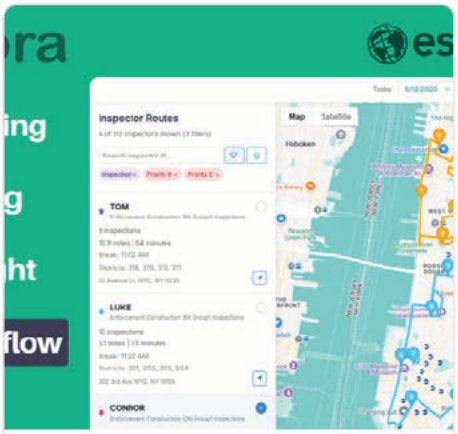
Artificial intelligence can help close that gap. AI should not be viewed as a replacement for public employees. Instead, it should be viewed as a workforce multiplier that helps inspectors, engineers, and field staff spend less time on administrative tasks and more time serving residents. The goal is not fewer workers. The goal is enabling the existing workforce to accomplish more.

Through our work with New York City agencies, we have seen firsthand how technology can help increase operational capacity and improve service delivery. New York has an opportunity to become the national leader in practical government AI by focusing on solutions that help public employees work more effectively and deliver better outcomes for residents.

I encourage the City to create faster pathways for agencies to pilot and adopt innovative technologies from startups and emerging companies. New York already has one of the strongest technology ecosystems in the world. By making it easier for government and startups to work together, the City can improve services, increase efficiency, and better meet the needs of New Yorkers.

The future of government AI is not replacing people. It is empowering people. New York City has the opportunity to lead that future.

Attachment(s)




RoutoraNYCDeck.pdf

Date Submitted: June 5, 2026

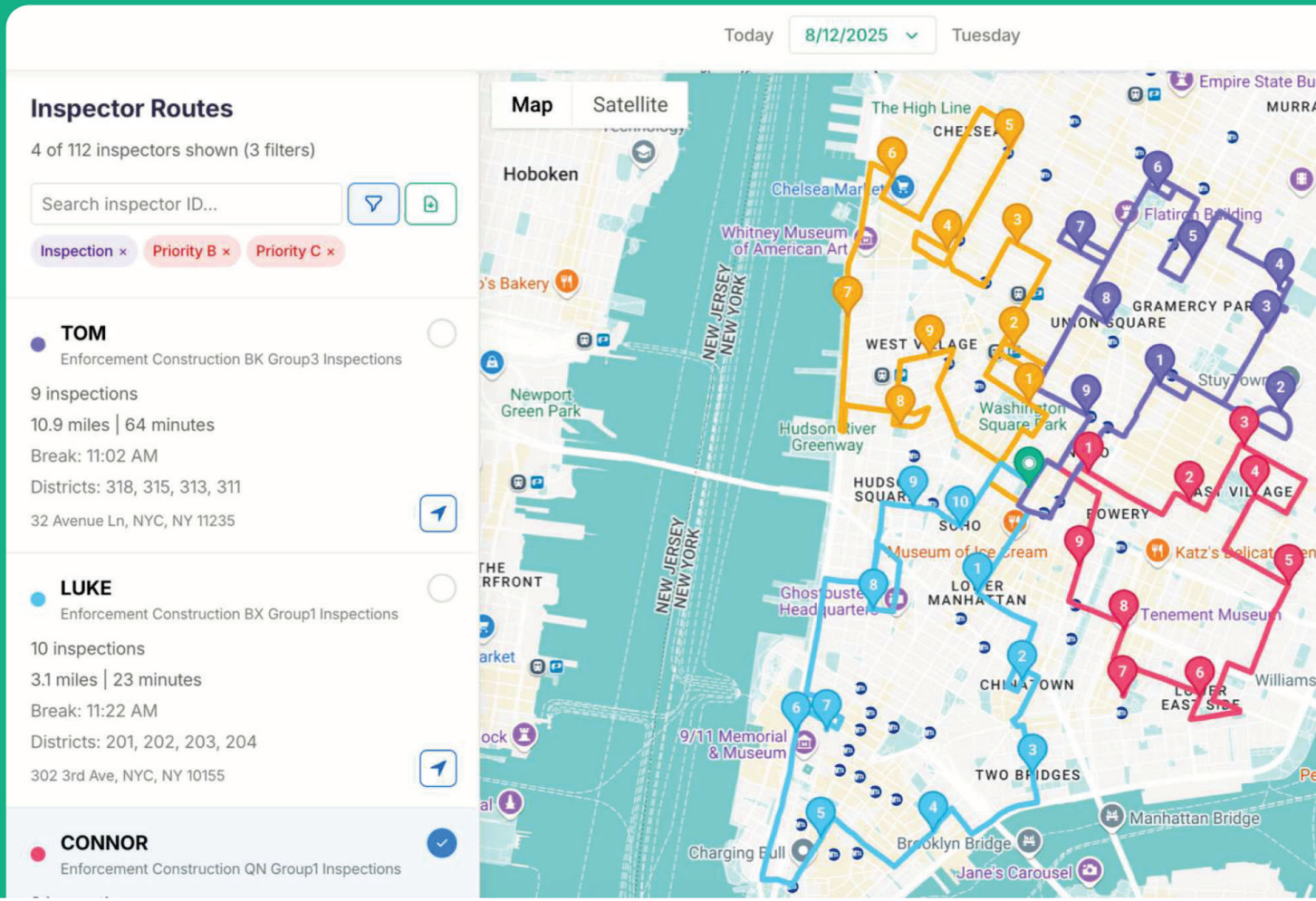
Topic: Department of Buildings (DOB) Issues, Procurement Reform, Unnecessary Bureaucracy, Budget Issues, Miscellaneous

Method Received: Airtable Form

Created By: 6/5/2026 6:37pm

routora

# Scheduling
+
# Routing
+
# Oversight
↓
**one workflow**



routora

# Meet Joe, a DOT commissioner whose dept visits 1000s of transit sites around NYC daily...



routora

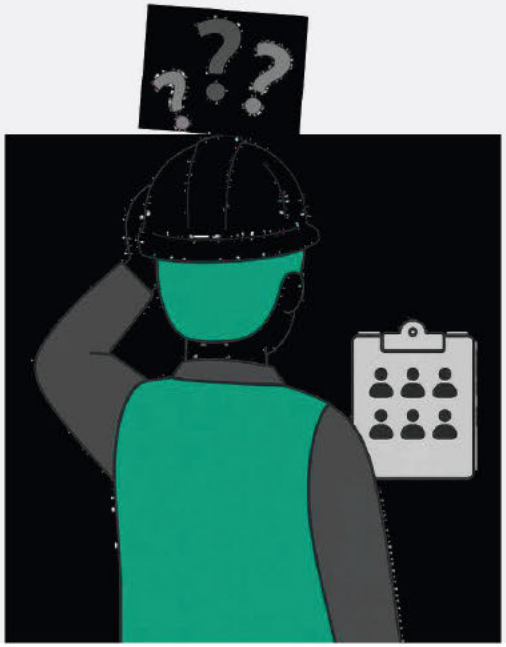
# Joe's dept wastes 100s of hrs/week *manually planning* 1000s of inspections

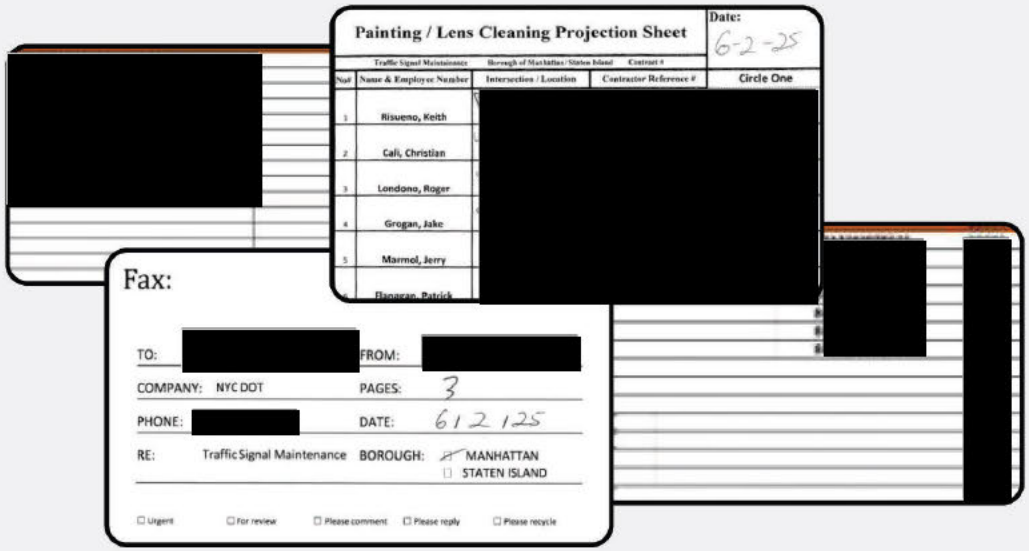


*Actual NYC Dept. of Buildings data*

routora

# Leading to inefficient routes, missed inspections & wasted funds...
# Joe wishes this process was *automated*




*Actual NYC Dept. of Transportation scheduling docs*

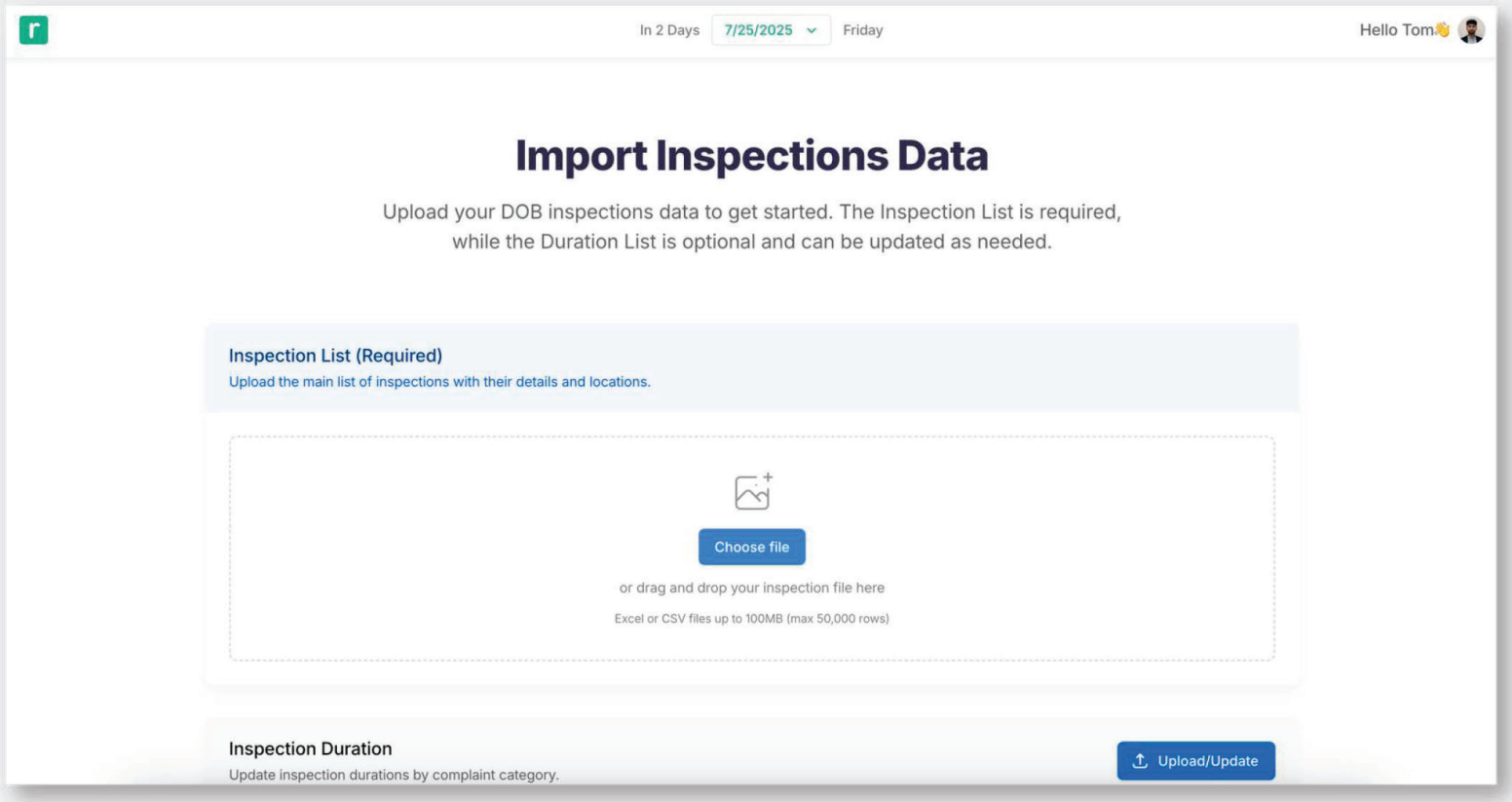
# Until he discovers Routora...




# ...the routing workflow that optimizes his dept

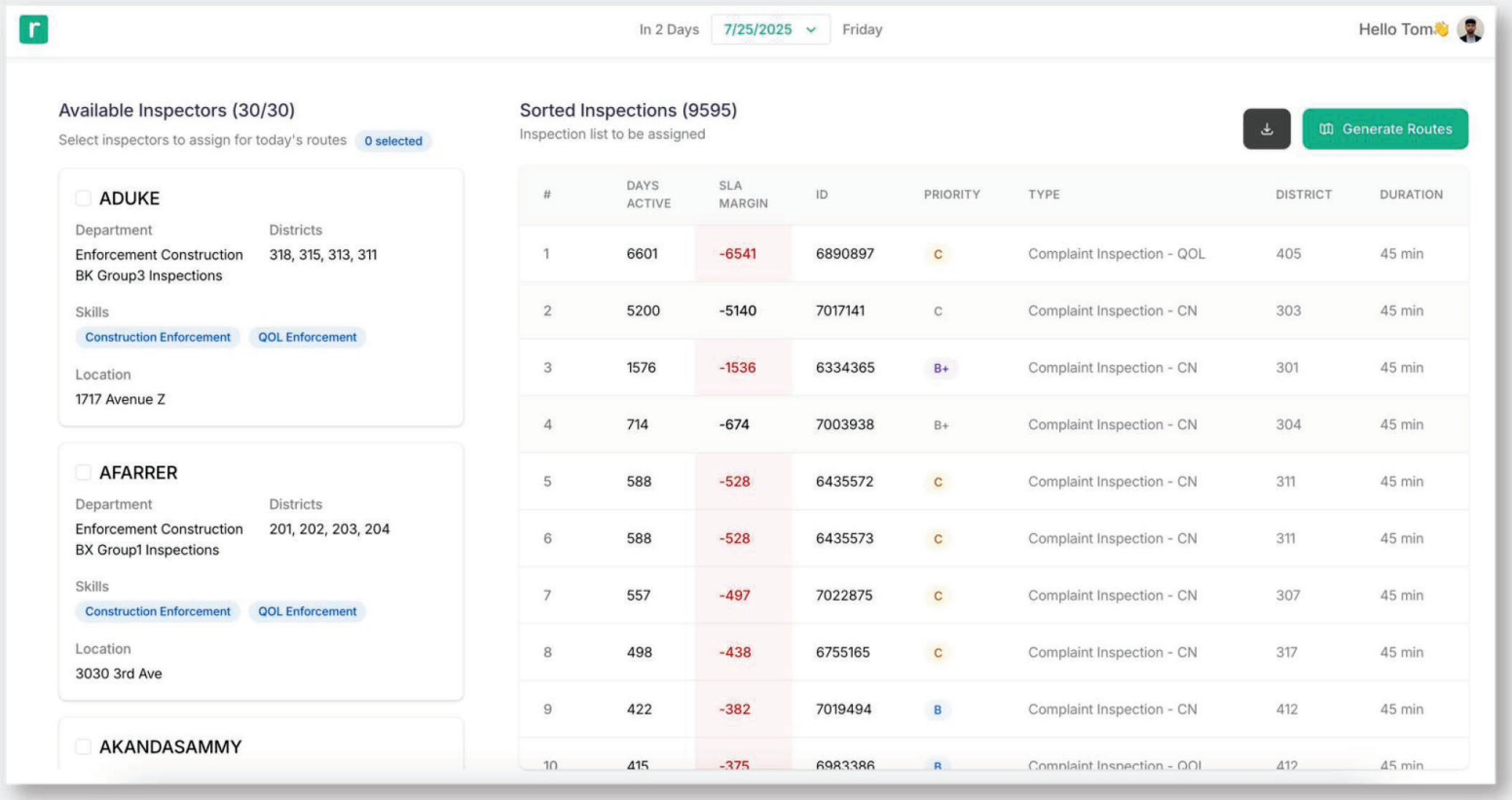
routora

# Joe uploads a list of inspection requests



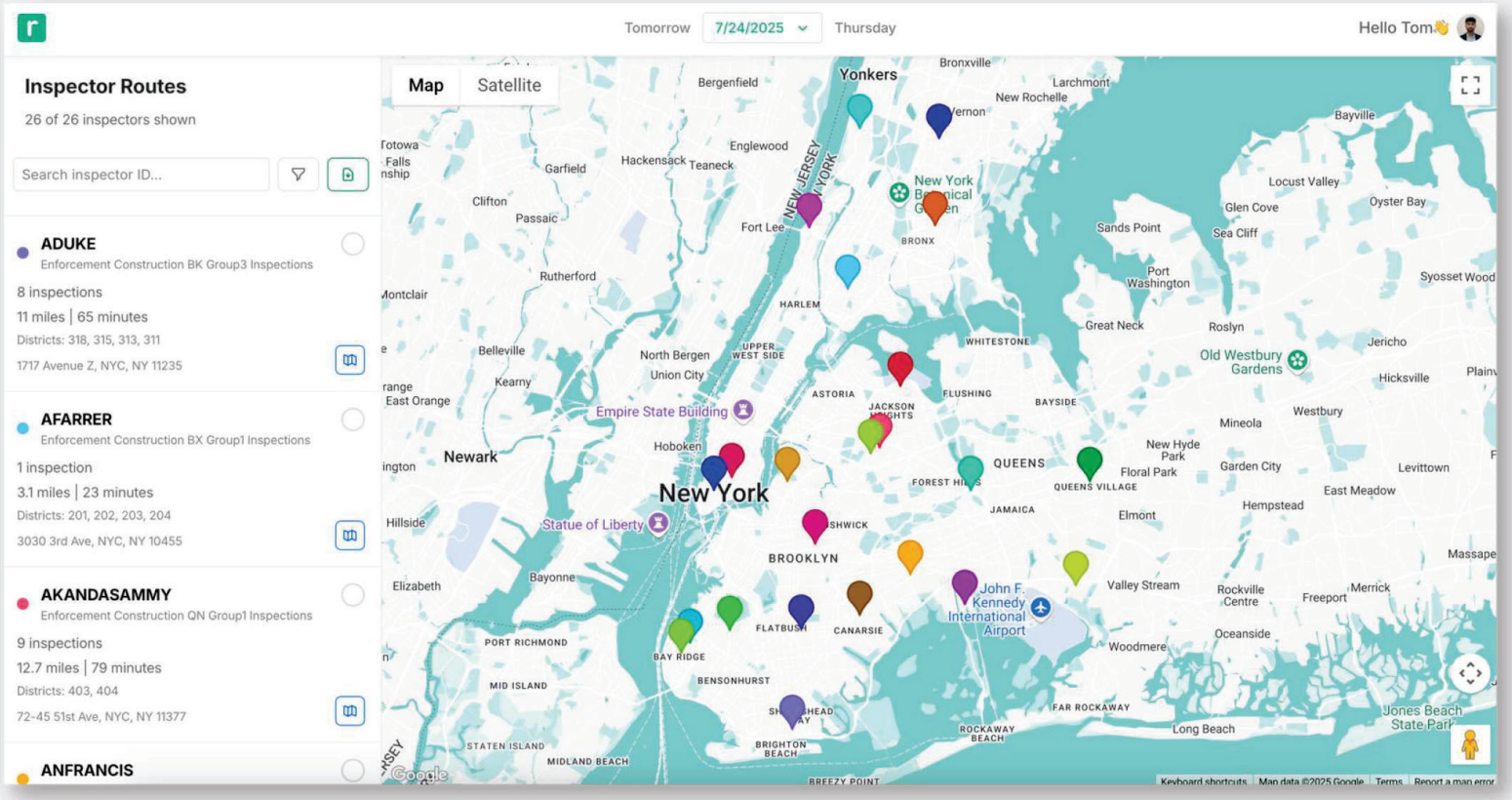
routora

# Requests are sorted by priority



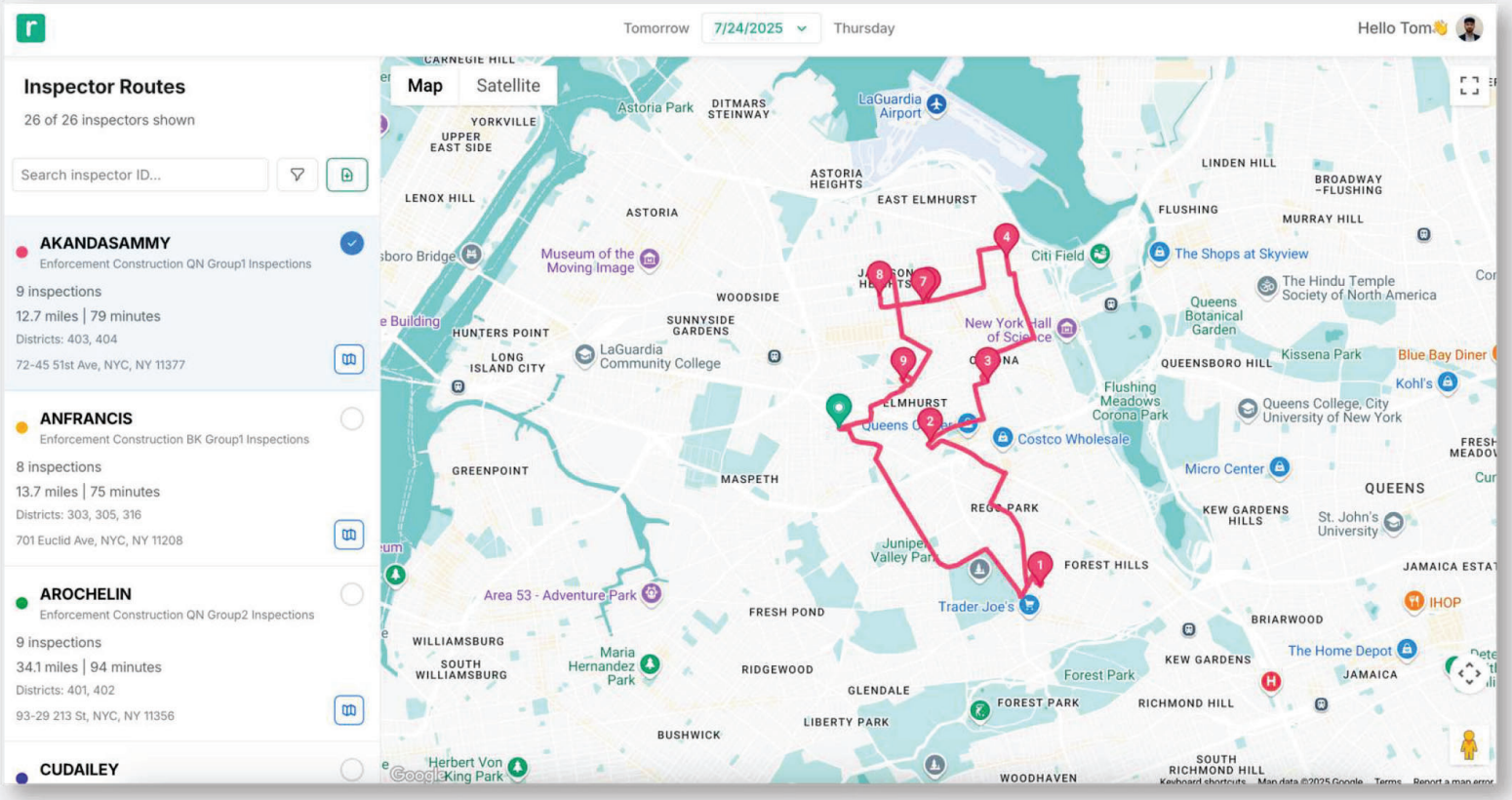
routora

# Driver locations appear in the mapping UI



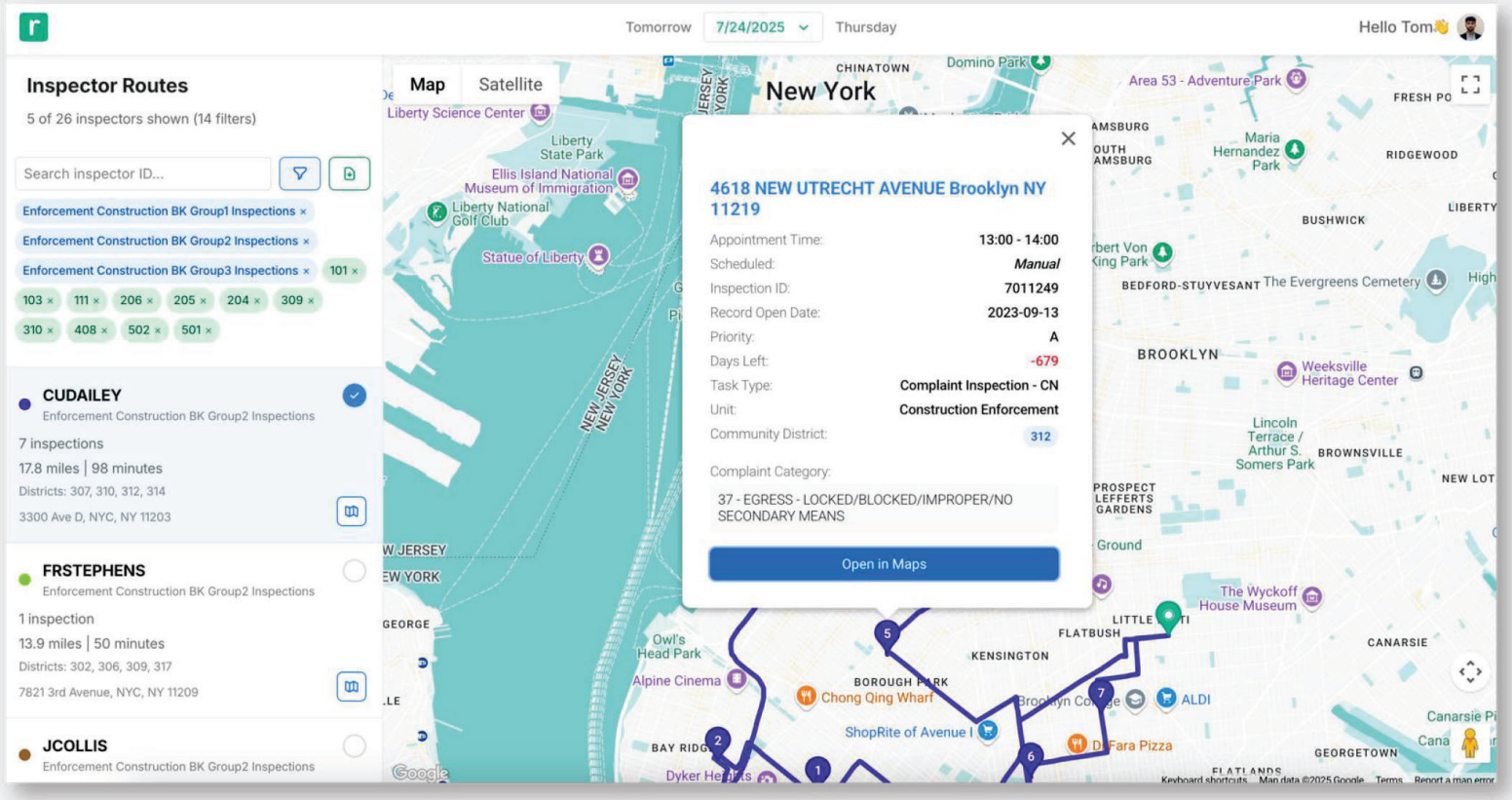
routora

# Generating optimized routes for each driver



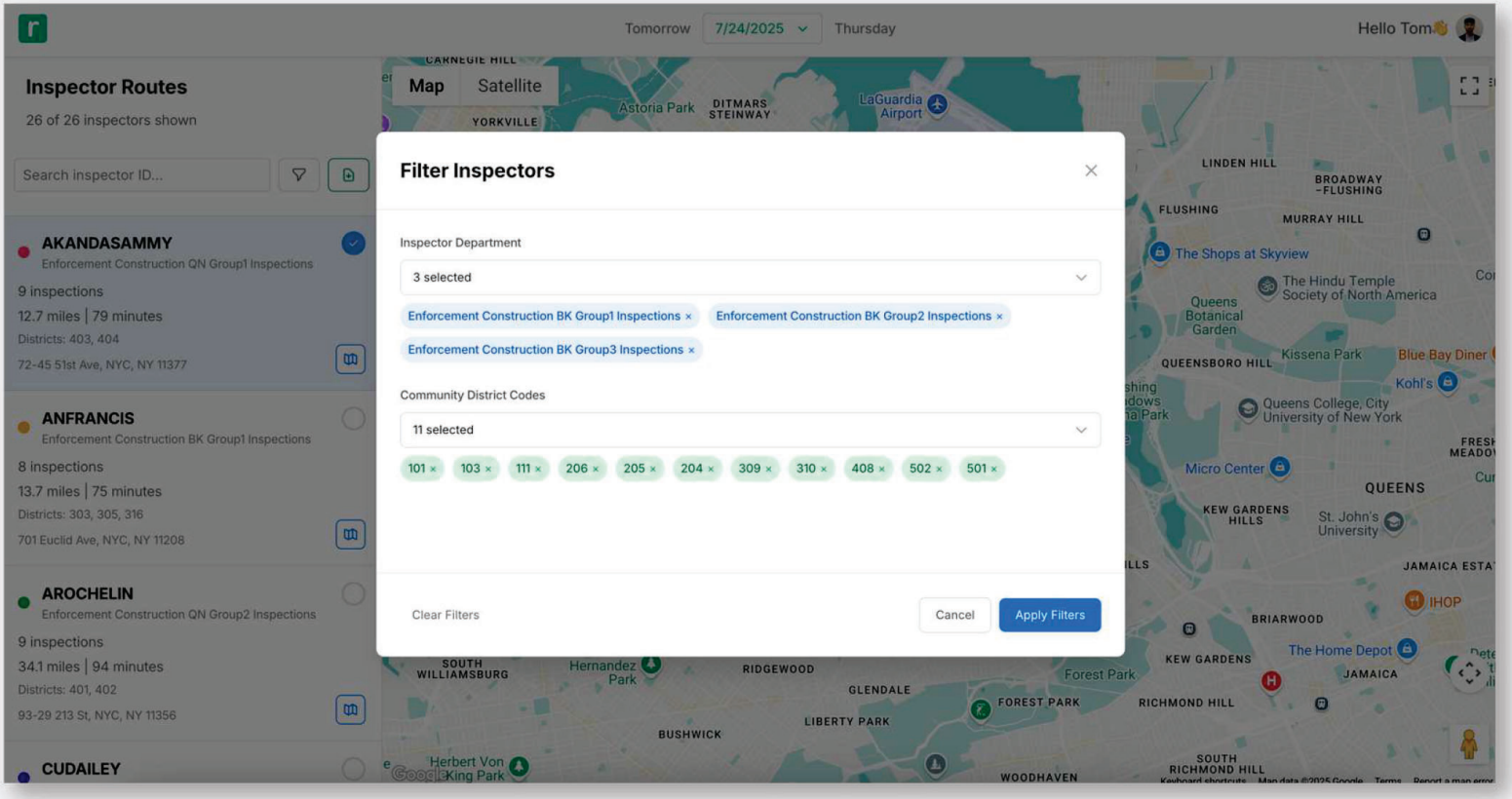
routora

# Review and monitor each stop



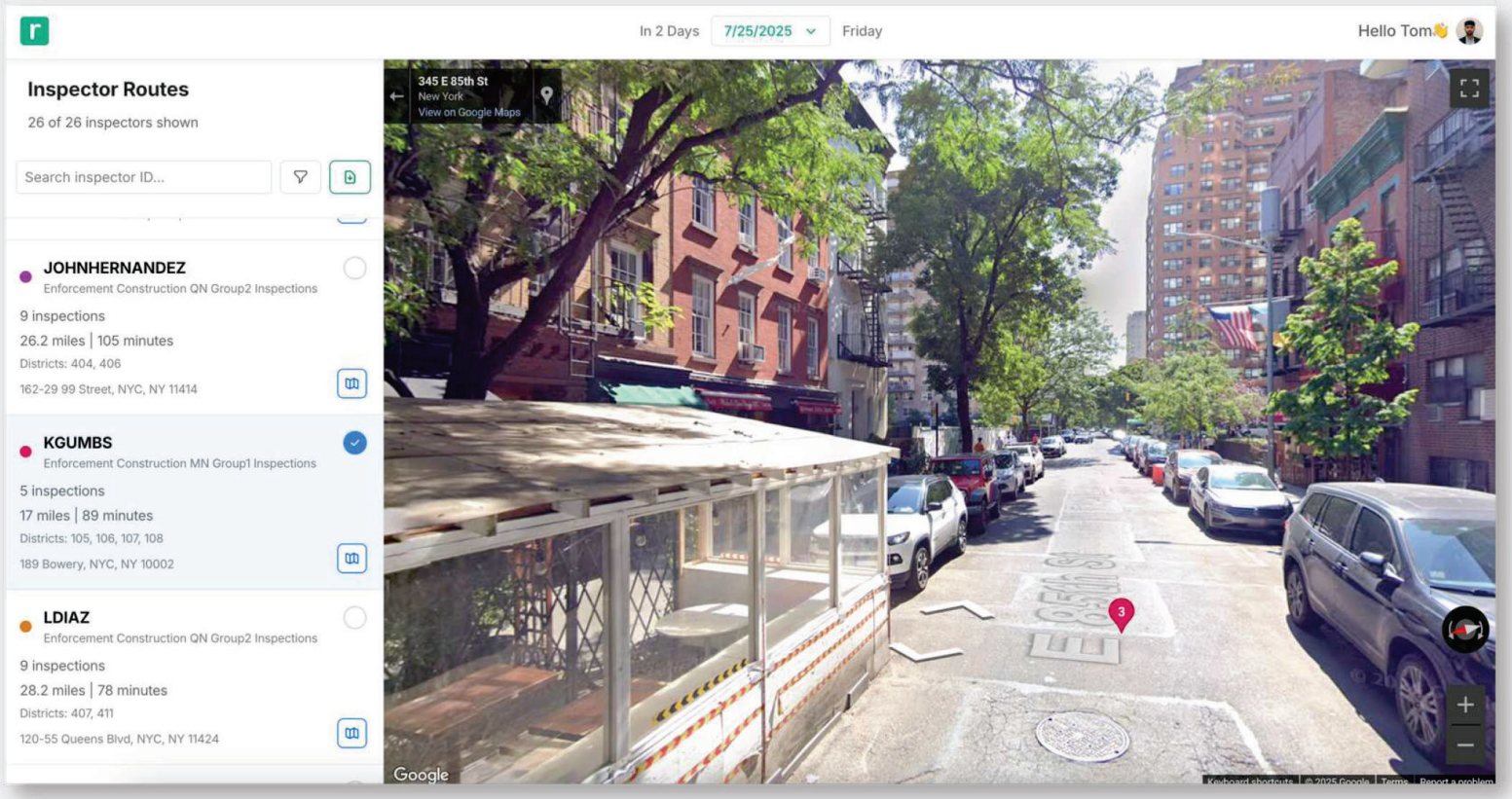
routora

# Filter by agency-specific parameters



routora

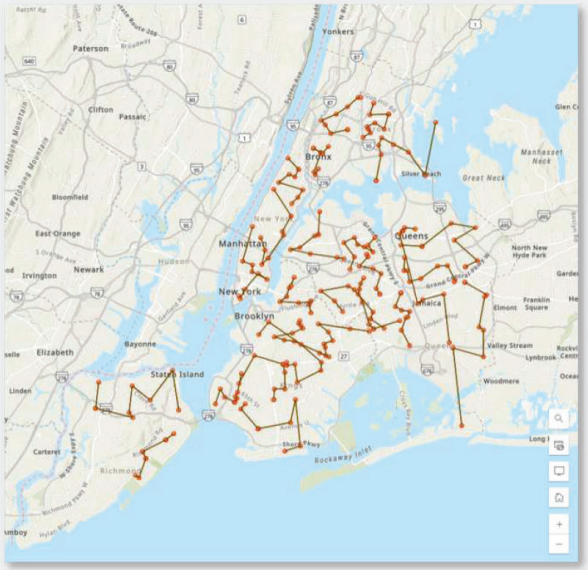
# While getting a lay of the land

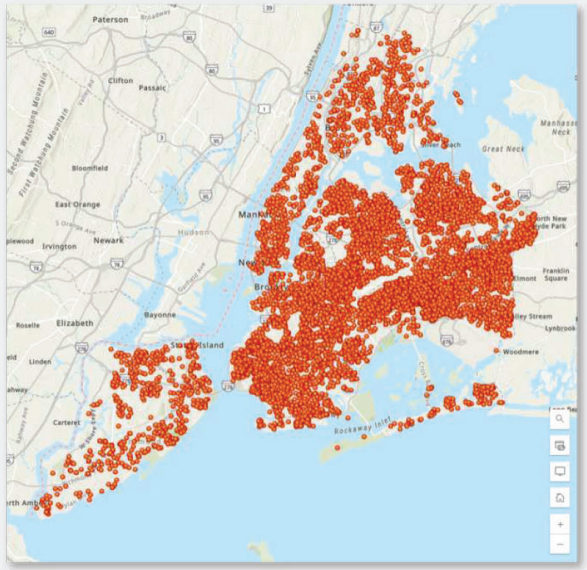


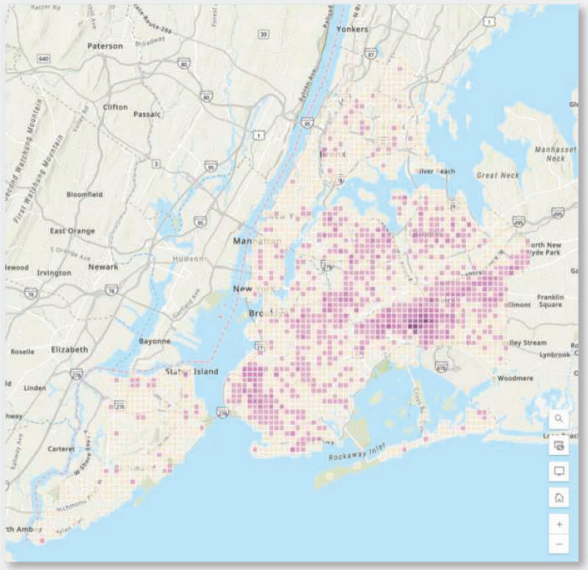
routora

# Custom integration with ArcGIS infrastructure



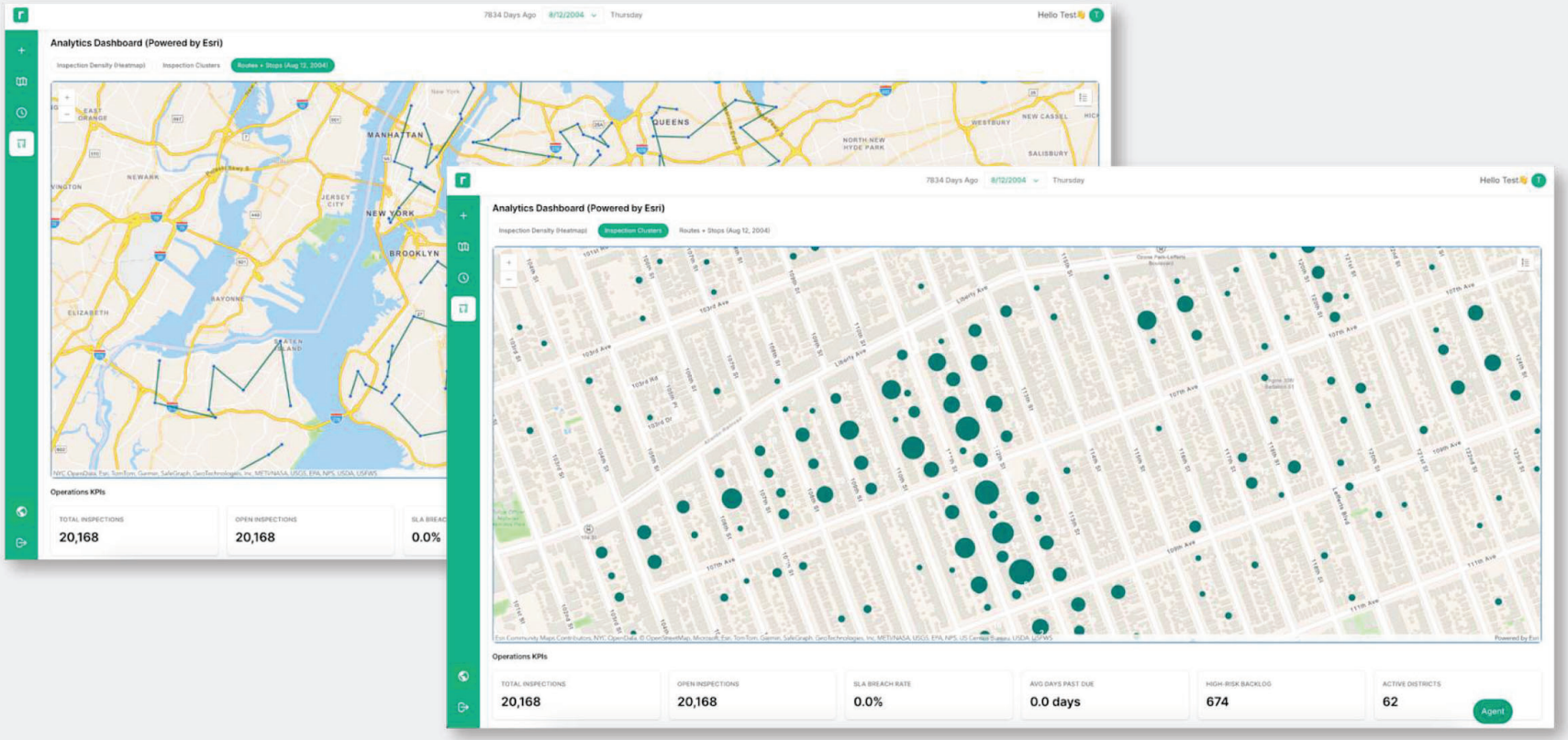



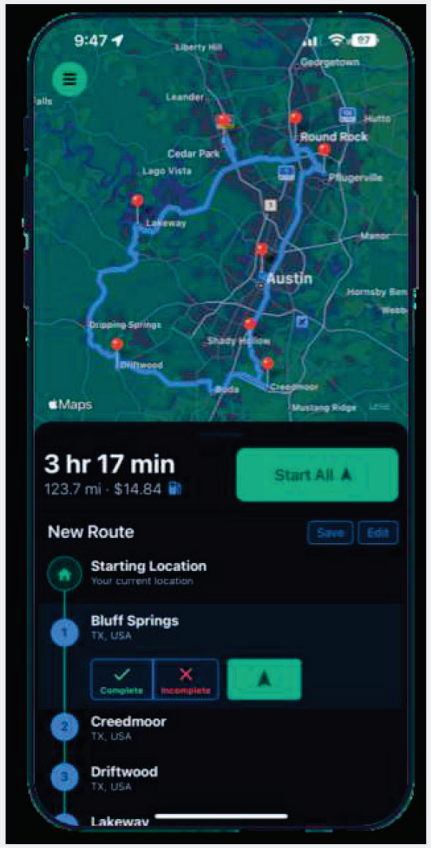
routora

# Built-in GIS analytics dashboard for KPIs

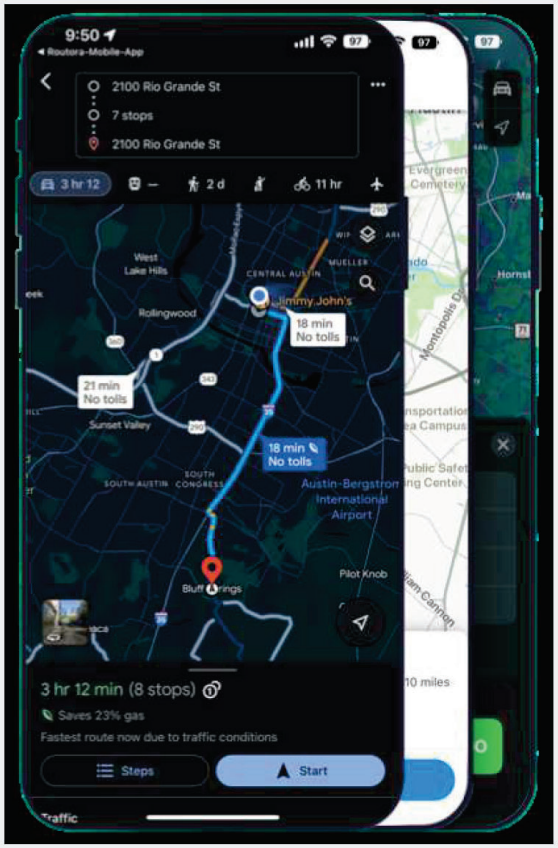


routora

# Drivers receive routes on mobile app




# Open in Google, Apple Maps, & Waze



routora

# Helping departments *save time...*




# ...and inspectors *serve more*

routora

# Ongoing NYC pilots with 800+ inspectors




- 500+ Building Inspectors
- Custom inspection assignment and routing workflow
- Ongoing testing with field teams







- 375+ Transportation Inspectors
- Mobile integration, live-tracking, custom UI
- Ongoing 7-month pilot

routora

June 30 - Sep 15 ‘25

# Dept of Buildings Pilot Findings

- **916 total routes** generated across **40 active planning days**
- **~23 inspectors routed per day**, optimizing real-world workloads
- **5,980 inspections scheduled**, with an average inspection backlog of **127 days overdue**
- Estimated **229 hours of manual planning saved** (15 min per route)

routora

# NYC Pilot Learnings

## Hours of manual planning

Inefficient routes with redundant travel

Missed high-priority inspections due to manual oversight

Spreadsheet chaos and fragmented scheduling

Time-consuming coordination across inspectors and districts

No visibility into inspector availability or real-time workload

## Minutes of automated scheduling

Optimized routes that minimize travel and group nearby stops

SLA-aware scheduling that prioritizes urgent inspections

Centralized platform with detailed GIS mapping

One-click route generation across all 500+ inspectors

Smart availability checks and district-based assignment logic

routora

# Scheduling, routing, and oversight in one workflow helps cities...

## Save Time



**625 hrs/wk**
of planning time saved

## Serve More



**50k+ inspections**
added per year

## Boost Revenue



**~$9M Annually**
in fees and fines

*Annual efficiency projections extrapolated from NYC Buildings pilot savings*

routora

# Minority-led, highly technical team



**Tom Vazhekatt**
Co-Founder / CEO



**Luke Blazek**
Co-Founder / COO



**Aryaman Dubey**
CTO



**Connor Laveau**
Head of Bus. Dev



**Alessandro DiSanto**
Advisor



**Meg Sranske**
Advisor



**George Schegolev**
Advisor



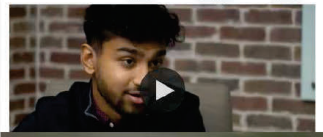
**Tracy Graham**
Advisor

Forbes 30 30 · University of Notre Dame · AT&T · Tesla · FedEx · Partnership for New York City · SpaceX

TRAFFIC

## Texas-based app promises to shorten your commute, save money on gas

Routora reorders the stops along your way to create the fastest, most efficient multi-stop route on Google Maps.














THE OBSERVER

ND startup featured at Times Square



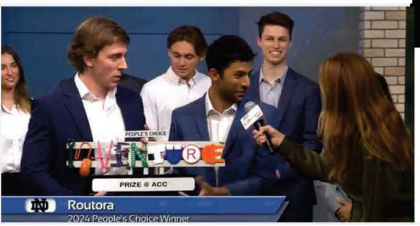

Students create Routora app to find quickest routes, calculate gas for drivers

## Top Charts

Free Apps | Paid Apps

89 Routora
Route Optimization & Planning
OPEN

ROAD TO VICTORY: ROUTORA WINS ACC INVENTURE PRIZE COMPETITION'S PEOPLE'S CHOICE AWARD




## UTD and Notre Dame Students' Route-Planning App Gets 5 New Features After Saving Users '2 Million Miles' of Driving

Launched last fall on the Apple iOS and Google Play app stores, the Routora app has added 37,000 drivers in over 90 countries, saving them 2.1 million driving miles, 50,000 hours, $315,000 in fuel costs, and 940,000 tons in CO2 emissions, the startup says.

BY DAVID SEELEY • MAR 14, 2024

yahoo!finance Sign in

# Route Optimization Company Created by College Students Launches Web App After Saving Drivers 2 Million Miles



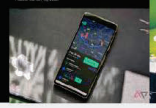
UTD STUDENT CREATES APP TO HELP DRIVERS

LOCAL NEWS

## College students create Routora app to help drivers find best routes, calculate gas

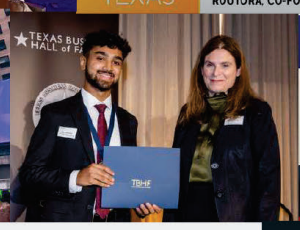
Robert Scoble @Scobleizer Follow

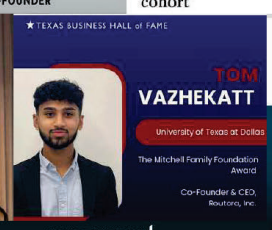
Just was talking with the founders of routora.com



Save time and money with this new AI-powered route planner for Android






University of Notre Dame
200K followers
7mo

Need to run a lot of errands before the holiday? There's an app to make every minute — and every mile — count.

Two ND undergrads recently launched Routora, a route optimization app that uses artificial intelligence to provide faster, more efficient multi-stop routes, with a friend at The University of Texas at Dallas.

**Website**
www.routora.com

**Contact**
[redacted]

Buildings Tech Lab

## NYC Department of Buildings selects finalists to complete proof of concepts

Archistar | CivCheck | GREENLITE | Gryps | INFILLA | PROPCHECK | routora

NYC Buildings | PARTNERSHIP FUND for New York City

BUSINESS INSIDER MARKETS INSIDER

## Dallas-Based Routora Set to Launch Fleet Management Product, After Saving Businesses Over 4 Million Minutes






CBS NEWS TEXAS
NEW THIS MORNING
LUKE BLAZEK
ROUTORA, CO-FOUNDER

STATESCOOP

NYC Tech Transit Lab names 12 startups for 2025 cohort

## NYC Transit Lab Turns to 12 Companies for Tech Innovation

GOVTECH BIZ

government technology

RAILWAY AGE SUBSCRIBE

## NYC Transit Tech Lab Announces 2025 Project Partners

Written by Carolina Worrell, Senior Editor

2025 Challenge Finalists

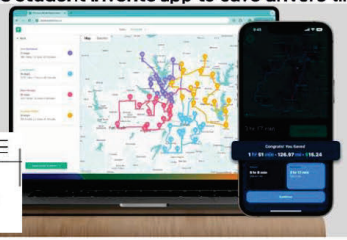
CENSYS | 7LIP | jawat | Kinexio | routora | TK

KRLD News Radio 1080

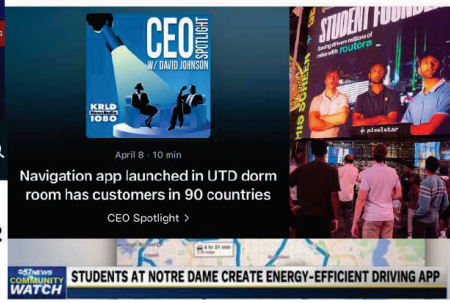
NEWS | ELECTION COVERAGE | TRAFFIC & WEATHER | PODCASTS | SPORTS | CONNECT

I NEWSRADIO 1080 KRLD • NEWS | LOCAL

## UT Dallas student invents app to save drivers time



Dallas-Based Routora Set to Launch Fleet Management Product, After Saving Busines...
finance.yahoo.com



Name

# Jessica Zegans

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

The city should assess new opportunities to expand public parking for cyclists. One of the primary barriers to entry for everyday bike commuters is the extremely limited amount of bike racks across the five buroughs. This simple addition of racks will create a major difference in one's desire to commute via bike.

Attachment(s)

Drop files here or click to browse

Date Submitted June 6, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/6/2026 9:14am

Name

# Lauren deLisa Coleman

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Founder & Executive Director |
| Zip Code | |
| Public Comment | For those of us representing memberships who are constituents, there should be a method that is easier for us to get through to discuss issues. It's simply too hard right now to get onto radars and talk to advisors/chief of staffs in anything tech, equity, economics, media related. It can take months of hunting, asking for introductions, waiting, etc before one can get through. Shouldn't be this way for taxpayers. This could easily be solved. The City desperately needs a task force/council on underrepresented tech founders and tech workers in NYC because they are falling behind (IF they were ever level in the first place - and not just the standard creation of a Hub or two via NYCEDC). There are special needs and considerations outside of the mainstream that are completely overlooked and, thereby, weaken the City economically and competitively. We would love to meet about this concept and have for some time given what our data and research show, and the endeavors on which we are currently working. See more at GameChangeProject.org Please contact: [redacted] Thank you. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 6, 2026 |
| Topic | Unnecessary Bureaucracy |
| Method Received | Airtable Form |

| | | |
|---|---|---|
| Created By | 6/6/2026 | 3:28pm |

Name

# Nancy Sheran

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | This is a general procedures comment. Can you please maintain an email list for the Charter Revision Commission and send out email announcements when upcoming meetings or important issues are announced. This should be a permanent email list that continues year to year. Provide a mechanism to unsubscribe from this email list. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 6, 2026 |
| Topic | Revocable Consent |
| Method Received | Airtable Form |
| Created By | 6/6/2026 5:14pm |

Name

# Ariela Rothstein

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I would love to see a Mamdani makeover of HR Connect for DOE employees. As a pregnant working employee, I spent hours of workday time on hold with HR (often 3 hour wait) to sort out questions related to leave, healthcare, etc . Then as a postpartum parent on parental leave, I spent hours again correcting mistakes from SOLAS. I would finally get through to someone and they would then tell me to wait for an elusive call back or an email from someone else. It is 2026. The technology is better today than when I started in the DOE in 2010 and yet HR Connect is still as inefficient for employees as it was then. It is a serious quality of life issue as we only need to interact with HR Connect when we have serious concerns - like healthcare enrollment for our new baby or the correct date when we'll return from parental leave. The DOE is one of the largest employer agencies of the city. It is time to update its systems.

Attachment(s)

Drop files here or click to browse

Date Submitted June 8, 2026

Topic Unnecessary Bureaucracy

Method Received Airtable Form

Created By 6/8/2026 9:17am

Name

## John Lussier

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

There is tens of millions of dollars annually in lost parking revenue and excess traffic, with some estimates running north of $200 million overall just for placard abuse. Cars are parked illegally everywhere and no one seems to care, double parked cars, alt side cars ignore street cleaners because it's cheaper than a garage, IF they get a ticket. There could be a billion dollars in revenue sitting for the city to capture it. You have to be bold, you have to change the reporting structure of the folks who write the tickets (they don't ticket fake placards or police, or anyone with an orange vest on the dashboard!), and use technology (cameras on the front of sweepers) , or citizen app reporting (which is already done for TLC). Do like Toronto and have bike lane enforcement ride the bike lanes of NYC all day and ticket people who park in bike lanes. An opportunity to stop corruption, increase traffic flow, AND get revenue.

I don't understand why this hasn't been fixed. The only answer I can think of is corruption.

https://doi.org/10.1016/j.trip.2023.100816

Attachment(s)

Drop files here or click to browse

Date Submitted June 8, 2026

Topic

Enforcement × Reporting Requirements ×
Unnecessary Bureaucracy × Budget Issues ×

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/8/2026 9:34am |

Name

# Harry Hess

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | NYE PS |
| Zip Code | |
| Public Comment | Teachers in the public school system should never have to pay city or state income taxes. We are often paying out of pocket to buy supples for our own classrooms. We have our own bills and lives and other taxes to already worry about. We are put in harms way everyday professionally and physically. We are blamed for failures inherent in the educational system. Our administrators do not really build us up and help us to be better educators. The "bottom line" and appearances seem to be the only thing that matters. Teaching and learning is messy hard work. Especially for teachers such as myself in District 75. Please give back to your teachers who give so much of themselves every day. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 8, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/8/2026 9:34am |

Name

# Marianne Pizzitola

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | NYC Organization of Public Service Retirees. |
| Zip Code | |
| Public Comment | There were several things that you could focus on the first I want to address with you is the use of consultants that were formally on payroll and paying them an exorbitant amount of money. Two such contracts come from the Mayors Office of Labor relations. One belongs to Bob Linn, former Commissioner, who hired Renee Campion the current Commissioner. She awarded him a $500 an hour contract to consult on collective-bargaining agreements. Her office should be doing without him.<br><br>If she's not capable to do the job without hiring him back, she shouldn't be there.<br><br>Another contract belongs to Martin Scheinman. They will use the excuse that only he has the knowledge and expertise to handle these issues but he doesn't. And sometimes that's not a benefit. Because it trenches the same old, same old rather than innovation and ingenuity. Martin is an arbitrator/mediator Beck gets paid $7500 a day. There are plenty of people that do this job with excellence that don't need to get paid that much. And when you file a FOIL, they redact the hell out of some of these agreements. Martin cannot be a neutral when he's entrenched with the same people he's supposed to be mediating.<br><br>And again, these are no bid contracts. To make sure that they stay financed by the city, they write them into agreement. This needs to end. |

Attachment(s)




IMG_0338.jpeg




IMG_0236.jpeg



IMG_0857.jpeg

Date Submitted: June 8, 2026

Topic: Procurement Reform ✕ | Unnecessary Bureaucracy ✕ | Reporting Requirements ✕ | Miscellaneous ✕

Method Received: Airtable Form

Created By: 6/8/2026 10:39am

SCHEINMAN
ARBITRATION & MEDIATION SERVICES

[redacted]

# Invoice

| Date | Invoice # |
|---|---|
| 1/5/2023 | 38548 |

**Bill To**

City Of New York
c/o Renee Campion, Commissioner
Office of Labor Relations
22 Cortlandt Street, 14th Floor
New York, NY 10007

**In Reference To**

City Of New York
and
New York City Municipal Labor Committee
(Healthcare Tripartite Meeting)

| Description | Amount |
|---|---|
| ***September 22, 2022 through December 31, 2022*** | |
| Discussions with Members of Committee (September 26, 2022 through September 30, 2022)<br>1 day @ $7,500.00 per day (Fee split between parties) | 3,750.00 |
| Preparation for and Meeting with Budget Director on September 29, 2022<br>0.50 day @ $7,500.00 per day = $3,750.00 (Fee split between parties) | 1,875.00 |
| Tripartite Meeting on September 30, 2022<br>1 day @ $7,500.00 per day (Fee split between parties) | 3,750.00 |
| Telephone Conferences with Principals and Attorneys on November 8, 2022<br>0.50 day @ $7,500.00 per day = $3,750.00 (Fee split between parties) | 1,875.00 |
| Tripartite Meeting on November 22, 2022<br>1 day @ $7,500.00 per day (Fee split between parties) | 3,750.00 |
| Tripartite Meeting on November 30, 2022<br>1 day @ $7,500.00 per day (Fee split between parties) | 3,750.00 |
| Outline for MA Award on December 3, 2022<br>1 day @ $7,500.00 per day (Fee split between parties) | 3,750.00 |
| Conference Call with Attorneys regarding MA Award on December 5, 2022<br>1 hour @ $7,500.00 per day = $937.50 (Fee split between parties) | 468.75 |
| Discussions with Principals on December 9, 2022<br>0.25 day @ $7,500.00 per day = $1,875.00 (Fee split between parties) | 937.50 |
| Work Drafting MA Opinion & Award on December 10, 11, 13, 14, 15, 2022<br>5 days @ $7,500.00 per day = $37,500.00 (Fee split between parties) | 18,750.00 |

[redacted]

Please indicate our invoice number on your payment.
Make all checks payable to Scheinman Arbitration Mediation Services.
If you have any questions concerning this invoice, contact Vanessa Boothe [redacted]
via e-mail to [redacted]

| | |
|---|---|
| **Total** | $42,656.25 |
| **Payments/Credits** | $0.00 |
| **Balance Due** | $42,656.25 |


ALAN KLINGER ATTORNEY FOR LOCAL 831
SANITATION-UFT-MLC & EMBLEM HEALTH
"REPRESENTS" LABOR ON TRIPARTITE
WITH BARRY PEEK & MARTIN SCHEINMAN
MEME MAKER

**Robert W. Linn**
[redacted]

**TO:**
Renee Campion
Commissioner
[redacted]

| DESCRIPTION |
| --- |
| **Health – Tri-partite health savings:** [redacted] **Total Health hours: 9.5** |
| **Labor and PBA** [redacted] **Communications with Labor Commissioner** [redacted] **Total PBA and labor 13 hrs** |

[redacted]

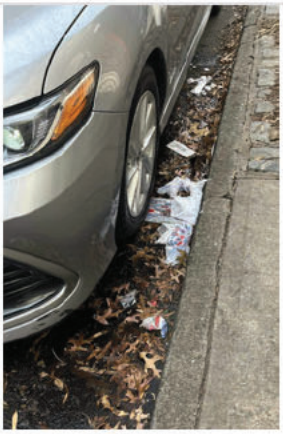
**Total (May 1 – June 30) 22.5 hrs @ $500/hr. = $ 11,250**

Name

## Carrie McLaren

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | apesht.org |
| Zip Code | [redacted] |
| Public Comment | I walk my block 2-3 a week picking up trash. This would be a whole lot easier if the city would ban the use of plastic bags for grocery store flyers. These bagged flyers are dumped in piles all along the street, ignoring “no flyers” signs. Many of them end up in in the storm grates, preventing rain water from properly draining.<br><br>The plastic is so thin, it’s difficult to remove the paper, and I assume the vast majority of these are not recycled. (The plastic does not protect the paper from getting wet.)<br><br>The problem was particularly acute after this winter’s heavy snowfall. I found multiple piles with HUNDREDS of plastic bags, all soaked and apparently abandoned by carriers.<br><br>Banning these bags would offer many benefits:<br>* Less street litter; cleaner, healthier streets<br>*. Better storm water draining<br>*. Paper flyers could be recycled<br>*. Less plastic going into our waterways |

Attachment(s)



plastc-bags.jpg



plastic-bags-bag.jpg




Signs don't work.jpg

Date Submitted: June 8, 2026

Topic: Unnecessary Bureaucracy, Enforcement

Method Received: Airtable Form

Created By: 6/8/2026 10:52am




ideal


PLEASE
NO
FLYERS
ADS
MENUS
THANK YOU!
COURTESY OF HAWTHORNESTREET.COM

Name

## Manssoum Sara

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | I am a single mother of three children, including children with special needs. My family has suffered from unsafe housing conditions, mice, and lead hazards. One of my children was found to have elevated lead levels in his blood.<br>The assistance my family receives is not enough. Many agencies and programs have all of our information and claim to help, but I am still left struggling alone. I am constantly dealing with housing problems, court cases, school issues, transportation challenges, and caring for my children without adequate support.<br>I feel like nobody is truly listening. I have spent months asking for help while my children continue to suffer. I am not asking for luxury or special treatment. I am asking for safety, dignity, and real support for my children. Please improve accountability, make services more effective, and ensure that vulnerable families receive the help they need. My children deserve better. |

Attachment(s)



IMG_7148.png



91ba1f84-161b-47e7-adad-2ac64f45778...



df0f4ecc 5355 4626 9c8b 89cb4dfeb31...



9a648770 e21c 4c3f 87ae 3025d5a8f5d...



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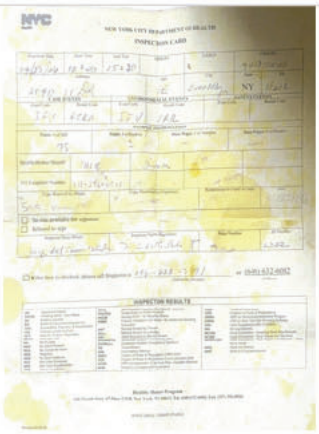
7e2393cf-32e6-4b9e-acd8-a832ffc0867...



90fb1825-deb6-4ea8-b74b-9c02c8b535...



df87e2da 2612 4255 bd4e 3cd02ffbbb...



3d96ce9b 033f 4b72 b025 ebad60c648...



IMG_6976.jpeg

Date Submitted: June 8, 2026

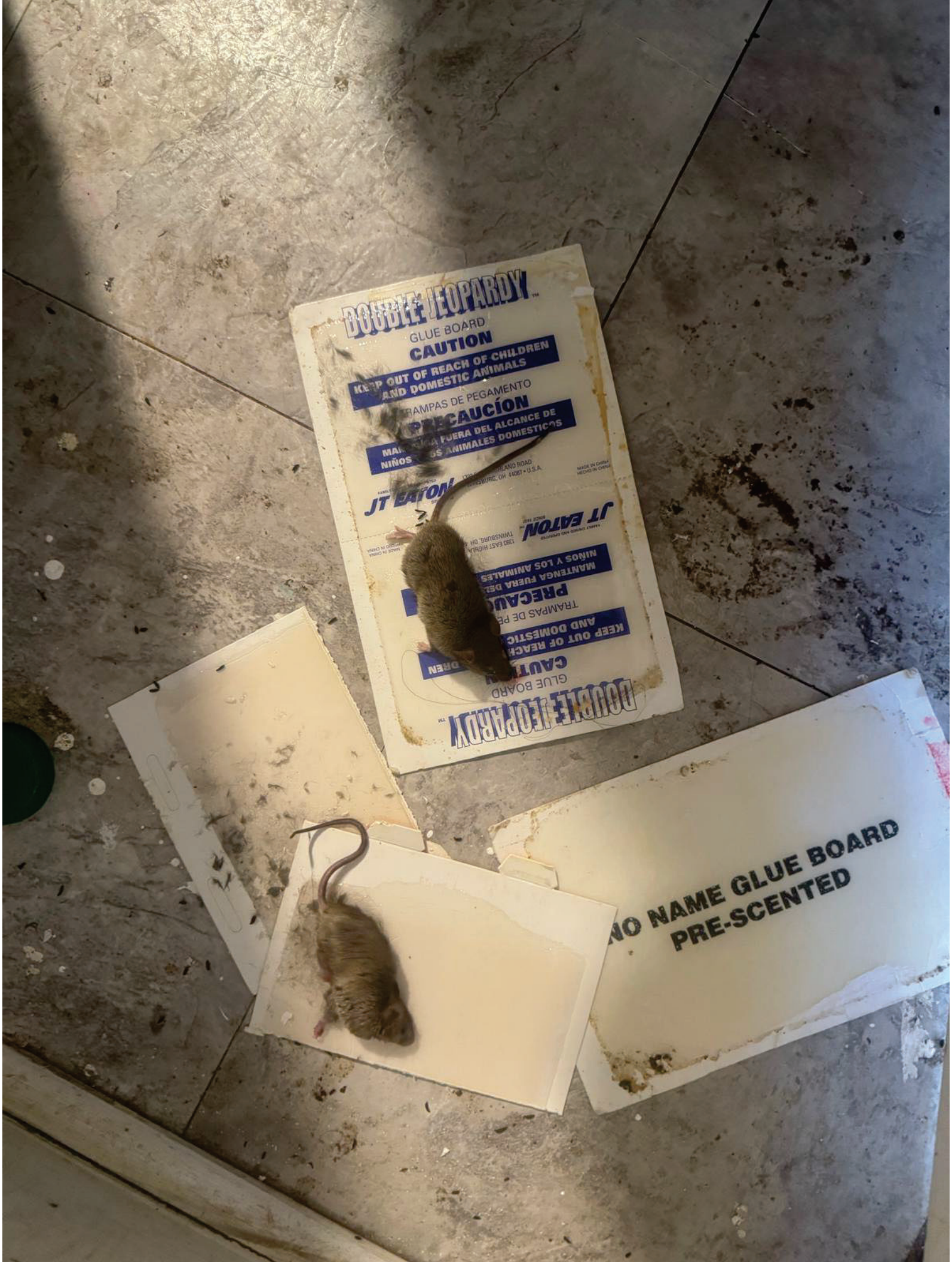
Topic: Tenant Protection × | Enforcement × | Unnecessary Bureaucracy ×

Method Received: Airtable Form

| | | |
|---|---|---|
| Created By | 6/8/2026 | 11:54am |




DOUBLE JEOPARDY
GLUE BOARD
CAUTION
KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS
TRAMPAS DE PEGAMENTO
PRECAUCIÓN
MANTENGA FUERA DEL ALCANCE DE NIÑOS Y LOS ANIMALES DOMESTICOS
JT EATON
NO NAME GLUE BOARD
PRE-SCENTED


DOUBLE JEOPARDY
GLUE BOARD
CAUTION
KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS
TRAMPAS DE PEGAMENTO
PRECAUCIÓN
JT EATON
NO NAME GLUE BOARD
PRE-SCENTED








temp/timer
ON-OFF
cool
energy saver
fan only
auto
hi
lo
mode
fan speed
timer
filter reset


mode
fan speed
timer
filter reset



NYC Health

# NEW YORK CITY DEPARTMENT OF HEALTH

## INSPECTION CARD

| Inspection Date | Start Time | End Time | ORDER# | LASU# | Child ID: |
|---|---|---|---|---|---|
| 04/23/26 | 10:20 | 15:30 | | L | [redacted] |

| Address | Apt.: | City | State | Zip |
|---|---|---|---|---|
| [redacted] | [redacted] | [redacted] | NY | [redacted] |

| CASE EVENTS | | ENVIRONMENTAL EVENTS | | SAFETY EVENTS | |
|---|---|---|---|---|---|
| Event Code: | Result Code: | Event Code: | Result Code: | Event Code | Result Code: |
| IFV | PCRA | IFV | VRR | | |

**SAMPLE INFORMATION**

| Paint: # of XRF | Paint: # of Positive | Dust Wipes: # of Samples | Dust Wipes: # of Positive |
|---|---|---|---|
| 75 | 5 | | |

| | | | | |
|---|---|---|---|---|
| Healthy Homes Hazard: | MLC | Smoke | | |
| 311 Complaint Number: | [redacted] | | | |

| Copy Received by (Print) | Copy Received by (Signature) | Relationship to Child or Other | Date |
|---|---|---|---|
| Sara Munoz | [signature] | | 4/23/26 |

☐ No one available for signature
☐ Refused to sign

| Inspector Name (Print) | Inspector Name (Signature) | Badge Number | ID Number: |
|---|---|---|---|
| Maria del Carmen Cotto | [signature] | 4 | 2302 |

☐ If this box is checked, please call Inspector at [redacted] (Mobile phone) or [redacted] (Office)

## INSPECTION RESULTS

| | |
|---|---|
| AV | Apartment Vacant |
| AVCW | Awaiting VCW – Dust Wipes |
| BV | Building Vacant |
| BD | Building Demolished/Vacant Lot |
| CEA | Counseling, Education & Assessment |
| CNL | Cannot Locate the Child |
| HFO | Hold for Further Observation |
| MESS | Message Left |
| NA | No Access |
| NAP | No Adult Present |
| NCA | No Cause for Action |
| NEG | Negative |
| NSA | No Such Address |
| NVC | Not Valid Complaint |
| NVS | Not Valid Supplemental |
| OJD | Out of Jurisdiction |
| OPHL | Other Possible Hazards-Submitted for Analysis |
| POSTED | Posted Order to Abate Nuisance |
| PVCW | Pending VCW – for Modified Orders |
| PVRR | Previous Violations not Abated - No Additional Sampling Conducted |
| RAT | Refused Access by Tenant |
| RALL | Refused Access by Landlord |
| SRF | Safety Regulations Being Followed |
| SVCWHPDx | Substantial Violation Complied by HPD |
| SVCWLLx | Substantial Violation Complied by Landlord |
| TM | Tenant Moved |
| USA | Unsuccessful Attempt |
| VNOV | Violation of Rules & Regulations (VRR)-NOV |
| VCO | Violation of Rules & Regulations-Commissioners Order |
| VCOD | VRR-Commissioners Order Dust Wipe Samples Required |
| VCW | Violations Complied with by Landlord |
| VDIS | Violations Discussed |
| VRR | Violation of Rules & Regulations |
| VRRH | VRR by Housing Development Program |
| VRRN | VRR by New York City Housing Authority |
| VSC | Valid Supplement with Condition |
| WA | Wrong Address |
| WCDW | Work Completed – Awaiting Dust Wipe Results |
| WCNR | Work Completed – Dust Wipes not Required |
| WCNR-SWO | Work Completed – Dust Wipes not Required – Stop Work Order |
| WNS | Work not Started |
| WIPI | Work in Progress-Inactive |

**Healthy Homes Program**

[redacted]

WHITE (RSU); CANARY (Public)

Revised: 03.03 25

NYC Health

# NEW YORK CITY DEPARTMENT OF HEALTH AND MENTAL HYGIENE

## INSPECTION CARD

| Inspection Date | Start Time | End Time | ORDER# | LASU# | Child ID: |
|---|---|---|---|---|---|
| 06/05/26 | 13:00 | 15:30 | | L | [redacted] |

| Address | Apt.: | City | State | Zip |
|---|---|---|---|---|
| [redacted] | [redacted] | [redacted] | NY | [redacted] |

| CASE EVENTS | | ENVIRONMENTAL EVENTS | | SAFETY EVENTS | |
|---|---|---|---|---|---|
| Event Code: | Result Code: | Event Code: | Result Code: | Event Code | Result Code: |
| IFV | PCRA | IFV | PVRR | | |

**SAMPLE INFORMATION**

| **Paint:** # of XRF | **Paint:** # of Positive | **Dust Wipes:** # of Samples | **Dust Wipes:** # of Positive |
|---|---|---|---|
| | | | |

| | | | | |
|---|---|---|---|---|
| Healthy Homes Hazard: | Mice | CO | | |
| 311 Complaint Number: | [redacted] | [redacted] | | |

| Copy Received by (Print) | Copy Received by (Signature) | Relationship to Child or Other | Date |
|---|---|---|---|
| Sara mansaum | [signature] | mother | 06-05-26 |

☐ No one available for signature
☐ Refused to sign

| Inspector Name (Print) | Inspector Name (Signature) | Badge Number | ID Number: |
|---|---|---|---|
| Maria del Carmen Colón Ortiz | [signature] | 4126 | 2202 |

☐ If this box is checked, please call Inspector at [redacted] (Mobile phone) or [redacted] (Office)

## INSPECTION RESULTS

| | |
|---|---|
| AV | Apartment Vacant |
| AVCW | Awaiting VCW – Dust Wipes |
| BV | Building Vacant |
| BD | Building Demolished/Vacant Lot |
| CEA | Counseling, Education & Assessment |
| CNL | Cannot Locate the Child |
| HFO | Hold for Further Observation |
| MESS | Message Left |
| NA | No Access |
| NAP | No Adult Present |
| NCA | No Cause for Action |
| NEG | Negative |
| NSA | No Such Address |
| NVC | Not Valid Complaint |
| NVS | Not Valid Supplemental |
| OJD | Out of Jurisdiction |
| OPHL | Other Possible Hazards-Submitted for Analysis |
| POSTED | Posted Order to Abate Nuisance |
| PVCW | Pending VCW – for Modified Orders |
| PVRR | Previous Violations not Abated - No Additional Sampling Conducted |
| RAT | Refused Access by Tenant |
| RALL | Refused Access by Landlord |
| SRF | Safety Regulations Being Followed |
| SVCWHPDx | Substantial Violation Complied by HPD |
| SVCWLLx | Substantial Violation Complied by Landlord |
| TM | Tenant Moved |
| USA | Unsuccessful Attempt |
| VNOV | Violation of Rules & Regulations (VRR)-NOV |
| VCO | Violation of Rules & Regulations-Commissioners Order |
| VCOD | VRR-Commissioners Order Dust Wipe Samples Required |
| VCW | Violations Complied with by Landlord |
| VDIS | Violations Discussed |
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| VRRH | VRR by Housing Development Program |
| VRRN | VRR by New York City Housing Authority |
| VSC | Valid Supplement with Condition |
| WA | Wrong Address |
| WCDW | Work Completed – Awaiting Dust Wipe Results |
| WCNR | Work Completed – Dust Wipes not Required |
| WCNR-SWO | Work Completed – Dust Wipes not Required – Stop Work Order |
| WNS | Work not Started |
| WIPI | Work in Progress-Inactive |

**Healthy Home Program**

[redacted]

WHITE (RSU); CANARY (Public)

Revised: 03.02.23

Name

# Christina

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Housing connect. If it's a lottery what should it matter if the person works for the city of New York in order to have a place to live. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 8, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/8/2026 12:33pm |

Name

## Dorian Solomon

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

The current City Charter provides no mechanism for administrative accountability short of an Article 78 proceeding. This reliance on the judicial system to resolve agency non-compliance is inherently inefficient, costly, and inaccessible to the average New Yorker.

The Problem

The Charter lacks a "pre-litigation" transparency requirement. When agencies specifically the Department of Buildings (DOB), Department of Health and Mental Hygiene (DOHMH), Department of Environmental Protection (DEP), Fire Department (FDNY), Department of Housing Preservation and Development (HPD), and ConEd—fail to act on documented code violations, the citizen is forced to spend months and significant funds to initiate an Article 78 proceeding in Supreme Court. This is a waste of judicial resources and taxpayer money. It creates an environment where agencies operate with impunity, knowing the barrier to entry for a lawsuit is too high for the average resident.

The Case Study

My experience with [redacted] (currently under review by the office of Manhattan Borough President Brad Hoylman Sigal) demonstrates this systemic failure. Despite numerous 311 complaints and repeated attempts at resolution, the agencies involved operated in a vacuum of transparency. This forced a citizen to choose between expensive, protracted litigation or living with an unresolved violation. This is a systemic issue, not an isolated incident.

The Proposal (Charter Amendment)

I propose an amendment to the City Charter that establishes an "Administrative Escalation & Transparency Protocol" (AETP):

1 Mandatory Disclosure: Agencies must provide a "Full Case Disposition Report" for any complaint that remains open for more than 90 days.

2 Ombudsman Escalation: Establish a Charter mandated, independent office to review agency non compliance upon request, providing a path for resolution before a citizen is forced to file an Article 78.

3 Efficiency Metric: Agencies must track and report the number of Article 78 petitions filed against them annually, and the Charter must require a yearly audit of these filings to identify which agency departments are chronically failing the public.

Note on Documentation

I have compiled a formal dossier of all complaints, agency responses, and the current correspondence with the office of Borough President Hoylman Sigal

regarding the subject property. This evidence is available for immediate submission upon your request.

By implementing this protocol, the City will drastically reduce the volume of Article 78 petitions, save on litigation costs, and hold agencies to a standard of performance that is currently absent. I submit this testimony as an example of how the Charter can be rewritten to favor efficiency over the current status quo of administrative obstruction.

Sincerely,

Dorian Solomon

Attachment(s)

Drop files here or click to browse

Date Submitted: June 8, 2026

Topic: Department of Buildings (DOB) Issues; Unnecessary Bureaucracy; Enforcement; Reporting Requirements

Method Received: Airtable Form

Created By: 6/8/2026 2:03pm

Name

# Nargis Baseel

Email [redacted]

Professional Affiliation: Lawyer UK

Zip Code:

Public Comment: Make the Foreign Legal Consultancy route easier and assist with making International legal advice accessible to NY residents by assisting Lawyers with setting up in NY. Start a scheme.

Attachment(s)



inbound3077377008434299779.docx

Date Submitted: June 8, 2026

Topic: Miscellaneous

Method Received: Airtable Form

| | |
|---|---|
| Created By | 6/8/2026 2:21pm |

**FROM:** Nargis Baseel – Senior Lawyer England & Wales
**DATE:** June 8, 2026
**SUBJECT:** Modernizing 22 NYCRR s 521.1 to remove barriers on UK legal talent and alleviate administrative delays. To introduce a pilot scheme to make English Legal advice accessible for NY residents.

**Law: Part 521 - Rules of the Court of Appeals for the Licensing of Foreign Legal Consultants**

---

A lobby for change to the outdated rule 22 NYCRR s 521.1 currently leaving international legal talent in limbo in particular for international freelancers or sole traders looking to obtain a license. The rule mandates that Foreign Legal Consultants (FLCs) maintain an office within New York State. However not all lawyers from the UK are able to collaborate with US attorneys and most UK freelancers/consultants will not be able to afford an office in NY to meet this requirement.

Currently, international professionals are having their FLC applications placed on hold while being asked to apply to the Court of Appeal for "waivers of strict compliance" to bypass the office requirement. By advocating for the removal of this requirement and thereafter introducing a scheme (early legal advice scheme) the mayor can accelerate the integration of international English legal consultants and support small consulting businesses who wish to collaborate within NY. Making international legal advice accessible is also as important as childcare, employment and small businesses opportunities.

**Strategic Alignment with the Mayor's Platform**

1. **Accelerating Business Onboarding:** lobbying to remove the requirement completely opens door to all international legal specialists to immediately embed themselves in New York.
2. **Cultivating a Healthier Tax Ecosystem:** While commercial landlords pay property taxes, requiring international professionals to enter expensive leases they do not necessarily need creates a major economic bottleneck. Removing the office requirement shifts how international professionals contribute long-term for New York City, leading to a much healthier tax ecosystem.
3. **Captured Tax Revenue:** Rather than sinking capital into commercial brick-and-mortar buildings, these professionals will now have the opportunity to redirect capital to contribute to the local city tax base through residential rentals, education and daily commerce within local neighbourhoods.

4. **Enhancing NYC's Global Edge:** Eliminating this barrier positions NYC as a progressive, tech-forward, and accessible marketplace for global legal professional talent.

I propose an early access legal scheme to be introduced where we provide English legal advice to residents of New York via the support of the mayor, the aim is to make it easy and accessible from the comfort of their homes. I would love to be the main point of call for this UK – NY FLC collaboration.

As someone who is currently waiting to hear back from the Court of Appeal in regard to my waiver application, I hope you can assist in proposing the above to the Mayor.

**Best Regards**
**Nargis Baseel**
**Senior Lawyer England & Wales**

**Email:** [redacted]
**Contact:** [redacted]

Name

# Carlos Segura

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I would like for the New York State and city government to consider an audit that would identify why the MTA can't or won't run in a more efficient fashion. By efficient I mean timely. Time is money and in a city like New York, that saying especially applies. I believe if this is something the city would prioritize that it would exponentially not only make New Yorkers happy but lead to the city being more fiscally productive.

Attachment(s)

Drop files here or click to browse

Date Submitted June 8, 2026

Topic Budget Issues

Method Received Airtable Form

Created By 6/8/2026 5:16pm

Name

# Rex Sarpong

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Housing is a critical challenge in New York City. I disagree with the perspective that supply is insufficient to meet demand; the core issue lies in non-compliance with existing housing laws, including landlords/ladies fraud and abuse. The cost of housing is escalating rapidly: an average studio apartment now costs approximately $2,500, with bedroom rates exceeding $3,000 in the current inflationary environment. Compounding these affordability crises are widespread issues of poor maintenance and substandard living conditions. While 311 is intended as a resource, it is frequently hampered by existing bureaucracy and overly stringent or inconsistently enforced regulations. What specific actions is the Mayor taking to ensure full compliance with housing laws across the city and making housing affordable?

Attachment(s)

Drop files here or click to browse

Date Submitted June 8, 2026

Topic Enforcement × Tenant Protection × Unnecessary Bureaucracy ×

Method Received Airtable Form

| | |
|---|---|
| Created By | 6/8/2026 6:07pm |

Name

# Paul Slapikas

Email [redacted]

Professional Affiliation: Retired

Zip Code:

Public Comment:

I recently read that Mayor Mamdani's administration convinced Amazon to pay nine million dollars in outstanding illegal idling fines. What many people may not be aware of is the huge number of Idling fines that are, and have been, outstanding for many years. There are tens of thousands of them. I quite often I see vehicles booted for unpaid traffic summonses. Why not start booting vehicles that have outstanding idling summonses also? Possibly, you'd need State approval but let's not let that stop New York City from collecting the money that is owed to us. The attached spreadsheet includes a few real life examples of unpaid idling fines. I estimate there is more than one hundred million dollars of unpaid idling fines. I am sure Mayor Mamdani would put it to good use if someone made a serious effort to collect it.

Attachment(s)

Example of Unpaid Idling Fines.numbers

Date Submitted: June 8, 2026

Topic: Enforcement, Budget Issues

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/8/2026 9:04pm |

oathsummonsdata 2026-06-08-17-19-042026-06-08-17-19-04

| ticket number | violation date | violation time | respondent last name | balance due | violation | hearing status | hearing result | hearing da | paid amount | total violation amount | penalty imposed | additional penalties or late fees | updated at |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 000415110N | 2018 08 24 12 00 00 AM | 10 47 00 | R VER STREET DEAL LEASE | 1300 | XX | DEFAULTED | DEFAULTED | 2018 12 19 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000416896M | 2018 10 09 12 00 00 AM | 19 51 00 | ESP NOZA CORP | 1300 | 50 30 | DOCKETED | DEFAULTED | 2019 02 13 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000417271N | 2018 10 16 12 00 00 AM | 13 21 00 | KAM MATER AL NC | 1300 | XX | DOCKETED | DEFAULTED | 2019 02 27 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000417295H | 2018 10 25 12 00 00 AM | 15 14 00 | K MBERLY S AUTOMOT VE NC | 1300 | XX | DOCKETED | DEFAULTED | 2019 03 27 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000660182L | 2019 05 28 12 00 00 AM | 09 11 00 | GLADYS VASQUEZ | 1300 | | DEFAULTED | DEFAULTED | 2019 10 01 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000661788K | 2019 07 30 12 00 00 AM | 14 49 00 | JUNKLUGGERS OF NASSAU COUNT' | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2020 10 21 | 0 | 350 | 350 | 105 | 2026 05 14 2 28 52 PM |
| 000662368Z | 2019 08 20 12 00 00 AM | 12 10 00 | USAC TOW NG CORP | 1300 | 47 19 | DEFAULTED | DEFAULTED | 2020 10 06 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000666077R | 2020 01 12 12 00 00 AM | 16 12 00 | EEB NY TRANSPORTAT ON CORP | 1300 | | DEFAULTED | DEFAULTED | 2020 07 15 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000667485K | 2020 02 18 12 00 00 AM | 09 35 00 | J B COMMERC AL CORP | 1300 | 44 04 | DEFAULTED | DEFAULTED | 2020 07 07 | 0 | 350 | 1000 | 300 | 2026 05 14 2 28 52 PM |
| 000671546R | 2020 01 14 12 00 00 AM | 09 35 00 | USAC TOW NG CORP | 1300 | 51 11 | DEFAULTED | DEFAULTED | 2021 01 25 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000671996M | 2020 07 15 12 00 00 AM | 08 07 00 | VALENT NA TRUCK NG LLC | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2021 02 08 | 0 | 350 | 350 | 105 | 2026 05 14 2 28 52 PM |
| 000673379H | 2020 08 17 12 00 00 AM | 14 26 00 | TOP RATED DR VERS NC | 1300 | 50 49 | DEFAULTED | DEFAULTED | 2021 03 23 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000673408H | 2020 08 25 12 00 00 AM | 10 30 00 | AMER CAN STORAGE TRANSPORT | 1300 | | DEFAULTED | DEFAULTED | 2021 06 09 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000673997P | 2020 09 29 12 00 00 AM | 10 06 00 | NYC R TEWAY TOW NG CORP | 1300 | | DEFAULTED | DEFAULTED | 2021 08 09 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000677071J | 2021 02 23 12 00 00 AM | 13 04 00 | REL ABLE APPL ANCE AC NC | 1300 | | DEFAULTED | DEFAULTED | 2021 07 20 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000678518L | 2021 06 16 12 00 00 AM | 14 27 00 | RELAC ONES C BAENO EXPRESS NC | 1300 | | DEFAULTED | DEFAULTED | 2022 01 04 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000703469X | 2021 11 11 12 00 00 AM | 09 36 00 | NYC R TEWAY TOW NG CORP | 2600 | 43 22 | DEFAULTED | DEFAULTED | 2022 05 23 | 0 | 600 | 2000 | 600 | 2026 05 22 7 31 18 PM |
| 000705791N | 2021 12 17 12 00 00 AM | 11 34 00 | ELM SUSPENS ON SYSTEMS NC | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2022 09 07 | 0 | 350 | 350 | 105 | 2026 05 22 7 31 18 PM |
| 000709424J | 2022 02 03 12 00 00 AM | 14 54 00 | RJC TRANSPORTAT ON NC | 2600 | 52 40 | DEFAULTED | DEFAULTED | 2022 11 02 | 0 | 600 | 2000 | 600 | 2026 05 14 2 28 52 PM |
| 000710305P | 2022 02 04 12 00 00 AM | 11 31 00 | DANELLA CONSTRUCT ON CORPOR | 105 | | HEAR NG COMPLETED | N V OLAT ON | 2022 12 12 | 350 | 350 | 350 | 105 | 2026 05 22 7 31 18 PM |
| 000711034R | 2022 03 15 12 00 00 AM | 08 01 00 | RL TRUCK NG LLC | 1300 | 43 20 | DEFAULTED | DEFAULTED | 2023 01 09 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000713382M | 2022 03 16 12 00 00 AM | 07 41 00 | WH TESTONE SALES NC | 1950 | 44 07 | DEFAULTED | DEFAULTED | 2023 03 14 | 0 | 440 | 1500 | 450 | 2026 05 22 7 31 18 PM |
| 000715178Y | 2022 04 27 12 00 00 AM | 07 10 00 | F VE BORO BOOM LLC | 455 | 45 05 | HEAR NG COMPLETED | N V OLAT ON | 2023 05 15 | 0 | 350 | 350 | 105 | 2026 05 22 7 31 18 PM |
| 000715179X | 2022 04 15 12 00 00 AM | 09 18 00 | LEOV G LDO DEBERAS DBA L D ME | 1400 | | DEFAULTED | DEFAULTED | 2024 09 03 | 0 | 350 | 1000 | 400 | 2026 05 20 9 37 50 PM |
| 000715521M | 2022 05 04 12 00 00 AM | 11 01 00 | THE SALVAT ON ARMY | 1600 | 39 11 | RESCHEDULED | DEFAULTED | 2026 07 07 | 0 | 350 | 1000 | 600 | 2026 05 20 9 37 50 PM |
| 000716045P | 2022 05 11 12 00 00 AM | 13 36 00 | ALL BORO TANK TEST NG NC | 2600 | 39 60 | DEFAULTED | DEFAULTED | 2023 06 13 | 0 | 600 | 2000 | 600 | 2026 05 14 2 28 52 PM |
| 000717182X | 2022 05 13 12 00 00 AM | 15 25 00 | ALL BORO TANK LLC | 2600 | 39 60 | DEFAULTED | DEFAULTED | 2023 07 11 | 0 | 600 | 2000 | 600 | 2026 05 22 7 31 18 PM |
| 000719271R | 2022 06 10 12 00 00 AM | 11 06 00 | EDGE AUTO NC | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2023 09 26 | 0 | 350 | 350 | 105 | 2026 05 20 9 37 50 PM |
| 000726833P | 2022 08 03 12 00 00 AM | 09 15 00 | L FFEY SHEET METAL CORP | 750 | 45 11 | DOCKETED | DEFAULTED | 2025 08 19 | 1500 | 440 | 1500 | 750 | 2026 05 20 9 37 50 PM |
| 000727991P | 2022 08 09 12 00 00 AM | 13 22 00 | CABEZAS UGLE | 2600 | 47 01 | DEFAULTED | DEFAULTED | 2024 04 10 | 0 | 600 | 2000 | 600 | 2026 05 20 9 37 50 PM |
| 000733380R | 2022 09 07 12 00 00 AM | 11 59 00 | GELCO FLEET TRUST | 1950 | 34 60 | DEFAULTED | DEFAULTED | 2023 03 01 | 0 | 440 | 1500 | 450 | 2026 05 22 7 31 18 PM |
| 000740392J | 2022 11 04 12 00 00 AM | 07 18 00 | WH TESTONE SALES NC | 1950 | 45 14 | DEFAULTED | DEFAULTED | 2023 04 05 | 0 | 440 | 1500 | 450 | 2026 05 22 7 31 18 PM |
| 000743136Y | 2022 11 23 12 00 00 AM | 10 36 00 | TR PLE R USA NC | 1300 | 45 11 | DEFAULTED | DEFAULTED | 2024 12 30 | 0 | 350 | 1000 | 300 | 2026 05 20 9 37 50 PM |
| 000743138H | 2022 11 23 12 00 00 AM | 13 39 00 | FOOTPR NTS CAFE | 1300 | | DEFAULTED | DEFAULTED | 2024 07 30 | 0 | 350 | 1000 | 300 | 2026 05 20 9 37 50 PM |
| 000750600Y | 2023 01 10 12 00 00 AM | 14 52 00 | R WAY MOV NG STORAGE LTD | 1300 | 44 16 | DEFAULTED | DEFAULTED | 2023 06 27 | 0 | 350 | 1000 | 300 | 2026 05 22 7 31 18 PM |
| 000754242L | 2023 01 04 12 00 00 AM | 07 41 00 | FRESH REFR GERAT ON AND A R CO | 1400 | 45 01 | DEFAULTED | DEFAULTED | 2024 04 02 | 0 | 350 | 1000 | 400 | 2026 05 20 9 37 50 PM |
| 000758389Y | 2023 01 27 12 00 00 AM | 17 11 00 | HOUSE OF S GNS NC | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2023 06 30 | 0 | 350 | 350 | 105 | 2026 05 14 2 28 52 PM |
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| 000767017H | 2023 03 23 12 00 00 AM | 10 12 00 | J ANTHONY | 455 | | HEAR NG COMPLETED | N V OLAT ON | 2024 10 28 | 0 | 350 | 350 | 105 | 2026 05 20 9 37 50 PM |
| 000773477J | 2023 03 15 12 00 00 AM | 08 03 00 | PROCARE MECHAN CAL CORP | 1950 | 46 09 | DEFAULTED | DEFAULTED | 2023 12 08 | 0 | 440 | 1500 | 450 | 2026 05 20 9 37 50 PM |
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| 000898609L | 2024 06 07 12 00 00 AM | 09 27 00 | CALL A HEAD CORP | 2600 | | DOCKETED | DEFAULTED | 2026 01 12 | 0 | 600 | 2000 | 600 | 2026 05 20 9 37 50 PM |
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| 000936860X | 2025 01 08 12 00 00 AM | 09 18 00 | NEW YORK PAV NG NC | 440 | | RESCHEDULED | | 2026 06 01 | 0 | 440 | 440 | 0 | 2026 05 20 9 37 50 PM |

Name

# Tom Harris

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Times Square Alliance |
| Zip Code | [redacted] |
| Public Comment | Topic: The Unhoused and Mentally Ill.<br><br>The way services are provided to the homeless and mentally ill is inefficient and rewards outreach over outcomes for individuals. Often times different providers offer different services to different individuals without coordination of care. The process is resource rich and accountability poor.<br><br>I am attaching a fuller outline of suggested solutions but in short:<br><br>1. We spend hundreds of millions of dollars on outreach contracts and permanent stability is not the measure of success. In fact, as more funding is provided, outcomes do not improve AND the number of people living on our streets increases.<br><br>2. There are overlapping areas of responsibility without any coordination of care.<br><br>3. Outreach and placement depend on outmoded data systems with significant issues related to access, lack of mobile capability and incomplete records.<br><br>4. Different providers are offered different solutions and access to care. The State SOS teams have one set of options and the city providers, another. Specifically, the State SOS team places people directly from the street to Safe Havens. City teams in Manhattan do not place people directly to Safe Havens.<br><br>Attached is fuller outline of the problem and suggested efficiencies to the system. |

Attachment(s)



Homeless/Mental Health Outreach

Edna has lived in the pedestrian plazas of Times Square for five years. She has a history of serious medical issues, and currently has dilenoprating/leg wounds, which have been treated on the street by a nurse once a week - not enough to keep her from contracting maggots. She has been repeatedly offered a room in supportive housing, but she continually refuses.

Smoke has been living at the entrance to a parking garage at 200 West 52nd Street for five years. Well-meaning people in the community offer him food, and while he sleeps rats eat it. There is a room, along with new clothes and shoes, waiting for him in a brand-new SOS facility, but he refuses to go and instructs the outreach team to give the room to someone else.

Salvation has lived at various locations in Times Square for six years: first in the pedestrian plazas, next at 42nd Street and 8th Avenue, and currently at 41st and 8th, outside of the New York Times building. She shows clear signs of psychosis and delusion, and over the years we have watched her deteriorate. We secured a room for her, but she insists she has a "lease" for the spot on the sidewalk near the New York Times.

**The current way we address these, and many other, seriously mentally ill unhoused persons is not working, and yet we continue with the same strategies destined to fail.**

To better provide service and support to our most vulnerable New Yorkers, we need to reimagine the way we provide outreach. And, outreach cannot be an end in itself – the only measure if success must be getting these individuals into treatment and then into safe and supportive housing. The current system is resource rich and accountability scarce. A better system would focus on fully integrated and individualized care plans tailored to everyone's needs and coordinated across agencies and providers. This is not happening under the current system.

**A reimagined system should prioritize making sure client information is up to date and shareable among providers, fully coordinating outreach, adding more mental health professionals to follow clients, and focusing on**

Thoughts on Mental Health Overhaul.d...

Date Submitted: June 9, 2026

Topic: Unnecessary Bureaucracy, Enforcement

Method Received: Airtable Form

Created By: 6/9/2026 7:19am

# Homeless/Mental Health Outreach

Edna has lived in the pedestrian plazas of Times Square for five years. She has a history of serious medical issues, and currently has deteriorating leg wounds, which have been treated on the street by a nurse once a week - not enough to keep her from contracting maggots. She has been repeatedly offered a room in supportive housing, but she continually refuses.

Smoke has been living at the entrance to a parking garage at [redacted] for five years. Well-meaning people in the community offer him food, and while he sleeps rats eat it. There is a room, along with new clothes and shoes, waiting for him in a brand-new SOS facility, but he refuses to go and instructs the outreach team to give the room to someone else.

Salvation has lived at various locations in Times Square for six years: first in the pedestrian plazas, next at [redacted], and currently at [redacted], outside of the New York Times Building. She shows clear signs of psychosis and delusion, and over the years we have watched her deteriorate. We secured a room for her, but she insists she has a "lease" for the spot on the sidewalk near the New York Times.

**The current way we address these, and many other, seriously mentally ill unhoused persons is not working, and yet we continue with the same strategies destined to fail.**

To better provide service and support to our most vulnerable New Yorkers, we need to reimagine the way we provide outreach. And, outreach cannot be an end in itself – the only measure of success must be getting these individuals into treatment and then into safe and supportive housing. The current system is resource rich and accountability scarce. A better system would focus on fully integrated and individualized care plans tailored to everyone's needs and coordinated across agencies and providers. This is not happening under the current system.

**A reimagined system should prioritize making sure client information is up to date and shareable among providers, fully coordinating outreach, adding more mental health professionals to follow clients, and focusing on continual follow-up until clients are either in treatment or in safe and supportive housing.**

**Information Sharing:**

To better serve those in crisis, outreach workers and first responders first need to be familiar with their history. Currently, we have seen different agencies reluctant to share information about their clients, citing HIPAA concerns. Outreach workers often interact with individuals without critical clinical history information to inform their decisions. HIPAA currently allows the sharing of personal health information in certain circumstances, such as when it's necessary for treatment or the health or safety of the patient or others. Any privacy concerns could easily be addressed via a standard consent form outreach workers offer automatically to all clients, much like we all sign when we go to any medical professional.

Providers also need better data systems whereby client information can be constantly and efficiently updated, and easily shared with other state and city contracted outreach teams.

## Focused and Coordinated Outreach:

Currently many well-intentioned service providers outreach to clients in overlapping areas. In a single day, a client in Midtown could encounter a different agency on the street, in the subway, or in the Port Authority. Because information is not shared, outreach teams have no idea whether or not – or how many times – a client has been approached in a single day, so rather than following up on services offered previously, the same initial conversation happens again and again. A more efficient system would have workers focus on geographical areas regardless of whether the client was on the street, or in the subway, or in the bus terminal.

## Additional Professionals Performing Outreach

Currently there are two types of professionals who engage with the mentally ill, psychiatric professionals and law enforcement. Often, these professionals need to determine whether someone is a danger to themselves or others and require further evaluation. The data shows that when a psychiatric professional initiates removal to a hospital, 75% of the time the client is admitted and gets treatment. Conversely, when law enforcement performs these removals, 75% of the time patients are released back to the street. This data shows that adding more psychiatric professionals to street teams will improve outcomes for clients. This will also help provide a higher level of care on the street, hopefully preventing unnecessary involuntary removals.

## Accountability and Follow-up

The current system is resource rich and accountability poor. A more effective system can only be achieved with performance-based contracts, whereby service providers are responsible for the quality of outcomes, not the quantity of outreach.

## Suggested Solutions:

1. Look to the San Francisco model: Develop multidisciplinary, interagency teams, geographically based that provide a case management model in the street and can instantly coordinate care amongst team members. Hold daily briefings to discuss strategy and goals for each individual. .
3. Currently we have options for those suffering from mental illness. Often times there is an overlap with addiction. The services for those suffering from people with substance abuse disorder rely on outdated voluntary models that fail to account for the severity and lethality of current synthetic street drugs.
4. City hospitals have better outcomes with this population than some private hospitals do. All emotionally disturbed individuals who come into the system through EMS should be diverted to city hospitals.
4. Each individual needs an advocate and in the absence of a family member, a social worker should be provided to monitor each client and track progress or setbacks, both inside and outside the hospital.

Process:

1. Acknowledge that the status quo is not acceptable and that we all need to work together to change the system.
2. Build a coalition of service providers, community groups (The Partnership, ABNY, REBNY, BIDS, etc.), elected officials, family members, and the mentally ill. Any solution needs to have "buy-in" in from all parties and be collaborative.
3. Advocate for legislative and policy solutions that will result in better outcomes.
4. Once new strategies are developed, track outcomes and adjust as necessary.

Name

# Kerry

Email [redacted]

Professional Affiliation: NYC agency

Zip Code:

Public Comment: As someone who has participated in the City's hiring process from both sides, I strongly urge this commission to look critically at improving how the City approves new hires, promotions, and backfills. Our agency has lost many great and competitive candidates to other opportunities while waiting for OMB approval. I have colleagues at other agencies having the same trouble. The waiting and uncertainty involved in hiring is not only demoralizing for all involved. It also saps the City's ability to ramp up new critical initiatives and to keep existing programs running well. Please look at ways to increase the City's speed and agility in this important area of our operations.

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

Date Submitted: June 9, 2026

Topic: Unnecessary Bureaucracy, Procurement Reform

Method Received: Airtable Form

Created By: 6/9/2026 7:28am

Name

# Lupita

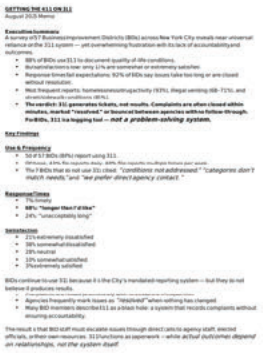
| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | For the last couple of years, New Yorkers has watched how it's always been profit over people. Like. The new enhanced MTA turn styles compared to the barricade steel that was on some stations. Clearly, we see where the prioritization is at if you could help to stand their New Yorker with public transportation made more for the people like. Standard air filter, cause we know how old the station is to the old carts with no AC at this point more MTA workers even if it's creating a new pipeline of careers. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 7:57am |

Name

# Tom Harris

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Times Square Alliance |
| Zip Code | [redacted] |
| Public Comment | Topic 311 System:<br><br>The 311 system quite simply, does not work. It is used to record complaints not get results. Even the recording of complaints does not result in the dedication of resources to proactively address problems. There seems to be little accountability by agencies to respond to and correct conditions. Often issues are closed without resolution or closed as being under another agencies jurisdiction without referring the complaint to that agency. Complaints are ALWAYS closed without conferring with the complainant.<br><br>Proposed Solutions for efficiency:<br><br>1. Accountability before closure: No ticket should be closed without verifying resolution. Unfounded complaints should not be closed without conferral with the complainant.<br>2. Agencies need to be mandated to document how a complaint was resolved.<br>3. Treat BIDs as trusted partners with dedicated pathways to report.<br>4. Expand the categories: Add drug use, vending enforcement, and plaza conditions as standalone complaint types.<br><br>Attached is a report prepared by BIDS to document frustrations. |

Attachment(s)



GETTING THE 411 ON 311.docx

Date Submitted: June 9, 2026

Topic: Unnecessary Bureaucracy, Enforcement, Reporting Requirements

Method Received: Airtable Form

Created By: 6/9/2026 8:42am

**GETTING THE 411 ON 311**
August 2025 Memo

## Executive Summary

A survey of 57 Business Improvement Districts (BIDs) across New York City reveals near-universal reliance on the 311 system — yet overwhelming frustration with its lack of accountability and outcomes.

- 88% of BIDs use 311 to document quality-of-life conditions.
- But satisfaction is low: only 13% are somewhat or extremely satisfied.
- Response times fail expectations: 92% of BIDs say issues take too long or are closed without resolution.
- Most frequent reports: homelessness/drug activity (93%), illegal vending (68–71%), and street/sidewalk conditions (85%).
- **The verdict: 311 generates tickets, not results. Complaints are often closed within minutes, marked "resolved," or bounced between agencies with no follow-through. For BIDs, 311 is a logging tool — *not a problem-solving system*.**

## Key Findings

### Use & Frequency

- 50 of 57 BIDs (88%) report using 311.
- Of those, 43% file reports daily, 40% file reports multiple times per week.
- The 7 BIDs that do not use 311 cited: *"conditions not addressed," "categories don't match needs,"* and *"we prefer direct agency contact."*

### Response Times

- 7%: timely
- **68%: "longer than I'd like"**
- 24%: "unacceptably long"

### Satisfaction

- 21% extremely dissatisfied
- 38% somewhat dissatisfied
- 28% neutral
- 10% somewhat satisfied
- 3% extremely satisfied

BIDs continue to use 311 because it is the City's mandated reporting system — but they do not believe it produces results.

- Complaints are closed prematurely with no evidence of inspection.
- Agencies frequently mark issues as *"resolved"* when nothing has changed.
- Many BID members describe 311 as a black hole: a system that records complaints without ensuring accountability.

The result is that BID staff must escalate issues through direct calls to agency staff, elected officials, or their own resources. 311 functions as paperwork — while *actual outcomes depend on relationships, not the system itself*.

This undermines public faith and wastes BID resources, particularly when frontline issues like homelessness, illegal vending, and open drug use are involved.

**BID Remarks: *"Closed Without Resolution"***

**Homelessness & Encampments**

- **Times Square Alliance**: *"Unhoused and mentally ill are not responded to in a timely manner and the responses are vague, inaccurate, and fail to solve the problems…Telling someone to call 311 to solve a problem is one small step short of ignoring their concern…It is a system that has been neglected since Mayor Bloomberg left. No one has ownership and agencies are acutely aware of that."*
- **Downtown Flushing BID**: *"Lack of response on homeless…Situations often get worse as time goes on… our Operations team takes it upon itself to address the situation as best they can."*

**Illegal Vending**

- **Dumbo BID**: *"311s get closed out as 'no longer DCWP jurisdiction' but don't get forwarded to DSNY. DSNY vending response is impossibly slow."*
- **Sunset Park Brooklyn**: *"DSNY is under provisioned for vendor enforcement and doesn't coordinate well with NYPD/DOT/DOHMH Vendor enforcement (if it's effective even short term) is almost entirely via NYPD and at the discretion of local electeds and disposition of the local precinct leadership.* ***311 is just the symptom of that. All DSNY 311 vendor complaints are systematically closed shortly after report. DSNY asserts it's their "acknowledgement of the complaint" But it's not the way 311 feedback is handled for other complaints and it leads to public not wanting to make reports that are perceived as useless.***

**Street/Infrastructure**

- **Forest Avenue BID (Staten Island)**: *"We put an issue in for sidewalk issue and it was closed immediately with no actions done. We put in another issue about the street scape of overgrown weeds and it was closed immediately reporting no action needed.*
- **Grand Central Partnership**: *"Many complaints are marked 'resolved' even when the issue clearly remains… This siloed approach undermines the purpose of a centralized system. — NYC should function as a coordinated whole, not as disconnected departments. In some cases, agencies claim that a site visit was made or that no issue existed, even when that's clearly not true, raising concerns about the accuracy and integrity of those responses."*

**General System Failure**

- **Union Square Partnership:** *"Situations often get worse as time goes on and we do not know enough about the status of our requests. Without a prompt response or even consistent communication, our Operations team takes it upon itself to address the situation as best they can, either through direct intervention or utilizing their contacts in city agencies. It is not ideal that one has to know someone to make things happen."*
- **161st Street BID**: *"The general consensus is why bother. If anybody needs a marketing campaign or something to build trust, it's 311."*
- **Hudson Yards Hell's Kitchen Alliance (HYHK)**: *"Tickets should not be closed UNTIL THE ISSUE IS RESOLVED."*

**Proposed Advocacy Priorities**

1. **Accountability Before Closure**
   No ticket should be closed until the condition is verified as resolved.
   Require photo evidence and detailed notes on action taken.
2. **Outcome Transparency**
   Agencies must state not just that an issue was addressed, but *how*.
   If unresolved, complaints should remain open or be escalated, not discarded.
3. **BID Priority Channels**
   Recognize BIDs as trusted reporting partners; create dedicated pathways for commercial corridors to ensure outcomes, not just logged data.
4. **Expanded Categories for Real Issues**
   Add drug use, vending enforcement, and plaza conditions as standalone complaint types.

Name

# Nurhaizatul Jamil

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Both the Mayor and Commissioner Levy have been going around delivering press conferences on housing affordability and equity. Meanwhile, I am actually an NYC housing lottery winner whose housing purchase has been stalled indefinitely despite having submitted my $40,000 downpayment 8 months ago because of two reasons: 1) the lack of transparency surrounding HomeFirst (it's pauses; it's processes) and having our HomeFirst application stalled for more than 6 months now with no end in sight and no updates 2) egregiously lackadaisical attitude by our housing non profit officer who is tasked with mediating and supervising the HomeFirst application process. I've submitted online inquiries to Commissioner Levy that have gone unanswered. So I ask that you all actually work on the processes surrounding HomeFirst before actually delivering platitudes on equitablef housing. Absolutely atrocious.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 9, 2026

Topic

Unnecessary Bureaucracy ✕ Enforcement ✕

Method Received

Airtable Form

| | |
|---|---|
| Created By | 6/9/2026 10:13am |

Name

# Joshua Brown

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Teacher |
| Zip Code | [redacted] |
| Public Comment | As a resident of Flatbush, Brooklyn (specifically the last stop on 2/5 at Flatbush/Brooklyn College), I believe our vibrant community deserves streets that are as clean as the surrounding areas of Prospect Park and Crown Heights. The Brooklyn Junction area has streets that are littered with trash that makes standing at the bus stop or going to the local businesses less desirable. Can we please clean up the area? |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 11:07am |

Name

# Steve Stankovic

Email [redacted]

Professional Affiliation Doorman

Zip Code [redacted]

Public Comment

Like I told you in the past present we need to see Art that thing chill out our brains and nervous system please can you put us to see Art we are going to remember it forever and we need to calm down cuz the people are so stressed out I don't know why maybe it's the internet idk or maybe it's cuz we didn't have the time and money to go to a museum so you need to obligatory Art therapy ,,, the people are coming without knowing knowledge . So with that in mind we need to put in their Knick fan mind ART thank you [redacted] or [redacted]

Attachment(s)


STEVE
STANKOVIC

SUMMARY

SKILLS

EDUCATION & CERTIFICATION

EXPERIENCE

Steve Resume 1 3.docx

Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

| | | |
|---|---|---|
| Created By | 6/9/2026 | 11:09am |

# STEVE
# STANKOVIC

Manhattan N.Y.
[redacted]
[redacted]

## SUMMARY

Motivated and skilled Host and cook in fine and casual dining. Proficient in making customers comfortable and satisfied while ensuring optimal guest flow in dining room and in any space. Maintains neat, clean and professional demeanor with staff and clientèle.

## SKILLS

**REHABILITATION RESONABLE ACCOMODATIONS**

- Fluent in Spanish, English, Portuguese
- Computer Skills
- Sales / customer service skills
- Security Guard

## EDUCATION & CERTIFICATION

**Some College No Degree | University of Puerto Rico, Rio Piedras Campus**
AUGUST 2008 – MAY 2013
**DRAMA THEATRE, CONCENTRATION**:
CUSTOME DESIGN, SCENE DESIGN, FUND VISUAL ARTS, WESTURE CULTURE

**Security guard training certificate |Radiant training & consultant school**
Sixteen-hour on-the-job Training Course for security guards

## EXPERIENCE

**Host | Dragonfly & Toro Salao Restaurant, San Juan Puerto Rico**
4 YEARS OF EXPERIENCE

- Manage in-person and telephone inquiries, customer service request, and restaurant bookings
- Assisting in training staff members
- Assisted waiters & bartenders with special request & inquires

**Cashier & Cook | Harry's Tacos**
7 MONTHS OF EXPERIENCE

- Food preparation, Customer Service, Cleaning, Cash register

**Library | University of Puerto Rico Library**
5 YEARS OF EXPERIENCE

- Responsible for assisting and monitoring students, staff & faculty in the resource center.
- Organization and maintenance of a wide inventory of books, newspapers, magazines, documents and other materials available for use by students & faculty

Name

# Anna Berlanga

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I find city services, obligations, and communications to be very disconnected. I have had the same email forever and lived at the same address for nearly ten years. I have a regular W2 job and pay my taxes. You should know exactly what programs I qualify for, what problems my community faces, what judgements have been made against me. But, every city agency and service is disconnected and disconnected from my data. I know we are scared of big government knowing everything about me, but it is really inefficient to have to have different sign ins for all the agencies and for nothing to talk to each other.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy

Method Received Airtable Form

Created By 6/9/2026 11:14am

Name

# MaryAnna Schaefer

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Would like to know if the City can clean public sidewalks (power wash) - especially those sidewalks under the Elevated Trains throughout the city- dirt, garbage and particularly bird fecal matter and residue present a very dirty and toxic environment that people walk on, carriages and carts roll on every day. Perhaps the MTA and Dept of Sanitation can work together efficiently to make an effort to clean public sidewalks along well traveled corridors in the Spring if once/year and if possible even 2/times per year.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy × Enforcement ×

Method Received Airtable Form

Created By 6/9/2026 11:33am

Name

# MaryAnna Schaefer

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Would like to know if the City can clean public sidewalks (power wash) - especially those sidewalks under the Elevated Trains throughout the city- dirt, garbage and particularly bird fecal matter and residue present a very dirty and toxic environment that people walk on, carriages and carts roll on every day. Perhaps the MTA and Dept of Sanitation can work together efficiently to make an effort to clean public sidewalks along well traveled corridors in the Spring if once/year and if possible even 2/times per year.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy × Enforcement ×

Method Received Airtable Form

Created By 6/9/2026 11:33am

Name

# Steven

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Too many Citibike racks/ports being dropped into communities in boros that depend on car ownership. The selection of sites seems determined to rid the areas of legitimate parking. It doesnt seem like convenience as much as anti car agenda. In Manhattan fine, in Notth Bronx it seems lacking consideration or perceived hostility.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Street Redesigns

Method Received Airtable Form

Created By 6/9/2026 11:33am

Name

# Soren Reck

Email [redacted]

Professional Affiliation NYC DOE

Zip Code [redacted]

Public Comment

As a young New York City public school educator, I see a huge disconnect between where education dollars are spent and what students and teachers actually need on a daily basis. I just finished my first year as an educator in District 9 of the Bronx, and watched schools invest significant resources in educational technology platforms that are often adopted without clear evidence of meaningful classroom benefits, as well as outside consultants and curriculum specialists who visit classrooms briefly and often provide little lasting impact on instruction. Meanwhile, many teachers regularly spend their own money on basic supplies such as pencils, paper, markers, and other classroom materials because school budgets do not adequately cover them. The stipends available for classroom supplies rarely reflect the actual costs teachers pay. At the same time, many school buildings have maintenance needs that go unaddressed, and classrooms are in varying states of disrepair. I believe a government efficiency review should prioritize examining whether spending is aligned with the needs of students and frontline educators. Before investing in new software subscriptions, consultant contracts, or administrative initiatives, the city should ensure that schools are fully equipped with basic supplies and well-maintained facilities. Teachers and students are often in the best position to identify what resources would have the greatest impact. Thank you Mayor Mamdani for soliciting feedback from New Yorkers!! -Soren Reck

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

| | |
|---|---|
| Topic | Budget Issues ✕ Unnecessary Bureaucracy ✕ Department of Buildings (DOB) Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/9/2026 11:50am |

Name

# Mike Centrella

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | SecurityScorecard |
| Zip Code | [redacted] |
| Public Comment | The New York City Commission on Government Efficiency has an important opportunity to strengthen the City's cyber resilience by addressing one of the most significant and underrecognized risks facing municipal government today: third party and supply chain cyber risk.<br><br>Recent incidents affecting NYC agencies — including the Department of Education and Health + Hospitals demonstrate that the City's exposure does not end at its own network perimeter. Vendors, software providers, and supply chain partners represent an expanding attack surface that requires continuous visibility, not annual compliance reviews.<br><br>The City already has the legal authority to act. Chapter 13 of the New York City Charter establishes the City's procurement authority and contractor responsibility standards. Section 2-08 of the Procurement Policy Board Rules further requires that contracts be awarded to responsible contractors who demonstrate business integrity and satisfactory performance. Updating the Vendor Responsibility matrix to include cybersecurity posture as a condition of doing business with the City is a logical, achievable, and necessary modernization step.<br><br>My full testimony, submitted for the record (attached), outlines the policy case in greater detail and offers specific recommendations for how the Commission can incorporate third party risk management into its modernization framework.<br><br>Respectfully submitted,<br>Mike Centrella<br>Former Assistant Director, United States Secret Service<br>Head of Public Policy, SecurityScorecard |

Attachment(s)



SecurityScorecard

June 9, 2026

**Testimony for the New York City Commission on Government Efficiency**

**Subject:** Modern Government Requires Continuous Visibility Across Third-Party and Supply Chain Risk

Chair, Commissioners, and members of the Commission:

Thank you for the opportunity to provide testimony regarding government modernization and the use of technology to improve the efficiency and effectiveness of New York City government.

Throughout my career in federal law enforcement, national security, and cybersecurity, I have observed a fundamental shift in how government operates. Today, government services are no longer delivered solely through government-owned systems and personnel. Instead, governments rely on vast ecosystems of contractors, software providers, cloud services, managed service providers, critical infrastructure operators, and other third-party partners to execute essential functions.

As a result, the security, resilience, and efficiency of government operations are increasingly dependent on entities that exist outside of government control.

This reality creates a challenge for modernization efforts. Government leaders often have visibility into their internal networks, systems, and assets, but limited visibility into the cyber risks posed by the thousands of external organizations that support government operations every day.

A city's ability to deliver services efficiently is directly tied to its ability to understand and manage risk across this broader ecosystem.

Recent cyber incidents have demonstrated that disruptions frequently originate not from direct attacks against government agencies, but through third-party vendors, software providers, and supply chain partners. These incidents can affect public safety, transportation, healthcare, utilities, emergency response, and citizen services.

For a city as large and complex as New York, this challenge is magnified by the scale of its technology ecosystem.

New York City has experienced this firsthand. Recent incidents affecting the Department of Education and Health + Hospitals appear to have originated not through direct attacks on City systems, but through compromised third-party vendors and software providers. These incidents exposed sensitive

SecurityScorecard, Inc.
1140 Avenue of the Americas, 19th Floor
New York, NY 10036

Michael Culbertson
Chief Government Solutions Advisor
mike@securityscorecard.com
Work: (855) 682-7567

Testimony for the New York City Commi...

Date Submitted: June 9, 2026

Topic: Procurement Reform

Method Received: Airtable Form

Created By: 6/9/2026 11:55am

SecurityScorecard

June 9, 2026

**Testimony for the New York City Commission on Government Efficiency**

**Subject:** Modern Government Requires Continuous Visibility Across Third-Party and Supply Chain Risk

Chair, Commissioners, and members of the Commission:

Thank you for the opportunity to provide testimony regarding government modernization and the use of technology to improve the efficiency and effectiveness of New York City government.

Throughout my career in federal law enforcement, national security, and cybersecurity, I have observed a fundamental shift in how government operates. Today, government services are no longer delivered solely through government-owned systems and personnel. Instead, governments rely on vast ecosystems of contractors, software providers, cloud services, managed service providers, critical infrastructure operators, and other third-party partners to execute essential functions.

As a result, the security, resilience, and efficiency of government operations are increasingly dependent on entities that exist outside of government control.
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A city's ability to deliver services efficiently is directly tied to its ability to understand and manage risk across this broader ecosystem.

Recent cyber incidents have demonstrated that disruptions frequently originate not from direct attacks against government agencies, but through third-party vendors, software providers, and supply chain partners. These incidents can affect public safety, transportation, healthcare, utilities, emergency response, and citizen services.

For a city as large and complex as New York, this challenge is magnified by the scale of its technology ecosystem.

New York City has experienced this firsthand. Recent incidents affecting the Department of Education and Health + Hospitals appear to have originated not through direct attacks on City systems, but through compromised third-party vendors and software providers. These incidents exposed sensitive

data belonging to hundreds of thousands of New Yorkers and demonstrated that a vendor's cybersecurity posture is inseparable from the City's own resilience.

The City already has a legal framework to act. Chapter 13 of the New York City Charter establishes the City's procurement authority and the standards governing contractor responsibility. Section 2-08 of the Procurement Policy Board Rules further requires that contracts be awarded to responsible contractors — those who demonstrate business integrity and a satisfactory record of performance. Cybersecurity posture should be recognized as a core component of vendor responsibility under both frameworks. A vendor that cannot demonstrate adequate cyber hygiene represents the same category of risk as one that lacks the financial resources or technical qualifications to perform. The Vendor Responsibility matrix should be updated to reflect this reality, requiring prospective contractors to affirmatively demonstrate a positive cyber posture as a condition of doing business with the City.

Modernization efforts should therefore include mechanisms that provide continuous visibility into third-party and supply chain risk. Point-in-time assessments and annual compliance reviews are no longer sufficient. Cyber risk changes daily — a vendor is acquired, a critical vulnerability goes unpatched for weeks, a cloud provider's security posture quietly degrades. New vulnerabilities emerge, vendors change ownership, technologies evolve, and threat actors continuously adapt.

To operate efficiently, government leaders need the ability to identify emerging risks before they become operational disruptions.

Continuous visibility enables governments to:

- Prioritize limited resources toward the highest-risk vendors and partners.
- Identify systemic risks that affect multiple agencies simultaneously.
- Improve resilience across critical services and infrastructure.
- Reduce the likelihood of operational disruptions caused by third-party incidents.
- Make more informed procurement and technology investment decisions — reducing cost, redundancy, and vendor risk at the point of acquisition rather than after the fact.

Most importantly, continuous visibility supports better governance. Decision-makers cannot manage risks they cannot see.

As the Commission evaluates ways to modernize government and improve operational efficiency, I encourage consideration of policies and frameworks that recognize cyber resilience and third-party risk management as essential components of government modernization.

Government efficiency is not simply about doing things faster. In today's interconnected environment, it requires visibility not only into government systems, but into the broader ecosystem upon which

government depends — and the confidence that critical services will remain available, resilient, and trusted by the public.

Thank you for the opportunity to submit this testimony and for your commitment to improving the effectiveness and resilience of New York City government.

Respectfully,
Mike Centrella
Former Assistant Director, United States Secret Service
Head of Public Policy, SecurityScorecard
[redacted]

Name

# Concerned Citizen

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Why is a NON-US British company National Grid, a company that provides terrible service with constant complaints by both city officials and residents, allowed to have monopoly access as the primary natural gas provider in NY. Across the board National Grid and it's sub contractors such as Hallen, USIC and New York Paving Inc are DESTROYING this cities infrastructure

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Franchises & Concessions, Enforcement, Unnecessary Bureaucracy, Miscellaneous

Method Received Airtable Form

Created By 6/9/2026 12:08pm

Name

## Andrew Rigie

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | New York City Hospitality Alliance |
| Zip Code | |

Public Comment

Dear Commission on Government Efficiency (COGE):

The New York City Hospitality Alliance, the not for profit organization representing thousands of restaurants, bars, and nightclubs across the five boroughs urges COGE, the Charter Revision Commission tasked with changing the Charter to make City government work better for New Yorkers, to remove the revocable consent for sidewalk cafes and roadway cafes from the Dining Out NYC program.

When the sidewalk café law was first adopted, it functioned as a straightforward licensing framework administered by the Department of Consumer Affairs. In the years that followed, additional layers were added: first, a zoning overlay, and later, a revocable consent requirement imposed on top of the license.

Decades later, we have made progress in simplifying this system. The zoning overlay has been eliminated as part of the effort to reduce red tape and modernize outdoor dining under the post-COVID outdoor dining system. However, the revocable consent requirement remains in place, and it is now the primary source of delay, cost, and administrative burden.

This additional requirement adds months to what should otherwise be a simple licensing process. If the City of New York is serious about creating a successful outdoor dining program one that is equitable, accessible to small businesses, and cuts red tape for restaurants in neighborhood across the five boroughs, you must eliminate the revocable consent requirement.

Outdoor dining is a social and economic engine. It creates jobs, increases sales for small businesses and generates additional sales tax revenue for the City. It brings foot traffic to commercial corridors, allows New Yorkers and visitors to dine alfresco together, and supports vibrant, safe communities across all five boroughs.

As it stands, the consent process introduces multiple unnecessary steps and significantly prolongs the timeline for restaurants seeking to operate sidewalk or roadway cafés. The City now estimates a minimum of six months for approval, much of that attributable to the consent process. As a result, new restaurant owners, many of whom have opened in February, March, or April, are effectively being told they cannot offer outdoor dining during their first year of operation. That outcome is both impractical and counterproductive. For existing restaurants, being told they must wait more than half a year to setup tables and chairs outside for their customers to dine at, is the exact kind of red table that makes running a small business in New York City so frustrating.

Moreover, revocable consent is not required for other commercial uses of the public right of way, such as fruit and vegetable stands or other food and

merchandise vendors. Historically, even individually owned sidewalk newsstands operated for decades without such a requirement.

Finally, eliminating the revocable consent requirement would not remove oversight or community input. The Council would still retain the ability to require community board review as part of the licensing process. This reform would simply align sidewalk and roadway cafés with numerous other licensed activities by removing an unnecessary and burdensome additional layer.

For these reasons, we urge the City of New York, through COGE, to begin the process of eliminating the revocable consent requirement and to establish a streamlined, efficient, and equitable framework for outdoor dining.

If you have comments or question please contact the New York City Hospitality Alliance's Executive Director Andrew Rigie at [redacted] or [redacted]

Attachment(s)


NYC HOSPITALITY ALLIANCE

Dear Commission on Government Efficiency (COGE):

The New York City Hospitality Alliance, the not-for-profit organization representing thousands of restaurants, bars, and nightclubs across the five boroughs urges COGE, the Charter Revision Commission tasked with changing the Charter to make City government work better for New Yorkers, to remove the revocable consent for sidewalk cafes and roadway cafes from the Dining Out NYC program.

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2026-06-10 COGE Public Hearing - Revo...

Date Submitted: June 9, 2026

Topic: Revocable Consent ✕ Unnecessary Bureaucracy ✕

Method Received: Airtable Form

Created By: 6/9/2026 12:17pm

NYC HOSPITALITY ALLIANCE

June 10, 2026

Dear Commission on Government Efficiency (COGE):

The New York City Hospitality Alliance, the not-for-profit organization representing thousands of restaurants, bars, and nightclubs across the five boroughs urges COGE, the Charter Revision Commission tasked with changing the Charter to make City government work better for New Yorkers, to remove the revocable consent for sidewalk cafes and roadway cafes from the Dining Out NYC program.

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NYC HOSPITALITY ALLIANCE

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For these reasons, we urge the City of New York, through COGE, to begin the process of eliminating the revocable consent requirement and to establish a streamlined, efficient, and equitable framework for outdoor dining.

If you have comments or question please contact the New York City Hospitality Alliance's Executive Director Andrew Rigie at [redacted] or [redacted].

Name

# Bethzy Miranda

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Potholes please get them all fixed by the Cross Bronx expwy (exit 6A) and Bruckner blvd cross section (exit 6A). It's horrendous no one sees the damage there since it's just expwy on top of each other. The Home Depot is around that area.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/9/2026 12:19pm

Name

## Consuela Hooblal

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Thank you for the opportunity to provide feedback on how New York City can better serve its taxpayers, homeowners, renters, and working families. True government efficiency requires listening to the residents who keep this city running. Below are specific areas where city management is failing its taxpayers and actionable recommendations for improvement.

1. Transit Infrastructure: Restore Community Input and Common Sense

Recent overhauls to the traffic grid in Eastern Queens are a prime example of administrative inefficiency masquerading as progress.

The Issue: The Department of Transportation (DOT) altered the traffic grid to speed up bus routes without local consultation. While buses may move faster between fewer stops, reduced frequency of overall buses total commute times have not improved. Furthermore, this bottlenecking has severely worsened vehicle congestion along major arteries like Hillside Avenue.
The Human Impact: The elimination of local bus stops has created immense hardship for seniors and residents with mobility issues. Forcing residents, including seniors, to walk blocks late at night for lack of local stops is a public safety and accessibility failure. Most outer-borough residents rely on a hybrid of cars and mass transit; city planning must reflect this reality.
The Solution: * Mandate robust community input before the DOT alters local grids.
Implement a tiered system: reduce stops only on Express/Rush buses, while maintaining original, accessible stops on local bus lines.
2. Affordability, Taxes, and the Cost of Living

While the city debates rent freezes to protect tenants, it completely ignores the primary driver of the affordability crisis for both renters and homeowners: skyrocketing government taxes and fees.

The Issue: The crushing burden of property taxes, water bills, utility fees, and income taxes is driving middle class families out of the city. It is ridiculous to expect housing costs to stabilize when the city continually increases the operational costs of owning and maintaining property.
The Human Impact: My three adult children cannot afford to buy a home or rent an apartment in the city in which they were raised. As a senior citizen, the sheer volume of city fees and taxes forces me to continue working full time at age 72, with no path to retirement for the next decade if I want to remain in the city I love. Working harder to maintain a home shouldn't mean being penalized with higher tax brackets that wipe out any financial gain.
The Solution: Shift the focus from pricing controls to municipal fiscal restraint. The city must freeze or reduce the taxes and fees levied on basic necessities (housing, water, energy) to provide real relief to working families and seniors.
3. Childcare and Education: Sustainable Alternatives to "Free" Programs

The city's push for entirely "free" childcare programs places an unsustainable burden on the municipal budget (and taxpayers) while failing to address structural issues.

The Issue: Funding entirely subsidized childcare strains city resources and creates inefficient bureaucracies.
The Solution: * Affordable, Not Free: Create government-funded, low-cost, subsidized childcare centers. This ensures excellent care and affordable rates for parents without depleting the city budget. It also allows the city to pay staff a thriving wage, turning these centers into engines for job creation and new taxpayers.
Restructure the School Calendar: Invest in an earlier start age and longer school days. The primary goal should be robust, early childhood education and better academic outcomes. A natural byproduct of an extended school day is the relief it provides to working parents, achieving two goals efficiently under the existing department of education framework. Again, more jobs, more taxpayers.
4. Overhaul the "Government-Non-Profit Complex"

True efficiency means maximizing the return on every taxpayer dollar. The current reliance on external, non profit organizations to execute core city functions is inefficient and plagued by systemic waste.

The Issue: The city has built a massive, unaccountable network of non profits to handle public services, leading to documented cronyism, administrative bloat, and fraud. Adding more monitors, rules, and administrators only compounds the bureaucratic waste.
The Solution: * Return to Direct Municipal Services: Shift funding away from external non profits and invest directly in civil service city workers who handle necessary, front-line jobs. We need more building inspectors, sanitation workers, park staff, and foster care caseworkers on the city payroll. Those were the kinds of jobs that built the NYC middle class, especially in Queens.
Implement Private Sector Metrics: Give city agencies and workers the operational leeway to do their jobs effectively but hold them strictly accountable to clear success ratios and performance metrics, just like a private business.
In Conclusion

New York City cannot tax its way out of operational inefficiency. To keep dedicated, hard working residents and seniors from being priced out of their homes, the administration must prioritize community driven infrastructure, rein in municipal spending, and return to an accountable, civil-service-driven model of governance.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 9, 2026

| | |
|---|---|
| Topic | Unnecessary Bureaucracy ✕ Budget Issues ✕ Tenant Protection ✕ Department of Buildings (DOB) Issues ✕ Miscellaneous ✕ |
| Method Received | Airtable Form |
| Created By | 6/9/2026 12:37pm |

Name

# Briana

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Civil legal services in NYC save the city millions of dollars every year by providing free or low-cost legal support to New Yorkers who would not otherwise be able to get help, leading to better outcomes for them and their families. These organizations, many of which were formed following Giuliani's termination of Legal Aid's contract in the 90s, do work and offer services that the court system should be doing but isn't, without which low-income litigants would fall through the cracks. Ensuring that organizations that provide indigent legal services (especially in relation to family court, where there is no right to an attorney) are properly funded will make the court system more efficient, ease the strain on court staff and 18B lawyers, and help New Yorkers get justice on critical issues that could have a lasting impact on their lives.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Budget Issues

Method Received Airtable Form

Created By 6/9/2026 12:37pm

Name

# Jood Daoud

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

MAMDANI, PLEASE READ THIS BECAUSE THE LAST THING I NEED IS SOMEONE IGNORING THE FACT I'M DOUBLE SURE THAT EVERYONE WANTS FREE VISAS AND AN ACTUALLY GREAT PIZZA PARTY ON THE NIGHT OF THE WORLD CUP. SPEAKING OF WHICH, WHAT IS A WORLD CUP IS THE WORLD CAN'T EVEN FUCKING REACH THE US ANYWAY? I NEED SOMEONE TO MARCH OVER TO THE WHITE HOUSE AND GIVE TRUMP A MASSIVE SLAP TO HIS FACE! WHY CAN'T ANYONE VISIT THE STATES ANYMORE? I LIVE ABROAD (NOT SAYING WHERE, CUZ PRIVACY), AND I WANNA VISIT NYC SO FUCKING BAD BUT GETTING VISAS IS HAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAARRRRRRRRRRDDDDDD. ALSO, I HATE POLITICS! WHY DO THEY HAVE TO AFFECT CIVILIANS ON A DAILY BASIS! AND IN ADDITION, THE ICE HAS TO MELT AT SOME POINT! FREE THOSE IMMIGRANT KIDS ALREADY! I DON'T NEED ANOTHER NIGHTMARE OF A CHILD REPEATEDLY CUTTING HIMSELF WITH A PLASTIC KNIFE! CAN WE PLEAAAAASSSEEEEEEEE PAY ATTENTION TO HOW KIDS AND TEENS ARE BEING TRAUMATIZED DAY AND NIGHT? I WANT PEACE. ABSOLUTE. FUCKING. PEACE. IN NEW YORK! AND THE STATES! AND THE WORLD! EVEN IF IT WERE FOR A FEW HOURS! IT'S TIME TO MAKE A CHANGE! AND I WANT A CHANCE FOR THE WORLD TO REMEMBER PEACE AT SOME POINT!

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Miscellaneous

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/9/2026 1:15pm |

Name

# Michael Teferi

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Poet, Writer, Positive Psychology Coach, Debut Poetry Book Author, and Podcast Host |
| Zip Code | [redacted] |
| Public Comment | Hi Mayor Mamdani! I was wondering whether I can ask you this question. Can you please ensure that you have quality lawyers undergo corporate price gouging legislation so that you can benefit the everyday people here please? I feel that the economy turmoil is serious in New York and across our country, and you can even offer the same for Congress as well since you recently visited with Congress. Congressional leaders must have bills that offer opportunities to lower the cost of living, plus lower tuition and room & board of our colleges and universities, as well. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 1:20pm |

Name

# Eddie Grupper

Email [redacted]

Professional Affiliation FDC

Zip Code [redacted]

Public Comment

Allowing and supporting natural plant growth at no/low foot traffic areas can save the city $$$ it would have spent on mowing, while mitigating flooding, infrastructure damage, and countless climate issues like heat island effect, and fostering unique beautification through re wilding, all free of cost. Tilling, seeding and tending is not technically necessary. Let nature save us $ and fix many issues for free.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Budget Issues

Method Received Airtable Form

Created By 6/9/2026 2:06pm

Name

# Elizabeth martinez

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I think it's absolutely important and valuable that the people of New York City know exactly where their tax dollars are going and how that money is being spent. Transparency and accountability are essential, especially when it comes to public funds. I fully support making that information available to the public so residents can stay informed and engaged in the decisions that affect their communities.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Reporting Requirements × Budget Issues ×

Method Received Airtable Form

Created By 6/9/2026 2:09pm

Name

# claudette hamilton

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I live in southeast queens in Cambria heights and my pet peeves:
Laurelton parkway bet 121 ave 130 ave always filthy and it is the govt responsibility to keep it clean sanitation cleans only when very filthy
Cross island pkwy south from 115 ave to entrance to belt pkwy west needs frequent cleaning - DOT says not them and Sanitstion says not them.
LIRR improve communication when on trains when patrons must transfer at Jamaica
NYCERS Definitely needs improved communication strategy for retirees and response to final pensions is horrible
MTA service for seniors for the OMNY transition need to be made public other than on a bus or train... paper mailouts maybe?
Sanitation bulk pickup or bulk drop off not well know
Median cleanings all across the city on a frequent basis - DOT or Sanitation? It was a project about 2 yrs ago after QBP Dunovan Richards and members railed and it was done along 121 Avenue in Cambria Heights. Growing again..

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy × Enforcement ×

Method Received Airtable Form

Created By 6/9/2026 2:10pm

Name

# Adam Fischer

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I would like the Mayors office to work with relative authorities to determine feasability of installing cameras on highways to enforce “NO TRUCKS OR BUSES IN LEFT LANE” as this rule is often ignored creating dangerous situations as well as traffic jams. Turning an already existing rule into something that is enforced in a similar fashion to traffic cams will drive (that pun is for Mayor Mamdani to run with)revenue to agencies as well cause meaningful reductions in the backlog if illegal traveling throughout the boroughs.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Enforcement

Method Received Airtable Form

Created By 6/9/2026 2:11pm

Name

# Noah

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | No sports fan should feel unsafe to come to your city to support their sports team. A disgrace what you let the people of that city do because they lost an NBA game |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 2:37pm |

Name

# Othman Gbadamassi

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | OCC Research & Metagov |
| Zip Code | |
| Public Comment | I'm Othman Gbadamassi, founder of OCC Research and a member of Metagov, a coalition partner behind the Hey Mamdani civic-technology proposal. I build the Governance Memory System, which gives an institution a durable, source attributed memory of its own decisions: what was said, why a proposal took shape, and whether it later worked. I've already built a working version for this commission from its own public record, at occresearch.org/coge. It holds the June 4 meeting in full: every resolution with its vote and transcript, each commissioner's stated priorities, and the themes more than one commissioner raised, updating after each hearing. For a commission reviewing a 340-page charter across ten hearings while serving without pay, it keeps the reasoning behind every recommendation traceable through November. I'm glad to make it available to the commission at no cost. A fuller comment is attached. |
| Attachment(s) |  OCC Research Custom Governance Me... |
| Date Submitted | June 9, 2026 |

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|---|---|
| Topic | Reporting Requirements |
| Method Received | Airtable Form |
| Created By | 6/9/2026 2:38pm |

**Public Comment to the New York City Commission on Government Efficiency**

***Category**: Modernizing Government and Streamlining Government Technology*

I am Othman Gbadamassi, founder of OCC Research and a member of Metagov, one of the coalition partners behind the Hey Mamdani civic-technology proposal to this administration (heymamdani.nyc). Before founding OCC Research, I spent four years as the de facto institutional memory across more than fifteen governance communities, watching the same failures repeat for the same reasons. OCC Research now builds and deploys the Governance Memory System (GMS) in public-sector settings full-time. I am submitting this comment because the problem GMS addresses bears directly on what this commission is doing, and because I have already built a working memory of this commission from its own public record, which you can see at occresearch.org/coge.

**The problem.** Over the coming months, the commission will review a 340-page charter, hold ten hearings across the five boroughs, and take in testimony from hundreds of New Yorkers, all while its members serve without pay. Gathering that input is not the hard part. Keeping track of it is: remembering what was raised where, why a proposal took the shape it did, and being able to show, when a recommendation reaches the November ballot, exactly what evidence and testimony produced it. Most public bodies lose that thread. The reasoning behind a decision evaporates, contributors rotate out, and a year later, no one can reconstruct why a choice was made or whether it worked. A commission devoted to efficiency has a particular stake in ensuring its deliberative record does not evaporate.

**What a memory of its own process would give the commission.**

- Pull up everything said on any charter topic across all ten hearings in seconds, with the source attached, so a commissioner who missed a session gets oriented in minutes rather than hours.
- See what New Yorkers keep raising across the boroughs, so recurring concerns surface on their own instead of getting buried in the volume.
- Trace any proposed amendment back to the testimony, research, and deliberation that shaped it, which makes the commission's proposals easier to defend in public and harder to second-guess later.
- Check whether a proposed reform actually has the budget and operational capacity behind it before it reaches the ballot, which is the core efficiency question: does the mandate match the money?
- Track whether those reforms deliver on their promises after adoption, so the commission's work keeps paying off beyond November.

**What this looks like in practice.** A lightweight working version already exists at occresearch.org/coge, built entirely from the commission's own public record. It currently holds the June 4 organizational meeting: every resolution the commission adopted, with its vote record and the transcript behind it; each commissioner and the priorities they raised; the Law Department's account of how the charter is structured and the ways it can be amended; and the structural themes that more than one commissioner surfaced independently. It updates after each hearing; every item is labeled either as directly observed in the record or as inferred from a pattern, and it is explicitly not affiliated with or commissioned by the commission. The system is modular, so only the pieces the commission needs get used. Nothing about its existing workflow would change, and it is not an administrative tool: it does not take notes, file documents, or replace anyone. It makes the people already doing the work more effective by surfacing what they need more quickly and reducing the cognitive load this work places on the commissioners.

**Evidence from prior work.** In a deployment for the Jersey City Board of Education, where the board had proposed a 17 percent tax levy increase, GMS analyzed 484 spending commitments over two years totaling $514.9 million and found that only 15, about 3 percent, had a signed contract attached, covering under 8 percent ($39.2M) of the approved dollars. Two independent audits corroborated the same documentation failures. The work pushed the board toward greater transparency and refocused attention on the structural constraints of the state funding formula. The public dashboard is at occresearch.org/gms-jcboe-dashboard.html. In a separate deployment for a national parliament, working only from public records, GMS flagged bills that had passed without recorded debate, identified committees where legislation had stalled for more than a year, and found four laws that created new spending obligations in shrinking budget areas. Every finding is traced back to its source, and the system marks plainly what it observed directly versus what it inferred.

**An offer.** I am glad to make a working version of this available to the commission at no cost, on a timeline that fits its schedule. If it proves useful, good. If not, there is no obligation. A real public-sector deployment advances the underlying research as much as it serves the city.

Thank you for taking on this work.

Name

# Rachael Fauss

Email [redacted]

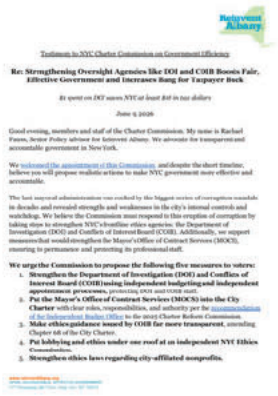
Professional Affiliation

Zip Code [redacted]

Public Comment

See attached testimony

Attachment(s)



Testimony to NYC Charter Commission on Government Efficiency

**Re: Strengthening Oversight Agencies like DOI and COIB Boosts Fair, Effective Government and Increases Bang for Taxpayer Buck**

*\$1 spent on DOI saves NYC at least \$16 in tax dollars*

June 9, 2026

Good evening, members and staff of the Charter Commission. My name is Rachael Fauss, Senior Policy advisor for Reinvent Albany. We advocate for transparent and accountable government in New York.

We welcomed the appointment of this Commission, and despite the short timeline, believe you will propose realistic actions to make NYC government more effective and accountable.

The last mayoral administration was rocked by the biggest series of corruption scandals in decades and revealed strengths and weaknesses in the city's internal controls and watchdogs. We believe the Commission must respond to this eruption of corruption by taking steps to strengthen NYC's frontline ethics agencies: the Department of Investigation (DOI) and Conflicts of Interest Board (COIB). Additionally, we support measures that would strengthen the Mayor's Office of Contract Services (MOCS), ensuring its permanence and protecting its professional staff.

**We urge the Commission to propose the following five measures to voters:**

1. **Strengthen the Department of Investigation (DOI) and Conflicts of Interest Board (COIB) using independent budgeting and independent appointment processes,** protecting DOI and COIB staff.
2. **Put the Mayor's Office of Contract Services (MOCS) into the City Charter** with clear roles, responsibilities, and authority per the recommendations of the Independent Budget Office to the 2023 Charter Reform Commission.
3. **Make ethics guidance issued by COIB far more transparent**, amending Chapter 68 of the City Charter.
4. **Put lobbying and ethics under one roof at an independent NYC Ethics Commission.**
5. **Strengthen ethics laws regarding city-affiliated nonprofits.**

Reinvent Albany Testimony to Charter C...

Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/9/2026 3:03pm

Testimony to NYC Charter Commission on Government Efficiency

# Re: Strengthening Oversight Agencies like DOI and COIB Boosts Fair, Effective Government and Increases Bang for Taxpayer Buck

*$1 spent on DOI saves NYC at least $18 in tax dollars*

June 9, 2026

Good evening, members and staff of the Charter Commission. My name is Rachael Fauss, Senior Policy Advisor for Reinvent Albany. We advocate for transparent and accountable government in New York.

We welcomed the appointment of this Commission, and despite the short timeline, believe you will propose realistic actions to make NYC government more effective and accountable.

The last mayoral administration was rocked by the biggest series of corruption scandals in decades and revealed strengths and weaknesses in the city's internal controls and watchdogs. We believe the Commission must respond to this eruption of corruption by taking steps to strengthen NYC's frontline ethics agencies: the Department of Investigation (DOI) and Conflicts of Interest Board (COIB). Additionally, we support measures that would strengthen the Mayor's Office of Contract Services (MOCS), ensuring its permanence and protecting its professional staff.

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3. **Make ethics guidance issued by COIB far more transparent**, amending Chapter 68 of the City Charter.
4. **Put lobbying and ethics under one roof at an independent NYC Ethics Commission.**
5. **Strengthen ethics laws regarding city-affiliated nonprofits.**

***Strengthening Internal Oversight Is an Incredibly Good Investment***

The charge of this Commission is to make City government work better and more efficiently for New Yorkers. Corruption wastes taxpayer dollars, rewards the worst people, and hurts the poor and vulnerable who are most dependent on the government for help. Conversely, it is a good public investment to fund oversight agencies.

If DOI is as effective as similar internal watchdogs like the federal Inspector Generals, one dollar spent on DOI saves NYC at least $18 in tax dollars, and makes it more likely agency decisions are based on public benefit. Likewise, a dollar spent on the NYC Comptroller, which is more akin to the General Accounting Office, results in $123 in savings.

In order for all oversight agencies to be most effective, they need the ability to act without fear or favor; this requires that they are protected against removal without cause, and funded via guaranteed budgets.

Fortunately for this Commission, independent budgeting and protections against removal were recently studied by the City Council's 2025 Charter Revision Commission, which drafted proposals for several oversight bodies, including DOI and COIB.

Detailed recommendations in these areas are provided below.

***Independent Budgeting for DOI, COIB***

First and foremost, the Commission should adopt well-vetted, longstanding proposals to provide independent budgeting for the Department of Investigation and the Conflicts of Interest Board. Both agencies have long sought these proposals – which are strongly supported by watchdog groups – but they have yet to advance to the voters. These proposals are low-hanging fruit that will have wide support from voters.

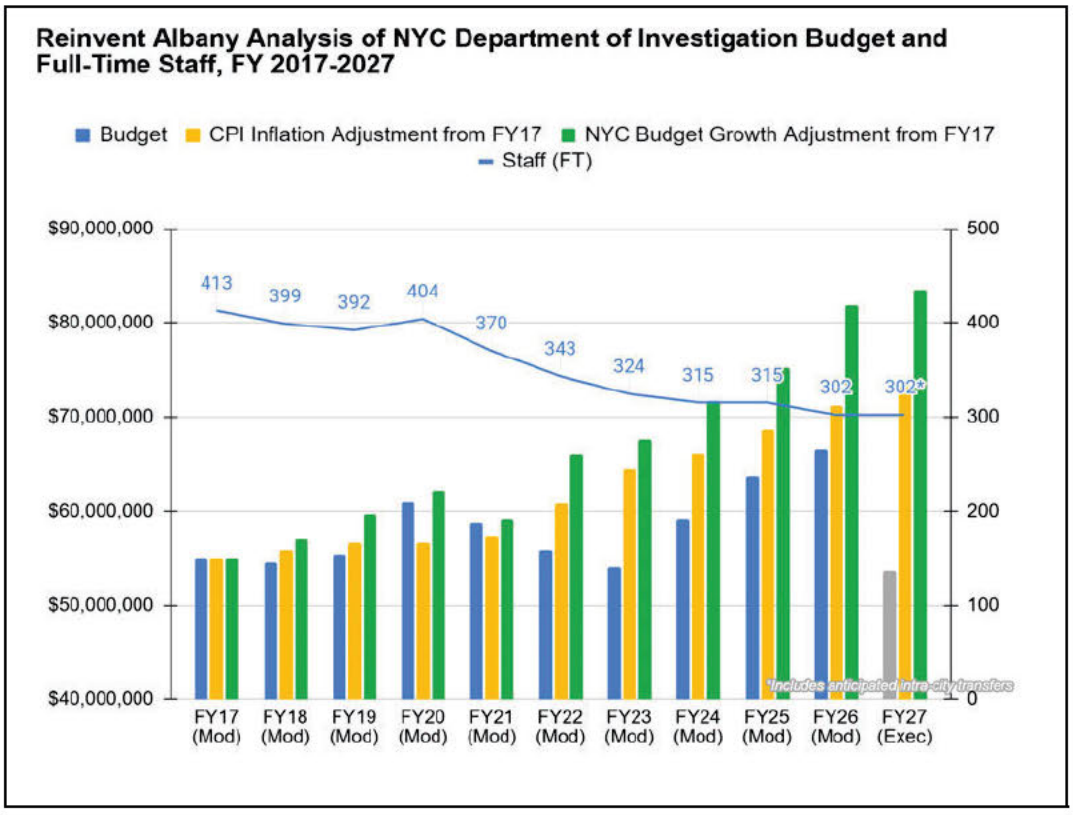
- **Department of Investigation** –DOI has sought to be funded via a formula giving it approximately .07 to .08 percent of the City's budget. The City Council's Charter Revision Commission proposed setting COIB's budget at .06 percent of the City's total expense budget.
- **Conflicts of Interest Board** – COIB has proposed past charter revisions that would peg its budget to .004 percent the total net expense budget of the city – with a higher amount of .007 percent if it is given the authority to conduct investigations. The City Council's Charter Revision Commission proposed setting COIB's budget at .0035 percent of the City's total expense budget.

We encourage this commission to not set its sights too low – the higher the percentage, the more likely it is to hold up over time, in particular as the agencies are given new responsibilities.

### *DOI and COIB's Budgets from FY17 - FY27*

DOI in particular has been decimated by Program to Eliminate the Gap (PEG) initiatives under the Adams administration. Overall, DOI has lost more than a quarter of its baseline and intra-city funded staff – 100+ positions – since FY17. Note that 302 staff are expected for FY27 after intra-city transfers are made, though the Executive Budget funds only 282 positions that are DOI-funded. These positions are reflected in future financial plans after the transfers are made. Additionally, a number of "on-loan" positions are not reflected here that are funded directly by NYCHA, Health + Hospitals, and New York City School Construction Authority and do not show up in the city's financial plans.

The chart below shows how DOI's budget has failed to increase with inflation and overall increases in the NYC budget. DOI's staff dropped 27% from FY17 to FY27, with a total loss of 111 full time employees. During this time, the NYC budget increased by nearly 52%, and the current level proposed for FY27 in the Executive Budget is 2% *less* than it received in FY17. A DOI budget that kept up with inflation would be $73.1 million, not $53.4 million; if it kept pace with NYC budget growth, it would be $83.4 million.

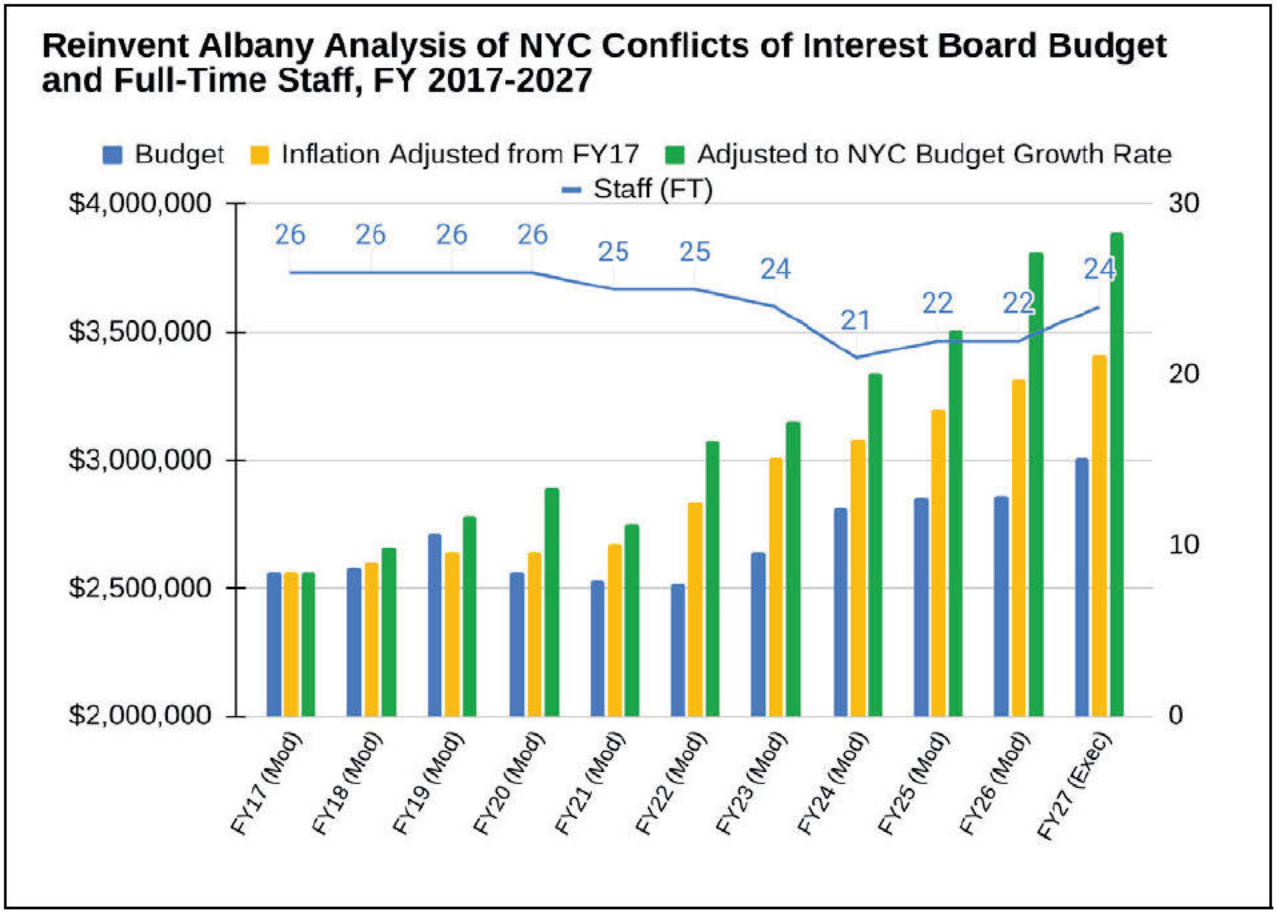



For the Conflicts of Interest Board, their budget has failed to keep pace with inflation and compensate for new responsibilities placed upon the agency – in particular, the

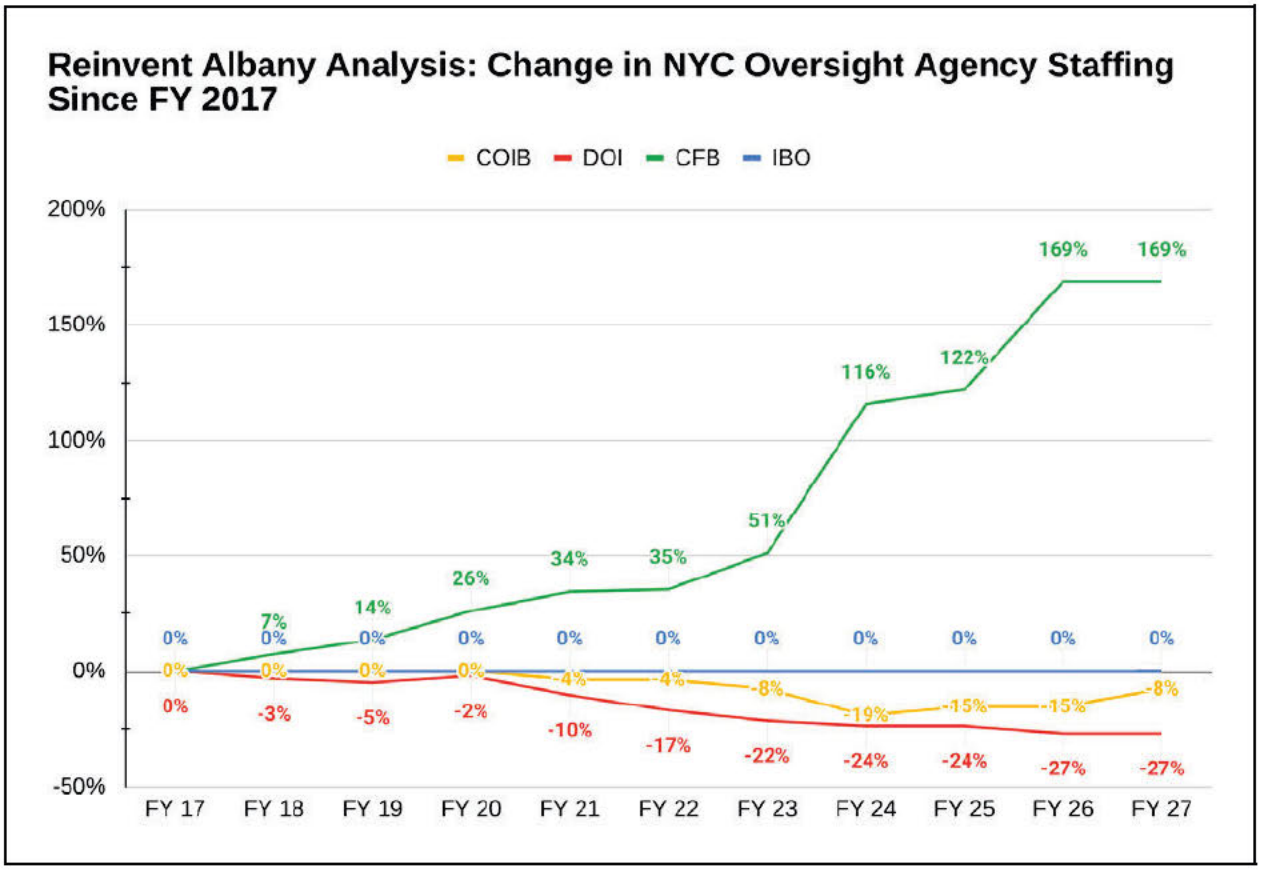
Legal Defense Trust program that was created in 2019. While the Executive Budget provided some additional staffing, bringing the agency to 24 positions, this is still under the 26 they previously had. Additionally, as COIB testified to the City Council at their June 4, 2026 budget hearing, they have unmet IT needs like updating their archaic financial disclosure filings systems.

COIB's staffing has dropped by 8% from FY17 to FY27, with a loss of two employees. However, as COIB stated at the budget hearing, they have not been able to maintain competitive salaries for their employees – even compared to other government positions in NYC. This is likely due to their budget failing to keep up with inflation or the increase in the size of the NYC budget.

The chart below shows the staffing reductions, and the failure of the budget to keep pace with inflation and growth of the city budget since FY17. COIB's budget has only increased 17.5% since FY17, while the NYC budget increased 52%. A COIB budget that kept up with inflation would be $3.4 million, not $3.0 million; if it kept pace with NYC budget growth, it would be $3.9 million.



When compared to oversight agencies that have independent budgets – the Independent Budget Office and the Campaign Finance Board – it is clear that the Department of Investigation and Conflicts of Interest Board have failed to be adequately funded to fulfill their missions.




***Protecting the Independence of the DOI and its Commissioner***

Reinvent Albany also supports proposals advanced by DOI and accepted by the City Council's 2025 Charter Revision Commission to protect the DOI Commissioner from removal. These include the following:

- Removal of the DOI Commissioner only for cause, with a written notice that clearly states the reasons for removal, and an opportunity for a public hearing held by the City Council.
- Giving the DOI Commissioner either a five- or seven-year year term.
- Codifying certain core DOI powers in the Charter, including that agency officers and employees of other city agencies cooperate fully with DOI investigations, and that DOI have access to those agencies' records, data and information.

***Put Lobbying and Ethics Under One Roof – Ideally Under an Independent NYC Ethics Commission***

Another efficiency proposal related to ethics is putting ethics and lobbying under one roof. Currently, the Conflicts of Interest Board administers the following laws: Chapter 68 of the City Charter, the Annual Disclosure Law, Lobbyist Gift Law, Affiliated Not-for-Profits Law, and Legal Defense Trusts Law. The City Clerk's Lobbying Bureau administers the NYC Lobbying Law. We caution that in merging these entities, there should not be staffing cuts, given that they have long been underfunded and understaffed.

Ideally, ethics and lobbying would be governed together by an independently-appointed board. The basic idea is to create an ethics agency with roughly the same responsibilities as the state's Commission on Ethics and Lobbying in Government (COELIG), but with a more independent appointment process. Lobbying and ethics are regulated together by the state commission. There is not only logic to this arrangement given the intersecting moonlighting, post-employment, and gift laws, but it also ensures that regulators have access to information necessary to conduct enforcement actions.

With other watchdog groups and ethics experts, we helped win improvements to New York State's ethics commission, COELIG. We successfully upheld its constitutionality before the NYS Court of Appeals – see our joint amicus brief. COELIG has a number of features that could be replicated and strengthened at the NYC level:

1. **Independent, balanced appointments –** COELIG has three main ways in which its appointment process increases independence:
    a. **Screening panel for nominations** – The state's law school deans approve nominations sent by the appointing authorities to ensure that candidates are qualified and will serve with independence and integrity.
    b. **Balanced appointments** – The Governor does not have a majority of appointments, but rather appoints 3 of the 11 members; the remainder are appointed by the legislative leaders, Comptroller, and Attorney General. The current Conflicts of Interest Board has a majority of mayoral appointments, with the mayor appointing 3 board members, with one each from the Comptroller and Public Advocate.
    c. **Selection of chair by commission, not appointing authority –** The chair is selected by the commission itself, and is not appointed separately by the Governor. This is a crucial mechanism to ensure that the body operates by consensus, and with independence.

***Make Ethics Guidance Public by Default***

We also strongly support greater transparency of written ethics guidance provided to senior officials. Ideally, all ethics guidance provided to these officials should be public by default. Currently, Chapter 68 of the NYC Charter provides that these opinions may be published, but the name of the official is redacted.

Too often, senior officials say that they received a written opinion from COIB, yet the press and public are unable to verify exactly what the guidance said, and whether the official is abiding by any limits or ground rules set by COIB.

We strongly support making all guidance to public officials public by default, and published on COIB's website. However, other ethics agencies have provided a middle ground that provides transparency under certain circumstances:

1. **Waive confidentiality when an official provides misleading, inaccurate, or incomplete public disclosure regarding contents of guidance** – COELIG recently adopted an advisory opinion that allows the commission to waive confidentiality and release information related to the guidance they provided.
2. **Require disclosure of written opinions when they are publicly cited by officials** – The Charter could be amended to require that written COIB guidance be publicly disclosed when the recipient publicly acknowledges its existence.

***Strengthen Ethics Laws for Donations to City-Affiliated Nonprofits, and Codify Oversight of Nonprofits in the Charter***

The City has seen the growth of a shadow government in the form of city-affiliated nonprofits. While Chapter 9 of Title 3 of the New York City Administrative Code provides some rules regarding limits and disclosure of donations made to these entities, they are otherwise not subject to the more robust oversight requirements of city agencies.

As we recommended to the 2018 City Charter Revision Commission, we urge this Commission to look at the following changes:

1. **City-affiliated nonprofits should be codified in the charter.** A new section of the city charter on city-affiliated profits should:
    - Provide a listing of all city-affiliated nonprofits and their associated city agency.
    - Create procedures for creating, dissolving and providing Council oversight of city-affiliated nonprofits. We believe the Council should have to approve the creation of a city-affiliated nonprofit following a public hearing and a statement by the agency as to why the nonprofit is needed. This is similar to how public authority subsidiaries are regulated at the state level.

- Explicitly require city-affiliated nonprofits to follow the Freedom of Information Law (FOIL), Open Meetings Law, and NYC Open Data Law.
- Mandate city-affiliated nonprofits follow procurement procedures of city agencies with rare exceptions.
- Report revenues and expenditures to the public, City Council and City Comptroller.
- Lay out ethics requirements for board members, staff, and fundraising.

2. **Limit *all* contributions from those doing business with the city to nonprofits affiliated with elected officials.** Under Local Law 181 of 2016, donations are limited to $400 to these entities, but *only* if the nonprofits spends 10 percent or more of their annual budget on public-facing communications featuring the elected official, limiting its application typically to the Mayor's Fund to Advance NYC. COIB has issued rules in this regard under Title 53 Chapter 3-03. Specifically:
    a. **Donations to these nonprofits should always be limited from those doing business with the city** – whether or not the communications of the affiliated nonprofit feature the elected official.
    b. **Donations should be limited until 180 days after a donor has ceased doing business with the city** and is removed from the doing business database.

3. **Restrict *all* donations to city government from those who do business with it.** Local Law 181 of 2016 only limits contributions to nonprofits affiliated with elected officials. It doesn't restrict donors doing business with the city from making contributions *directly* to government agencies. A donor can give unlimited sums to an agency even while bidding on a contract or seeking a favorable determination on a matter before the agency, provided agency officials didn't directly solicit it and there is a disclaimer that it won't affect their business before the city.

4. **Require "volunteers" doing major policy work or senior level appointments for the city to follow city ethics laws regarding fundraising.** The City has, in some instances, utilized people who are not on the city payroll to do policy work or assist in choosing senior officials while they are also fundraising for nonprofits affiliated with elected officials. We do not oppose *per diem* or unpaid volunteers serving on city boards, task forces and commissions, much like the members of this commission. But they should not also be fundraising simultaneously for nonprofits affiliated with elected officials. If they do, they should follow city ethics laws in some form.

Name

# Danny Tejada

Email [redacted]

Professional Affiliation We Go To College

Zip Code [redacted]

Public Comment

I'm sending my essay on why NYC Public Schools should cancel the contract with College Board for SAT School Day for your consideration: https://www.wegotocollege.com/post/nyc_s_doe_should_cancel_the_sat_school_day_contract_with_college_board

As a taxpayer in NYC, I want my tax dollars to support efforts that have a greater impact on college enrollment. For the cost of SAT School Day, every high school in NYC could fund about five local college trips. As a college counselor for 13 years, I know the impact a college trip can have on students. Oftentimes, public school students don't have the means or time to visit a college. For many of them, college can seem like another world. It did for me as a first generation student. When I hosted college trips, I've seen students who had no interest in attending college change their minds after seeing themselves there. A 2021 study shows how college trips shift the conversation for students: https://files.eric.ed.gov/fulltext/EJ1323822.pdf

Despite a huge push towards non-college pathways, having a college degree is still a more sure way to climb the economic ladder, live longer, and be an active citizen, as seen in a recent report from College Board: https://research.collegeboard.org/media/pdf/education-pays-2026-full-report.pdf

The U.S. Bureau of Labor Statistics' Occupational Outlook Handbook shows the benefits of a college education and the realities of non-college pathways. The non-college pathways are important to our society, but we should present students with every postsecondary option and explain how it could impact their future financially, health wise, and socially. It's time for us to leave "Testing for All" behind and start hosting "College Trips for All."

Attachment(s)

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Date Submitted: June 9, 2026

Topic: Procurement Reform

Method Received: Airtable Form

Created By: 6/9/2026 3:18pm

Name

# Izik Bakhshiyev

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I want to urge the commission to make public dashboards a core part of any government efficiency reform.

New York City already publishes a lot of data, but residents still often cannot answer basic questions: What was the original promise? What is the current status? Why is it delayed? How much has the cost changed? Which agency owns the problem? What is being done to fix it?

The city should not only report data after the fact. It should be required to publish clear public baselines for major projects and critical services.

For capital projects, that should mean original budget, current budget, original completion date, current completion date, project phase, lead agency, delay reason, change orders, and next milestone.

For services, that should mean wait times, backlogs, missed deadlines, complaint volume, vendor performance, and corrective actions.

A dashboard should not be a press release. It should be an accountability tool. If government is serious about efficiency, New Yorkers should be able to see where government is working, where it is failing, and who is responsible.

Please consider a Charter amendment requiring standardized public performance dashboards for major capital projects and critical city services.

Attachment(s)

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Date Submitted June 9, 2026

| | |
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| Topic | Reporting Requirements ✕ Unnecessary Bureaucracy ✕ |
| Method Received | Airtable Form |
| Created By | 6/9/2026 3:51pm |

Name

# Dennis

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

One way to make government more efficient is to focus on things that actually matter to the public. More focus on sanitation efforts, more safety and more incentives for business (Steinway Street has blocks where 50% of the stores are closed down.) At the height of this all though, the focus should be on education. Having schools struggle to retain teachers and (ESPECIALLY) paraprofessionals is NOT efficient. If paras aren't there to help kids with special needs, it causes a domino effect problem.

Put focus on what actually matters and not nonsensical things like "more bike lanes".

Attachment(s)

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Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy

Method Received Airtable Form

Created By 6/9/2026 3:53pm

Name

# Katrina Bryan

Email [redacted]

Professional Affiliation None

Zip Code [redacted]

Public Comment

Can we please jus have a monthly unlimited OMNY? Even if it's "more" it saved me from even thinking about paying. I was happy to pay my fare. Tons of businesses got random stop ins because I didn't think twice about hopping off and on the bus.

Now I'm constantly micromanaging this tap card wondering if it just double charged me yet again (have to wait 20 mins to transfer too).

And no, I don't want to give the private equity firm that operates Cubic all my PII for the "convenience" of babysitting this damn card.

On top of all this we already have busted OMNY vending machines and no word on when we can see our fare balance while tapping AS WE COULD WITH METROCARD.

Thank you.

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Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

| | | |
|---|---|---|
| Created By | 6/9/2026 | 3:58pm |

Name

# Noelani fishman

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Protect trans healthcare! As a constituent, this should be your priority when it's nationally under attack. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 4:12pm |

Name

# Claire

Email [redacted]

Professional Affiliation Teacher

Zip Code [redacted]

Public Comment

We need less DOE bureaucracy, and more money for faculty, staff, and students. There is too much bureaucracy and too much of the burden still falls on teachers (and other school staff) to justify their choices and their professional judgement. I want good trainings from leaders in the field, not meaningless PDs on basics of teaching from admin who haven't been in the classroom recently.

Attachment(s) Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy × Budget Issues ×

Method Received Airtable Form

Created By 6/9/2026 4:25pm

Name

# Matthew Clarke

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Design Trust for Public Space, Executive Director |
| Zip Code | [redacted] |

Public Comment

The Design Trust for Public Space applauds Mayor Mamdani's efforts to make city government work better for New Yorkers. The Commission on Government Efficiency is an important step to modernizing operations and leaving outdated bureaucracy in the past. Permitting and paperwork shouldn't be a barrier to our residents' ability to access crucial public services.

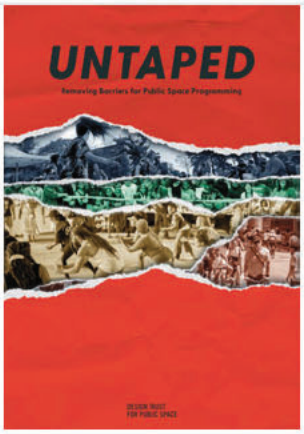
As a nonprofit that works to unlock the potential of New York City's public spaces – from parks and plazas to streets and public buildings – through community informed design, we are all too familiar with the red tape and unwieldy maze of permitting and insurance requirements to program and bring communal spaces to life. In some severe cases, several city agencies are required to sign off on the permitting for one outdoor event, each with their own complicated processes.

We spent a year working with 55+ stakeholders, spanning city agencies, community organizations, and private sector partners across all five boroughs to better understand these barriers and to underscore the cultural and economic value of the nearly 30,000 annual events these programmers produce, animating city life. The research is clear: public space programming strengthens social cohesion, catalyzes local business growth, improves public health and safety, and expands access to arts and culture. Yet, fragmented permitting rules, outdated digital tools, disproportionate insurance costs, and siloed processes burden organizers and agency staff alike, discouraging participation and leaving too much opportunity on the table.

Based on this research, our latest report, Untaped: Removing Barriers for Public Space Programming, proposes eight recommendations to streamline and simplify public realm management, including reorganizing what was once the Office of the Public Realm, specific guidelines and technology updates to reform the permitting process into one central resource, and new reasonable regulatory standards.

Untaped offers a roadmap for a city where public space is truly public, open, and accessible by the full diversity of NYC. We urge the commission to review our recommendations, attached and available at www.untaped.nyc, and integrate the Untaped policy platform into their proposals. New Yorkers deserve clarity and agency in deciding how they can use their public spaces.

Attachment(s)




Untaped_Final_v1.1.pdf

Date Submitted: June 9, 2026

Topic: Unnecessary Bureaucracy, Department of Buildings (DOB) Issues, Miscellaneous

Method Received: Airtable Form

Created By: 6/9/2026 4:38pm

# UNTAPED

## Removing Barriers for Public Space Programming



DESIGN TRUST
FOR PUBLIC SPACE

# Untaped

**Removing Barriers for Public Space Programming**

**Authored by:**
Nur Asri, Design Trust Fellow
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Jack Shugrue, Design Trust Fellow
Akemi Sato, Design Trust for Public Space
Matthew Clarke, Design Trust for Public Space

DESIGN TRUST
FOR PUBLIC SPACE

**Acknowledgements**
Untaped is made possible by generous support from:

**The New York Community Trust**
**The NYC Green Fund**

The Design Trust for Public Space would like to thank the following agencies, partners, and stakeholders for their time, strategic support, and valuable insights:

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Layla Dozier, Communications and Events Coordinator

**Design Trust Fellows**
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Matthew Franchi, Cornell PiTech Impact Fellow

**Partner Organizations**
City Parks Foundation
Trust for Public Land
Alice Austen House
Queensboro Dance Festival
Uptown Grand Central
Brownsville Community Justice Center
The POINT CDC

**With Appreciation**
Downtown Brooklyn Partnership
Mayor's Office of Public Realm
NYC Department of Transportation
NYC Department of Parks and Recreation
NYC Street Activity Permit Office
Public Housing Community Fund
Street Vendor Project
Union Square Partnership
Urban Design Forum

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Version 1.1 - Last update: March 2026

DESIGN TRUST
FOR PUBLIC SPACE



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# Executive Summary

New Yorkers deserve world-class public spaces in neighborhoods across the five boroughs. Over the past 30 years, the City of New York, community organizations, and dedicated residents have made enormous strides in improving the quality and extent of this public realm, which can include parks, plazas, waterfronts, sidewalks, streets, libraries, and more. Today, there are 30,000+ acres of parkland, 70+ public plazas, 595 privately-owned public spaces, and 200 open streets, enjoyed by over 8.4 million New Yorkers across the city. Public space should function as a shared resource supported by clear standards, modern digital tools, and a permitting ecosystem that is predictable, accessible, and equitable.

The research conducted through the Untaped initiative reveals a public realm ecosystem in New York City that is rich with community creativity and civic commitment, yet constrained by structural barriers that limit access, consistency, and equity. The project surfaced clear patterns that highlight where the system succeeds, where it falls short, and where meaningful reform is both possible and urgently needed.

## Our Vision for Public Space Equity

A **We have to systemically shift how we value and manage our public realm**. Despite the breadth of public spaces available across the city, our communities often find themselves unable to program these spaces due to layers of requirements, permits, and fees.

B **We can simplify and streamline permitting processes to encourage public space activation.** Applicants need to be armed with the right information and technical resources along the permitting journey to successfully complete applications quickly and accurately.

C **We need to earn the trust and build the capacity of our public realm stewards.** Communities, small organizations, and volunteers would benefit from resources and know-how to help make the procedures of activating the public realm more accessible.





## How Can We Achieve this Vision?

### We have to systemically shift how we value and manage our public realm.

**1. Centralizing Public Programming in the Office of the Mayor**
The City of New York should create a centralized office for public space programming by integrating the role of the Office of the Public Realm with the current functions of the Mayor's Office of Citywide Event Coordination and Management (CECM) and the Street Activity Permit Office (SAPO), creating a strengthened center for public realm oversight, coordination, and strategy.

**2. Tiered and Performance-Based Qualification Rubric**
The City of New York should simplify the permitting structure for public realm permit approvals by creating a tiered event qualification standard. In addition, the City should reform its permitting fees, insurance requirements, and other parameters to align with these tiers, ensuring that smaller activations don't face unnecessary red tape and that larger activations can generate appropriate revenue for the city.

**3. A Public Realm Evaluation Platform**
An NYC Public Space Programming Impact Tool, which could be developed as an open-source web-based platform to catalog the impact of the smallest and largest programs across the city, should be developed by a coalition of public, private, and civic partners.

### We can simplify and streamline permitting processes to encourage public space activation.

**4. Targeted UX/UI Refinements**
The City of New York should undertake targeted, independent user experience and user interface (UX/UI) refinements to its existing E-Apply permitting software and associated informational websites, specifically those managed by SAPO (Street Activity Permit Office) and NYC Parks, to significantly improve accessibility, clarity, and public trust in the permitting process.

**5. One-Stop Shop**
The City of New York should launch a single, mobile-friendly, centralized website that consolidates every step and resource required to plan and permit public-space activations. Designed as a clear, contemporary, and multilingual experience, this "one-stop shop" would let applicants understand what permits they need, when to apply, what it costs, and how to comply, without having to navigate multiple agency sites or rely on too much staff intervention.

**6. "Space Stager" Public Space Digital Mapping**
New York City should establish a public space mapping tool, an interactive digital platform designed to transform the way public space activations are planned, permitted, and managed. The tool would function as a citywide public programming atlas, merging the real-time collaborative features of platforms like Miro or Canvas with the mapping power of OpenStreetMap and ZoLa NYC.

**We need to earn the trust and build the capacity of our public realm stewards.**

**7. Seasonal Activation Partner Permit**
The City of New York should establish a Seasonal Activation Partner Permit (SAPP), a streamlined, medium-term permitting mechanism that allows qualified community partners, cultural organizations, local nonprofits, and small business alliances to repeatedly activate public spaces over the course of a defined season and within defined parameters, without having to reapply for individual permits for each event.

**8. NYC Public Space Stewardship Fund**
The City of New York should work with the philanthropic and civic communities to establish an NYC Public Space Stewardship Fund, a private 501(c)3 that can raise money from multiple sources, including public grants, municipal allocations, philanthropic contributions, corporate donations and partnerships, and grassroots fundraising to support under-resourced community groups, cultural organizations, and small-scale public space stewards.





## What Do We Risk?

Public space management and activations drive powerful social, economic, health, and community-building benefits. Their wide-ranging community, placemaking, economic, and fiscal impacts are felt across neighborhoods and local economies.

- Public space programming serves as one of the most important tools to build community and improve social cohesion.
- Public space programming can create positive shifts in perceptions of neighborhoods and can catalyze economic growth.
- Programming supercharges the ability for public spaces to improve public health and public safety.
- Arts and cultural programming is a fundamental right and a tool for healthier communities.




**Fig 1.** (Below) Turnout NYC event at Brownsville Community Justice Center with Brooklyn Fam; Credit: Design Trust for Public Space

# Introduction

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Across New York City, public spaces are increasingly recognized as essential civic infrastructure, places where communities gather, celebrate, heal, organize, exchange culture, and build local economies. Over the past thirty years, the City of New York, community organizations, and dedicated residents have made enormous strides in improving the quality and extent of this public realm, which can include parks, plazas, waterfronts, sidewalks, streets, libraries, and more. This transformation has also expanded the amount of outdoor public programming, whether that's a block party for a few dozen neighbors or a multi-day festival with tens of thousands of attendees.

Today, with budget forecasts showing potential deficits, and with city government prioritizing costly investments like affordable housing, the public realm agenda is facing an important juncture. How can New York City continue to deliver on a visionary public realm that makes city life worthwhile and enjoyable, with limited resources and time to do so? **The answer is simple: by cutting red tape, eliminating unnecessary barriers, and unlocking the potential of our public realm partnerships.**

**Fig 2.** (Right) Juneteenth performance; Credit: Van Cortlandt Park Alliance



Public events in New York are produced by an impressive combination of private organizations, individuals, and city agencies. NYC Parks alone hosts over 13,000 free events in its spaces, in addition to providing direction, regulation, and support of other activities. NYC DOT's plaza program has invigorated 92 public spaces across the city with activations and programs. This agency leadership is complemented by thousands of private organizations of all types—arts, social service, community, educational—who are responsible for creating these events

or are producing events of their own design. This incredible ecosystem helps move forward the nearly 30,000 events that animate our city on a yearly basis. This demand has created additional pressure on how groups manage these diverse uses and needs, especially smaller public spaces that lack conservancy groups and smaller organizations looking to put on events with fewer than 500 people. Elected officials recognize that the city will increasingly have to depend on private entities to step in and deliver important resources for our neighborhoods.

*Untaped*, a citywide initiative led by the Design Trust for Public Space, set out to understand these barriers and develop actionable strategies to unlock the full potential of New York's public realm. The coalition worked towards the following three goals:

A. Make parks and public space inherently more open and accessible to arts, cultural, culinary, educational, and social organizations, especially in historically marginalized neighborhoods.

B. Model innovative new methods of public-private partnerships in public space programming across the city, especially focused on smaller, civic-minded partnerships.

C. Use the insights derived from this project to create a national model for public programming regulations based on the unique challenges of every locality.

Through a year-long research and engagement process, including workshops, interviews, focus groups, surveys, and cross-sector advisory sessions, the project brought together over 55 stakeholders across all five boroughs. This included nonprofit partners—the City Parks Foundation and Trust for Public Land—that served as key partners, offering citywide and nationwide perspectives. It included key agencies responsible for stewarding, programming, and activating public spaces across the city, especially the NYC Department of Transportation and NYC Department of Parks and Recreation, two agencies that manage a great majority of citywide events.

*Untaped* approached this work from a community-centered and policy-driven perspective, grounded in the belief that public space should be joyful to use and accessible to organizations of all sizes, especially those with limited administrative capacity. Organizers should be able to bring people together without navigating a maze of siloed digital portals, opaque requirements, last-minute surprises, or high financial





barriers. Public space should function as a shared resource supported by clear standards, modern digital tools, and a permitting ecosystem that is predictable, accessible, and equitable.

While City agencies are responsible for managing many of the recommendations and related activities in this report, *Untaped* is directed at a citywide conversation, one that needs top-level leadership. Key agencies responsible for stewarding, programming, and activating public spaces across the city, especially the NYC Department of Transportation and NYC Department of Parks and Recreation, manage a great majority of NYC events and do so with great skill. These agencies are also overstretched in their capacity to manage existing capacity, to reform their systems, or to think collaboratively across other agencies, including the Police and Fire Departments, the Health Department, and other regulatory bodies. Untaped seeks citywide leadership and investment in creating solutions.

*Untaped* uncovered a crucial finding that the barriers facing public space organizers are not simply a result of a single broken step, but of a fragmented system in need of alignment, clarity, modernization, and investment. Community groups want to animate their neighborhoods, agencies want safe and coordinated public spaces, and ultimately, both parties need a permitting system and a public realm governance structure that is designed for today's cultural life and adapted to today's technology.

**Untaped offers a roadmap for a city where public space is public, open, accessible, and animated by the full diversity of its people.**



**Fig 3.** (Right) Summer Streets 2024; Credit: NYC Department of Transportation

"A simple meetup to play the board game Jenga requires 34th Avenue Open Street in Queens to have the same million-dollar insurance coverage as a large one-off dance performance with a stage and speakers.

Organizers sometimes don't even learn whether their events are approved until the day before."

- Jackson Chabot, Elana Ehrenberg, and Rebecca Macklis. 'Free NYC's Block Parties from Suffocatin Red Tape,' City Limits, May 23, 2024,

"Since at least 2016, New York City has maintained a rolling moratorium on new multi-block, multi-day street fair permits. The same festivals, run by the same production companies, return year after year while community groups in the Bronx, Queens, and Brooklyn have no pathway to enter the program."

- "Streets for People," NYC Comptroller, April 25, 2025

# What We Learned

The Untaped initiative employed a four-phase approach supported by cross-sector partnerships, and meaningful engagement with New Yorkers who regularly activate the public realm. Led by the Design Trust for Public Space, the process combined community insight with agency expertise to build a more accessible, collaborative, and equitable framework for public space activation in New York City. The approach balanced the experiences of organizers across all five boroughs, while also drawing on national lessons from cities advancing innovative models for public realm stewardship.

The research conducted through the Untaped initiative reveals a public realm ecosystem in New York City that is rich with community creativity and civic commitment, yet constrained by structural barriers that limit access, consistency, and equity. The project surfaced clear patterns that highlight where the system succeeds, where it falls short, and where meaningful reform is both possible and urgently needed.

Taken together, these findings form the evidentiary backbone for the eight recommendations in this report. The insights reflect the lived experiences of organizers working in plazas, sidewalks, schoolyards, waterfronts, parks, and streets across all five boroughs, particularly in historically underinvested neighborhoods where public space programming carries heightened social and economic significance.

**Fig 4.** (Below) Summer Street 2024; Source: NYC Department of Transportation







**A System Defined by Fragmentation, Redundancy, and Inconsistency**

The research found that New York City's permitting environment is not lacking in effort or intent, but in alignment. Agencies operate in silos, each with their own definitions, timelines, risk thresholds, and and digital systems or a lack thereof. The result is a permitting landscape that feels inconsistent and unpredictable even to experienced event planners and community organizers.

Applicants regularly reported inconsistent requirements (especially around insurance and documentation) depending on the permitting officer, agency, or location; this fuels a perception of inequity and erodes trust. Agencies shared these perspectives and cited the lack of resources, people, and tools that could help them move these applications more efficiently. For emerging groups and smaller organizations, this lack of predictability becomes a structural barrier that discourages participation altogether and, as a result, limits geographic equity of public space programming.

**Access Barriers Rooted in Administrative Burden and Hidden Costs**

While fees are a challenge, research revealed that administrative burden (not cost alone) is often the greatest barrier. Across interviews and workshops, partners emphasized the time-consuming, multi-step, and often confusing nature of the existing permitting process. Many smaller organizations lack dedicated administrative staff and must rely on volunteers to navigate dense applications, insurance procurement, multiple forms, and shifting permitting instructions.

Insurance emerged as a particularly significant barrier. The absence of low-risk event categories forces small organizations into purchasing insurance packages that are disproportionate to the scale of their activities. This results in both financial strain and discouragement from future programming.

**Digital Tools Are Outdated, Non-Intuitive, and Not Mobile-Centered**

The research confirmed widespread issues with digital permitting tools, including missing calendar insights/updates, unclear language or application status, inaccessible forms, and outdated informational websites. For many organizers who rely primarily on mobile devices, the platforms feel nearly unusable.

"We know we're required to obtain sound permits from NYPD, but it always depends on the precinct. Some see that your even is over at 4pm on a Saturday, so they don't worry about it. Other times, they ask you to come on the day of the event, but we don't have time to go to the precinct day of the event because we're also running around managing set-up"

-Karesia Batan, Queensboro Dance Festival

"Casita Maria has worked to activate Raul del Valle Square, a public plaza managed by the NYC Parks Department. When they wants to put on a performance they must get a:

Sound permit - Must contact the local NYPD 42nd Precinct directly. Sound permits are not managed through SAPO or Parks.

Festival permit - Must apply through SAPO via E-Apply. Separate application, separate timeline, separate documentation requirements.

Public art installation - Approval required from the NYC Department of Transportation, even though the space is managed by Parks.

Parks use permit - The underlying right to use the plaza at all requires coordination with NYC Parks.

Four agencies. Four separate processes. Four separate timelines."

- *Neighborhood Commons*, 2022, Design Trust for Public Space

This contributes to a perception that the permitting process is not designed for everyday New Yorkers, but rather for organizations with professional administrative infrastructure. Research affirmed the need for a unified, mobile-first, and user-centered permitting experience.

**Weather-Related Vulnerability Is a Major System Gap**

Across stakeholder outreach, partners described weather unpredictability (particularly rain) as one of the most destabilizing factors for public space activations. While rain-date accommodations pose feasibility hurdles, a single storm can erase months of planning and funding. Additionally, redoing applications and gathering permits when weather hits forces many organizations to redo much of the work, instead of being able to pull forward a saved application.

This gap disproportionately impacts smaller organizations and threatens continued participation in the public realm. Research framed weather flexibility as not simply an operational improvement, but a major equity intervention.

**Community Organizations Demonstrate Deep Capacity, but Need Structural Support**

The research surfaced a powerful strength: the staff of New York City's community organizations are highly capable, innovative, and deeply committed to their neighborhoods. Many have years (sometimes decades) of programming experience. They understand local needs, partner effectively with small businesses and residents, and activate public space in ways that strengthen community life, cultural identity, and social resilience.

Yet their capacity is often diverted toward navigating bureaucracy rather than producing public benefit. Stakeholders consistently expressed a desire for long-term collaborative partnerships with the City, rather than transactional, event-by-event interactions.

**Measuring the Impact of Public Space Programming Is Critical but Resource-Intensive and Costly**

Across stakeholder interviews, community groups described a largely pragmatic, grant-driven approach to measuring the impact of public space programming. Most evaluation efforts are currently shaped by funder requirements and available expertise and resources, leading





organizations to focus on what is feasible rather than comprehensive. Data collection is often motivated by the need to justify funding, strengthen future grant applications, and demonstrate value to partners and agencies.

Many stakeholders emphasized the importance of sharing data with public agencies to address inequities in under-invested neighborhoods, and to leverage evidence to attract greater, more sustained public investment alongside philanthropic support.

**Added Complexity with Vending, Concessions, and Event-Based Revenue Generation**

A recurring barrier across interviews was confusion about vending and concession regulations. Organizers emphasized that while public space events are increasingly expected to be lively, culturally rich, and economically supportive of neighborhoods, the rules governing food sales, merchandise, ticketing, and revenue generation remain some of the most opaque and burdensome elements of the permitting process. While SAPO can issue commercial event permits, the moment an organizer introduces food sales or merchandise to their programming, they enter a separate regulatory framework involving concessions, health permits, and a legal framework with a far higher barrier to entry. This creates inequitable conditions in which only well-resourced event producers can reliably generate revenue through public space activations.

**Fig 5.** (Below) Turnout NYC graphic marker; Source: Design Trust for Public Space; **Fig 6.** (Right below) Friday Night Cabaret; Source: Leonardo Mascaro






"One Open Streets partner reported that the SAPO process led to the loss of more volunteers than any other task associated with the program. Even for applicants comfortable with navigating bureaucracy, SAPO's non-intuitive website design, vague expectations, and burdensome requirements are overwhelming."

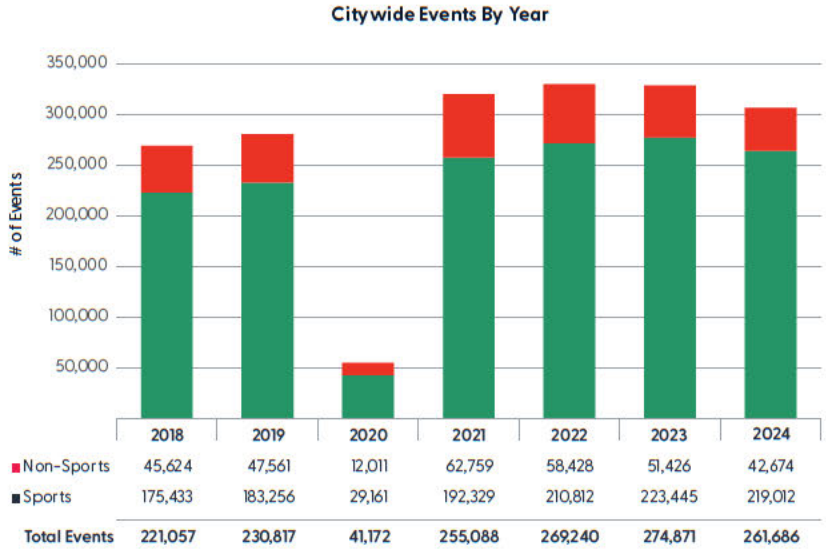
- 'Streets for People,' 2025

"When a Bed-Stuy block association tried to organize their first block party in 2021 after reviving a defunct neighborhood group, they ran into a problem:

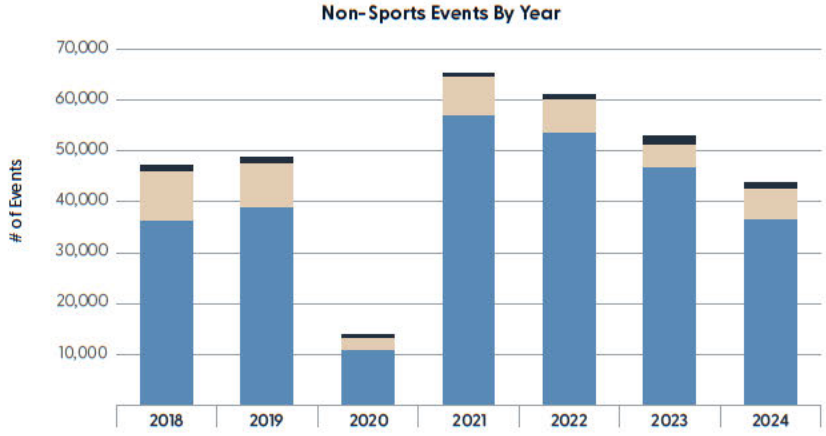
'Our first attempt to apply online was denied because we were applying to have local businesses that are on the corner of our block participate as block association members.'

The city's rules distinguish between a "block party" (residents only, no sales) and a "single block festival" (nonprofits, can fundraise and sell), but the difference between these categories is not surfaced clearly in the application interface."

-Divya Murthy, "Hot to Throw a Block Party in New York City," The City, 2023




| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|---|---|---|---|---|---|---|---|
| Non-Sports | 45,624 | 47,561 | 12,011 | 62,759 | 58,428 | 51,426 | 42,674 |
| Sports | 175,433 | 183,256 | 29,161 | 192,329 | 210,812 | 223,445 | 219,012 |
| Total Events | 221,057 | 230,817 | 41,172 | 255,088 | 269,240 | 274,871 | 261,686 |




| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|---|---|---|---|---|---|---|---|
| Other | 435 | 383 | 119 | 181 | 180 | 888 | 435 |
| Media | 10,221 | 9,592 | 2,826 | 6,803 | 7,908 | 5,287 | 6,704 |
| Special Events | 34,968 | 37,586 | 9,066 | 55,775 | 52,340 | 45,251 | 35,545 |
| Total Non-Sports | 45,624 | 47,561 | 12,011 | 62,759 | 58,428 | 51,426 | 42,674 |





**Fig 7. & 8** (Left) Source: Citwide Events Coordination Management

# Between 1998 and 2024, sports events have represented nearly 80% of all events in NYC.

**New York City Event Data**

This analysis examines 1,553,931 permitted events across New York City's five boroughs from 2018 through 2024, drawn from the NYC Open Data special events permitting dataset. The data captures seven years of urban activity spanning the pre-pandemic era, a near-total shutdown in 2020, a vigorous rebound, and a period of normalization—offering a longitudinal window into New York's public space programming.

Sports-related events dominate, accounting for approximately 79.4% of all permitted activity. A supplemental analysis excluding sports permits reveals how special events, after experiencing a pos-pandemic surge, have declined for four years straight. Media events, which include theater load-ins and film shoots, have remained a steady presence in NYC.

The overall dataset is dominated by recurring events, which represent approximately 85–92% of total permits in most years. This reflects the nature of youth sports programs—weekly league games that are permitted in aggregate. Many public spaces face competition for their use, putting pressure on communities and facilities to keep up with demand.

The non-recurring (one-time) event share is meaningfully higher within the non-sports category, indicating that special events, film shoots, and street activations are predominantly discrete occurrences rather than ongoing programs.

The ratio of recurring to one-time events shifted notably in 2021, when the non-sports one-time event count spiked to 42,738—nearly double the 2019 figure of 22,069. This suggests a wave of deferred or newly planned events entering the market as restrictions lifted, with organizers launching new initiatives alongside the return of pre-pandemic staples.

# Non-sports events, after a COVID dip and subsequent spike, have declined dramatically since 2021.

**Total Permitted Events by Space (2018 - 2024)**
Data from CEMS (OTI)

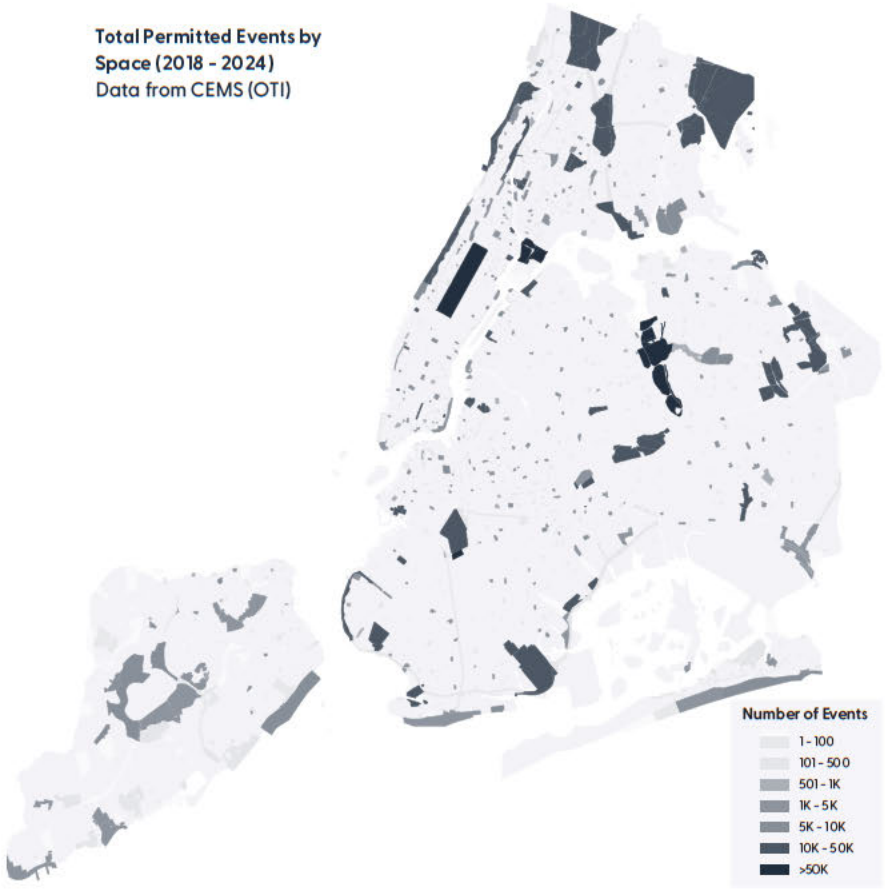
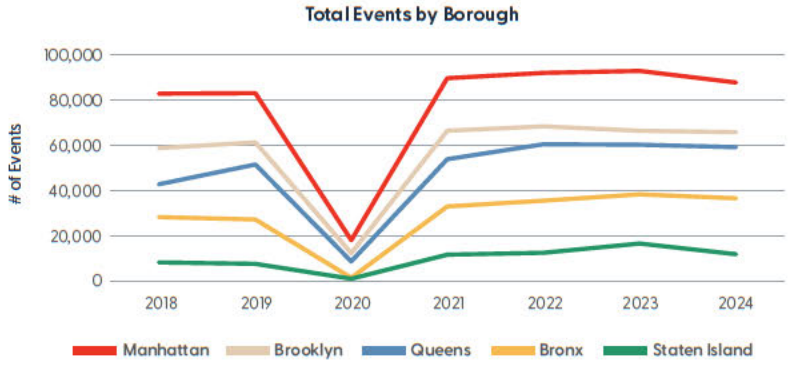



**Fig 9. & 10** (Left & Below)
Source: Citwide Events Coordination Management

# Public events take place across the five boroughs, with a few major parks seeing enormous demand.

**Public Event Distribution**

Manhattan consistently commands the largest share of permitted events, averaging approximately 37% of citywide volume. Brooklyn is a stable second, followed by Queens—which has shown the most pronounced relative growth since 2018, suggesting an expanding event infrastructure in the borough. The Bronx and Staten Island remain smaller in absolute terms but both have recovered from pandemic-level lows.



# Why It Matters

Public space activations drive powerful social, economic, health, and community-building benefits. Their impacts reach across neighborhoods and local economies. When these benefits are clearly understood, advocates can speak more compellingly and creatively about why public space programming matters.

Across New York City's five boroughs, a growing body of research confirms that public space programming delivers wide-ranging benefits for individuals, communities, and the city as a whole. New York City averages between 5,000 and 7,000 non-sports public events every month. Each contributes to the vitality of our neighborhoods and to the city's tax base through direct and indirect spending. Beyond their enormous fiscal impact, these programs also deliver significant health, physical, social, and community benefits.

These impacts need to be weighed against the real costs of improving public space regulations. These include defending the city against lawsuits—both successful claims and unsuccessful cases that still require staff time and legal resources—as well as investments in new systems to manage these processes and the human resources to oversee them. Even so, the research is clear: The economic, social, and health returns of public space programming are substantial and enduring.

**1. Public space programming serves as one of the most important tools to build community and improve social cohesion.**

Public programming creates venues where residents connect, develop a sense of belonging, and strengthen their neighborhoods—often in ways that promote both physical and environmental health (Wilkerson, 2021). Stevenson (2020) finds that community events improve "social capital, interaction, participation, sense of place, and overall well-being." These positive impacts can drive improved community engagement and higher levels of participation in community planning and civic life (Vest, Simmons, and Frumkin, 2024).

## Social Cohesion

In communities that are divided or where some residents experience high levels of disinvestment and barriers to participation in civic life,

Wilkerson, Risa. 2021. "Socially Connected Communities: Solutions for Social Isolation." *Healthy Places by Design.*

Stevenson, Nancy. 2020. "The Contribution of Community Events to Social Sustainability in Local Neighbourhoods." *Journal of Sustainable Tourism 29*, no. 11–12: 1776–91.

Vest, Geneva, Cary Simmons, and Howard Frumkin. 2024. "Revitalize Parks to Strengthen Democracy." *Stanford Social Innovation Review* 22, no. 3: 48–57.





McGillivray, David, Severin Guillard, Graham Ross, and Peter McCaughey. 2021. "Participatory Design Practice, Event(s) and the Activation of Public Space." *Journal of Urbanism: International Research on Placemaking and Urban Sustainability* 18, no. 4: 595–612.

Love, Hanna, & Cailean Kok. (2021). Public Spaces and Social Divides: Examining Equity in Urban Investments. *Brooking Institute.*

Project for Public Spaces. 2009. "How Public Spaces Can Boost Building Performance."

Hardy, Juanita. 2023. "Creative Placemaking: Experts Study Creating a Distinctive Sense of Place." *Urban Land Institute.*

Love, Hanna, and Cailean Kok. 2011. "Beyond Traditional Measures: Examining the Holistic Impacts of Public Space Investments in Three Cities." Brookings Metropolitan Policy Program.

Yolal, M., Gursoy, D., Uysal, M., Kim, H. L., & Karacaoğlu, S. (2016). Impacts of festivals and events on residents' well-being. *Annals of Tourism Research*, 61, 1-18.

## Catalyst

Bureau of Policy and Organizing. 2025. "Streets for People: Open Streets and the Future of Public Space Management in NYC." Office of the New York City Comptroller.

**Fig 11.** (pg. 30-31) Kensington Plaza programming; Source: NYC Department of Transportation

pop-ups and tactical urbanism initiatives attract participation from a broader cross section of the community than other events. Festivals and community events help produce high quality public spaces that are more sociable, inclusive, and welcoming (McGillivray et al., 2021). This effect is stronger in events with arts and cultural components, as collaborative creative activities provide welcoming spaces for sharing new perspectives and draw participants who may hesitate to join other neighborhood activities.

When events like farmers' markets leverage community-tailored programming and partnerships, communities experience greater inclusion and trust-building among neighbors (Love and Kok, 2021). Well-used public spaces make entire areas more marketable and competitive, drawing residential and commercial tenants while improving customer satisfaction and spending (Project for Public Spaces, 2009).

**2. Public space programming can create positive shifts in perceptions of neighborhoods and can catalyze economic growth.**

Public space activations encourage people to spend more time in public spaces and help catalyze future investment. Property values often rise in response to nearby arts and cultural assets, especially when those assets are meaningfully connected to community interests (Hardy, 2023). Even when current investment is limited, "public spaces play a critical role in shifting perceptions of place" and "public space investments can catalyze overdue infrastructure developments and 'pave the way' for additional private sector development" (Love and Kok, 2011). Residents appreciate the resulting quality of life improvements, with cultural and educational opportunities in neighborhood public spaces linked to their well-being (Yolal et al., 2016).

Investment in public space programming produces clear and demonstrable economic returns. Participants spend money on tickets, goods, and activities at these programs and nearby businesses, contributing millions to New York City's tax base. Economic impacts extend beyond direct spending to include indirect effects—through local suppliers—and induced effects, as employees of businesses and vendors spend their earnings locally. The New York City Comptroller (2025) found that in New York, Open Streets generated foot traffic and increased busi-



ness visibility and opportunities for growth. Programming encourages people to spend more time at their destinations and visit nearby shops and restaurants, increasing foot traffic and helping businesses thrive (Morrison, 2024).

Morrison, Eva. 2024. "How Placemaking Positively Impacts Our Health." *Happy Cities*.

Benefits often accrue to entrepreneurs and small businesses in particular. Public spaces themselves serve as "powerful incubators for entrepreneurs and small businesses" (Love and Kok, 2021). Neighborhood events and activities invite additional foot traffic back to commercial districts, encouraging the success of entrepreneurs with nearby brick-and-mortar locations or temporary retail spaces in the area (Ehrenberg, 2022). For entire neighborhoods, activations form a critical part of local culture—a key factor in making cities a destination for residents, employers, and investors. A Michigan State University study found that a variety of events and festivals contributed significantly to local cultural offerings and therefore to both short-term and long-term economic growth at the neighborhood level.

Ehrenberg, Elana. 2022. "How Public Spaces Can Keep Small Businesses Open." *Bloomberg CityLab Economy*.

Local Economic Planning. Economic Development Potential of Festivals, Arts and Culture. East Lansing: School of Planning, Design & Construction, Michigan State University, 2015.

### 3. Programming supercharges the ability for public spaces to improve public health and public safety.

Public spaces such as parks and sidewalks make physical activity easier and more likely for more people to use, while parks with active

**Fig 12.** (Below) Asphalt Asters; Source: Molly Gambardella







Foderaro, Lisa W., and Will Klein. 2023. "The Power of Parks to Promote Health: A Special Report." Trust for Public Land.

programming are associated with even stronger increases in physical activity. The resulting health benefits—both physical and mental—combine powerfully with improved social connections enabled by parks and community programming (Foderaro and Klein, 2023).

Beyond physical health benefits, active public spaces promote better public safety. Research on New York City's Open Streets program improved traffic safety, expanded play opportunities in neighborhoods, enhanced public safety, encouraged and facilitated access to services, built support for permanent street safety improvements, and strengthened community relationships (Bureau of Policy and Organizing, 2025). In communities with long-standing inequities, community-focused programming can help address economic and social obstacles to health through programming and community-building (Barrios and Garner, 2024).

## Public Health

Barrios, Vanessa, and Christine Garner. 2024. "Reclaiming Public Space for Health Equity." Regional Plan Association.

### 4. Arts and cultural programming is a fundamental right and a tool for healthier communities.

National Endowment for the Arts. "Arts Attendance, Art-Making, and Social Connectedness: Spring/Summer 2024." 2024.

Adults who attend live arts events experience lower levels of loneliness, while adults who lack access to or do not participate in public arts events report higher rates of isolation (National Endowment for the Arts, 2024). Cultural participation is strongly associated with improved mental health, emotional resilience, well-being, and social connection. Frequent participation in arts activities is also associated with higher life satisfaction, lower levels of mental distress, and greater physical functioning.

## Culture

Arts Fund. 2018. "Arts & Health: What We've Learned."

Americans for the Arts. 2022. "Arts & Economic Prosperity 6."

Many communities now "use public art and cultural assets as a tool for health promotion...and to address inequities in the social determinants of health" (Arts Fund, 2018). Arts and culture events also drive economic impact, as attendees support local businesses and spend more money locally as a direct result of their attendance (Americans for the Arts, 2022). This produces higher levels of community pride, social cohesion, well-being, and neighborhood livability (Arts Fund, 2018).

# Recommendations

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NYC Public Space Stewardship Fund

Recommendation One

# Centralizing Public Programming in the Office of the Mayor

## What

**The City of New York should create a centralized office for public space programming by integrating the role of the Office of the Public Realm with the current functions of the Mayor's Office of Citywide Event Coordination and Management (CECM) and the Street Activity Permit Office (SAPO), creating a strengthened center for public realm oversight, management, and strategy.**

**By taking this step, the City of New York could 1) streamline the process for communities and event organizers who must navigate multiple city agencies to produce programming, 2) give city agencies a unified leader to support collaboration and strategic management, and 3) elevate the public realm as a core, long-term priority of the Mayor's Office.**

## Why It Matters

New Yorkers experience public spaces as a connected system. They do not categorize parks, sidewalks, streets, plazas, or community gardens by management entities or agency regulation. These spaces are valued collectively as neighborhood assets that support community life, culture, and local economies. Yet the permitting and approval processes governing these spaces are fragmented across multiple agencies and regulatory frameworks. This requires applicants to go through multiple kinds of processes, during which they are often expected to coordinate communication between agencies themselves. This complexity places a disproportionate burden on groups with less experience or fewer administrative resources.

Even city agencies face hurdles in coordinating their own procedures. Communication systems are often designed within the confines of each agency, meaning a paper record in one may not align with a digital form in another. As a result, both applicants and city staff experience uncertainty around approvals and responsibilities.

For this reason, agencies often value having representation within the Mayor's Office, where interagency coordination and policy leadership can occur. There are several existing mayoral entities, such as the Citywide Event Coordination and Management (CECM), Street Activity Permit Office (SAPO), and the Office of the Public Realm (OPR), that have demonstrated expertise, but could be strengthened with an increased ability to be strategic and help set citywide policy.

Many of the recommendations in the *Untaped* project require centralized leadership, though not rigid centralization. The New York City government is complex; this complexity has, for better or worse, evolved to reflect the complexity of the city. Reform often works best when there is strong political will and a mechanism to easily coordinate; it works less well when the City tries to create one process for the manifold kinds of end users and end products that help activate our public realm.





## How

Taking this step will require political will and organizational flexibility, but does not require a large investment from the City. While there are a variety of ways to structure, staff, and charge a new office overseeing the public realm and public space programming, the *Untaped* project identifies four considerations that should receive particular attention.

**1. Reorganize the three mayoral offices**
In order to strengthen executive leadership, centralize oversight of public realm events, and streamline citywide communications, the City should create a centralized office for public space and programming by integrating the Office of the Public Realm with CECM and SAPO. This renewed office would serve three primary functions: 1) provide strategic planning for the city's public realm; 2) advance key strategic initiatives and projects; and 3) serve as the centralized hub for public space permitting and management.

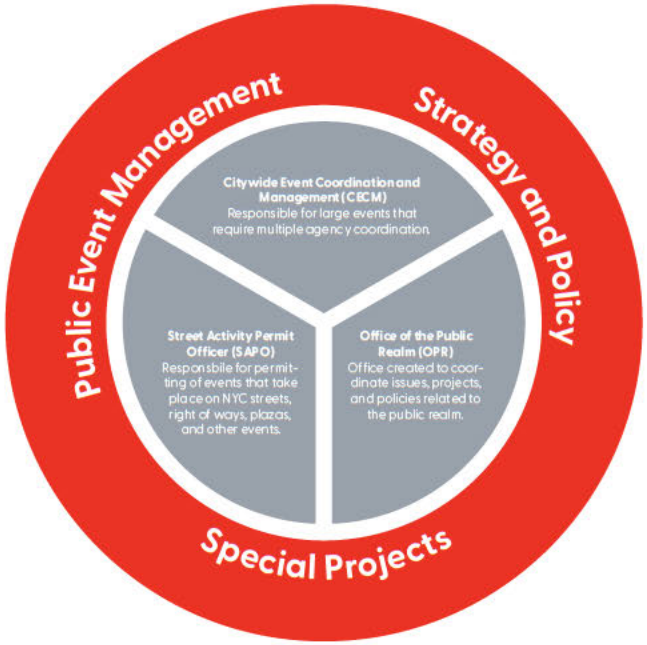



**Fig 13.** (Right) Diagram of combined mayoral entity and its roles

The first two functions build directly on the recent work of the Office of the Public Realm. Over the past three years the office has delivered important strategic visions, such as the "Realm of Possibility" report, which outlines 15 ways to improve the public realm. This kind of work can be developed and formalized, potentially with the release of recurring public realm plans for the city. Likewise, the OPR has helped to shepherd interagency projects, such as Outdoor Dining, sidewalk shed reform, Gotham Park, and public restroom development. These efforts demonstrate the value of strong leadership in addressing complex, cross-cutting challenges.

## Reform often works best when there is strong political will and a mechanism to easily coordinate.

The third function would represent a significant shift in operations. CECM and SAPO would be combined with OPR and would collectively report to a deputy mayor. While these offices currently hold substantial regulatory authority, they have limited capacity to shape policy upstream. This means that someone else is creating the policies that they in turn have to regulate. A centralized office could help ensure that new initiatives—such as expanded Open Streets—are designed in ways that are easier and more equitable to regulate.

**2. Formalize interagency collaboration**

The reorganization would also continue a practice of strong interagency coordination. In this initial evolution, the office would either provide permits directly (through SAPO) or provide coordination as necessary to agency partners in Parks, NYPD, NYFD, SBS, and others. It would also liaise, where appropriate, with other official bodies such as Council offices and Community Boards. Not only would it serve in a coordinating role, it would also make sure that coordination is in line with a strategic vision for the public realm and the broader priorities of the administration.

**3. Identify opportunities for evolution**

The reorganized office, now made a more permanent part of the city infrastructure, could also grow and mature to capture new functions and roles. At the outset, some events, like Open Streets (currently regulated by DOT) or events taking place in Parks spaces, would still





be managed by their host agencies. The office would provide coordinating support and help advance new policies. Over time, as the new structure demonstrates effectiveness, additional permitting functions could be integrated.

One of the gaps that the research for *Untaped* uncovered is the widely different systems that agencies use to permit. These systems don't communicate with each other, largely because they have been sourced and developed by individual agencies, and not with a citywide lens. The office could project manage the development of new systems as technologies emerge. For example, the single contract that the Mayor's Office awarded to Live XYZ to map storefront data has been widely successful. Similar partnerships could work with the office to develop new technologies to manage and permit events, publicize them with a broader audience, and think more creatively about revenue generation for the city (potentially developing significant resources for public events).

**Fig 14.** (Right) Summer Street; Source: NYC Department of Transportation



**4. Partner with the private sector**
Lastly, the new office could work in tandem with a complementary private entity dedicated to supporting the public realm, much like the Public Housing Community Fund or the Fund for Public Health does for NYCHA or the NYC Department of Health and Mental Hygiene respectively. This would most likely be structured as an independent 501(c)3, but other incorporation options could be useful as well. This entity would, unlike a mayoral office, be able to raise funds to support important public space initiatives across the city, pilot innovative ideas, and support end users with technical assistance to communities and organizers. The office could partner with this new organization in a variety of ways, from an informal partnership to a more structured public-private partnership with shared contracts and operating goals. Additional details on this model are explored in **Recommendation Eight**, which proposes a Public Space Stewardship Fund.

**Fig 15.** (Below) Chuseok Festival, San Francisco; Source: Mark Shigenaga






## Precedent

**City of San Francisco's Entertainment Commission**
The Entertainment Commission was established in 2002 through a voter-approved ballot measure (Proposition S) that fundamentally restructured how San Francisco manages its nightlife, events, and public entertainment. The Commission operates with seven commissioners serving four-year terms: four nominated by the Mayor and three appointed by the Board of Supervisors. The Commission meets twice monthly in public sessions and oversees a dedicated staff that includes permit inspectors, policy analysts, and administrative support.

The Commission functions as a semi-autonomous body with rulemaking authority. This independence has proven both a strength and a limitation: while it can move quickly on policy innovations without navigating complex bureaucratic approval chains, it also occasionally operates in tension with other city departments that view its mandate as overlapping with their own jurisdiction.

The Commission's original mandate centered on three primary functions: issuing and regulating entertainment permits, mediating conflicts between venues and residents, and developing policies that balance public safety with cultural vitality. Over two decades, this scope has expanded considerably. The Commission now oversees a unified permitting process for entertainment venues, special events, street festivals, and outdoor performances. This consolidation replaced a fragmented system where applicants navigated multiple departments—a scenario familiar to New York. A single Entertainment Permit now covers activities that previously required separate approvals from police, fire, health, and planning departments. While these agencies still conduct inspections and provide input, the Commission serves as the central coordinating body and final decision-maker for most entertainment-related activities.

Beyond permitting, the Commission has become an active policymaking body. It has developed comprehensive regulations around sound amplification, operating hours, security requirements, and crowd management. Notably, it created the city's "nightlife district" designations, where different standards apply to venues in entertainment-focused neighborhoods versus residential areas.

Recommendation Two

# Tiered and Performance-Based Qualification



## What

The City of New York should simplify the permitting structure for public realm permit approvals by creating a tiered event qualification standard. In addition, the City should reform its permitting fees, insurance requirements, and other parameters to align with these tiers, ensuring that smaller activations don't face unnecessary red tape and that larger activations can generate appropriate revenue for the city.

This system would give applicants a clear-eyed view of what parameters trigger greater levels of insurance and allow those applicants to more easily tailor their events ahead of time. This would represent a shift from a taxonomic structure, which tries to classify every type of event (film shoot, plaza activation, picnic, food stall, etc), to a performance-based structure, which organizes the tiers based on their management needs. This more clearly identifies the appropriate triggers (excess noise, the presence of fire, large crowds, etc) that need mitigation.

## Why It Matters

Across multiple agencies (SAPO, Parks, DOT, DCLA, FDNY, NYPD, and others), community groups and small organizers face a landscape of confusing, inconsistent, and opaque permitting requirements. Similar events can be asked for different levels of insurance, documentation, and approvals depending on where they occur or who is processing the application. This creates uncertainty, delays, and avoidable costs. Many groups aren't sure, when requesting permits, what triggers higher fees or more burdensome regulations. These barriers disproportionately burden first-time, grassroots, and neighborhood-based organizers, the very groups the City seeks to uplift to achieve equity in the public realm.

**Fig 16.** (Below) Jamaica Queens Summer Festival; Source: Nat Valentine








## How

A published, tiered risk rubric addresses this directly. By making the risk assessment transparent up front, it standardizes expectations across agencies and boroughs and reduces staff review and coordination. A no-insurance Tier 1, paired with clear safety guardrails, removes a major financial barrier for low-risk, community-scale activations while still protecting public safety and the City's risk tolerance. The tiered event rubric recommendation requires substantial time and conversation amongst city staff, including the Law Department and most operating agencies, but it does not require significant capital investment or cost. These four steps will set up this recommendation for success:

**1. Collaboratively define a rubric**
The City should work across agencies and sectors to develop a clear rubric that organizes events into a set of tiers, based on measurable factors, such as expected attendance, event footprint, duration, structures, and activity types. These tiers would establish uniform thresholds for what is considered low, moderate, or high risk, and map directly to corresponding permitting, insurance, and documentation requirements.

NYC Parks already has a similar model, with events under 500 people and not having a promotional or commercial aspect requiring much simpler permits. NYC DOT, via SAPO, still categorizes its event by type and not by complexity. In a long-term version, the City could look to align its event permitting structure so that Parks and non-Parks events have similar thresholds.

Some of this work only requires a categorical reorganization, while some need more exhaustive reform. For example, the lowest-risk tier could be defined as events that don't require separate indemnification by the applicants, eliminating the burden of insurance costs for many small-scale producers. A simple terms-and-conditions waiver could be established and paired with a basic safety checklist that ensures ADA access, egress clearance, and sound compliance. This Tier One category would include the smallest, lowest-risk activations, such as community tabling, small performances, and block-level gatherings. The City could establish an appropriate cap on attendance, duration, and physical impact.

To develop this rubric and to periodically review their efficacy, the City should convene a Public Event Standards Task Force, a formal inter-

agency working group that includes SAPO, Parks, DOT, FDNY, NYPD, DCLA, the Law Department, and the Comptroller's Office of Risk Management. This body would establish and update the rubric, adjudicate exceptions, and ensure alignment across jurisdictions. To do this work would require additional investment in people and tools to accomplish, as city agencies are currently under-resourced for their existing work.

## **Tier One** - Limited Risk Events

**Potential Characteristics**
- Limited attendees and potential size
- Limited duration of event
- Lack of generators or electrical equipment
- No concessions
- Limited structures such as stages or large tents

**Potential Benefits**
- Expedited application processing
- No insurance requirements
- Self-service options
- Reduced permitting fees

## **Tier Two** - Moderate Risk Events

**Potential Characteristics**
- Moderate attendance expected
- Event duration can range
- Some power generation and equipment
- Concessions
- Structures that don't require DOB permits

**Potential Benefits**
- Clear expectations for review and processing
- Insurance requirements are handled by custom insurance products
- Opportunity to work with staff person on application

## **Tier Three** - Complex Events

**Potential Characteristics**
- Large attendance with crowd mitigation strategy needed
- Range of durations
- Complex power, electrical, and digital infrastructure
- Concessions and promotion
- Large structures such as stages or temporary buildings

**Potential Benefits**
- Coordinated and long-lead coordination from multiple agencies
- Revenue generating for applicants and potentially for the City
- High-profile event with Mayoral coordination
- Dedicated staff managers for event success





**2. Expose the back end**
This new tiered structure will be visual and descriptive, and could potentially be embedded in the One-Stop Permitting Portal **(Rec. Five)** and interoperable with the Public Space Event Stager **(Rec. Six)** so applicants can (1) self-identify their tier, (2) generate an exact requirement checklist, and (3) produce simple, compliant site plans.

Transparency can build public confidence in the permitting process, reduce the amount of time-intensive correspondence, and make events safer. Once the tiers are finalized, they should be publicly released in plain language, translated into multiple languages, and paired with visual guides and FAQs that explain the purpose, process, and implications of each tier. This commitment to clear communication will state when and why insurance, fees, or additional documents are needed. By revealing the logic behind approvals, the City can move away from the perception of arbitrary or uneven enforcement, and applicants can make informed decisions about how to design their events, before a last-minute rejection or request comes from the City.

**Many groups aren't sure, when requesting permits, what triggers higher fees or more burdensome regulations.**

This should include publishing the decision tree used internally by agencies to determine permit requirements, along with a "what changed" log that tracks updates over time. This type of openness, already a best practice in other cities, would demystify a process that applicants currently describe as opaque and unpredictable.

Over time, to make the rubric tangible to applicants, the City should also develop a gallery of example event types, visual and descriptive case studies that outline common neighborhood events by their appropriate tiers, showing the corresponding permits, lead times, and fees. These examples would function as reference points for both applicants and agency staff, improving consistency across the city.

**3. Make it usable on day one**
For the rubric to be effective, it must be usable from day one. The City should integrate a "What's my tier?" self-assessment feature within the recommended One-Stop Permitting Portal **(Rec. Five)**. This digital tool would guide users through a short series of questions about event size, location, and logistics, automatically categorizing their event into the

appropriate tier and generating a personalized checklist of requirements. The system could also link directly to the Public Space Event Stager (**Rec. Six**), allowing organizers to upload or generate simple, dimensioned site diagrams that automatically validate key compliance elements such as hydrant clearance, egress widths, and ADA access.

Beyond technology, the City should focus on capacity-building and outreach. Agencies, in partnership with local arts councils, BIDs, and community-based organizations, should host quarterly office hours and training sessions to walk applicants through the rubric and application process. This outreach should specifically target first-time, emerging, and BIPOC-led organizations, groups that have historically faced the steepest learning curves and the most barriers to entry. Again, this enhanced service would require a hard look at current staffing levels and the need for additional resources. The Public-Private Partnership (**Rec. Eight**) organization could help allay some of these concerns by hosting many of these resources. By pairing digital tools with community education, the City can ensure that the rubric is both equitable and practical.

**4. Set up a structure that can evolve**
The rubric should not be static; it should evolve as the City learns from data and experience. The implementation could begin on a pilot basis, perhaps limited by geography or through several trusted event partners, to test the thresholds and administrative processes. Feedback from both applicants and enforcement officers could inform the updates before a citywide launch.

The City could develop a dashboard of key performance indicators (KPIs) to measure and track the new tiered program over time. These indicators could include a blend of publicly shared and internal indicators. For example, the Law Department should be a regular partner in evaluating how updated standards impact the litigation faced by the City for public events.

The Public Event Standards Task Force could be occasionally empowered to conduct an evidence-based review, using permitting data and community feedback to refine definitions and thresholds. Over time, the rubric would become a foundational policy instrument, codified across agencies and embedded within the City's broader strategy for public space management. It would bring coherence, fairness, and predictability to a system that currently relies too heavily on discretion and institutional memory.





## Precedent

**City of Boston's Special Event Tier Tool**
Boston's Special Event Tier Tool demonstrates a way that this might work in practice. Rather than organizing permits by event type, Boston categorizes all outdoor events into three tiers based on measurable risk factors including event duration (single versus multiple days), spatial footprint (one city block versus multiple blocks), whether the event is stationary or mobile, anticipated attendance thresholds (under 150, 150-250, or over 250 people), and the presence of complicating factors such as vending, alcohol service, or large equipment. Each tier corresponds to differentiated requirements for application deadlines, processing timelines, insurance levels, and fees.

Boston's system offers applicants a transparent self-assessment tool before formal submission. This allows organizers to understand in advance what tier their event will likely fall into and adjust their plans accordingly to minimize costs and complexity. The Special Events Committee makes the final tier determination upon application review, but the published framework reduces uncertainty and prevents surprises during the approval process. This transparency directly addresses the opacity that New York applicants currently face, where similar events receive inconsistent treatment depending on agency interpretation or location.

New York could build on this foundation by incorporating additional refinements such as a true no-insurance tier for the smallest gatherings, multilingual guidance materials, integration with digital site planning tools, and stronger interagency coordination through a dedicated task force.

## Recommendation Three

# Public Realm Evaluation Platform

### What

**An NYC Public Space Programming Impact Tool, which could be developed as an open-source web-based platform to catalog the impact of the smallest and largest programs across the city, should be developed by a coalition of public, private, and civic partners. It would develop an exhaustive set of potential indicators, each with common measurement strategies. Programming partners could select and use the indicators that match their organizational needs. Data would be available for partners to understand their local impacts and would aggregate, anonymously, into a citywide database. This citywide data would catalog the annual impact of public space programming, detect trends, and identify ongoing areas for policy development.**

## Why It Matters

To date, the City of New York has not established a consistent and standardized method for evaluating the impact of public space and public space programming, whether a private venture or a program administered by New York City departments, including Small Business Services, Department of Transportation, Department of Parks and Recreation, Special Activity Permit Office, and Department of Cultural Affairs. As such, advocates, policymakers, and agencies have been unable to effectively communicate the collective value of their programs or to identify areas for program improvement. This has limited the amount of resources available, whether from public or private funding. As the City increases the number of third-party, private technology partnerships, the public realm represents an area ripe for experimentation and research.

**Fig 17.** (Below) Opening the Edge Ribbon Cutting; Source Tameek Williams







## How

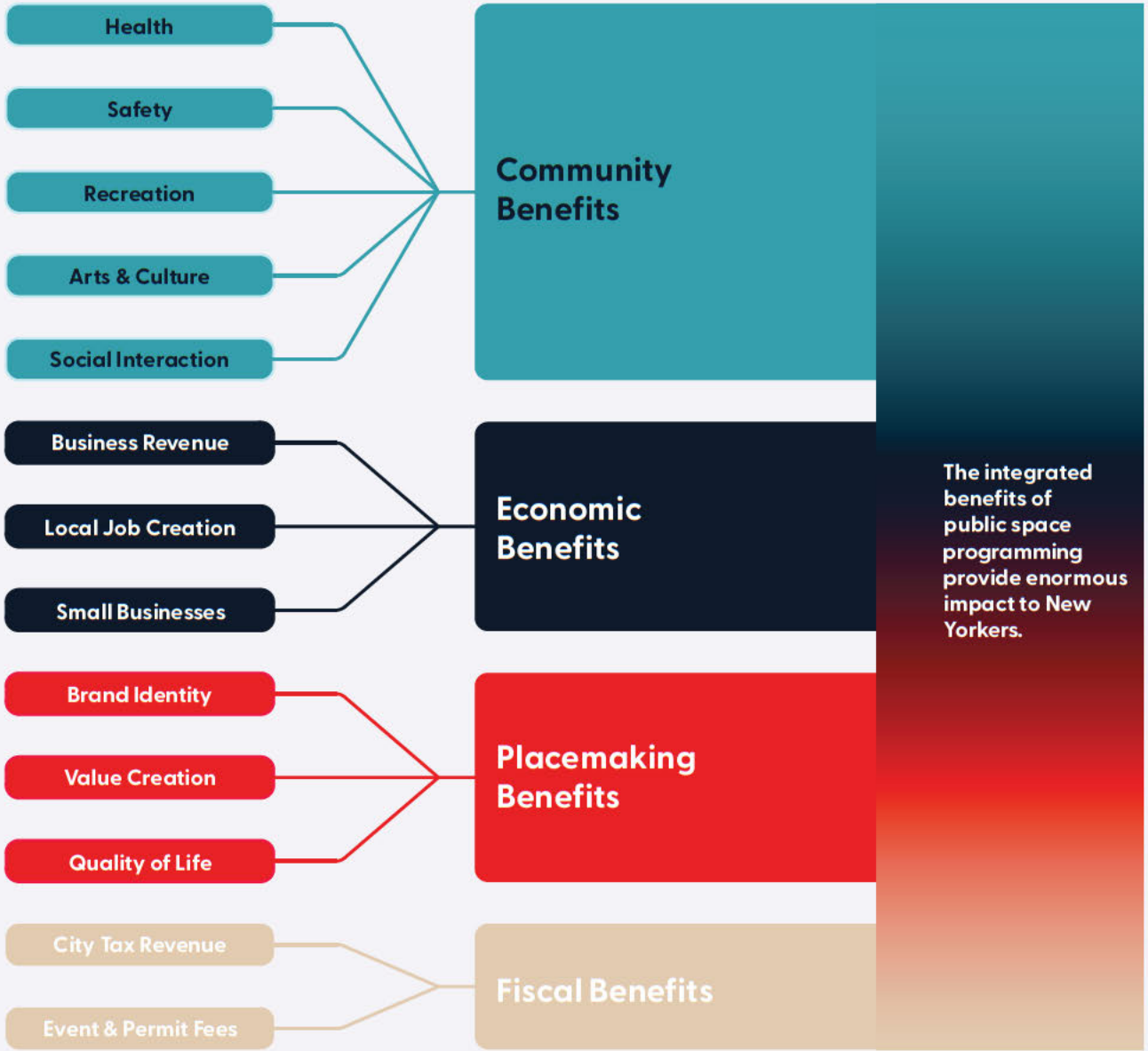
An evaluation tool would allow New York to understand the collective impact of its public realm and better serve residents and producers alike. An initial investment would have enormous downstream benefits. These four steps will set up this recommendation for success:

**1. Design a cross-sectional advisory board**
The renewed Mayoral Office (**Rec. One**) should convene a project-based Advisory Board made up of relevant city agency research staff, the City's IT department, the Mayor's Office for Economic Opportunity, and other civic, business, and philanthropic organizations. The group could provide targeted input on the goals of the impact evaluation program and identify priority metrics. The group could collect and explore existing research, resources, and data that should be included in the effort. This Advisory Board could identify additional areas for research and evaluation, including the measurement of the shared economic impact of public space programming.

**2. Develop a programming evaluation framework**
The *Untaped* project recommends starting with four key categories of impact measurement: community, placemaking, economic, and fiscal. Within these categories, there are sub-categories, with corresponding metrics, that measure the ways in which public space activations impact the city's overall well-being. This framework provides a shared language for how activations generate qualitative and quantitative impacts, valuable data in advocating for the importance of public space activation. This data would be gathered by a variety of data sources, which include:

Attendee Intercept Survey: Attendee intercepts are an essential tool for finding out how participants are engaging in activities and spending associated with public space activations. Surveys also capture attendees' perceptions of the event and characterizations of the neighborhood and public space. Surveys are best issued during the event to reflect a comprehensive sample.

Business/Vendor Survey: Business and vendor surveys allow advocates to understand the full picture of how public space activations contribute to revenues, job creation, day-to-day operations, and support for small businesses and entrepreneurship. These surveys are particularly beneficial for activations with a heavy emphasis on businesses and




*Public space activations generate impact across four key categories: community, placemaking, economic, and fiscal impacts. Within these categories, there are several sub-categories and metrics that tell a comprehensive story of the ways in which activations impact the city, social infrastructure, and local economy. This framework provides a shared language for how activations generate qualitative and quantitative impacts, valuable data in advocating for the importance and value of public space activation.*

**Community Benefits**
*The benefits to local neighborhoods that improve residents' quality of life and local amenities.*

> *Sample Metrics or KPIs: Physical Activity, Access to Fresh Food, Personal/Property Crime, Perceptions of Crime, Recreational Opportunity, Arts Opportunity, Culture Opportunity, Attendance/ Demographics, Opportunities to Socialize*

**Economic Benefits**
*The additional revenue generated through the event and the event's impact on local businesses.*

> *Sample Metrics or KPIs: Spending at Businesses, Business Operations, Additional Employment, Small Businesses Support, New Businesses*

**Placemaking Benefits**
*Neighborhood character and identity to attract additional economic and community activities.*

> *Sample Metrics or KPIs: Neighborhood Character, Visitor Attraction, Business Attraction, Built Environment Improvements, Attendee Enjoyment of Event, Novelty and Exposure, Stewardship and Civic Pride*

**Fiscal Benefits**
*The ways in which activations contribute to city revenues.*

> *Sample Metrics or KPIs: Sales Tax, Corporate Income Tax, Personal Income Tax, Hotel Room Occupancy Tax, Event Permitting/Application Fees*

vendors and should be administered following an event.

Organizer Input: Organizers can contribute important insights about the offerings at an event. Often, organizers compile findings from event registration and ticketing data, should that be available. Impact takeaways may be top level—like how many people attended the event—but can still provide valuable talking points with limited resource investment.

Secondary Data Sources: Secondary data sources are particularly helpful for categories like public safety. Secondary data can also be leveraged using analysis tools like IMPLAN modeling (used for economic impact). Secondary data sources can also help measure long-term impacts (such as property values and safety) for signature and frequent events.

**An evaluation tool would allow New York to understand the collective impact of its public realm and better serve residents and producers.**

The metrics identified in the framework should also leverage any existing secondary public data (e.g. Census data, NYC Open Data) and/or proprietary data sources such as Placer.ai, Live XYZ, CoStar, Sprout Social, etc. The public realm stewardship survey should primarily serve to fill in gaps and information that cannot be extracted from existing public and/or proprietary data, and should focus on public space user perception and program partner experience. As such, the design of the survey should follow a thorough audit of existing data collected by or accessible to various city agencies (including data from third-party vendors).

The matrix of event typologies and metric types shows the wide-ranging impacts achieved by common events. Note that although each event has impacts across the full spectrum, organizers usually choose to focus on a few specific types to tell the strongest possible story about their event and because of the resources necessary to conduct these measurements. The kinds of data collected and the means of that collection should be driven by the goals and capacity of the producing entity, which can vary across geography, type, size, and scale.





**3. Build an open-source and accessible platform**

Similar to past citywide program and grant evaluation exercises, the Citywide Impact Evaluation of Public Realm Stewardship should be conducted by independent external evaluation consulting firms or teams of firms selected through a competitive bidding process. The bidding process should consider the expertise and past experience of the vendor in developing program impact studies and perception surveys (including survey administration, survey design, outreach design, and data analysis and reporting), familiarity with research in public space, and technology capabilities to develop a visualization dashboard on existing software such as Tableau, Microsoft Power BI, or others.

**Fig 18.** (Right) Harlem Silent Disco; Source: Andre Whitehead



The toolkit should be designed with a sense of user engagement in mind. Small, even single-person, organizations should be able to use the survey platform, with limited training and resources. Likewise, researchers or policymakers should have access to rich, vetted data that can speak to the citywide impact of public space programming and activation.

A publicly accessible “impact dashboard” could be created to integrate data into a single site. The dashboard would enable partners to explore various filters (by activation type, by date, by geographic area) and should include an economic impact calculator so that dashboard metrics can be used to produce spend, output, and tax impact figures, enabling policymakers and community partners to calculate return on investment.

In addition to the development of a survey questionnaire on a free and public, interoperable platform, the City, with support of city law, should develop a data sharing agreement that outlines how data collected through the survey will be used, stewardship of the data, and responsibilities and processes for collection, storage, and use of the data to mitigate risks or data breaches.

**4. Centralize information on a dashboard**
It's unrealistic to assume that every program or activation will be measured by the evaluation platform. To fill gaps in data and information, the City of New York should administer an annual or biannual survey to monitor the perception and attitudes of public space users, to gather annual estimates of spending and programming across organizations, and to analyze which groups are undertaking programming.

The survey should be distributed in partnership with city agencies and community partners through the use of a standardized toolkit of resources that include marketing materials (copy, creative assets); questionnaires (developed on a free, interoperable platform such as Google Forms, and pre-populated with standardized question types organized by category, or shared through a civic data library); training materials (recorded workshops or webinars, checklists); and reporting procedures (recorded workshops or webinars, checklists).

To get started, the City, the Advisory Board, and the renewed Mayor's Office should identify pilot funding to test the evaluation platform, measure effectiveness of the survey, and identify outreach methods. This will set an important baseline by which future results can be measured, build trust amongst stakeholders, and identify hurdles in the implementation of the survey. This exercise could be done before the creation of the full platform, as a research exercise, or after, as a beta test for the larger exercise. The NYC Public Space Stewardship Fund (**Rec. Eight**) could be a partner in this effort, or even a project manager, in order to take some of the burden off of city agencies.





## Precedent

Centralized, tech-enabled evaluation platforms to track and evaluate events and activations exist commercially and are being widely developed and used by private event organizers and venue operators. Platforms and evaluation dashboards such as Tourism Economics' Event Impact Calculator and EventUp's Event Analytics and Reporting software are among existing solutions that enable various users to better understand the returns on investment (ROI) and impacts of public and private ticketed events annually.

These commercial event management and reporting platforms offer customizable dashboards, real-time metrics, automated data integrations, and survey tools that support organizations' continuous learning and evidence-based improvements to events and activations. Among indicators that are typically included in these commercial platforms are: "Total Attendees," "Total Spending by category," "Total Revenue," "Event Marketing Performance," "Average Dwell Time," and "Total Traffic by hour."

While existing evaluation platforms used by private venues and event organizers may prioritize the measurement of impact on sales, revenue, and digital engagement, to demonstrate ROI to sponsors and vendors, it is important that the City of New York expand its focus to operations and broader community and environmental outcomes similar to those outlined in the above framework and that of the Reimagining the Civic Commons (RCC) initiative by Knight Foundation. RCC emphasizes multiple outcome domains including civic engagement, socioeconomic mixing, environmental sustainability, and place value (measured through indicators such as perceptions of safety, and frequency and length of visits).

A citywide platform that marries EventUp-style digital integration and real-time metrics with RCC's expansive measurement lens will not only empower our city agencies and community-based program partners alike to tell data-rich stories of impact, but will also make data collection and analysis scalable, making it easier to compare outcomes across boroughs and over time, and enabling more responsive, equitable policy and programming decisions.

Recommendation Four

# Targeted User Experience Refinements

## What

The City of New York should undertake targeted, independent UX/UI refinements to its existing E-Apply permitting software and associated informational websites, specifically those managed by SAPO (Street Activity Permit Office) and NYC Parks, to significantly improve accessibility, clarity, and public trust in the permitting process.

While each UX issue in isolation may appear minor, together they create a user experience that feels outdated, tedious, and confusing, deterring many applicants from pursuing public space activations altogether. Addressing these issues collectively through targeted, data-driven design interventions can substantially modernize how people perceive and engage with city permitting systems.

## Why It Matters

Navigating New York City's digital permitting systems is a well-documented pain point for community partners, artists, and civic organizations looking to host public space activations. Information is fragmented, difficult to locate, and presented in ways that do not align with how events are actually planned, especially for applicants relying primarily on mobile devices. Users routinely encounter broken links, unclear form fields, contradictory instructions, and little explanation for why certain questions are being asked. These cumulative micro-barriers reinforce a perception of bureaucracy as exclusionary and create an uneven playing field that privileges organizations with dedicated administrative capacity or prior experience.

Improving usability, accessibility, and transparency in these systems is therefore not just a technical or aesthetic upgrade, it is an equity intervention. Targeted UX/UI refinements would make the permitting process more intuitive, predictable, and trustworthy. Applicants would benefit from clearer guidance and more consistent timelines, while agencies would see fewer user errors, reduced help desk volume, and faster, more consistent review processes. Over time, the platform will become more agile, easier to maintain, and more reflective of the diverse civic life it is meant to support.

**Fig 19.** (Below) Turnout Queensboro Dance Festival; Source: Design Trust for Public Space







## How

Modernizing these interfaces signals that New York is investing in itself. A refreshed permitting experience will become part of a broader commitment to high-quality digital and public infrastructure: tools that are modern, easy to use, visually coherent, and reflective of the city's cultural vibrancy. This positions New York not only as a leader in public realm policy, but also in government technology and design excellence.

**1. Conduct comprehensive UX/UI audits and prioritize fixes**
The first step toward improving the permitting experience is to understand the user journey in greater detail. The City should commission an independent UX/UI and accessibility audit, ideally led by a civic-tech incubator or university design lab such as Civic Hall, Parsons, or CUNY TechWorks. This audit would document pain points across SAPO and Parks' permitting platforms, identifying areas where technical issues, like malfunctioning tooltips, broken calendar widgets, or unclear navigation, compound the difficulty of submitting applications.

Mobile-first accessibility should be a priority. Many community partners and smaller organizations rely primarily on smartphones to interact with city systems, yet the permitting portals are not optimized for mobile screens or assistive technologies. The audit should therefore include testing with screen readers, translation tools, and low-bandwidth devices to ensure compliance with WCAG 2.2 AA standards.

Once the findings are gathered, the City should establish a prioritization framework that categorizes fixes according to user impact, frequency, and technical effort, identifying quick wins (like clarifying tooltips or fixing save states) alongside more complex improvements (such as adding estimated processing timelines). Rather than attempting a complete overhaul at once, improvements should be implemented in quarterly design sprints, enabling iterative updates and transparent communication of progress to the public. This incremental, agile approach ensures steady improvement while minimizing service disruptions.

Based on the existing research by the *Untaped* initiative, early areas for improvement include the following:

- Creation of a design system (including color, typeface, sizing, hierarchy, amount of info per page, interaction, spacing, etc.)

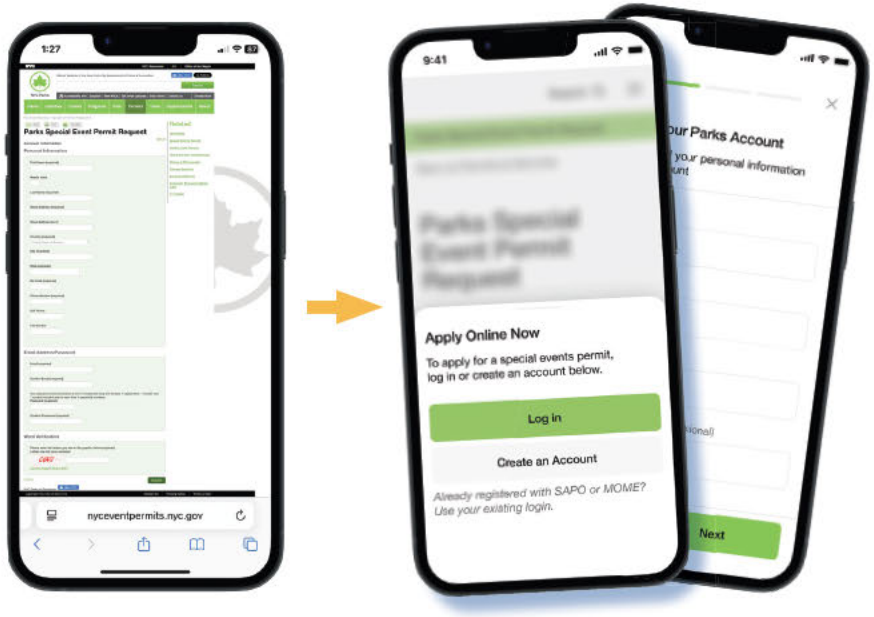



Fig 20. (Left) User registration experience currently and potential new platforms that modernize the system

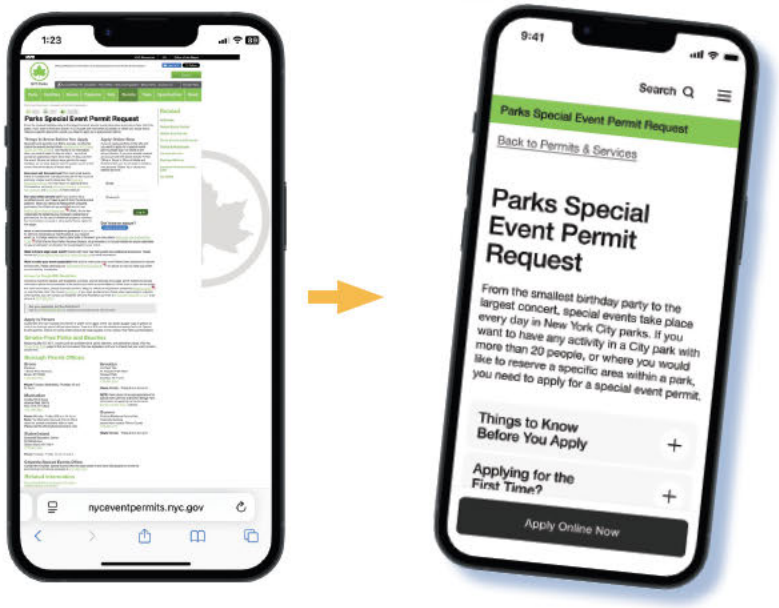



Fig 21. (Left) Information sources that are not geared towards mobile and potential UX designs for alternatives.





that informs the design and information display of informational permitting pages.

- Fix recurring calendar and tooltip bugs that interfere with submission accuracy.
- Add contextual explanations for each question in the application (e.g., why specific data is required).
- Use plain, accessible language in all forms and automated communications.
- Display estimated application timelines by event type to set realistic expectations.
- Improve saved status, enabling users to pause and resume applications seamlessly.
- Implement step-specific feedback functions instead of one global comment form.
- Conduct a comprehensive accessibility and mobile performance audit to meet WCAG 2.2 AA standards.
- Improve mobile optimization and visual hierarchy for easy navigation.
- Add contextual images, diagrams, and descriptive examples (e.g., annotated event diagrams, case studies).
- Surface key content through dynamic FAQs and quick-start modules rather than static text blocks.

While not exhaustive, this list represents relatively easy fixes to address the permitting process's digital journey. NYC Parks is already investing in a new portal in partnership with CECM that addresses many of these improvements. This work could serve as an early proof of concept that informs a citywide approach towards permits.

**2. Redesign content architecture for clarity**

Beyond technical fixes, the City must address the deeper issue of content design and navigation. The permitting process currently overwhelms users with dense information presented in fragmented, text-heavy pages. A redesign should start by reorganizing content around user intent, prioritizing "what applicants need to know now": required steps, timelines, costs, and points of contact.

Visual hierarchy and content clarity are critical. Pages should include diagrams, infographics, and annotated case studies showing the types of events covered, what permits they require, and what documentation is necessary. Collaborating with communication design specialists, the City should conduct a plain-language rewrite of existing forms and web copy, transforming technical and legal text into clear, approachable language without sacrificing precision.



**Fig 22.** (Left) Turnout NYC Event at Uptown Grand Central, Harlem Silent Disco; Source: Andre Whitehead

The E-Apply platform should incorporate contextual help features, tooltips, expandable "Why we ask this" boxes, and step-by-step guidance, so that applicants understand the purpose behind each question. Providing estimated processing times for each application type would also set realistic expectations, reducing applicant anxiety and follow-up inquiries. These changes, though small in isolation, collectively represent a cultural shift toward treating permitting as a public service rather than a bureaucratic obstacle.

**3. Prototype, test, and sustain through civic tech infrastructure**
Modernization is most effective when grounded in evidence and iteration. The City should begin by developing interactive prototypes, for example, using Figma or similar platforms, to visualize proposed improvements to the E-Apply system. These prototypes can be tested directly with end users, including community organizers, artists, and small business owners, to gather real-time feedback before implementation.

Once core features are validated, the City should launch a beta version of E-Apply that incorporates embedded feedback loops. Instead of a single, global "feedback" button, users should be able to comment on specific steps or questions in the process, creating actionable data for designers and developers. The City should complement this with a public transparency dashboard, similar to NYC Open Data, showing progress on bug fixes, accessibility enhancements, and response times to user reports.

Finally, sustaining these improvements will require stable funding and dedicated staff. The City should create a sustainability plan that secures ongoing maintenance resources through a combination of operating budget allocations, philanthropic support, and public-private partnerships. Coordination with the Mayor's Office (**Rec. One**) could ensure that UX improvements for permitting align with broader goals for transparency and accessibility in the public space management ecosystem.

**4. Renew systems design as an essential city service**
Sustaining high-quality digital services requires ongoing stewardship, not just one-time fixes. The City must invest in design and accessibility expertise as a core competency within government. This means hiring or contracting UX researchers, content strategists, and accessibility specialists, not just software developers, to ensure that quality is maintained beyond the initial upgrade. The City should consider reinvigo-

rating its Service Design Studio, or broadening its mandate, to provide leadership over this and a number of other UX/UI challenges facing the city. Currently situated within the Mayors' Office for Economic Opportunity, this studio could step up in an important moment and provide needed creativity and human-centered design.

**Improving usability, accessibility, and transparency in these systems is not just a technical or aesthetic upgrade, it is an equity intervention.**

Additional leadership should come from the Office of Technology and Innovation (OTI), which should assume the role of citywide UX governance body. OTI can ensure consistent design standards across agencies and develop a unified design system: a shared library of components, icons, and interaction models that create visual and functional consistency across all public-facing city services. This approach, modeled after successful examples like San Francisco's Department of Digital Services, would lay the groundwork for broader modernization across municipal platforms, starting with permitting.

In parallel, the City should build partnerships with local universities and design programs to establish pathway fellowships and internships in civic technology. Programs through institutions like CUNY, Pratt, Cornell Tech, or NYU could give students hands-on experience improving municipal digital services while providing the city with fresh talent and ongoing research capacity.





## Precedent

**Boston's Permitting Modernization Initiative**
Boston's permitting modernization effort addressed UX barriers in permitting systems across city government. Under Mayor Michelle Wu's administration, Boston established permitting reform as a key priority, organizing efforts around "no wrong door" and "tell us once" principles that reduce redundancy and improve user experience across multiple city departments.

Boston's approach combines immediate tactical fixes with longer-term infrastructure investments. The city created multilingual guides such as "Navigating the Permitting Process" that use plain language, visual diagrams, and step-by-step instructions to demystify requirements for first-time applicants. The Inspectional Services Department implemented a Fast Track program that guarantees seven-day approvals for eligible permits, setting clear expectations and reducing applicant anxiety about processing timelines.

Boston embedded these improvements within broader governance reforms. A Technology Modernization Executive Order formalized cross-agency coordination and established sustained funding for digital service improvements. The city government has prioritized mobile optimization, accessibility compliance, and iterative feedback collection, recognizing that modernization is an ongoing process rather than a one-time project.

Recommendation Five

# One-Stop Shop



## What

**The City of New York should launch a single, mobile-friendly, centralized website that consolidates every step and resource required to plan and permit public-space activations. Designed as a clear, contemporary, and multilingual experience, this "one-stop shop" would let applicants understand what permits they need, when to apply, what it costs, and how to comply, without having to navigate multiple agency sites or rely on too much staff intervention.**

## Why It Matters

New York City's permitting process for public space activations is fragmented across multiple agencies, each with its own requirements, terminology, and digital platforms. Applicants often don't know where to begin or which permits they need, leading to delays, confusion, and missed opportunities. The system relies on desktop-era interfaces and inconsistent guidance, which is especially challenging for grassroots organizers, small businesses, and artists who primarily use mobile devices and may not have administrative support.

This fragmentation reinforces inequities: those with prior experience or institutional resources can navigate the process, while smaller community-led groups face disproportionate burdens. Meanwhile, applicants experience public space as a shared civic resource, not as a set of agency silos. The current permitting ecosystem does not reflect that reality. A centralized, mobile-first one-stop portal would provide clear starting points, consistent language, and streamlined workflows. This reduces search time and user error, speeds up approvals, and allows agency staff to focus on safety and coordination rather than troubleshooting. It also expands who can confidently access and animate public space, particularly BIPOC-led and emerging organizations.

Crucially, this is also an investment in New York's digital public infrastructure. A modern, intuitive, and visually coherent platform signals that the City is committed to equitable access, design excellence, and the everyday dignity of those who steward public life. By prioritizing usability, not just compliance, the City can strengthen trust, broaden participation, and support a more vibrant and inclusive public realm.

**Fig 23.** (Below) New York City Open Street; Source: NYC Department of Transportation







## How

Implementing the one-stop shop will require coordinated delivery of user-centered design, inter-agency policy alignment, and sustainable operations. To deliver a functional one-stop shop, the City must actively coordinate user-centered design, inter-agency policy alignment, and long-term operational ownership. The City should prioritize the four considerations below:

**1. Build a mobile-first and accessible user experience**
The City's first priority should be to center user experience and accessibility. The new portal should implement the targeted design improvements identified in the UX/UI Improvements initiative (**Rec. Four**), including guided intake flows, plain-language content, and cost and lead time calculators. These refinements will ensure applicants can clearly see the path from idea to permit, whether they are organizing a small neighborhood fair or a large public concert.

This requires building, governing, and maintaining a centralized digital platform that does the following:

- Permit Navigator ("Get Started" funnel): This might include: guided questions that route users to the correct path (e.g., SAPO vs. Parks vs. DOT), surface requirements at the right time, and generate a tailored checklist of documents, fees, insurance, access routes, and lead times.

- Permit matrix and case studies: Side-by-side comparisons of common event types and rules (e.g. markets, performances, pop-ups, block parties) showing which permits are required, typical timelines, ADA considerations, when vending sales or ticketed event components shift an activation into separate regulatory pathways, and real examples with diagrams and/or photos.

- Calendar and funding hub: Key dates, blackout periods, processing windows, and funding opportunities (e.g. micro-grants, matching grants), with reminders and alerts.

- Application tools: Save-and-resume, status tracking, email/SMS notifications, fee calculators, printable PDFs, plain-language templates (e.g. site plan, insurance COI guidance, vending and concession guidance), and data collection prompts for post-event

reporting.

- APIs and integrations: Connections to agency systems for status updates; optional integration with the Public Space Event Stager (**Rec. Six**) to attach compliant site plans; alignment with the Stewardship Fund (**Rec. Seven**) to pre-screen for grant eligibility.

- Accessibility and trust: WCAG 2.2 AA compliance, mobile optimization, multilingual content, plain-language guides, and transparent policy references.

A key feature of this new system should be a Permit Navigator, a decision-tree tool that asks short, non-technical questions, such as event type, attendance, location, and activities, and outputs the exact permits required, along with deadlines, fees, and insurance needs. By translating complex regulatory frameworks into clear, conversational guidance, the Navigator would make permitting legible to first-time and grassroots organizers. This Navigator will be mutually supported by the Tiered Permitting Rubric (**Rec. Two**); applicants can be guided to programming changes that move them to easier tiers, saving them time and money.

To maintain long-term usability, the City should also develop a shared design system and content style guide. This will ensure that as agencies update their individual web pages or forms, the user experience remains consistent across platforms, devices, and languages.

**2. Align data and content across agencies**
The success of the One-Stop Digital Shop will depend on alignment across multiple city agencies. The City should establish a cross-agency content council, composed of new and existing public agency stewards from SAPO, Parks, DOT, DCLA, FDNY, and NYPD, to maintain a single source of truth for permit definitions and identify when they trigger separate requirements, fee tables, lead times, and blackout dates. This council would prevent outdated or contradictory information from circulating between agencies, a major current pain point for applicants.

Where possible, the portal should expose real-time status updates via APIs, allowing applicants to track their applications without relying on manual email correspondence. The system should also integrate with the Public Space Event Stager (**Rec. Six**), allowing users to attach dimensioned, compliant site plans that automatically validate basic safety and accessibility criteria.





Finally, the portal should embody policy transparency. Each requirement, whether for insurance, lead time, or noise control, should be accompanied by plain-language explanations and "what changed" notes when rules are updated. This clarity transforms the permitting system from a gatekeeping mechanism into an educational resource for the public.

**New York City's permitting process for public space activations is fragmented across multiple agencies, each with its own requirements, terminology, and digital platforms.**

**3. Deliver performance through public-private partnership**
Implementation should follow a build–operate partnership model, combining the city's leadership with private sector technical expertise. A core municipal product team, consisting of product managers, UX designers, engineers, and content specialists, should work alongside a civic-tech vendor during the build phase to ensure that institutional knowledge remains within city government.

Funding should come from a hybrid model that blends city operational funds with philanthropic or corporate social responsibility (CSR) support. This approach has precedent in digital equity initiatives and ensures that improvements can continue beyond the initial rollout. The Public Space Stewardship Fund (**Rec. Eight**) could provide complementary support by underwriting applicant training sessions and micro-grants to offset small permitting costs.

To manage risk and scale efficiently, the City should take a phased approach: the first phase would launch a unified front door that routes users to existing agency systems while offering timelines and navigational guidance; the second phase would integrate deeper API connections, dashboards, and payment capabilities.

**4. Provide a roadmap for continuous iteration**
A major determinant of success will be the City's ability to sustain and iterate the platform. The rollout should include training and support for community-based users, with short tutorials, office hours, and video walkthroughs for BIDs, cultural councils, and neighborhood groups.

The system should embed feedback loops at every level, enabling users to comment on specific steps or submit post-permit surveys. This data should feed into an internal continuous improvement roadmap that is publicly visible, ensuring accountability.

Finally, the City should publish equity dashboards tracking key performance indicators such as time-to-approval, mobile performance, language accessibility, and the participation rate of first-time applicants. This transparency will demonstrate progress and ensure that the permitting portal evolves as a living public service, responsive to community needs and technological change.

**Fig 24.** (Below) Neighborhood Commons Brownsville activation with Caribeing; Source: Design Trust for Public Space








## Precedent

The City of Boston's public space special events portal, which provides applicants with a clear, step-by-step pathway for hosting events in parks, plazas, and streets. Rather than requiring organizers to already know which permits they need, the site asks simple up-front questions about event size, activities, location, and footprint, and then automatically directs applicants to the correct processes and forms. It consolidates timelines, insurance requirements, departmental reviews, and contact information in one place, making it easier for both new and recurring organizers to understand expectations and prepare accordingly.

The portal is written in accessible language, visually organized, and designed to reduce guesswork, helping applicants plan confidently and allowing officials to review applications more efficiently. A New York City one-stop permitting site could adapt this model to local agency structures and community needs, ensuring that public space activation feels approachable, navigable, and aligned with the City's broader goals for equity and cultural life.

Recommendation Six

# "Space Stager" Public Space Digital Mapping

## What

New York City should establish a public space mapping tool, an interactive digital platform designed to transform the way public space activations are planned, permitted, and managed. The tool would function as a citywide public programming atlas, merging the real-time collaborative features of platforms like Miro or Canvas with the mapping power of OpenStreetMap and ZoLa NYC.

By centralizing a comprehensive inventory of public spaces, including detailed street-level data such as fire hydrants, sidewalk widths, street trees, bike lanes, and bus stops, the tool would allow organizers, community groups, and agencies to collaboratively visualize site layouts, overlay infrastructure layers, measure distances, and annotate plans. Final plans could then be archived and made publicly accessible, ensuring both institutional memory and greater transparency across neighborhoods.

## Why It Matters

Organizing events in New York City's public spaces currently requires navigating complex permitting expectations, including producing detailed site plans, documenting fixed infrastructure, and demonstrating emergency access routes. These technical requirements often demand drawing, mapping, and spatial planning skills that many grassroots and under-resourced groups simply do not have. As a result, the ability to activate parks, plazas, and streets is uneven, privileging organizations with professional support and limiting cultural expression and visibility in communities that already face resource disparities.

A shared, intuitive Event Stager tool would lower these barriers by standardizing information across agencies and providing collaborative planning features that make it possible to meet compliance requirements without specialized technical training. It would also streamline agency review, reducing delays and administrative back-and-forth.

Importantly, by archiving event layouts and making records accessible over time, the tool would strengthen institutional memory and public accountability. Communities will gain visibility into what has been done before, and will be able to reuse or adapt successful layouts and engage as equal partners in shaping public space, not just applicants seeking permission.

**Fig 25.** (Below) Bathgate Avenue Open Street in the Bronx; Source: NYC Department of Transportation







## How

Implementing the Public Space Event Stager will require strong cross-agency coordination, data transparency, and investment in digital infrastructure. While this recommendation calls for technological and policy innovation, it does not demand a complete overhaul of existing systems; rather, it aligns and strengthens them under a unified framework. The following considerations should guide its development and implementation:

**1. Conduct a citywide data audit and standardization process**
Before development begins, the City should undertake a comprehensive audit of existing physical and geographic public space datasets. Agencies such as DOT, Parks, SAPO, and DCLA maintain separate databases of infrastructure, permitting, and assets, often in incompatible formats. This audit would identify overlaps, gaps, and redundancies, creating a unified and standardized dataset that includes elements like sidewalk widths, hydrant and utilities locations, vegetation, and past event records. A single data schema will create enormous benefits, updated dynamically as new events are permitted. Standardization would not only streamline permitting but also enable the City to analyze patterns in public space use, helping inform broader urban design and equity strategies.

**2. Design and test the digital platform**
Once the data foundation is established, the City should develop a prototype of the Event Stager platform: an interactive, citywide map that merges real-time collaboration (like Miro) with open-source mapping (like OpenStreetMap or ZoLa). The tool would allow users to visualize public spaces, overlay infrastructure layers, measure distances, and plan event layouts collaboratively, including elements like temporary seating, tables, stages, street vending tents, and equipment. Users would be able to design and configure their public program in the same way that they might move through Google Maps or order an Uber.

The City should partner with universities, civic-tech organizations, and design firms to ensure the tool's accessibility, usability, and visual clarity. Pilot testing should take place in a few representative neighborhoods and with a diversity of organizational scales and types. Feedback from both city staff and local organizers should guide iterative improvements before scaling citywide. The prototype phase is an opportunity

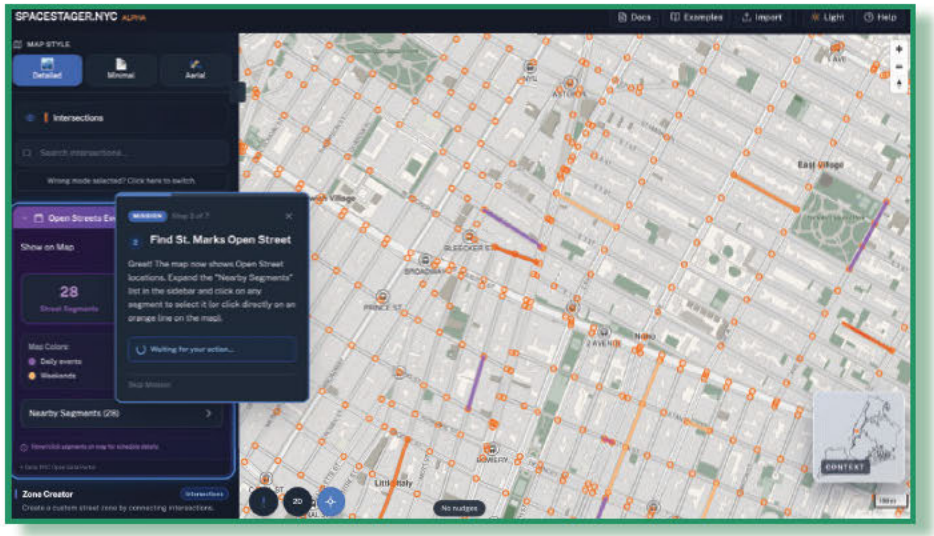



**Fig 26.** (Above) The Spacestager prototype draws on existing spatial databases to create custom site plans.

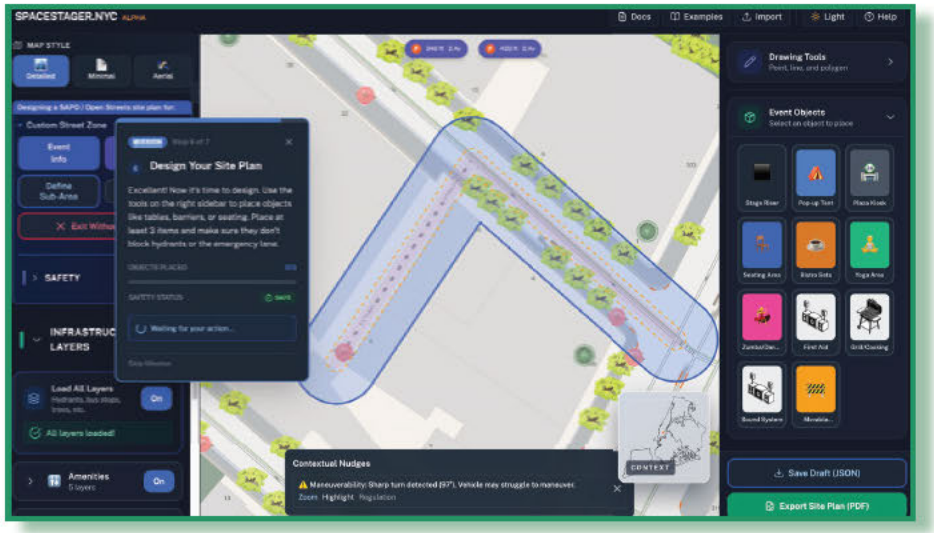
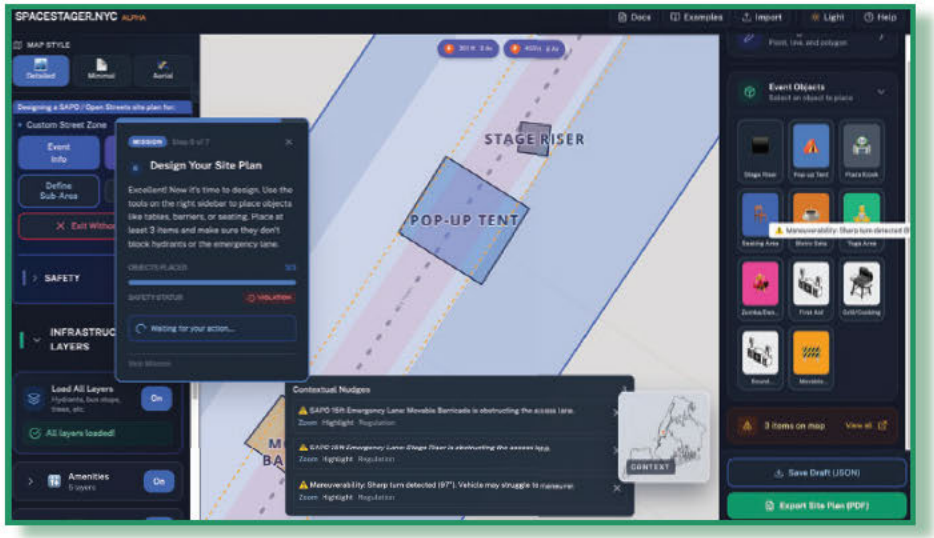



**Fig 28.** (Above) Spacestager allows for the automatic inclusion of existing site information, such as trees, fire hydrants, and utilities.

**Fig 27.** (Below) Spacestager can allow for easy mapping of a NYC Open Street or other street activity, offering contextual nudges and insight along the way.



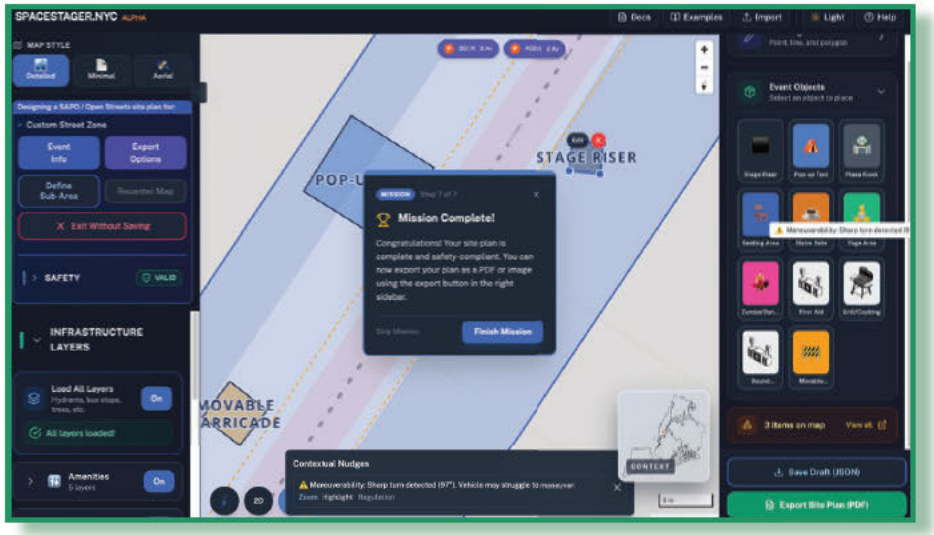




**Fig 29.** (Below) Spacestager allows for saving events for future reference, exporting site plans, and collaborative working models.

to demonstrate that good design, grounded in equity and practicality, can make permitting more transparent, not more complex.

**3. Align the tool with institutional policies**
The Event Stager's long-term success will depend on strong governance and user education. Embedding the tool within the new Mayor's Office (**Rec. One**) would give it a stable institutional home, ensuring coordination between SAPO, DOT, Parks, and other agencies. A strong partnership with OTI would maintain its long-term functionality.

The City should also develop a training program for users, both agency staff and community groups, so that everyone can access and use the platform effectively. Aligning permitting policies and data-sharing agreements is essential to ensure that all relevant agencies can both contribute to and draw from the system. The governance framework should also include clear privacy protocols to safeguard sensitive data while preserving transparency in public decision-making.

**4. Evaluate and sustain the tool over time**
For the Public Space Event Stager to be effective over time, the City must treat it as living infrastructure requiring continual investment and adaptation. Sustaining it will require dedicated funding for server maintenance, feature updates, and user support. The City should explore public-private partnerships to either supplement the capacity for the Stager tool, or to potentially own and manage the back end of the site, with a universal city contract.

Evaluation over time should focus on measurable outcomes: reductions in permitting time, increased collaboration between agencies, and higher numbers of public space activations across boroughs. Regular user feedback, through surveys, workshops, and public design sessions, should inform continuous improvements. The Event Stager's ultimate value lies in its adaptability: it will succeed if it becomes a shared civic tool that grows with the communities and agencies that use it.

Additionally, there are a number of other use cases to adapt the tool, should it prove successful. A similar tool could be created to help manage the outdoor dining program, giving restaurant owners a simpler way to communicate with city staff about their designs, or it could help coordinate less complex site-based construction projects.





## Precedent

Models already exist demonstrating how spatial transparency and mapping tools can support city agencies and community users. Platforms like OpenStreetMap show how collaboratively maintained base maps provide accurate, open-source spatial context; ZoLa NYC illustrates how layered zoning and land-use information can be presented in clear, toggleable formats; and ChiStreetWork (Chicago) offers a centralized interface for tracking street closures and planned public right-of-way use.

Commercial event planning platforms show that this functionality adds value for cities and users. Iventis, used by major international events including the 2022 Commonwealth Games and the UN Climate Change Conference (COP26), provides collaborative visual mapping that enables multiple stakeholders to work simultaneously on event plans. Users upload CAD drawings, place infrastructure with centimeter accuracy on satellite maps, and generate 3D visualizations. OnePlan, used by over 50,000 events worldwide, offers similar functionality optimized for community-scale events. Built on Esri's ArcGIS platform, OnePlan allows governments to digitize event planning with accurate geospatial data for mapping infrastructure and emergency access.

A New York City Public Space Event Stager could integrate these strengths into a single, interactive platform combining open-source mapping foundations with professional-grade collaboration features, making sophisticated site planning accessible to all organizers regardless of technical expertise or organizational capacity.

Recommendation Seven

# Seasonal Activation Partner Permit





## What

**The City of New York should establish a Seasonal Activation Partner Permit (SAPP), a streamlined, medium-term permitting mechanism that allows qualified community partners, cultural organizations, local nonprofits, and small business alliances to repeatedly activate public spaces over the course of a defined season and within defined parameters, without having to reapply for individual permits for each event.**

## Why It Matters

Community organizations, neighborhood associations, and local cultural groups often run recurring public space events that are essential to neighborhood life. Yet each activation, even when it is identical to a previously approved one, requires reapplying, repaying fees, resubmitting insurance, and undergoing a full review. This redundant process creates unnecessary financial strain and administrative labor for both applicants and agency staff. Groups that have repeatedly demonstrated strong stewardship are still forced to start from zero every season, often facing inconsistent requirements and timelines depending on who reviews their application. The result is confusion, inequity, and a system that discourages long-term community programming.

Requiring a separate permit for each event makes scheduling difficult, as the public space programming confronts the dynamics of the real world. Weather unpredictability is an enormous challenge; a single day of rain can cancel months of preparation, costing organizers permit fees, deposits, and momentum. As permits do not allow for flexibility because of a weather event, many community groups simply cannot absorb the financial risk, discouraging them from activating public spaces at all. Groups that schedule repeat events throughout the year and/or annually must deal with archaic grandfathering of historic events and confusion when external factors, such as artist schedules or third-party vendors, force date shifts that they cannot accommodate without additional permitting.

**Fig 30.** (Below) Brownsville Community Justice Center open mic afternoon; Source: SITU








## How

A Seasonal Activation Partner Permit (SAPP) would mitigate these structural barriers by creating a predictable, trust-based pathway for recurring events. It would allow qualifying partners to renew or modify approved event plans with minimal friction, stabilizing costs and allowing for flexible weather options. Rather than treating each activation as a one-off transaction, the City would recognize recurring events as ongoing civic infrastructure, worthy of consistent support, streamlined processes, and shared responsibility.

The SAPP would be a new permit type that would apply across all public space typologies and boroughs (or it could start in a trial period with more limited purview), expanding beyond the limited frameworks of existing plaza partners, Open Streets, or park conservancies. A SAPP would grant a pre-approved partner permission to host recurring or flexible programming in designated spaces during a set seasonal window (e.g., May–August or November–January) under agreed-upon parameters of duration, number of activations (including proposed dates), location and footprint size, insurance requirements, and types of activities (e.g., vending, amplified sound, or performances). The permit should also codify the process for renewal, allowing returning partners in good standing to reaffirm their prior-season compliance rather than starting from scratch. In order to develop the SAPP, the following process is recommended.

**1. Design the policy and eligibility framework**
At the core of the Seasonal Activation Partner Permit is the need for a predictable and transparent structure that recognizes trusted community partners as capable stewards of public space. The City, including the Law Department and Comptroller's Office, should begin by establishing clear eligibility criteria, initially focusing on proven plaza partners, Open Streets organizations, and nonprofits with a track record of successful activations. Existing legal structures, such as sole source license agreements, could be evaluated as a potential model or as the foundation for an expanded program. Over time, eligibility can expand to include new community-based organizations that demonstrate local benefit or emerging leadership capacity. By codifying these elements—eligibility, structure, renewals, and weather flexibility—the City would establish a permitting system that builds stability, rewards good stewardship, and expands equitable access to activation opportunities.

**2. Centralize coordination**
A successful SAPP will also require a unified permitting body that links all relevant agencies (**Rec. One**) and presents a single, intelligible interface for applicants (**Rec. Five**). The City should integrate the program into the proposed One-Stop Permitting Portal to create a centralized and transparent application system. Through this digital infrastructure, partner organizations could submit a single seasonal application, track approval progress, and update scheduling information without duplicating paperwork across SAPO, DOT, Parks, and other agencies.

**3. Implement and operationalize**
To formalize and operationalize this permit, the City should issue a citywide directive from the Mayor's Office that clearly establishes the SAPP framework, including parameters for duration, renewal, insurance, and coordination. The directive would unify disparate agency policies and create a consistent standard for recurring public space activations.

Importantly, the SAPP would enable select applicants to identify alternative dates in the case of cancellations due to weather (as long as rescheduled events maintain agreed-upon parameters of scale, timing, and safety and are held during the set seasonal window). Rain dates should be piloted for activations that fall under higher Event Tiers (**Rec. Two**), i.e. events that may anticipate large attendance, require larger footprints, or have longer duration.

The City should also explore partnerships and resources that help establish these recurring partnerships, as many groups will be new to longer-term relationships with the City. This could be financially supported through partnerships with the Public Space Stewardship Fund (**Rec. Eight**), which would provide grants or matching support for community.

**4. Evaluate over time**
To ensure the Seasonal Activation Partner Permit is equitable, effective, and sustainable, the City should begin with limited pilot programs, either starting with a smaller geographic zone or identifying a handful of pilot partners. These pilots would test efficiency and user experience.

Once established, the permit could evolve to include hybrid programming models (indoor-outdoor, digital-physical), collaborative events across multiple partners, and neighborhood-based activation zones that further decentralize decision-making. Taken together, these steps would transform the City's approach to recurring public space activation, from a transactional permitting system to a partnership-based model grounded in trust, flexibility, and community stewardship.

**Fig 31.** (Pg. 94-95) Union Square Greenmarket; Source: Uptown Phil Roeder





## Precedent

**New York City Farmers Market Permit**
New York City's farmers' markets show how innovative legal structures can support recurring community activations. This includes the Greenmarket program, operated by GrowNYC since 1976, which operates as a sole-source concession. While different in its legal structure, length, and geography, this precedent affirms the core principle behind the Seasonal Activation Partner: certain trusted community partners could benefit by not reapplying for identical activations each time they occur.

These farmers markets' concession agreements dramatically reduce administrative burden for both organizers and city agencies. Rather than processing 50+ individual applications for a weekly summer market, the City processes one application covering the entire season. The predictable fee structure allows farmers and market managers to budget accurately, removing financial uncertainty.

Most importantly, the Greenmarket model has proven sustainable at scale. GrowNYC operates 45+ locations citywide, serving over 200 regional farmers across all five boroughs. The program's 50-year longevity demonstrates that seasonal permits can maintain public safety and quality standards while dramatically simplifying recurring activations. The Seasonal Activation Partner Permit could extend this proven framework to other types of community-led public space programming, from cultural performances to neighborhood gatherings.


GOLDEN BEETS
BEETS
WHITE CARROTS
PURPLE CARROTS
CARROTS
RADISHES

Recommendation Eight

# NYC Public Space Stewardship Fund

## What

**The City of New York should work with the philanthropic and civic communities to establish a NYC Public Space Stewardship Fund, a private 501(c)3 that can raise money from multiple sources, including public grants, municipal allocations, philanthropic contributions, corporate donations and partnerships, and grassroots fundraising. These resources can nimbly support under-resourced community groups, cultural organizations, and small-scale public space stewards with a combination of technical and financial resources. This organization can interface with trusted agency partners in tackling needs that the City can't, for legal or structural reasons.**

## Why It Matters

Communities are constantly in search of funding and volunteer support to execute activations. Many community-based organizations attribute programming challenges to operating with extremely limited staff, time, and cash flow, while being asked to front costs for permits, insurance, site plans, artist fees, and equipment, often months before reimbursement (typical for government grants). As such, flexible funding mechanisms through a nonprofit intermediary may allow organizations to cover insurance, permit fees, and deposits; pay artists and vendors on time; and move forward with programming even when city permitting timelines are unclear or delayed.

New York already has a number of "Fund of" organizations and nonprofits that work in this space. While this recommendation encourages a field scan to ensure that a new organization isn't competing for dollars or duplicating efforts, it is supported by a clear need for resources in community-based organizations, especially in new areas of innovation for the city, like Open Streets and outdoor dining. NYC Parks has a handful of organizations, like the City Parks Foundation/Partnership for Parks, that have a mandate to support work in its purview. These partners should be seen as models for learning, adaptation, and potential growth, as we define the city's public realm more broadly. Additionally, the Urban Design Forum and ANHD have been leading the advocacy for a very similar idea for years, demonstrating a shared commitment to fill a gap of important need.

**Fig 32.** (Below) "Les Diamants" by Perseides Studio from QDS International; Source: Art Partners








## How

The NYC Public Space Stewardship Fund would be designed to have a broad remit, one that could change over time as needs evolved. This is purposeful, as successful public private partnerships exist so that the private partner can be flexible and responsive to community needs. In order to jump-start the Stewardship Fund, the following steps should be taken:

**1. Establish the entity's governance framework**
The independent, nonprofit Stewardship Fund should be created by a partnership between the City of New York and existing nonprofits with sectoral expertise. A number of successful models exist, which should be studied for their legal structure, programs, and impacts. Likely, the Fund would exist as a 501(c)(3) that operates as a long-term vehicle for supporting public realm programming, maintenance, and activation. The organization could have a formal public-private partnership overlay, coordinated by a license or contractual agreement, which would give the organization more power to work and speak on behalf of city priorities. The City would provide legitimacy and oversight, while private and philanthropic partners contribute funding and technical expertise.

**These partners should be seen as models for learning, adaptation, and potential growth, as we define the city's public realm more broadly.**

Governance should include a diverse board of representatives from city agencies, community-based organizations, cultural institutions, and civic advocates. This diversity ensures that funding and support reflects the full spectrum of NYC's public space users. The board should operate under a well-defined charter and set of bylaws, paired with other appropriate governance documents such as a set of financial policies. The Fund's mission should center equity, prioritizing historically under-resourced neighborhoods and supporting organizations that have been excluded from traditional funding streams.

**2. Design inclusive program**
The Fund should be designed to lower barriers and build capacity. Examples of resources that could be provided include, but are not limited to:

**Fig 33.** (Pg. 92-93) Turnout NYC Event, Roller Jam 2021; Source: Uptown Grand Central



- Low-barrier, rolling micro-grants ($1,000–$10,000) to support small-scale activations such as arts programming, markets, performances, and pop-ups. These grants can be executed with minimal administration and operate as risk capital for smaller organizations.

- Matching grants to incentivize and support public space management and stewardship initiatives.

- Cooperative and one-time insurance coverage pre-authorized by city agencies, reducing a major financial and logistical barrier for organizers. These products could be co-vetted by city legal staff and private sector partners, so that public space partners can purchase these products, according to their tier (**Rec. Two**) and with assurance of their legal applicability.

- Accessible informational resources (websites, guides, brochures, workshops) that simplify and demystify the permitting process. These guides could be created in tandem with the other products here, such as the One-Stop Shop (**Rec. Five**) or the Space Stager Tool (**Rec. Six**). In a future instance, the Fund could "adopt" one of these programs and become the digital clearinghouse for city infrastructure under a license agreement. This would allow for these tools to be maintained and designed with much greater flexibility.

- Training and mentorship programs for public space management partners, with a focus on supporting new, emerging, and historically underrepresented groups. This blends financial aid with education, transforming grants into pathways for long-term community empowerment.

However, the Fund is only limited by creativity and resources. Future programs could expand any one of the above resources, or new ones could be created.

**3. Diversify revenue streams and partnerships**
For the Fund to be sustainable, it must rely on diverse revenue streams. Core funding could include a master contract with the City, supplemented by philanthropy, corporate sponsorships, and foundation grants. The Fund should also explore earned income opportunities, such as fee-for-service consulting, cross-sector partnerships, and collaborations with BIDs that may lack crucial cultural and public programming components. Partnerships with universities and arts councils








Fig 34. (Above) Potential diagram of Stewardship Fund organizational structure

could help document and disseminate the Fund's impact, turning it into a learning model for public space governance.

Additionally, should the fee structure be improved, with clearer tiers, there is also an opportunity for the Fund to take advantage of increased permit fees for larger and more well-established public space producers, such as media companies, concert promoters, and cultural organizations. With more equitable but greater resources, the Fund could be super-charged as a conduit for marketing, community engagement, event promotion, event management, and other services that go beyond a typical nonprofit entity. The success of this direction would require innovative legal thinking about the for-profit potential of events, combined with a mission-driven service for local communities.

**4. Evaluate impact**
Transparency will be central to the Fund's legitimacy. It should maintain a publicly accessible database and publish annual reports tracking the number, type, and geographic distribution of its support and awards. Evaluation metrics should include organizational growth, stewardship longevity, and community satisfaction. To ensure responsiveness, the Fund should maintain open feedback loops, hosting community listening sessions and peer-learning forums that allow grantees to share experiences and shape future programs. This culture of transparency and iteration will make the Fund more than a financial mechanism, it will be a civic institution of trust, ensuring that resources reach the people and places that need them most.

**Fig 35.** (Below) Collective Bloom by Acrylize







## Precedent

**New York City "Fund Ofs"**
New York City has long pioneered public private partnerships to extend the reach of needed services, starting with the Fund for the City of New York in 1961. Today, many such organizations demonstrate both the viability and flexibility of the "Fund of" model. The Public Housing Community Fund (2015) and City Parks Foundation's Partnerships for Parks (1995) show a variety of approaches that could be used to design the Public Space Stewardship Fund.

All three organizations share foundational characteristics: 501(c)(3) nonprofit status, formal partnerships with city agencies, diversified revenue streams combining public contracts with philanthropic support, and governance structures blending government oversight with community representation. This hybrid model enables them to operate with greater agility than traditional government programs while maintaining public accountability and mission alignment. Critically, each organization fills gaps that city agencies cannot address alone, whether due to procurement restrictions, budget cycles, or statutory limitations on direct service delivery.

Partnerships for Parks operates closest to the proposed model, providing grassroots park groups with small grants, technical assistance, and volunteer coordination, but only in NYC Parks controlled spaces. The Public Housing Community Fund shows how a partner can take on expansive capital projects and support programming that transforms NYCHA communities.

## Appendix One

# Methodology





The Untaped initiative employed a four-phase approach supported by cross-sector partnerships and meaningful engagement with New Yorkers who regularly activate the public realm. Led by the Design Trust for Public Space, the process combined community insight with agency expertise to build a more accessible, collaborative, and equitable framework for public space activation in New York City. The approach balanced the experiences of organizers across all five boroughs, while also drawing on national learning from cities advancing innovative models for public realm stewardship.

The four-phased initiative consisted of Research, Partner-Based Analysis, Impact Evaluation, and Recommendations.

**Research Phase**
The project began with foundational research to understand the current landscape of public space activation and permitting in New York City. This phase included the formation of an advisory group, made up of fellows from the NYC Department of Transportation, NYC Department of Parks and Recreation, City Parks Foundation, Trust for Public Land, and community-based organizations representing all five boroughs. This group hosted a kickoff workshop to shape an initial research framework, and provided insight into how existing systems function on a daily basis. The fellows conducted background research; reviewed City policies, permitting processes, and public realm management structures; gathered initial qualitative data; and conducted limited field observations of active events. These early efforts clarified the key administrative and structural challenges facing public space permit applicants.

**Partner-Based Analysis**
The primary methodology of research focused on engaging with stakeholders and community-facing partners. Over the course of the project, the team engaged 55+ such stakeholders across all five boroughs, including cultural organizations; community development groups; arts non-profits; Open Streets partners; and food security, youth, and immigrant justice development organizations. Engagement methods included hands-on workshops, one-on-one interviews, focus groups, site visits, and transcript analysis, generating a rich body of qualitative data.

The project synthesized these insights with thematic coding of recurring issues, operational barriers, and structural inequalities. Community partners shared perspectives on navigating city systems, coordinat-

ing with agencies, operational burdens, and the lived experience of programming public spaces at the neighborhood scale. These findings shaped both the problem definition and the direction for the recommendations.

To ground this evaluation framework in a national context, the project team collaborated with the Trust for Public Land's Park Stewardship Community of Practice, which produced case studies on promising stewardship and permitting models from Philadelphia, Raleigh, San Francisco, Pittsburg, Austin, and Long Beach. These comparative insights offered valuable lessons on governance, risk management, insurance, capacity building, and community-based stewardship across U.S cities.

**Impact Evaluation**

Rather than conducting a comprehensive impact survey across all organizations and events (an effort beyond the project scope), the team worked with Jon Stover and Associates (JS&A) to develop a pilot evaluation tool for public space activation and tested the tool in several real-world environments. This process helped inform the initiative's research and laid the groundwork for a more robust system: The NYC Public Space Programming Impact Tool.

This proposed tool would allow programming partners to select impact indicators that match their events and organizational goals, across four primary impact categories: community, placemaking, economic, and fiscal. These indicators would support consistent measurements, anonymous citywide aggregation, and an improved understanding of the value and outcomes of public space activation.

**Recommendations**

In the final phase, the project team synthesized research findings, stakeholder insights, national case studies, and policy analysis into a cohesive set of actionable recommendations. This refinement process took place through iterative workshops with stakeholders and advisory group members, ensuring that each recommendation reflected community needs, agency realities, and the broader goals of public realm equity. These final recommendations were reviewed with a broad group of stakeholders for final feedback and assessment.





**Fig 36.** (Right) Turnout NYC Queensboro Dance Festival; Source: Andre Whitehead



DESIGN TRUST
FOR PUBLIC SPACE

Name

# Michael T. Maynard

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Philanthropic Endeavors for Humanity |
| Zip Code | [redacted] |
| Public Comment | Is there any remaining initiative for public free buses or are we still going for expediting efficiency? |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 4:44pm |

Name

# Evelyn Choudhury

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | The city is blessed with so much opportunity. We need to urgently address, gun violence among teens. Prevention is key, fun free programs after school and summer , paid internships. Parent support so they can reach to someone and say they need help with their child. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Policing |
| Method Received | Airtable Form |
| Created By | 6/9/2026 4:44pm |

Name

# Cristifer Hanmore

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Mayor Mamdani is a breath of fresh air. His policies that pull inspiration from the FDR New Deal era and modern reforms are a shining beacon in todays political field. I have written a very thorough wage reform that pulls directly from FDRs new deal policies as well, that I would love to have reviewed and hear feedback if possible. I dont know how else to deliver this information, but I would love if someone could reach out to me about it! |
| Attachment(s) |  STATE OF NEW YORK inbound5312355212479539435.docx |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 4:50pm |

# STATE OF NEW YORK

Draft Legislation Prepared by Cristifer Hanmore
For Introduction by the New York State Legislature

SECTION 1. Purpose and intent.

(a) The purpose of this Act is to ensure that all workers in New York State are paid a wage sufficient to meet the cost of living in their county of employment.

(b) This Act seeks to reduce taxpayer burden by eliminating corporate cost-shifting through underpayment of wages.

Reasoning: Establishes the legislative purpose and ensures communities benefit from reduced poverty, increased stability, and reduced taxpayer subsidies.

SECTION 2. Definitions.

(a) "Baseline living wage" shall mean the hourly wage required for a full-time worker to meet the essential cost of living in the county of primary employment, as determined annually pursuant to Section 7 of this Act.

(b) "Employer" shall mean any person, partnership, corporation, association, organization, or other entity employing one or more individuals within the State of New York.

(c) "Small employer" shall mean an employer with fewer than one hundred employees statewide. "Mid-market employer" shall mean an employer with one hundred to nine hundred ninety-nine employees statewide. "Large employer" shall mean an employer with one thousand or more employees nationwide.

(d) "Primary work county" shall mean the county in which an employee performs fifty percent or more of their monthly work hours.

(e) "High-cost exposure county" shall mean any county in which an employee performs twenty percent or more of their monthly work hours and where the baseline living wage exceeds that of the employee's primary work county.

(f) "Minimal exposure" shall mean work performed in a higher-cost county constituting less than twenty percent of an employee's monthly work hours.

(g) "Youth or apprentice worker" shall mean an employee under the age of eighteen, or a first-time worker within their first six months of employment, who is concurrently enrolled as a dependent or student.

(h) "Certified or skilled professional" shall mean any employee who holds a state license, recognized certification, or documented advanced training necessary for their occupation.

(i) "County variance band" shall mean the permissible adjustment range of no more than five percent above or below the annually calculated baseline living wage for a county.

(j) "Living wage index" shall mean the consolidated dataset produced annually under Section 7 of this Act.

Reasoning: Clear, uniform definitions ensure consistent application, protect mobile workers, and establish a transparent framework grounded in reputable datasets.

SECTION 3. Employer classifications and wage requirements.

(a) Baseline wage requirement. All employers shall compensate employees at no less than the baseline living wage corresponding to the employee's primary work county.

(b) Small employers. Small employers shall comply with the baseline living wage requirements but shall be eligible for temporary payroll tax credits during the phase-in period.

(c) Mid-market employers. Mid-market employers shall comply with the baseline living wage requirements according to the statutory implementation schedule.

(d) Large employers. Large employers shall comply immediately upon the effective date and shall not be eligible for transitional adjustments.

(e) Tier 1 mid-market transitional employers.

(1) Employers with one hundred to one hundred forty-nine employees statewide shall be classified as Tier 1 mid-market transitional employers.

(2) Tier 1 employers shall meet phased-in wage thresholds: Year 1: 92%; Year 2: 96%; Year 3: 100% of the baseline living wage.

(3) Tier 1 employers shall receive extended access to payroll transition credits and simplified filing requirements for the first twenty-four months.

(4) No retroactive penalties shall apply when employers cross the one-hundred-employee threshold.

(f) Skill premium requirement.

(1) Certified or skilled professionals shall receive a mandatory wage premium of no less than 15% and no more than 30% above the baseline living wage.

(2) Employers shall maintain transparent promotion pathways and documented qualification standards.

(3) Employers shall not reduce wage differentials to avoid compliance.

(4) Merit-based raises shall not be eliminated due to implementation of this Act.

(g) Prohibition on wage compression. No employer shall diminish wage hierarchies for skill, responsibility, or tenure to offset compliance.

Reasoning: This section supports fair transitions for employers, preserves incentives for skill development, and prevents wage compression that would undermine professional

advancement.

SECTION 3-A. Fair compensation and fiscal responsibility.

(a) Purpose. The purpose of this section is to ensure that all workers are compensated fairly while maintaining fiscal responsibility for taxpayers and balancing the needs of employers during the transition to a county-based living wage framework.

(b) Corporate cost-shifting prohibition. No employer shall shift labor costs onto state public assistance programs by compensating employees at wages insufficient to meet the baseline living wage for their county of primary employment. Employers who do so shall be subject to reimbursement requirements pursuant to Section 5 of this Act.

(c) Transitional employer support. (1) Small employers and Tier 1 mid-market transitional employers shall be eligible for temporary payroll credits during the initial phase-in period of this Act, subject to regulations promulgated by the Department of Taxation and Finance. (2) Payroll credits shall phase out as employers reach full compliance with applicable wage tiers.

(d) Youth and apprentice wage tier. (1) Employers may compensate youth or apprentice workers, as defined in Section 2 of this Act, at eighty-five percent of the baseline living wage for the first six months of cumulative employment. (2) Youth or apprentice workers shall be paid no less than one hundred percent of the baseline living wage upon: (A) completion of six months of cumulative employment, or (B) attaining the age of eighteen, whichever occurs first. (3) No employer may reduce hours, manipulate onboarding dates, or otherwise engage in practices intended to delay an employee's progression to the full baseline living wage. (4) Youth or apprentice wage allowances shall not be used as grounds for discrimination in hiring, retention, or promotion.

(e) Safeguard against age discrimination. Employers shall not refuse to hire or retain workers on the basis of age in order to pay reduced youth or apprentice wage rates. The Department of Labor shall investigate patterns indicating potential abuse or discriminatory hiring practices.

(f) Taxpayer protection. Implementation of the youth and apprentice wage tier shall not diminish projected taxpayer savings resulting from reductions in wage-related public benefit expenditures.

Reasoning: Transitional wage allowances for youth and first-time workers are limited and time-bound to prevent exploitation, while prohibitions on cost-shifting protect taxpayers. Clear restrictions prevent delaying progression to the full living wage and bar age-based discrimination.

SECTION 4. Elimination of scheduling-based exploitation and multi-county wage clarification.

(a) Prohibition on variable wage manipulation. No employer shall assign, adjust, or manipulate employee schedules or work locations for the purpose of avoiding the baseline living wage applicable to the employee's primary work county. Any pattern of such conduct shall constitute a violation of this Act.

(b) Hours reporting. Employers shall maintain accurate daily and weekly records of the counties in which employees perform work. Such records shall be retained for no less than six years and made available to the Department of Labor upon request.

(c) Multi-county worker compensation rule. (1) Primary work county rule. An employee shall be compensated at the baseline living wage corresponding to the county in which the employee performs fifty percent or more of their monthly work hours. (2) High-cost exposure rule. Where an employee performs twenty percent or more of their monthly work hours in a high-cost exposure county, the employer shall compensate the employee at the baseline living wage of that higher-cost county for the entire month. (3) Minimal exposure exception. Work performed in a higher-cost county constituting less than twenty percent of an employee's monthly work hours shall not trigger wage reassignment. (4) Rotation and travel assignments. Where an employee's duties require routine travel or rotation between multiple counties, the employer shall calculate compensation based on: (A) the primary work county, or (B) the high-cost exposure county, pursuant to this subsection. Employers shall not rotate employees into lower-wage counties for the purpose of reducing labor costs. (5) Employer duty to track. Employers shall use existing scheduling, payroll, or time-keeping systems to document county-specific hours worked. Failure to maintain adequate records shall create a rebuttable presumption of violation.

(d) Prevention of artificial work reassignment. Employers shall not modify assigned job sites, delivery routes, client lists, regional territories, or similar work responsibilities in a manner that artificially relocates an employee's labor to a lower-cost county for the purpose of lowering wage obligations.

(e) Protection for mobile, travel-heavy, and on-site workers. For employees in construction, transportation, field services, installation, banking, inspection, and other travel-based sectors, the Department of Labor shall promulgate regulations ensuring that routine travel does not diminish wage protections under this Act.

(f) Employee complaint and investigation process. (1) Any employee who believes that their employer has violated this section, including but not limited to misclassification of county-specific hours, artificial reassignment of work locations, or failure to pay the correct county-based wage, may file a complaint with the New York State Department of Labor, Division of Labor Standards. (2) Complaints may be submitted: (A) online through the Department of Labor's wage complaint portal; (B) by mail; or (C) in person at any regional Labor Standards office. (3) Upon receipt of a complaint, the Department of Labor shall initiate a preliminary review within fifteen business days to determine whether the allegations, if true, would constitute a violation. (4) If a violation is reasonably suspected, the Department shall open a full investigation, including review of employer timekeeping, payroll, and location-based

work records. (5) No employer may retaliate against any employee for filing a complaint, cooperating with an investigation, or attempting to exercise rights under this Act. Any such retaliation shall constitute a separate and independent violation. (6) Employees shall be informed in writing of: (A) receipt of their complaint, (B) the status of any investigation, and (C) the outcome of the Department's determination.

Reasoning: Prevents geographic wage manipulation, protects mobile workers, and provides a clear, fast pathway for employees to report violations, with retaliation explicitly prohibited.

SECTION 5. Accountability and public cost responsibility.

(a) Purpose. The purpose of this section is to ensure that employers, rather than taxpayers, bear the economic responsibility for wages that fall below the baseline living wage required for self-sufficiency in the employee's county of primary employment.

(b) Corporate cost-shifting defined. For the purposes of this Act, "corporate cost-shifting" shall mean the practice of compensating employees at wages insufficient to meet the baseline living wage, resulting in such employees relying, in whole or in part, on public assistance benefits administered by the State of New York or its subdivisions.

(c) Prohibition on corporate cost-shifting. No employer shall compensate any employee at a rate below the applicable county-based baseline living wage in a manner that causes or contributes to the employee's reliance on publicly funded assistance programs.

(d) Public assistance reimbursement framework. (1) Reimbursement recipient. All reimbursement payments required under this section shall be remitted to the State of New York and allocated to the agency or agencies responsible for administering the public benefit program or programs for which the employee qualified as a result of wage insufficiency. (2) No employee liability. Under no circumstances shall an employee be required to repay any portion of public assistance benefits received. Employers shall not remit reimbursement payments directly to employees. (3) Proportional attribution. Employer reimbursement obligations shall be limited to the portion of benefits attributable to wage insufficiency, as calculated by OTDA, the Medicaid Division of the Department of Health, or any successor agencies. (4) State treasury allocation. All such reimbursements shall be deposited into the Workforce Stability & Public Benefit Offset Account, a dedicated account within the State Treasury, and shall be used exclusively for the administration of public benefit programs or for taxpayer relief. (5) Annual reconciliation. Reimbursement amounts shall be calculated on an annual basis, using employer wage reporting data, employee income verification systems, and public assistance eligibility records. (6) Coordination with wage enforcement. Where the Department of Labor determines that an employer has failed to comply with the baseline living wage requirements established under this Act, such determination shall automatically initiate a review of reimbursement by the appropriate state agency or agencies.

(e) Notice to employers. The OTDA shall provide notice to employers when a reimbursement assessment has been initiated, including a description of the benefits implicated, the data sources relied upon, and the employer's right to challenge or correct reported wage data.

(f) Appeals. Employers shall have the right to appeal reimbursement determinations within thirty days of receipt of notice. Appeals shall be heard by an administrative law judge pursuant to procedures established by the relevant agency. Filing an appeal shall not stay wage enforcement actions under any other section of this Act.

(g) Anti-retaliation. No employer shall retaliate against an employee who applies for public assistance benefits, cooperates with a reimbursement investigation, or exercises rights granted under this Act. Retaliation shall constitute a separate violation, subject to civil penalties.

(h) Employer cooperation. Employers shall provide payroll records, scheduling records, county-specific work location data, and any additional documentation reasonably required to determine whether wage insufficiency contributed to an employee's eligibility for public assistance.

Reasoning: Ensures taxpayers are not subsidizing inadequate wages, limits reimbursement to the portion caused by wage insufficiency, and provides due process and anti-retaliation protections.

SECTION 6. Profit-sharing requirements and protections for skill-based wage structures.

(a) Purpose. The purpose of this section is to preserve fair and competitive compensation structures within the workforce, ensure upward mobility for skilled workers, and prevent employers from diminishing wage hierarchies in response to the implementation of this Act.

(b) Profit-sharing requirements. (1) Employers who maintain profit-sharing, bonuses, or incentive-based compensation systems shall continue such systems in a manner that does not disadvantage employees as a consequence of compliance with this Act. (2) No employer shall reduce or eliminate profit-sharing or bonus programs solely to offset the cost of meeting baseline living wage requirements.

(c) Skill premium protections. (1) Certified or skilled professionals shall receive a mandatory wage premium of no less than fifteen percent and no more than thirty percent above the baseline living wage for the county of primary employment. (2) Employers shall clearly identify which positions qualify as certified or skilled professional roles, and shall maintain written documentation of the qualifications, licenses, or certifications required for each such role. (3) Employers shall not reduce training, licensing assistance, or skill development opportunities in an attempt to avoid compliance with wage premium requirements.

(d) Merit-based compensation. (1) Employers shall maintain merit-based wage increases for employees whose performance, experience, longevity, or additional responsibilities justify higher compensation. (2) Compliance with the baseline living wage shall not be used as grounds for eliminating annual merit-based raises or altering established raise schedules.

(e) Promotion and advancement transparency. (1) Employers with twenty or more employees shall maintain written promotion pathways outlining the criteria, responsibilities, and wage expectations associated with advancement opportunities. (2) Such documents shall be made available to employees upon hiring and whenever updated. (3) Employers shall not use compliance with this Act as justification for reducing the availability of promotional opportunities.

(f) Anti-compression clause. (1) No employer shall reduce the differential between wage tiers for skilled and unskilled positions, or between supervisory and non-supervisory roles, as a means of offsetting compliance with the baseline living wage. (2) Wage compression resulting from failure to maintain proper differentials under this subsection shall constitute a violation of this Act. (3) Employers shall review compensation structures annually to ensure preservation of wage hierarchies consistent with the requirements of this Act.

(g) Prohibition on adverse restructuring. Employers shall not alter job titles, reclassify positions, eliminate supervisory responsibilities, or consolidate roles in a manner intended to circumvent wage premium or merit-based compensation obligations.

Reasoning: Preserves incentives for skill development and career advancement, protects merit-based systems, and prevents flattening of wage structures that would undermine service quality and worker mobility.

SECTION 7. Regional adjustment, housing safeguards, and annual data requirements.

(a) Purpose. The purpose of this section is to ensure that baseline living wages remain aligned with the true and current cost of living in each county, to prevent wage gains from being undermined by housing inflation or price manipulation, and to provide predictable economic transitions for employers and communities.

(b) Regional living wage adjustments. (1) Baseline living wages shall be calculated annually for each county using recognized datasets including the MIT Living Wage Model, BLS CPI-U, HUD Fair Market Rent indices, USDA food data, and regional transportation and utility datasets. (2) Annual adjustments shall be effective January first. (3) Counties may not manipulate data inputs to suppress wage calculations.

(c) Housing and market safeguards. (1) Rent increases for existing tenants shall not exceed CPI-U plus five percent in any twelve-month period. (2) Subsidized units shall follow federal requirements unless more protective state rules apply. (3) Retaliatory or exploitative rent increases are prohibited. (4) DHCR shall enforce this subsection.

(d) County variance band. Annual baseline living wages shall not vary by more than five percent above or below calculation without review and approval by DOL.

(e) Data update frequency and inflation review. (1) DOL shall conduct quarterly inflation reviews. (2) If inflation exceeds five percent in any twelve-month period, an interim update shall be issued. (3) Interim updates shall not exceed five percent unless jointly approved by DOL and DOB.

(f) Economic stability and price impact protections. (1) DOL shall publish annual Price Impact Assessments. (2) Wage adjustments historically impact prices by 0.3-0.5% and reports shall reflect this. (3) Midmarket employers may receive temporary payroll credits for up to twenty-four months. (4) Employers shall not reduce workforce solely to avoid compliance. (5) Automation adoption shall not be used as a pretext for evading wage requirements.

(g) Public transparency. All county-level calculations and datasets shall be published annually on a publicly accessible website.

Reasoning: Ensures wages stay aligned with real costs, prevents price gouging, stabilizes housing, and provides quarterly inflation safeguards to protect workers and communities.

SECTION 8. Enforcement, audits, and interagency coordination.

(a) Purpose. Establishes a coordinated, data-driven enforcement system using existing state infrastructure.

(b) Primary enforcement authority. DOL shall serve as lead enforcement agency.

(c) Interagency coordination. DOL, DTF, and OTDA shall exchange wage, payroll, and benefit data and develop shared protocols.

(d) Randomized audit program. DOL shall conduct randomized audits comparable to unemployment insurance investigations.

(e) Targeted investigations. DOL shall initiate investigations where reasonable cause exists, including employee complaints and data irregularities.

(f) Penalties and corrective actions. Employers in violation shall pay underpaid wages, reimburse state programs, and may face civil penalties.

(g) Employer cooperation. Employers shall provide payroll, scheduling, and county-specific work records upon request.

(h) Appeals process. Employers may appeal within thirty days; appeals shall not suspend wage recovery unless stayed for good cause.

(i) No new agency created. Enforcement shall be conducted using existing agencies and personnel.

(j) Annual enforcement report. DOL shall publish an annual compliance and enforcement summary.

Reasoning: Provides strong enforcement without creating new agencies, reduces fraud, protects workers, and ensures efficient statewide compliance.

SECTION 9. Effective date and implementation schedule.

(a) Effective date. This Act shall take effect on January first following enactment.

(b) Immediate applicability for large employers. Large employers shall comply on the effective date.

(c) Phase-in for small and mid-market employers. Small employers receive up to a three-year phase in; midmarket employers comply per Section 3; Tier 1 transitional employers follow Section 3(e).

(d) Youth and apprentice worker transition. Youth workers employed for six months or more shall transition immediately to full baseline wages.

(e) High-cost exposure applicability. High cost exposure rules apply immediately with a ninety day implementation grace period.

(f) Inflation review timeline. Quarterly inflation reviews begin in the first full quarter after the effective date.

(g) Public assistance reimbursement schedule. OTDA shall issue first reimbursement assessments within one year.

(h) Employer notification. DOL shall notify employers of wage schedules ninety days in advance of the effective date.

(i) No retroactive liability. No retroactive wage liability shall apply except in cases of fraud or misclassification.

(j) Regulatory authority. Agencies shall promulgate necessary regulations within twelve months.

Reasoning: Ensures stable, predictable implementation for workers and employers, with clear timelines and protections against retroactive burden.

SECTION 10. Small Employer Payroll Credit Provision.

(a) Purpose. The purpose of this section is to provide financial support and cash flow assistance to small and mid-sized employers during the transition to full compliance with the county-based living wage standards established by this Act.

(b) Eligibility. Any small or mid-sized employer, as defined in Section 2(c) of this Act, may

apply for advanceable payroll tax credits to offset the cost of increased wage obligations during the initial phase-in period.

(c) Advance credit structure. (1) Credits shall be available on a monthly basis and calculated based on the difference between pre-Act wages and the applicable baseline living wage. (2) Credits shall be distributed in advance of payroll cycles upon employer request and subject to verification. (3) Overpayment reconciliation shall occur quarterly and credits in excess of obligations shall be repaid or deducted from future claims.

(d) Filing requirements. (1) Employers shall submit documentation of prior wage rates, current wage obligations, and payroll processing records. (2) DTF shall issue simplified guidance and digital submission forms for rapid processing.

(e) Sunset clause. Advanceable payroll credits shall sunset for each eligible employer upon completion of their designated transition period under Section 3(b). Employers who reach full compliance early shall cease to receive credits upon full implementation.

(f) Fraud safeguards. Any employer found to have falsified payroll records or misrepresented eligibility shall be subject to civil penalties and permanent disqualification from wage-related tax credit programs.

(g) Interagency coordination. The Department of Taxation and Finance shall coordinate with the Department of Labor and OTDA to verify wage data and ensure accurate credit allocation.

SECTION 11. Economic Downturn Contingency.

(a) Authority. In the event of a certified economic recession or fiscal emergency, the Governor may, upon approval by a two-thirds vote of the Legislature, temporarily suspend any fiscal outlays or credit reimbursements authorized under this Act.

(b) Certification. Such determination must be based on economic indicators consistent with those used by the New York State Division of the Budget and the Comptroller's Office.

(c) Duration. Suspensions enacted under this section shall last no longer than 12 months without legislative reauthorization.

(d) Transparency. All declarations, justifications, and financial impact assessments shall be published on the State's official transparency portal within 14 days of enactment.

SECTION 12. Wage Compliance Infrastructure Investment.

(a) Appropriation. The sum of $50,000,000 is hereby appropriated from the general fund to be used by the Department of Labor in coordination with the Department of Taxation and Finance and the Office of Temporary and Disability Assistance for systems modernization.

(b) Use of Funds. Funds shall be used exclusively to develop, implement, and maintain integrated compliance systems, wage reporting interfaces, fraud detection algorithms, and employer accountability tools.

(c) Reporting. A joint annual report shall be submitted to the Legislature detailing expenditures, performance outcomes, and areas for improvement in enforcement or data collection.

13. Advance Wage Stabilization Credit Payments.

1. Establishment of Advance Payments.
   The Department of Taxation and Finance shall administer an *Advance Wage Stabilization Credit* ("AWSC"), allowing eligible employers to receive advance quarterly payments equal to the projected Small Employer Wage Transition Credit and Living-Wage Compliance Credit for that quarter.

2. Eligibility.
   (a) Any employer eligible for the credits under sections 7, 8, or 9 of this Act may elect to receive such credits as advance payments.
   (b) Eligibility shall be verified through quarterly payroll filings.

3. Method of Calculation.
   (a) Advance payments shall be calculated based on:
   (i) quarterly payroll submitted through NYS-45 filings;
   (ii) the applicable county living-wage table; and
   (iii) employee hours reported for the preceding quarter.

4. Reconciliation.
   (a) Overpayments or underpayments shall be reconciled during the annual tax filing.
   (b) No penalties shall apply for variances resulting from payroll fluctuations.

5. Purpose.
   This section ensures employers receive timely support concurrent with rising payroll obligations, preventing cash-flow distress during compliance with this Act.

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§ 14. Payroll Tax Neutralization for Living-Wage Compliance.

1. Neutralization Credit Established.
   Employers subject to increased payroll tax liabilities resulting directly from living-wage adjustments under this Act shall receive a Payroll Tax Neutralization Credit ("PTNC").

2. Scope.
   The PTNC shall offset increased employer costs attributable to:
   (a) employer-side FICA contributions;
   (b) state unemployment insurance (SUI);
   (c) workers' compensation premiums;
   (d) paid family leave insurance contributions attributable to increased wage indexing.

3. Calculation.
   The credit shall equal the marginal increase in employer payroll tax liability attributable solely to the wage increases mandated by this Act.

4. Transparency.
   The Department of Labor shall publish annual guidance specifying the methodology for calculating neutralized payroll obligations.

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§ 15. Total Compensation Equivalency Option.

1. Definition.
   "Total Compensation" includes:
   (a) employer-paid health insurance;
   (b) employer-paid dental or vision coverage;
   (c) employer-paid retirement contributions;
   (d) employer-paid life or disability insurance; and
   (e) paid-time-off calculated at hourly value.

2. Equivalency Credit.
   Employers providing Total Compensation benefits above a threshold established by the Commissioner shall be permitted to offset up to fifteen percent (15%) of the hourly living-wage requirement through documented employer-paid benefits.

3. Limitations.
   (a) Benefits must be employer-paid (not employee cost-shared).
   (b) ERISA compliance is required.
   (c) Valuation methodology shall be standardized and published annually.

4. Purpose.
   To encourage robust employee benefit packages and ensure fairness for employers who already provide high-value compensation.

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§ 16. Revenue-Adjusted Compliance Schedule.

1. Revenue-Based Phase-In.
   Employers demonstrating financial hardship may phase in wage compliance based on a Revenue-to-Payroll ratio rather than a fixed timeline.

2. Threshold.
   Employers whose payroll exceeds fifty percent (50%) of gross revenue may delay each scheduled wage increase for up to 12 months, renewable upon re-evaluation.

3. Documentation.
   (a) Employers must provide financial statements, tax returns, or payroll records.
   (b) The Department of Labor shall develop standardized forms.

4. Safeguards.
   (a) The delay may not exceed three consecutive years.
   (b) Employees must still receive annual COLA adjustments during the delay period.

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§ 17. Regional Rate Adjustment for Service-Based Small Businesses.

1. Eligibility.
   Applies to:
   (a) franchisees with contractual pricing caps;
   (b) service-based employers operating under fixed-rate agreements;
   (c) small businesses with ≤ 25 employees whose service prices cannot be adjusted without franchisor or contractual approval.

2. Regional Adjustment.
   Eligible employers may comply using the average living-wage rate of any contiguous county, provided such county has a lower baseline wage than the employer's home county.

3. Documentation.
   Employers must demonstrate contractual restrictions preventing proportional price increases.

4. Purpose.
   To prevent compliance issues for service businesses unable to raise consumer pricing.

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§ 18. Small Employer Wage Stabilization Fund.

1. Fund Creation.
   A Small Employer Wage Stabilization Fund ("SEWSF") is hereby created, administered by Empire State Development.

2. Use of Funds.
   (a) Short-term bridge grants for qualifying employers;
   (b) Zero-percent loans repayable over 24–36 months;
   (c) Emergency wage assistance for businesses facing closure due to mandated wage adjustments.

3. Eligibility.
   Employers with ≤ 50 employees during the fiscal year.

4. Appropriation.
   The Legislature shall appropriate funds annually to maintain program solvency.

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§ 19. Skilled and Licensed Occupation Premium Schedule.

1. Skill Premium Structure.
   The living-wage premium for certified or licensed workers shall be:
   (a) 10% for entry-level certifications;
   (b) 15% for intermediate certifications or two-year experience;
   (c) 20% for advanced certifications;
   (d) 25% for state-licensed trades or professions requiring formal licensure.

2. Purpose.
   To ensure wage premiums are predictable, consistent, and reflective of skill without imposing undue payroll volatility.

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§ 20. Wage Table Publication and Notice Requirements.

1. Advance Publication.
   The Commissioner shall publish updated county living-wage tables no later than June 30 of each year for the following calendar year.

2. Employer Notice Period.
   Employers shall be notified electronically at least six months prior to the wage change taking effect.

3. Transparency.
   All tables shall be posted publicly on the Department of Labor’s website in a machine-readable format.

APPENDIX A. Community Impact Summary

SECTION 1 - Purpose and Intent

This section establishes the economic and moral justification of the Act, ensuring that full-time work provides sufficient income to meet basic living costs without reliance on public assistance. Communities benefit from reduced poverty and greater financial stability.

SECTION 2 - Definitions

This section provides uniform terminology, protecting against misinterpretation and ensuring consistent statewide enforcement. Clear definitions help both workers and employers understand their rights and responsibilities.

SECTION 3 - Employer Classifications and Wage Requirements

This section protects workers while ensuring businesses can adapt through phased implementation. Small and midmarket employers benefit from transition periods, while workers gain predictable, county based living standards.

SECTION 3-A - Fair Compensation and Fiscal Responsibility

This section prevents employers from shifting labor costs onto taxpayers and establishes strong protections for youth and apprentice workers. Communities benefit from reduced reliance on public assistance and fair entry-level wage structures.

SECTION 4 – Multi-County Wage Clarification & Anti-Exploitation

This section protects mobile workers from geographic wage manipulation and prevents employers from assigning lower wage counties to avoid compliance. Communities benefit through wage fairness and territorial integrity of regional labor markets.

SECTION 5 - Accountability and Public Cost Responsibility

This section ensures that taxpayers are no longer subsidizing wages that fall below the cost of living. Public benefit programs stabilize as employers assume responsibility for wage related social costs.

SECTION 6 - Merit, Skill, and Promotion Protections

This section preserves wage hierarchies, ensuring that skilled workers maintain wage advantages and that merit based raises remain intact. Communities benefit from stronger professional development pathways and quality of service preservation.

SECTION 7 - Housing Safeguards and Inflation Review

This section prevents landlords from capturing worker wage gains through excessive rent increases and ensures that wages remain aligned with real costs of living. Communities gain housing stability and protection from market volatility.

SECTION 8 - Enforcement and Interagency Coordination

This section ensures compliance through data driven enforcement using existing agencies, reducing administrative burden and improving accountability. Workers gain protection; employers gain clarity; taxpayers benefit from reduced fraud.

SECTION 9 - Implementation Schedule

This section ensures a smooth, predictable rollout. Employers receive adequate transition time, and workers begin receiving living wages without delay. Communities experience stable, phased economic change.

SECTION 10 – Small Employer Payroll Credit Provision

This section provides transitional financial relief for small and mid-sized employers required to raise wages under the Act. By offering advanceable payroll tax credits based on the wage gap between previous pay rates and the new county-based living wage standard, it helps preserve small business viability during the phase-in period. The provision balances worker protection with employer sustainability, reduces the likelihood of layoffs or hiring freezes, and ensures wage equity across employer sizes. Interagency safeguards and quarterly reconciliation reduce fraud and protect public funds.

SECTION 11 – Economic Downturn Contingency

This section creates a fiscally responsible safeguard by enabling the temporary suspension of certain financial outlays or credit reimbursements authorized by the Act in the event of a recession or certified economic emergency. Requiring both executive certification and a two-thirds legislative vote, the provision ensures checks and balances while preserving essential wage protections. Its transparency and time-bound design foster public trust and economic resilience without weakening long-term wage reform goals.

SECTION 12 – Wage Compliance Infrastructure Investment

This section allocates funding for the modernization of wage enforcement and benefit reimbursement systems across relevant state agencies. The investment will support the creation of real-time wage reporting tools, improved employer oversight, and fraud prevention systems. By building durable infrastructure, the provision enables accurate compliance tracking, reduces administrative burdens for employers, and strengthens the integrity and efficiency of the entire wage adjustment framework statewide.

**SECTION 13 Impact of advance wage stabilization payments**

(1) The introduction of advance quarterly wage stabilization payments provides immediate

liquidity support for small and mid-sized employers during the wage transition period. (2) Such payments reduce cash-flow volatility and prevent businesses from carrying the financial burden of wage increases until tax-time reconciliation. (3) Communities with high concentrations of service-sector or seasonal employers shall experience greater local business retention and reduced risk of closures during the early years of implementation.
**Reasoning:** Advance credits prevent payroll shocks, enabling communities to retain existing businesses and maintain stable employment while wages rise predictably.

---

**(b) Impact of payroll tax neutralization for mandated wage increases (Section 14).**
(1) Neutralizing the marginal increase in employer payroll tax obligations ensures that mandated living-wage adjustments do not generate secondary increases in FICA, unemployment insurance, or workers' compensation costs. (2) This stabilization effect strengthens the financial resilience of small businesses and preserves local employment opportunities. (3) Communities with narrow business margins, such as rural towns with low customer volume, shall experience reduced pressure to downsize staff.
**Reasoning:** Offsetting automatic payroll tax inflation prevents compounding burdens on employers, ensuring local economies remain stable while the living-wage standard is phased in.

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**(c) Impact of total compensation equivalency options (Section 15).**
(1) Allowing employer-paid health insurance, retirement contributions, and related benefits to satisfy a portion of the living-wage requirement encourages employers to maintain or expand high-quality benefit offerings. (2) Workers receive improved overall compensation packages, increasing financial security and reducing reliance on state health or social-service programs. (3) Communities benefit from healthier, more stable workforces and greater employer participation in benefit markets.
**Reasoning:** Recognizing employer-paid benefits reduces unnecessary payroll strain while incentivizing robust compensation structures that improve community well-being.

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**(d) Impact of revenue-adjusted compliance schedules (Section 16).**
(1) Small or financially distressed employers may implement living-wage requirements on a revenue-sensitive schedule, preventing abrupt payroll shocks that disproportionately affect low-margin local businesses. (2) This flexibility reduces business closures and layoffs during periods of economic hardship. (3) Communities with fragile commercial corridors or high levels of small, independent businesses shall experience improved economic continuity.
**Reasoning:** Tying wage compliance to financial capacity ensures struggling employers remain viable, protecting employment and local commerce during the transition.

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**(e) Impact of regional living-wage adjustments for service-based small businesses (Section 17).**
(1) Franchise operators and fixed-rate service businesses constrained by corporate pricing structures may comply using contiguous-county wage rates, preventing wage mandates from exceeding contractual revenue limits. (2) This provision supports business survival in regions where cost structures differ sharply across county borders. (3) Communities with high franchise density or fixed-price service sectors maintain competitive service availability and prevent abrupt consumer price increases.
**Reasoning:** Regional flexibility shields vulnerable service providers from structural pricing constraints, preserving local services and employment opportunities.

---

**(f) Impact of the small employer wage stabilization fund (Section 18).**
(1) Short-term grants and zero-interest loans provide transitional relief for employers facing temporary cash-flow deficits during wage adjustments. (2) This reduces the incidence of layoffs, shortened hours, or business closures during the initial implementation years. (3) Communities benefit from steadier employment levels, reduced vacancy rates in commercial districts, and stronger local tax bases.
**Reasoning:** A stabilization fund ensures that wage reforms do not unintentionally destabilize small business ecosystems that communities depend upon.

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**(g) Impact of standardized skilled-occupation wage premiums (Section 19).**
(1) A tiered, predictable premium schedule for certified and licensed workers ensures consistent compensation structures across industries and reduces payroll uncertainty for employers. (2) Skilled workers experience fair, transparent compensation growth without excessive wage compression. (3) Communities benefit from stronger retention in trades, technical fields, and professional services, supporting local infrastructure and economic development.
**Reasoning:** Clarifying skill-based premiums maintains wage hierarchies, supports workforce development, and ensures equitable compensation for high-skill labor.

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**(h) Impact of advance publication of living-wage tables (Section 20).**
(1) Six-month advance publication of updated living-wage requirements allows employers to prepare budgets, adjust pricing, and plan staffing responsibly. (2) Workers benefit from predictable annual wage adjustments that reflect local cost-of-living changes. (3) Communities gain from enhanced business planning stability, reduced sudden closures, and smoother long-term economic transitions.
**Reasoning:** Early publication enhances transparency for both workers and businesses, reducing uncertainty and promoting orderly community-level adaptation to wage reforms.

APPENDIX B. References


I. Wage, Cost of Living, and Economic Datasets

1. MIT Living Wage Calculator - Annual and quarterly adjusted county cost of living estimates.

2. U.S. Bureau of Labor Statistics (BLS) - CPIU, ECI, and Local Area Wage Statistics.

3. U.S. Department of Housing and Urban Development (HUD) - Fair Market Rent indices.

4. U.S. Department of Agriculture (USDA) - National Food Plan cost data.

5. Regional transportation cost indices - NYMTC and Upstate transit data.

6. NYS Department of Public Service - Utility and energy burden analysis.

II. Public Assistance and Cost Shifting Analyses

7. NYS Office of Temporary and Disability Assistance (OTDA) - SNAP expenditure & eligibility data.

8. NYS Department of Health - Medicaid enrollment and annual expenditure tables.

9. Government Accountability Office (GAO) - Corporate wage subsidy impact reports.

10. Congressional Budget Office (CBO) - Labor-market and wage floor analyses.

11. Economic Policy Institute (EPI) - Wage stagnation and employer cost-shifting research.

III. Housing Stability and Market Protections

12. HUD Housing Affordability Data System (HADS).

13. NYS Division of Housing and Community Renewal - Rent regulation & tenant protection data.

14. Federal inflation adjustment guidelines informing CPIU methodologies.

IV. Labor Standards, Enforcement, and Compliance

15. NYS Department of Labor - Wage Theft Prevention Act records & enforcement manuals.

16. NYS Department of Taxation and Finance - Quarterly employer wage reporting protocols.

17. Unemployment Insurance audit methodologies (baseline model for randomized audits).

18. U.S. DOL Employment & Training Administration - National certification and occupation guidelines.

V. Economic Impact and Price Stability Research

19. National Bureau of Economic Research - Historical wage price elasticity studies.

20. Brookings Institution - Automation and labor market transition analyses.

21. Federal Reserve System Research Divisions - Price stability and wage dynamics.

22. OECD Employment and Wage Reports - International benchmarks.

VI. Workforce Demographics and Travel Based Occupations

23. U.S. Census Bureau LEHD - Intercounty commuting flow and workforce mobility data.

24. NYS Comptroller - Workforce mobility and regional employment patterns.

VII. Youth Wage Standards and International Models

25. United Kingdom Office of National Statistics - Youth & apprentice wage tiers.

26. Canadian Provincial Living Wage Programs - Region based wage precedent.

VIII. Legislative Precedents and Comparable Statutes

27. Seattle Ordinance 124490 - Phased minimum wage framework.

28. San Francisco Minimum Compensation Ordinance.

29. Maryland Fair Wage Act - County variance model used for regional benchmarking.

Name

# Victoria

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

A few years ago, there was a proposed bill championed by Council Member Lincoln Restler to award civilians 25% of a $175 ticket for anyone blocking bike lanes. The bill never moved forward, but I believe it should be revisited.

New York bikers know the frustration of cars consistently idling and parking in the bike lanes. Blocking bike lanes causes safety concerns for bikers who are forced to share narrow roadways with cars, takes away valuable parking for delivery drivers trying to efficiently do their job, causes congestion in an already-cramped city, and discourages Citi bike usage.

Introducing a "bike lane bounty", where citizens can report cars idling in bike lanes and receive a portion of the ticket fees, will discourage drivers from taking up valuable bike lanes and incentivize New Yorkers to take alternative transportation, which will in turn result in less subway congestion as well. The income generated from those tickets can also be used to improve the city, and even the multiple bike lanes throughout the city that require pothole fixes and repainting.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Enforcement × Street Redesigns ×

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Name

## Dorian Solomon

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

Public Comment

Proposed Government Efficiency Reform: Create a 311 Pathway for Agency Determination Requests

New Yorkers should not have to submit repeated complaints into the wrong 311 categories when the actual issue is that an agency needs to make a formal determination.

I am submitting this as a government efficiency concern based on my experience trying to report unresolved issues involving a commercial laundromat operating beneath residential apartments at 2167 3 Ave / 201 E 118 St.

The laundromat operates gas fired dryers and exhaust/venting equipment. I attempted to ask 311 which complaint category would require DEP to review whether this equipment requires an air permit, registration, certificate of operation, or other DEP determination.

311 responded that there is no service request category that matches this issue and that they are unable to create new service types. The only option offered was to forward my message to DEP as general feedback.

This reveals a serious gap.

Residents should have a clear 311 pathway to request an official agency determination when a condition may involve permitting, equipment authorization, emissions, building safety, or overlapping agency jurisdiction.

The problem is not only that one complaint was unresolved. The larger problem is that the City's intake system appears unable to route certain legitimate regulatory questions into an actionable review.

Proposed reform:

Create a 311 service request category called something like:

Agency Determination / Jurisdiction Review Request

This category should allow residents to request a formal agency determination when:

* multiple agencies are involved;
* a complaint does not fit existing 311 categories;
* the issue involves possible permit, registration, certificate, or authorization requirements;
* prior complaints were closed without explaining what was actually reviewed;
* residents are being redirected between agencies without a responsible agency taking ownership.

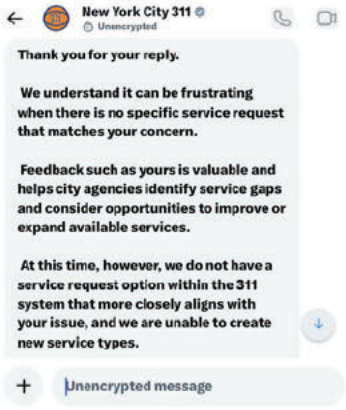
The responding agency should be required to state:

1. whether it has jurisdiction;
2. whether an inspection or records review was performed;
3. what equipment, permit, registration, or condition was reviewed;
4. whether another agency has jurisdiction;
5. which specific 311 category or agency unit should handle future complaints.

This would reduce repeat complaints, prevent agency ping pong, improve transparency, and help residents understand whether a condition has actually been reviewed or merely administratively closed.

A government efficiency system should not leave residents trapped between agencies because the correct complaint category does not exist.

Attachment(s)




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Date Submitted: June 9, 2026

Topic: Unnecessary Bureaucracy ✕ | Enforcement ✕ | Department of Buildings (DOB) Issues ✕

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New York City 311

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Thank you for your reply.

We understand it can be frustrating when there is no specific service request that matches your concern.

Feedback such as yours is valuable and helps city agencies identify service gaps and consider opportunities to improve or expand available services.

At this time, however, we do not have a service request option within the 311 system that more closely aligns with your issue, and we are unable to create new service types.

Unencrypted message

Name

## Corey Hannigan

| | |
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| Email | [redacted] |
| Professional Affiliation | Transportation Alternatives |
| Zip Code | |

Public Comment

Good morning. Thank you for your time and the opportunity to testify today on streamlining government processes for infrastructure projects and the public realm. My name is Corey Hannigan, and I am the Policy and Government Relations Director for Safe Streets at Transportation Alternatives.

We applaud the Mamdani Administration's efforts to simplify bureaucratic processes and speed up infrastructure redesigns, because New York City knows what works best on our streets, but has failed to scale our proven best practices to reach every corner of the city. Currently, rolling out street improvements can be slow and onerous. Months and sometimes years of stakeholder engagement are required just to bring our streets in line with best practices, inflating project costs and delaying crucial safety projects. To reach every neighborhood and protect every New Yorker whether they're walking to the grocery store, biking to school, or taking the bus to work New York City needs to shorten its timelines for implementing tested, standard redesigns.

When a protected bike lane is proposed and presented to a community, the Department of Transportation has already conducted months of outreach, analysis, and research, and the design is professionally drafted in accordance with all local, state, and federal guidelines. From there, additional months of outreach and delays cost time, money, and lives: with hundreds of deaths and thousands of serious injuries on our streets every year, we can't afford to keep waiting.

The separate provision of proposed street designs specifically for firehouses' approval is duplicative, as DOT incorporates emergency response management and FDNY consultation into its planning from the start. And without a clear timeline for responses, life saving projects can be delayed by local firehouses simply by not responding to the DOT's outreach. 31st Street in Astoria was just one example of this procedural breakdown.

In line with standard FDNY approved accessibility guidelines, street safety projects like protected bike and bus lanes reduce the number and severity of crashes on our streets, helping save lives without firefighter or EMS involvement and freeing up their capacity for other emergencies. They also provide open lanes to allow fire trucks and ambulances to bypass traffic and improve access to hydrants, speeding up emergency responses.

Imposing a sensible timeline during which the station house can register objections, or removing the requirement for duplicative comment entirely, would help the DOT install more life saving safety improvements faster. An even more efficient government would streamline the extensive and lengthy Community Board and City Council consultation process and the outreach requirements to four separate city agencies, each of which creates additional delays.

On a similar note, New York City's popular outdoor dining program has been severely hampered by unnecessary bureaucratic requirements, including

seasonal installations and high fees. Only about 1,300 businesses are fully approved for outdoor dining this year, down from the high of roughly 8,000 during the COVID-era temporary program. At its peak, the program took up less than 1% of the city's parking spaces, while creating 100,000 jobs. The more onerous and time intensive the processes, the fewer outdoor dining opportunities are available to New Yorkers harming local businesses, abandoning neighbors with health conditions who may not be safe in restaurants, reducing tax revenue, and failing to capitalize on the opportunity presented by a summer World Cup. This process also creates an uneven playing field for outer borough businesses who need it most only 38% of the businesses currently approved for outdoor dining are located outside Manhattan.

We support the streamlining of the outdoor dining application process, and call for further efficiency improvements, including eliminating the duplicative processes for street-bed and sidewalk dining, moving to a year-round program, easing or removing City Council and Community Board notification requirements and veto power, creating more flexible sidewalk and curbside specifications, expanding design options, and simplifying licensing and liability requirements.

No matter where they live, every New Yorker deserves to be able to walk out their door knowing they'll make it home safely each night. They deserve vibrant, thriving streets, and the option to sit down to eat with their neighbors. And they deserve a city that works to make it easier, not harder, to run a small business. This is a city we can build.

Thank you for the opportunity to testify today.

Attachment(s)


TRANSPORTATION ALTERNATIVES

Public Testimony of Transportation Alternatives
Charter Revision Committee Hearing: Streamlining Government for Infrastructure Projects and Public Realm on Tuesday, June 9, 2026

Good morning. Thank you for your time and the opportunity to testify today on streamlining government processes for infrastructure projects and for public realm. My name is Corey Hannigan, and I am the Policy and Government Relations Director for Safe Streets at Transportation Alternatives.

We applaud the Mamdani Administration's efforts to simplify bureaucratic processes and speed up infrastructure redesigns, because New York City knows what needs fixed on our streets, but has failed to scale our proven best practices to reach every corner of the city. Currently, rolling out street improvements can be slow and onerous, Months and sometimes years of stakeholder engagement are required just to bring our streets in line with best practices, inflating project costs and delaying crucial safety projects. To reach every neighborhood and protect every New Yorker – whether they're walking to the grocery store, biking to school, or taking the bus to work – New York City needs to shorten its timelines for implementing tested, standard redesigns.

When a protected bike lane is proposed and presented to a community, the Department of Transportation has already conducted months of outreach, analysis, and research, and the design is professionally drafted in accordance with all local, state, and federal guidelines. From there, additional months of outreach and delays cost time, money, and lives: with hundreds of deaths and thousands of serious injuries on our streets every year, we can't afford to keep waiting.

The separate provision of proposed street designs specifically for firehouses' approval is duplicative, as DOT incorporates emergency response management and FDNY consultation into its planning from the start. And without a clear timeline for responses, life-saving projects can be delayed by local firehouses simply by not responding to the DOT's outreach. 31st Street in Astoria was just one example of this procedural breakdown.

COGE Infrastructure Hearing Testimony...

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Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy × Street Redesigns ×

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**Public Testimony of Transportation Alternatives**
**Charter Revision Committee Hearing: Streamlining Government for Infrastructure Projects and Public Realm on Tuesday, June 9, 2026**

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In line with standard FDNY-approved accessibility guidelines, street safety projects like protected bike and bus lanes reduce the number and severity of crashes on our streets, helping save lives without firefighter or EMS involvement and freeing up their capacity for other emergencies. They also provide open lanes to allow fire trucks and ambulances to bypass traffic and improve access to hydrants, speeding up emergency responses.

Imposing a sensible timeline during which the station house can register objections, or removing the requirement for duplicative comment entirely, would help the DOT install more life-saving safety improvements faster. An even more efficient government would streamline the extensive and lengthy Community Board and City Council consultation process and the outreach requirements to four separate city agencies, each of which creates additional delays.

On a similar note, New York City's popular outdoor dining program has been severely hampered by unnecessary bureaucratic requirements, including seasonal installations and high fees. Only about 1,300 businesses are fully approved for outdoor dining this year, down from the high of roughly 8,000 during the COVID-era temporary program. At its peak, the program took up less than 1% of the city's parking spaces, while creating 100,000 jobs. The more onerous and time-intensive the processes, the fewer outdoor dining opportunities are available to New Yorkers – harming local businesses, abandoning neighbors with health conditions who may not be safe in restaurants, reducing tax revenue, and failing to capitalize on the opportunity presented by a summer World Cup. This process also creates an uneven playing field for outer-borough businesses who need it most – only 38% of the businesses currently approved for outdoor dining are located outside Manhattan.

We support the streamlining of the outdoor dining application process, and call for further efficiency improvements, including eliminating the duplicative processes for street-bed and sidewalk dining, moving to a year-round program, easing or removing City Council and Community Board notification requirements and veto power, creating more flexible sidewalk and curbside specifications, expanding design options, and simplifying licensing and liability requirements.

No matter where they live, every New Yorker deserves to be able to walk out their door knowing they'll make it home safely each night. They deserve vibrant, thriving streets, and the option to sit down to eat with their neighbors. And they deserve a city that works to make it easier, not harder, to run a small business. This is a city we can build.

Thank you for the opportunity to testify today.

Name

# Dylan Garity

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

The use of NYC funds to partner with AI and ed tech companies and force their slop on students and teachers is a tremendous waste. This seems to be a glaring disconnect within the administration right now, where the crimes and anti human practices of those companies are clearly recognized in other aspects of city policy (thanks for getting rid of the wasteful city chatbot based on the stolen work of New Yorkers!), but not in our schools. I urge the mayor and the administration to immediately implement the two year moratorium on AI in schools (https://parentsforaicaution.com/aim_coalition/), and to cancel all ed-tech partnerships with these companies that are trying to infiltrate schools to create customers and actively worsening education in doing so. Right now, Chancellor Samuels and other DOE leadership are clearly completely in the pockets of big tech, and that is fundamentally incompatible with a functioning, ethical education system. If they won't renounce these partnerships, then new leadership is needed, for our children and for actual efficiency!

Attachment(s)

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Topic Procurement Reform × Budget Issues × Unnecessary Bureaucracy ×

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Name

## Santos Rodriguez

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| Email | [redacted] |
| Professional Affiliation | Building & Construction Trades Council of Greater New York |
| Zip Code | [redacted] |

Public Comment

Attached
Building & Construction Trades Council of Greater New York, President Gary LaBarbera's Testimony
BCTC IPA Cover letter and IPA report regarding "Quantifying the Value of Union Labor in Construction Projects"

Testimony
On behalf of Building and Construction Trades Council of Greater New York & Vicinity
Commission on Government Efficiency (COGE)
June 9, 2025

My name is Gary LaBarbera, and I am President of the Building and Construction Trades Council of Greater New York & Vicinity ("BCTC"). Thank you for the opportunity to submit written testimony today on behalf of our affiliates and the more than 100,000 skilled union construction workers.

The Building and Construction Trades Council of Greater New York & Vicinity is an organization of local building and construction trade unions affiliated with 15 International Unions in the North American Building Trades Union. Our local union affiliates represent approximately 100,000 union construction workers. Our mission is to raise the standard of living for all workers, to advocate for safe working conditions, and to collectively advance the interests of our affiliates' members and all workers in New York City.

Our members are the backbone of this city. They build the housing people live in, the schools children attend, the hospitals families rely on in a crisis, and the infrastructure that keeps the city moving. But they don't just build New York, they live here. They raise their kids here. They have as much at stake in this city's future as anyone sitting in this room. Our goal is simple: to help build a city where working people can still afford to stay. Because our members are present at every stage of a project. From the first permit to the final inspection, in every borough, we have a ground level view of what moves projects forward and what gets in the way.

As this Commission looks for ways to make government work better, I want to offer a perspective that goes beyond process and paperwork. Real efficiency isn't just about moving faster. It's about getting better results projects delivered on time, under budget. This is about making sure New Yorkers can access the opportunities those projects create.

The answer, for us, starts with the skilled union workforce. Skilled workers understand efficiency; they are what make it possible. Workers who know their trade get it done right the first time, which means fewer delays and fewer mistakes. Our registered apprenticeship programs are among the most effective workforce pipelines in the country. We have been successfully building sustainable pathways to the middle class for working families for generations and have programming designed to better reach our communities across the five boroughs, including but not limited to students,

women and non binary individuals, veterans, justice involved individuals, and public housing residents. This is not a side benefit of public investment. That's part of what the public is paying for.

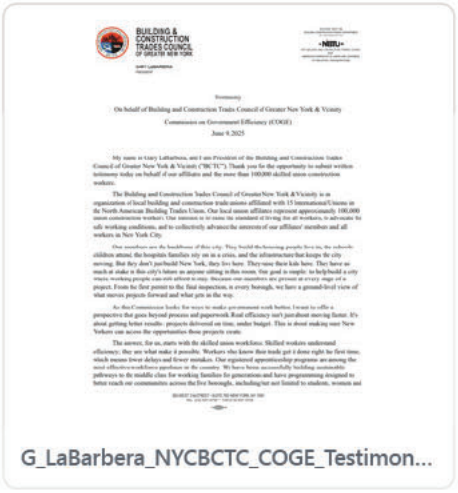
The data backs this up. In 2022, the Independent Project Analysis group published a rigorous study Quantifying the Value of Union Labor in Construction Projects — examining real project outcomes across the industry. The findings were clear: union labor consistently delivers better cost performance, better schedule performance, and fewer incidents than non union labor on comparable projects. What union workers bring to a job is not just skill — it's continuity, accountability, and a culture of safety built over years of apprenticeship training. They show up credentialed, they work under established safety protocols, and they are backed by a system of labor management cooperation that keeps projects moving. For anyone wanting to learn more about efficiency in construction, that study is worth reading in full: IPA Study — Quantifying the Value of Union Labor in Construction Projects, which also include in my testimony.

The Building Trades also invest union pension funds where their members work. The retirement security of the same workers who build this city, are actively looking to invest in the projects that shape New York's future, providing both debt and equity financing to help get deals done. These are not passive investments. When union funds put capital into a project, it comes with an expectation and an obligation: that the union members whose deferred wages built that fund go to work on that project. It is a full circle commitment labor financing the work, and the work coming back to labor. That kind of aligned investment is exactly what efficient, accountable use of capital looks like.
When public dollars are on the table, whether through direct spending, tax incentives, or subsidies, New Yorkers deserve accountability and results. Cutting red tape is one thing. Cutting the conditions that ensure public money serves the public good is another.

We cannot solve one crisis by exacerbating another. New York doesn't have to choose between building more housing and preserving good union jobs for working people; we can do it all, and we should. A truly efficient government doesn't just build faster. It builds smarter, invests wisely, and makes sure the people doing the work can afford to live in the city they're building. The Building & Construction Trades Council is ready to be a real partner in that effort.

Thank you for the opportunity to submit this testimony.

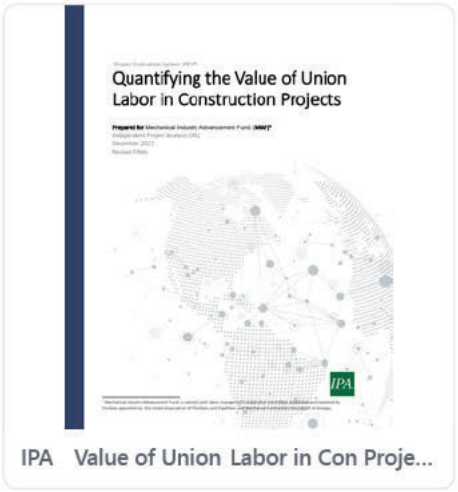
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BCTC Cover Letter for IPA Study.pdf




IPA Value of Union Labor in Con Proje...

Date Submitted: June 9, 2026

Topic: Procurement Reform ✕ | Unnecessary Bureaucracy ✕ | Budget Issues ✕ | Enforcement ✕

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**BUILDING & CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK**

AFFILIATED WITH THE
BUILDING CONSTRUCTION TRADES DEPARTMENT
OF WASHINGTON, DC

NABTU

NYS BUILDING AND CONSTRUCTION TRADES COUNCIL

AMERICAN FEDERATION OF LABOR AND CONGRESS
OF INDUSTRIAL ORGANIZATIONS

**GARY LaBARBERA**
PRESIDENT

Testimony

On behalf of Building and Construction Trades Council of Greater New York & Vicinity

Commission on Government Efficiency (COGE)

June 9, 2025

My name is Gary LaBarbera, and I am President of the Building and Construction Trades Council of Greater New York & Vicinity ("BCTC"). Thank you for the opportunity to submit written testimony today on behalf of our affiliates and the more than 100,000 skilled union construction workers.

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As this Commission looks for ways to make government work better, I want to offer a perspective that goes beyond process and paperwork. Real efficiency isn't just about moving faster. It's about getting better results - projects delivered on time, under budget. This is about making sure New Yorkers can access the opportunities those projects create.

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Thank you for the opportunity to submit this testimony.

BUILDING &
CONSTRUCTION
TRADES COUNCIL
OF GREATER NEW YORK

GARY LaBARBERA
PRESIDENT

AFFILIATED WITH THE
BUILDING CONSTRUCTION TRADES DEPARTMENT
OF WASHINGTON, DC
NABTU
NYS BUILDING AND CONSTRUCTION TRADES COUNCIL
AMERICAN FEDERATION OF LABOR AND CONGRESS
OF INDUSTRIAL ORGANIZATIONS

June 9, 2026

Dear Charter Revision
Chair, Commissioners, and Staff,

The purpose of this letter is to inform you of critically important new research regarding the cost-effectiveness and other major advantages of union-built construction projects. In light of current market conditions in the construction industry, this information has never been more crucial.

The Building and Construction Trades Council of Greater New York & Vicinity is an organization of local building and construction trade unions affiliated with 15 International Unions in the North American Building Trades Union. Our local union affiliates represent approximately 100,000 union construction workers. Our mission is to raise the standard of living for all workers, to advocate for safe working conditions, and to collectively advance the interests of our affiliates' members and all workers in New York City.

**Union Projects = LOWER Final In-Place Cost.** Due to the skill training and project staffing capabilities of the Building Trades, we have always known that union projects provide better value. Now, there is extensive data-driven research that provides irrefutable proof of this point from Independent Project Analysis (IPA), a respected global leader in construction management.

In a groundbreaking study—comparing union to non-union performance on 1,550 projects over a 20-year period—IPA conclusively shows union projects ***are delivered at 4 percent LOWER cost*** when measured by ***final, in-place costs***. There is no better metric.[1] These savings, IPA found, were due to a ***14 percent labor productivity advantage*** driven by the superior training and staffing capabilities of the union sector, which also delivers projects with ***lower risk of schedule delays*** and ***more predictable budgets***.

**Crucial Importance of IPA Data**. While the IPA's findings are important in any context—current construction industry conditions greatly amplify the value of these advantages for project owners, developers and other investors in capital construction. Such conditions include the following:

> **Massive Market Demand:** Surging demand is projected across the economy, including ***$10 trillion in vital infrastructure systems by 2033***, according to a recent Blackrock report,[2] while additional demand is emerging in residential, commercial or institutional sectors.

[1] Michael McFadden, Sai Santosh, and Ronit Shetty, Independent Project Analysis ("IPA", *Quantifying the Value of Union Labor in Construction Projects* (December 2022) (hereinafter "IPA Study"), https://www.ipaglobal.com/wp-content/uploads/2023/02/Value-Union-Labor-Construction-Projects-IPA-Study.pdf

[2] *Building America: Investing in Infrastructure and the Workforce, On the Record*, Blackrock (March 2026), at 2, investing-in-infrastructure-and-workforce.pdf.

[redacted]

**Escalating Construction Costs:** A convergence of multiple factors are making cost-effective construction increasingly difficult, especially ***rising material, equipment and financing costs***, and ***extremely burdensome permitting requirements***.

**Open Shop's Growing Skills Crisis.** The value of union construction is further amplified by acute, persistent failures in the non-union sector's recruitment and training capabilities, which have led ***annual worker shortages of 650,000*** projected to result in a **2.6 million deficit by 2028**.[3]

This problem is now widely viewed by the industry to have reached a ***crisis level as they producing substantial cost overruns and schedule delays***, as well as lower quality and escalating safety incidents and contract claims and litigation. For example, one study reports that these shortages drive increases of ***17% in budgets and 22% in schedules***—and this was a decade ago.

In the current climate, these shortages are getting progressively worse while the so-called solutions offered by the open shop—*e.g.,* technical schools, community colleges, reduced apprenticeship standards—have been ***tried for years and have consistently failed***. The problem is now a crisis.[4]

**An Alternative Business Model.** In contrast to the non-union sector, the Building Trades offer the highest performing training programs and best staffing capabilities in the industry. Plus, we routinely get far more apprentice applicants than we can take. The issue, however, is we ***can only bring in new members if we have enough projects to employ them***—a simple supply and demand equation.

It is for these reasons that we need to build new partnerships with the project owner community. In short, the industry will not be able to address the skills crisis **unless reforms are adopted in public and private procurement policies** to ensure projects are reliably staffed with qualified craft labor.

**Additional Value-Added Benefits.** In addition to providing superior performance, the Building Trades provide further cost-savings and other advantages to owners through Project Labor Agreements and related programs, *e.g.,* Alternative Dispute Resolution Programs to reduce workers compensation costs.

We also have extensive experience in providing ***vital, often decisive assistance in supporting project funding, as well as permitting*** and other regulatory approvals. Finally, we bring good jobs and training to local communities and maintain industry leading programs to promote opportunities for veterans, women and people of color.

In closing, we would be glad to meet with you at your earliest convenience to discuss these issues and explore how we can work together to build stronger craft labor capabilities needed to meet emerging demand in the construction industry. Thank you for your attention in this matter.

Sincerely,

Mary LaBarbera

---

[3] Bureau of Labor Statistics, *Construction and Extraction Occupations: Occupational Outlook Handbook* (last updated August 28, 2025), https://www.bls.gov/ooh/construction-and-extraction/;National Center for Construction Education and Research, *Construction Credentials: Why Do They Matter*? (August 28, 2024), The National Center for Construction Education and Research.

[4] Timothy R. B. Taylor et al., *Is There A Demographic Labor Cliff That Will Affect Project Performance*, Constr. Indus. Inst. at iv (August 2016).

Project Evaluation System (PES®)

# Quantifying the Value of Union Labor in Construction Projects

Prepared for Mechanical Industry Advancement Fund (MIAF)[1]

Independent Project Analysis (IPA)

December 2022

Revised FINAL



[1] Mechanical Industry Advancement Fund, a national joint labor management cooperative committee established and operated by trustees appointed by the United Association of Plumbers and Pipefitters and Mechanical Contractors Association of America.

Prepared by Michael McFadden, Sai Santosh, and Ronit Shetty

Edited by Loren Farrar

Reviewed Aditya Munshi

Project Account ID: MCAY201RES

This IPA report analyzes the performance of union labor versus non-union labor and subcontracted versus direct hire labor on cost and schedule performance using IPA's extensive database of capital projects.

This study references an earlier study, "The Looming Labor Shortage," that Edward Merrow presented for a panel discussion at the UA/MCAA Labor Relations Conference on October 30, 2008.

The December 2022 Revised Final now includes performance comparisons between Union, Open Shop, and mixed labor projects; the earlier version showed performance comparisons between only Union and Open Shop projects. We have also changed how we display labor productivity in the graphs to make it easier to interpret.

For questions, please contact:
**Michael McFadden**

[redacted]

[redacted]

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# About IPA

Since its founding in 1987, IPA has rapidly evolved into the preeminent consultancy in project evaluation and in project system benchmarking and has become the industry leader in quantitative analysis of project management system effectiveness worldwide. IPA improves the competitiveness of our customers by identifying the practices that generate effective use of capital in their businesses. It is our mission and unique competence to conduct research into the functioning of capital projects and project systems. We then apply the results of that research to help our customers create and use capital assets more efficiently. Our clients depend on our research results and quantitative measurements to enhance the value generated from their capital projects.

Our approach to increasing the success rate of a capital project is both simple and effective: IPA has developed detailed, carefully normalized databases that contain data about the entire project life cycle from the business idea through to early operation. We have used these data to develop powerful statistical tools that enable us to compare project performance in numerous areas.

IPA works on behalf of project owners and views project success from the vantage point of owners rather than contractors. IPA alone is responsible for the data review, analysis, and findings contained in the report.

# Executive Summary

This study expands on an earlier study[2] that found that union labor is more productive than open shop labor and projects that employed union labor cost less, despite the higher average all-in wage rate paid to union labor. Other studies have similarly found that higher craft labor costs for prevailing wage projects, which often reflect union wage rates, do not result in higher total project costs than non-prevailing wage projects.[3] The current study confirmed the findings from the earlier IPA study and examined some of the underlying differences in union labor versus open shop labor that may explain the differences in productivity as well as the overall effect on project outcomes. The study found:

- Productivity for union labor is 14 percent higher versus open shop labor
- Projects that use a mix[4] of union and open shop labor have 8 percent better productivity than projects that use all open shop labor
- The use of union labor reduces the total cost of projects by an average of 4 percent versus when open shop labor is used
- The union craft labor and foremen have demonstrated a significantly higher level of skills versus open shop labor
- Strong relationships exist between higher craft skills and lower project total costs as well as better construction schedule predictability
- Projects are 40 percent less likely to experience a shortage of skilled labor when union labor is sourced versus open shop labor
- Projects that are short on skilled labor are twice as likely to have a 10 percent or higher cost overrun and are more likely to have schedule slip of 25 percent or higher
- Turnover of labor on projects is one-third less likely when union labor is employed versus open shop labor
- Turnover of labor is linked to worse project cost and schedule outcomes
- Projects using a mix of union and open shop labor saw benefits from the presence of union labor in each of the measures of performance versus projects that employ solely open shop labor

The overall findings indicate that the combination of better skills, more reliable sourcing of sufficient skilled labor, and better labor stability (e.g., less labor turnover) all contribute to better productivity and better project outcomes.

[2] Edward W. Merrow, *The Looming Labor Shortage*, presented at the UA/MCAA Labor Relations Conference, October 30, 2008.
[3] Gerard M. Waites, Esq., Prevailing Wage Laws: Research Report – Comprehensive Review of Public Policy Benefits, 2022, O'Donoghue & O'Donoghue LLP 5301 Wisconsin Ave N.W., Suite 800 Washington, DC 20015.
[4] Projects that are referenced as using mixed labor are projects involving both open shop as well as union labor. The details of the make-up of the two labor sources are unknown, apart from the fact that both union and open shop labor were used.

# Background & Objectives

The MIAF is interested in promoting the value of union labor to the American industry. Since the initial 2008 IPA study on the productivity advantages of union sector labor on capital projects relative to open shop or mixed projects and the allied advantages of subcontracted union work relative to direct hire performance, the MCAA and UA have been tracking productivity and related workforce development and performance issues in a variety of ways related to the prevailing wage policy, project labor agreements, and overall private and public sector construction project policy forums that help build, maintain, and foster the high skill construction workforce training and performance.

In June 2022, the MCAA and UA decided to commission another more detailed study from IPA that is reflected in this report. The current study confirmed and expanded on the findings from the previous study and showed that although the hourly all-in labor rates[5] are higher for union labor, this is more than offset by the value gained from the better productivity; in other words, the cost of labor cannot be viewed simply through the lens of the hourly all-in rates charged for the work as labor productivity plays a significant role not only on labor costs, but also on the overall project cost and potentially other outcomes that capital project owner's value.

Labor productivity is a function of many things. The skill of the labor is a key driver of overall productivity, but multiple factors influence labor productivity, such as management practices, weather, project size and project complexity, and others. The study Edward Merrow presented to the MCAA[6] in 2008 focused on the drivers of labor productivity, which included the source of labor. Merrow's study showed how labor productivity is highly variable from project to project driven by practices such as Front-End-Loading (FEL), which is a measure of the completeness of planning done prior to project execution; execution discipline (e.g., not deviating from the original plan); construction labor work schedules (e.g., use of long work weeks or excessive overtime, etc.); and the source of labor (e.g., union versus open shop and subcontracted versus direct hire labor). After controlling for project scope (e.g., office building versus chemical plant, etc.), project size, and project type (e.g., brownfield [work at an existing site] or greenfield [work at a brand new site], etc.), the project-to-project labor productivity variability is very large, as shown in Figure 1 below. The key findings from the 2008 study are that the labor productivity is strongly driven by the practices both the owner and contractor employed in managing the project. Another finding is that the source of labor is strongly linked to lower project costs.

The current study will focus on further understanding how the source of labor—in this case, union versus mixed and open shop labor and subcontracted versus direct hire—drives productivity and how that links more broadly to project performance.

[5] The all-in wage rate is the base rate *(total earnings before payroll deductions)*, plus indirect labor, indirect material, and other indirects (including small tools and miscellaneous consumables allowance, bonds insurance, and contractor fees) *plus* overtime premiums, incentives, and travel allowances.

[6] Edward W. Merrow, *The Looming Labor Shortage*, presented at the UA/MCAA Labor Relations Conference, October 30, 2008.

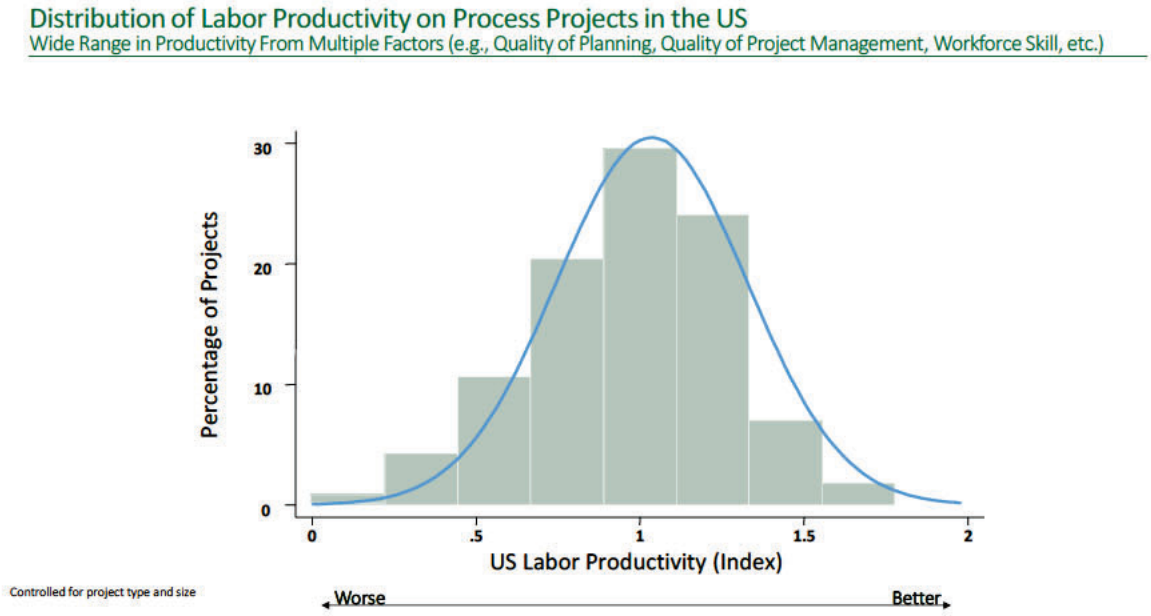



Figure 1

The current study focuses on how the source of labor is linked to project performance through better productivity and what drives the better productivity of union labor. Below in Figure 2 is an illustration of the framework that the study follows. We will focus on the topic of labor source and refer the reader to the earlier study in which the other drivers of productivity were analyzed.

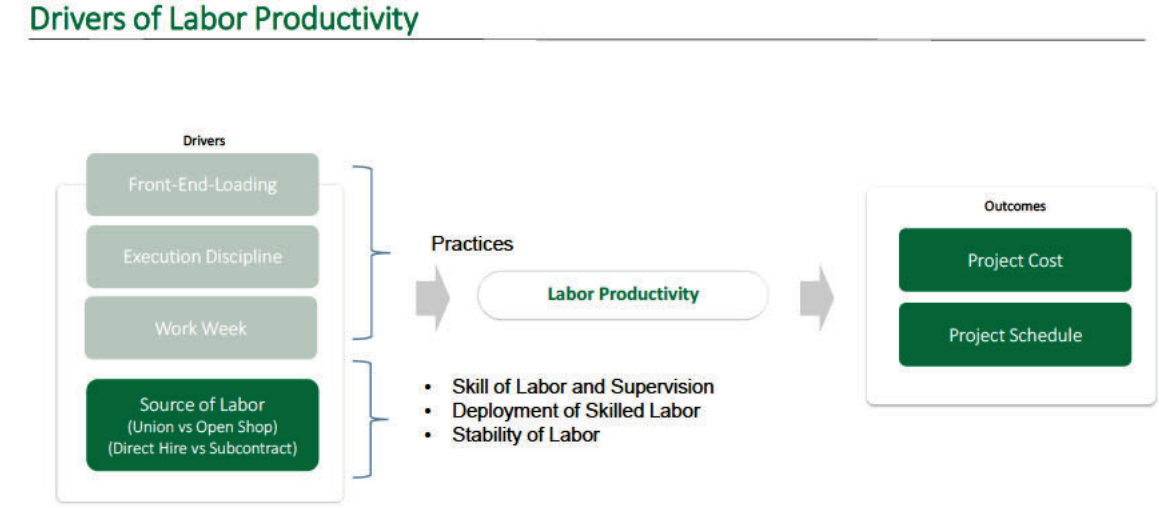



Figure 2

To determine the inherent productivity associated with the skill of the labor, it is important to be able to account for and remove these other factors. IPA has collected detailed information on thousands of capital projects, allowing us to analyze the differences in performance of union versus open shop labor on capital projects by isolating and removing the other influences of labor productivity to identify the effect of labor productivity, labor costs, and overall project performance. In this study, we seek to answer a set of questions that hopefully will shed additional light on the value of union labor to the project owner. These include the following:

- How do labor productivity and all-in wage rates compare between union and non-union labor?
- What are the benefits of using union labor on a project?
- What are the benefits of using subcontracted versus direct hire labor?
- What may explain the higher productivity performance differences?
  - Higher level of skill for both craft and foremen?
  - Lower turnover of craft during project construction?
  - More reliable deployment of sufficient labor to the projects?
  - Higher productivity leading to the need for less craft?

# Study Database & Methodology

Each chapter will have a chapter-specific description of the database and methodology; however, this section describes the overall study database and methodology that will be referenced throughout.

## Study Database

Since its founding in 1987, IPA has rapidly evolved into the preeminent consultancy in project evaluation and in project system benchmarking and has become the industry leader in quantitative analysis of project management system effectiveness worldwide. IPA improves the competitiveness of our customers by identifying the practices that generate effective use of capital in their businesses. It is our mission and unique competence to conduct research into the functioning of capital projects and project systems. We then apply the results of that research to help our customers create and use capital assets more efficiently. Our clients depend on our research results and quantitative measurements to enhance the value generated from their capital projects.

Our approach to increasing the success rate of a capital project is both simple and effective: IPA has developed detailed, carefully normalized databases that contain data about the entire project life cycle from the business idea through to early operation. We have used these data to develop powerful statistical tools that enable us to compare project performance in numerous areas.

IPA's capital projects database includes over 20,000 projects with more than 21 million data points regarding project drivers and project outcomes. The database includes projects executed in over 100 countries by more than 550 companies. The quality of the data is ensured by face-to-face data collections and extensive reviews of project histories. IPA's capital projects database is ever expanding as we evaluate approximately 600 projects every year. The database is supplemented with client documentation, including native cost and schedule documents, risk registers, change logs, bases of design, P&IDs, block flow diagrams, and other critical project documentation.

From this larger database of projects, we have selected a dataset of 1,550 projects that were executed in the United States over the past 20 years, which are described in the table below. These projects primarily come from the process industries, but include a good number of conventional building projects, such as offices, labs, and warehouses. From this dataset, we have coded the projects as having been executed using either union labor, non-union labor, or a mix of both. The project sizes range from $200,000 to more than $6 billion. About half of the projects employed open shop labor, one-quarter employed union labor, and one-quarter employed a mix of union and open shop labor. The projects included greenfield construction (e.g., construction at a new site, add-on, or expansion projects [new construction, but at an existing site], and revamp projects [e.g., construction projects that update existing facilities]). The projects also come from many different industrial sectors.

The dataset project characteristics are shown in Table 1 below.

## Database Description

### Recent Industrial Projects in the Unites States

| Characteristic | United States (n = 1,550)<br>Mean and Range |
|---|---|
| Project Size ([2002]US$ millions) | 89 (median)<br>0.2 > 6,000 |
| Authorization Year | 2007<br>(2000 – 2022) |
| Labor Force Make up for Project | 51 percent Open Shop<br>25 percent Union<br>24 percent Mixed |
| Project Type | 21 percent Greenfield/Colocated<br>37 percent Add on/Expansion<br>39 percent Revamp<br>3 percent Other |
| Industrial Sector | 29 percent Oil Refining<br>38 percent Chemicals<br>8 percent Pharmaceuticals<br>8 percent Consumer Products<br>9 percent Distribution<br>5 percent Mining, Metals, and Minerals<br>3 percent Pulp and Paper/Other |

Table 1

# Analysis—Source of Labor and Project Performance

In the following section, we examine the different hypotheses tested with the goal of gaining a better explanation of what is driving the project performance differences between union and open shop labor.

## Methodology—Assessing Labor Productivity

Labor productivity is usually defined as a measure of the hours required to complete a certain measure of scope. For craft labor, we often look at hours per unit of installed material (e.g., feet of pipe, tons of steel, cubic yards of concrete). The analysis that follows employs two distinct approaches to measure productivity. The first is to produce labor productivity for the entire project that represents the work done collectively by all trades (e.g., civil, electrical piping, steel, etc.). The second is to look at the craft-level productivity by using a single craft (in this case, pipe fitting craft labor as the base case, given the significance of this craft on industrial projects), but the same was done with the other labor crafts (e.g., mechanical, civil and electrical, and instrumentation).

### Labor Productivity at the Overall Project Level

To measure labor productivity at the overall project level, IPA employs a method we call twinning in which we compare projects that are similar to each other (e.g., office building to office building, chemical plants to chemical plants) and adjust for other differences like project size as well as normalize for wage differences from location to location and over time, as described earlier in the General Methodology Description section. We can then compare construction costs for like-to-like projects to create a productivity index for each project (e.g., actual productivity/benchmark productivity). A higher index means higher productivity (e.g., fewer labor hours per installed material). The productivity index can then be used to quantify the relationships between practices, unusual events (such as severe weather, labor source, etc.), and their effect on the relative productivity. The value of this approach is that it provides a measure of the relative labor productivity for the composite of all labor on a project. It also provides a way to determine the labor productivity when individual material quantities are not available (e.g., details on the pipe or steel are not provided).

### Labor Productivity at the Craft Level

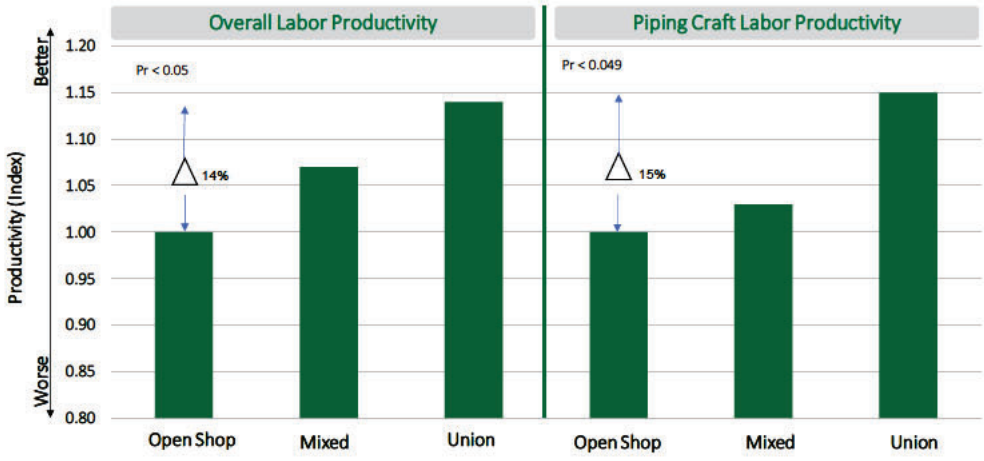
The second methodology involves the more traditional hours per unit quantity installed. We can do this for each of the major crafts (e.g., installation of pipe, steel, concrete, and electrical). For the current study, we focused on pipe fitting craft productivity, which is component of the mechanical trade. IPA has developed a methodology to normalize for feet and size of pipe as well as for other site factors that can influence a pipe installation. For every project for which IPA has collected both hours as well as quantities and characteristics of the pipe installed, we can produce a relative productivity index for the piping craft for each project. A higher index means better labor productivity (i.e., fewer labor hours required per installed quantity of pipe).

## Overview Source of Labor and Project Value

The previous study linked source of labor to productivity and project costs; the current study updates and expands on that analysis to explain how the labor source is linked to other project outcomes and why. In Figure 3 below, we compare productivity for union versus mixed and open shop labor using the two methods described above. Based on the overall labor productivity method, union labor was found to be 14 percent more productive than open shop labor and 7 percent more productive than a mixed labor force. Looking specifically at the installation of pipe (part of the mechanical trade), union craft labor was found to be 15 percent more productive than open shop labor and 12 percent more productive than a mixed labor force. In other words, both methods had similar results. We looked at labor wage rates and found union labor to be 9.7 percent higher than open shop labor, on average. All of these

relationships were found to be statistically significant.[7] We also looked at the differences between subcontract and direct hire labor, but no statistically significant differences between these groups were found.

## Union Labor vs. Mixed and Open Shop Labor Productivity

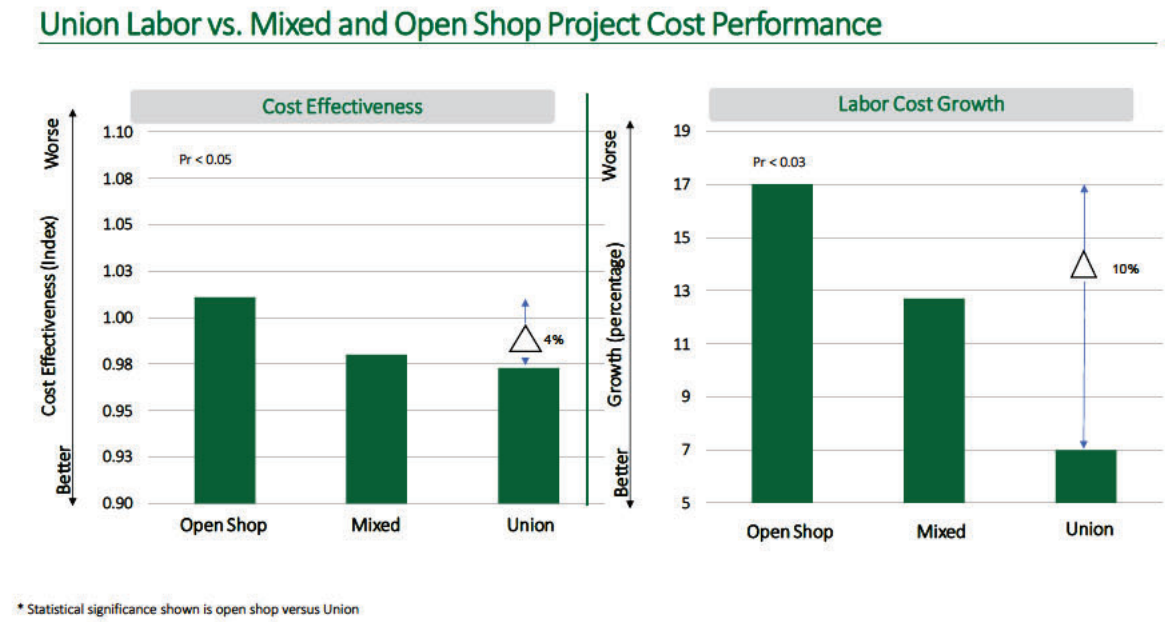



* Statistical significance shown is open shop vs. union

Figure 3

We also looked at cost and schedule performance by comparing projects that employed union labor versus projects that employed open shop labor. As shown in Figure 4 below, projects employing union labor have 4 percent lower costs (better overall cost effectiveness) and 10 percent lower labor cost growth. Although a 4 percent lower overall cost seems modest, there is very little opportunity to reduce the materials costs that make up roughly half of the costs for a typical project in the United States. Therefore, savings from higher labor productivity represent one of the primary ways that owners can reduce costs. Projects employing a mixed labor force have both cost effectiveness and cost growth performance in between open shop and union labor. In addition, we found that projects employing union labor average 8 percent less construction schedule slip than open shop.

[7] We use a measure of statistical significance that is shown as a p value in which a p value of <0.05 indicates that the findings have a less than 5 percent chance of being random; in other words, there is a 95 percent chance that the effect being tested can be considered real.




* Statistical significance shown is open shop versus Union

Figure 4

Given that labor is typically 25 to 35 percent of the total project cost and the wage rate difference, combined with the better productivity, cannot account for the 4 percent overall project cost savings, we did a deeper dive to determine the source of these cost savings. The costs of materials (e.g., equipment steel, concrete, pipe, wire, etc.) are generally competitively sourced. Therefore, significant differences in the materials costs are generally not big contributors to the lower project costs. Cost savings on projects generally come from some efficiency gains in the field coming from some combination of lower labor, construction supervision, and construction indirect costs and/or efficiency gains in office costs coming from lower project management, engineering/design, and project definition costs. Looking at both field and office costs and controlling for project scope, size, and ratio of equipment and bulks (steel, pipe, concrete and electrical), as shown in Table 2 below, we found that union projects have both lower field and office costs versus the materials installed, on average, than projects that use either mixed or open shop labor. The savings come from labor as well as other construction costs (e.g., construction supervision and construction indirect costs) and lower project management costs that contribute to the lower office costs.

## Project Cost Ratio Analysis

| Cost Ratio | Open Shop | Mixed | Union | Statistical Significance** P > \|t\| |
|---|---|---|---|---|
| Field to Materials Cost | 0.70 | 0.65 | 0.64 | 0.007 |
| Office to Materials Cost | 0.36 | 0.32 | 0.27 | 0.005 |

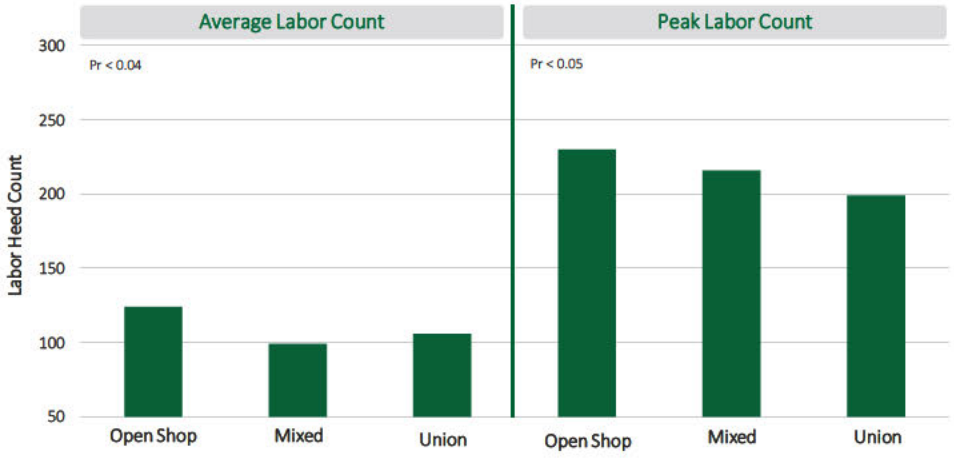
* Controlled for project size ($100 million), ratio of bulks to equipment, and project complexity

** Statistical significance shown is open shop vs. union

Table 2

To support this finding, it was found that projects that employ union labor require nearly 10 percent fewer craft workers, on average, and have a nearly 10 percent lower peak number of craft workers, on average, than projects employing open shop labor, as shown in Figure 5 below. This finding suggests that the higher productivity from union labor translates into both fewer hours overall as well as fewer individuals being required to accomplish the same work. A reduction in the peak number of craft workers is also desirable by reducing the density of workers during periods of highest construction activity. Projects with mixed labor are similar to projects employing union labor with regard to the average number of craft workers required and higher than projects employing union labor with regard to peak number of craft workers required.

## Average and Peak Labor Required




* Based on a $100 million project

** Statistical significance shown is open shop vs. union

Figure 5

We also looked at the cost performance of projects by comparing those that used direct hire labor versus those that subcontracted their labor. As Figure 6 below shows, projects that use subcontracted labor have 3 percent lower

costs than the projects that use direct hire labor. However, we did not find differences in productivity or head counts between direct hire and subcontracted labor projects. We suspect the better cost effectiveness is a result of the subcontracted labor often being made up of cohorts of workers who have worked on multiple projects together, resulting in some efficiencies that our other measures could not identify.

### Subcontracted vs. Direct Hire Labor and Cost Effectiveness




Figure 6

## Methodology—Assessing Labor and First Line Supervisory Skills

Skill assessments for construction craft can be done using measures such as frequency of errors or defects and other means that quantify the quality of their work. As an alternative to these types of measures, IPA assess craft labor and foremen skills by asking the project owners to rate the skill level for four of the major trades (piping, mechanical, electrical, and civil) for both craft labor as well as the foremen that worked on their project. We ask them to rate the skills for each trade on a scale of 1 to 5, with 1 being unskilled, 2 being below average skill, 3 being average skill, 4 being above average skill, and 5 being highly skilled. Although this is based on judgement, it comes from owner construction and project management leads who are generally very familiar with the construction trades. IPA has gathered this information on thousands of projects and found that the rating of skills by the owners is correlated with several expected performance measures. In the following section, we show the relationships between craft and first line supervisory skills and project outcomes.

### Labor Source and Skills

## Overview Source of Labor and Skill

There is a strong correlation between skill and productivity. It has been reported by others that the union sector has historically funded and promoted craft training through its join labor/management apprenticeship program. In contrast, open shop labor has lacked standardized training.[8] The difference in productivity between union and open shop crafts suggests that some of that performance difference arises from better skills. Figure 7 below shows how

[8] Allison L. Huang, Robert E. Chapman, and David T. Butry, Metrics and Tools for Measuring Construction Productivity: Technical and Empirical Considerations, U.S. Department of Commerce, National Institute of Standards and Technology, Office of Applied Economics, NIST Special Publication 1101 (2009) ("Typically, training programs are funded by both owners and contractors through union and collective bargaining agreements. While open shop training programs exist, they tend to be rare."), p. 23 see citing Construction Industry Institute, Construction Industry Craft Training in the United States and Canada. RS 231-1 (Austin, TX: Construction Industry Institute, 2007).

frequently owners rated the skills of craft and foremen *(those who supervise the craft workers)* for the mechanical trades installing pipe using a scale of 1 to 5 (low to high), as described earlier. The installation of pipe on many industrial projects is the dominant craft in terms of labor hours and therefore is an important indicator of project success. When we compare the skill ratings for the craft employed on union, mixed, and open shop projects, union workers were much more likely to be rated as above average or highly skilled versus open shop and mixed workers. In other words, 75 percent of the project owners rated the craft installing piping as above average or highly skilled for union workers compared to only 63 percent of the open shop workers being rated as above average or highly skilled. Union labor was also less likely to be rated as only average or unskilled. Similar results are found for the foremen and this same pattern is also seen across the other craft disciplines (e.g., iron workers, electrical and instrumentation, and civil).

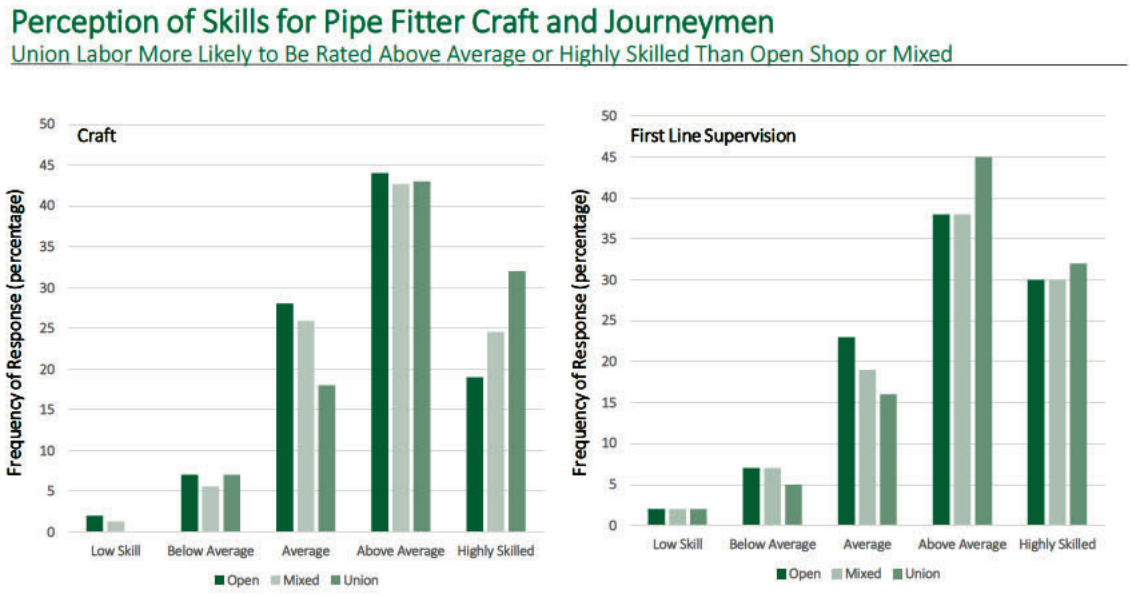



Figure 7

When we look at the relationship between craft and foremen skill and project performance, it was found that both craft and foremen skills drive cost competitiveness and cost growth. Union labor go through regular training and an apprenticeship program, both of which raise the skill levels for the craft and foremen. As Figures 8 and 9 below indicate, the projects that are able to attract the mechanical trades higher skilled craft labor and foremen to install pipe have better cost outcomes. We see the same effect for the other major crafts. In addition, we see that projects that have highly skilled labor for one craft are more likely to have highly skilled labor for the other crafts. The higher skill level that union labor brings to the project is why union labor is more productive and driving the relationship with better cost effectiveness.

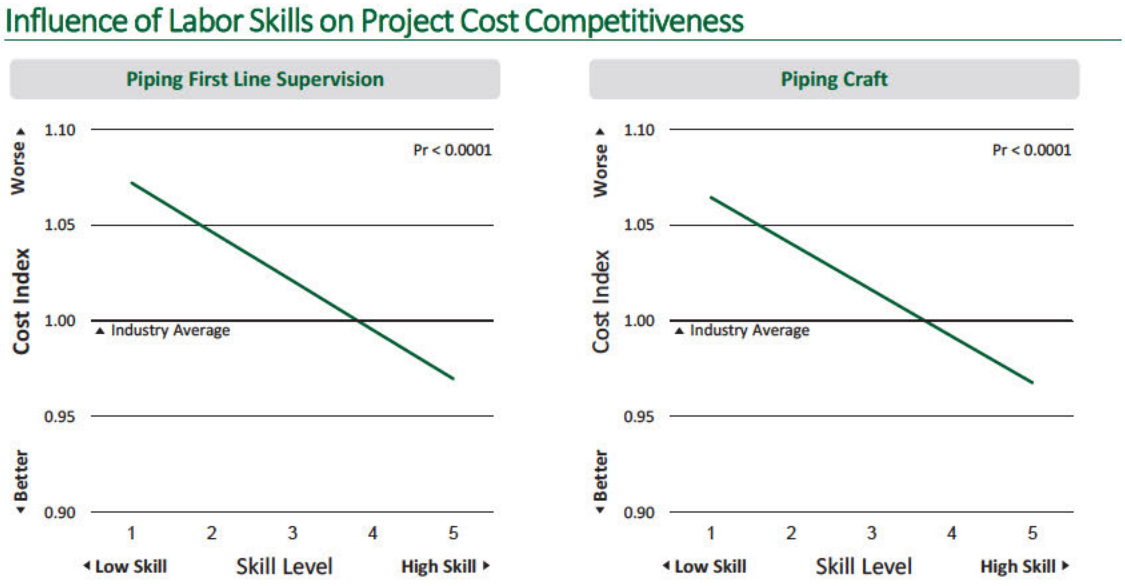



Figure 8

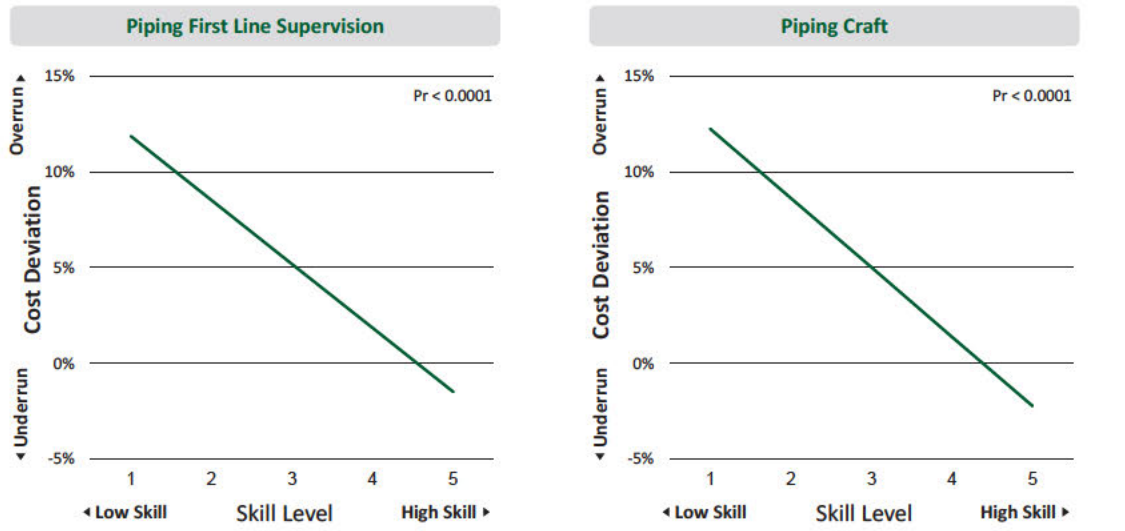



Figure 9

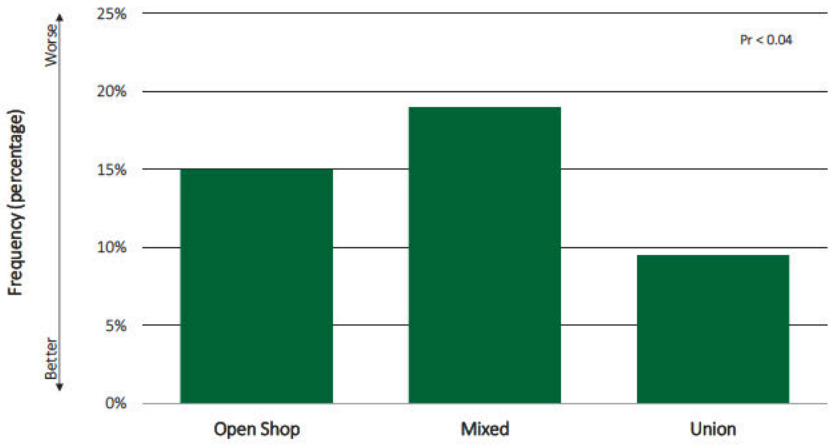
## Methodology—Assessing Labor Deployment

In addition to the effects of labor skills on project outcomes, projects are sensitive to other things that force the project to deviate from the plan, which dictates the need for the number and mix of craft required for a project's execution. Any deviation from the plan often creates inefficiencies through the need for workarounds and rework and having to do work out of sequence to account for insufficient craft labor, which implies that the projects that cannot meet their labor requirements will suffer. For each project, IPA asked the owner whether sufficient skilled labor was available for the project; in other words, was there a shortage of skilled labor? We use this measure to assess whether adequate labor was deployed for each project.

## Labor Source and Deployment

Over the past 20 years, about one in seven projects experienced a shortage of skilled labor, and the lack of having sufficient skilled labor has significant negative consequences on project outcomes. Other studies have asserted, that one of the greatest challenges facing the construction industry is its ability to attract and retain qualified workers. This is underscored by the fact that shortages of skilled workers continue to plague the construction industry[9]. The sourcing of labor that can meet the required number, mix, and skills of labor for the project plan is an important consideration. As figure 10 below shows, projects employing union labor are nearly 40 percent less likely to experience a shortage of skilled labor compared to the projects that employ open shop labor. Despite the value shown in the figure below for mixed labor being higher than open shop labor, there was no statistical difference between mixed and open shop projects, on average. Union contractors have access to local union referral systems and, especially on large projects, contractors can access additional support from neighboring local unions facilitating more effective deployment of labor. The findings suggest that union halls are more effective at meeting owner's requirements for sufficient skilled labor than when labor comes from open shop sources. This difference holds up in both hot as well as normal labor markets.

### Frequency of a Shortage of Skilled Labor




* Statistical significance shown is open shop vs. union

Figure 10

A shortage of skilled labor creates risk for projects. Projects that experience skilled labor shortages, on average, have 10 percent higher cost growth and 6 percent greater schedule slip than projects that found enough skilled labor. They are also at greater risk of significant cost growth and schedule slip. As Figure 11 below indicates, projects that are short on skilled labor are twice as likely to have a 10 percent or higher cost overrun and are more likely to have schedule slip of 25 percent or higher.

[9] Allison L. Huang, Robert E. Chapman, and David T. Butry, Metrics and Tools for Measuring Construction Productivity: Technical and Empirical Considerations, U.S. Department of Commerce, National Institute of Standards and Technology, Office of Applied Economics, NIST Special Publication 1101 (2009)

## Cost Growth and Schedule Slip From Labor Shortage

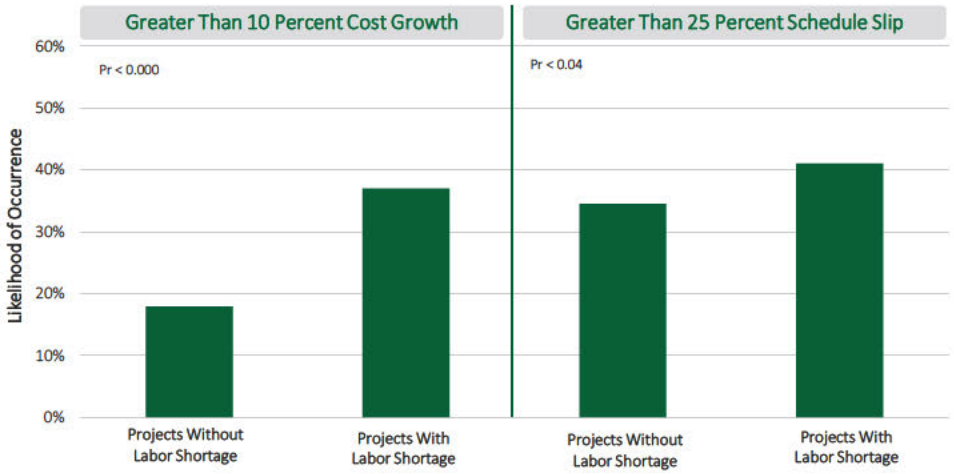



Figure 11

# Methodology—Assessing Labor Turnover

For each project, IPA asks the following question to the team: what was the average monthly turnover for each craft and foremen (e.g., pipe fitting, mechanical, electrical and instrumentation, and civil)? We use this information to relate the effects of turnover on project performance.

## Labor Source and Turnover

The turnover of craft and foremen can also degrade productivity as the loss of a skilled craft or supervisor leaves a gap in the workforce and bringing a new individual onto the project requires an onboarding process as well as time to become familiar with the work environment, etc. Figure 12 below shows the monthly average turnover of the mechanical trade pipe fitting craft, which compares projects that employ union, mixed, and open shop labor. On average, projects that employ union labor have monthly turnover rates that are one-third lower than open shop labor and one-quarter lower than mixed workforces for pipefitters. Similar findings were also found for the electrical, civil, and steel workers. This finding suggests that union labor is more likely to remain on the project, whereas open shop labor is more likely to leave. This finding is even more pronounced during hot labor markets during which the rate of turnover for open shop labor increases as union labor turnover remains unchanged.

## Frequency of Turnover of Labor

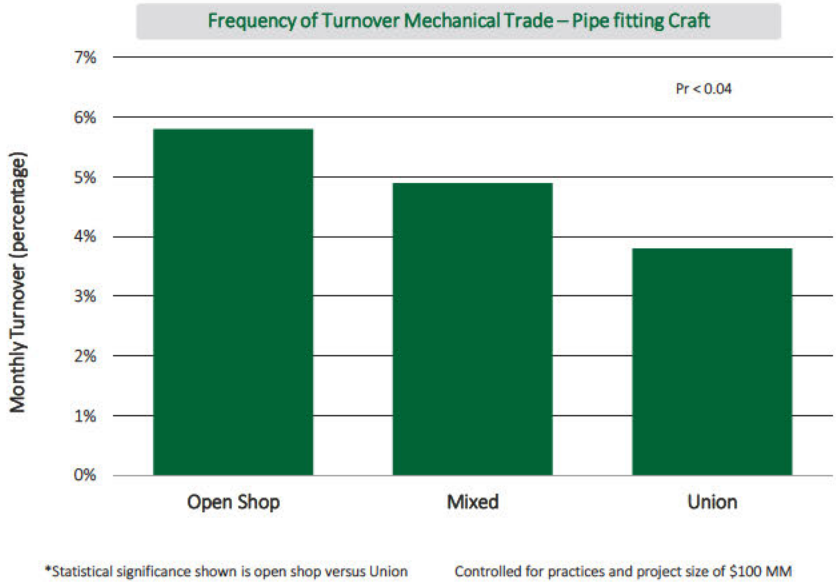



Figure 12

As with shortages of skilled labor, turnovers of skilled labor, especially unwanted turnovers, create manpower gaps that can cause projects to have to deviate from plans to work around these missing crafts until new craft and first line supervisors can be found, hired, and on boarded. The turnover of skilled labor has a negative effect on project performance. As Figure13 below indicates, the turnover of skilled craft is linked to higher cost growth as well as higher project costs.

## Influence of Labor Turnover on Project Cost Performance

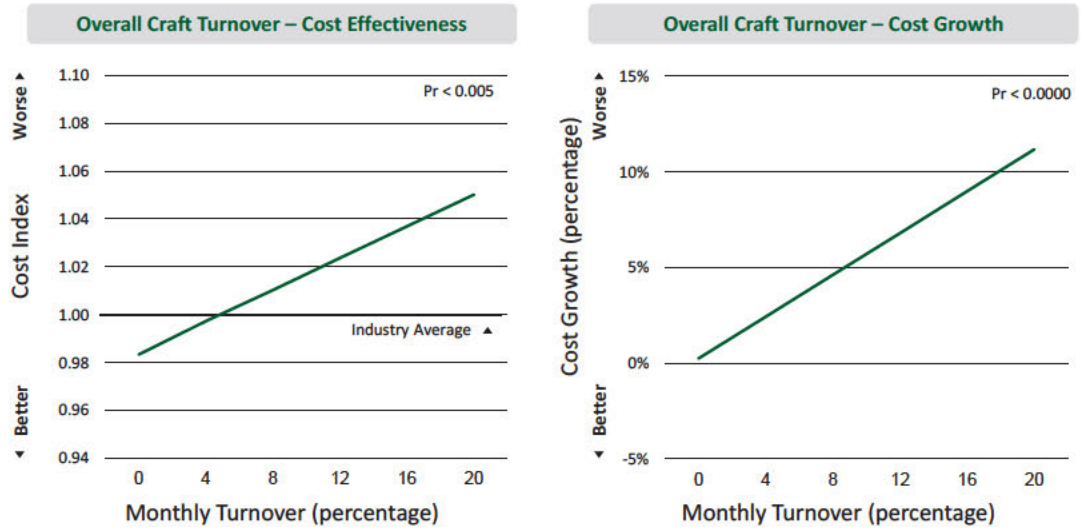



Figure 13

# Conclusions

This study confirms earlier work that found that union labor delivers lower and more predictable project costs and more predictable schedules. Subcontracted labor also delivers lower overall project costs. The study confirmed union labor is significantly more productive than open shop labor and this higher productivity is linked to significant overall cost savings. Projects with mixed labor still see benefits in productivity and cost savings by having union labor on their projects as compared to open shop projects. The current study unpacked the drivers of this better productivity. As hypothesized, owner experts reported that union labor across all crafts has higher skills for both craft and foremen. One key finding is that the union labor and supervision are much more likely to be highly skilled and far less likely to be rated as average or lower skilled. The level of craft skill is directly related to overall project cost and schedule performance.

The second difference between union versus open shop and mixed labor is around the ability to reliably source the labor when needed. Projects that sourced labor from union halls are 40 percent less likely to be short on skilled labor than when projects sourced labor from open shop sources or mixed labor. Skilled labor shortages create significant challenges to projects. Our study found that skilled labor shortages are linked to worse cost and schedule performance, including increased risk of major cost growth and schedule slip. Therefore, the source of labor should be considered an important risk management practice.

Finally, we looked at the turnover of labor as another potential explanation for the higher productivity of union versus open shop labor. The study found that projects that employ union labor report significantly lower monthly turnover rates for their workers than projects employing open shop labor. Projects employing mixed labor appear to benefit from the presence of union labor with lower turnover than projects employing open shop labor. Again, labor turnover is linked to cost and schedule performance.

The combination of higher skills gained through more consistent training and better deployment of labor from union halls along with lower turnover of craft once they are on the job helps to explain the significantly higher productivity of union labor that drives lower and more predictable project costs, lower risk of major cost and schedule deviations, and a reduced labor count that may reduce the exposure hours for the project. The presence of union labor in projects employing mixed labor is evident in nearly all of the key success measures. Overall employing union labor creates significant value for owners through lower costs and more predictable schedules and acts as a risk mitigation strategy that reduces the risk of major cost and schedule deviations.

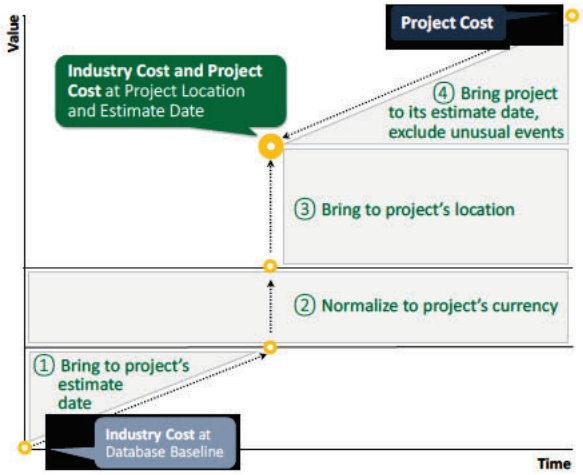
# Appendix Methodology

## Cost Normalization

IPA's analytic techniques include data normalization methods that allow us to make valid comparisons across different time periods and regions of the world. The goal of normalization is to neutralize any inherent advantage or disadvantage of a project's timeframe and location, which allows us to analyze and compare projects on an equal basis, thus ensuring benchmarking accuracy.

IPA's PES Database stores project cost values normalized to a constant reference location, time, and currency, and with unusual events excluded., IPA's analytic methodology accounts for:

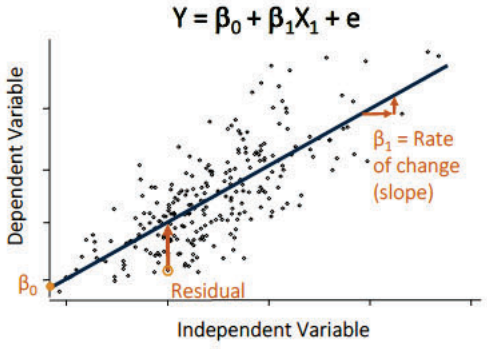
- **Time period**
  - Industry costs are escalated from the PES Database reference time period to a project's estimate date based on inflation data obtained from the projects evaluated by IPA and selected public sources
  - IPA captures inflation data for each major cost category and accounts for recent extraordinary inflation (see below for further discussion)
  - Because industry costs are presented as of the project's estimate date, escalation is removed from the project's cost estimate, while actual costs are de-escalated to the estimate date based on an expenditure profile established from the project's schedule




- **Location**
  - Industry cost data are converted from the reference currency in the PES Database *(note that in the case of this study, all projects are from the United States and all project costs were in U.S. dollars; therefore, no currency adjustment* was needed)
  - Differences in local labor rates are used to convert field labor costs from the reference location to the project's location
  - Office services and materials procurement typically follow World Open Market (WOM) pricing; for some regions, these costs are also adjusted from the reference location to the project's location
  - These location-adjustment factors can change over time, and IPA updates them as needed
- **Unusual events**
  - Costs in the PES Database exclude the effect of workers' strikes, natural disasters, global pandemics, etc.

## Statistical Models

IPA uses multivariate statistical (regression) models to establish benchmarks for project outcomes (contingency used, cost, schedule, and operability) based on industry data that control for specific project characteristics. Fairly comparing targets and outcomes between a project and Industry requires the outcome models be derived from PES Database projects that have been normalized to a constant location, time, and currency, as described in the previous section. The benchmarks and distributions generated by the models account for the fact that a project outcome has multiple drivers. Controlling for these drivers simultaneously allows us to quantify the effect of each driver on that outcome. The figure below shows a simple illustration of a single-variable regression model and its associated uncertainty.




$Y$ = Dependent Variable
$X_1$ = Independent Variable
$\beta_0$ = Constant
$\beta_1$ = Slope of Independent Variable
$e$ = Residual—variance in Y that is unexplained by the variance of the independent variable(s)

IPA's models are multivariate (i.e., they account for multiple independent variables [drivers] simultaneously). Because IPA's models are based on actual project data and cannot control for every conceivable driver of a project

outcome, the models control for the most leveraging drivers, derived from empirical observations and hypotheses of what drives project performance. IPA's models are periodically updated as needed to capture recent project performance and ensure critical drivers remain relevant.




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Name

# ada beresford

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Can we please deal with con edison's criminal behavior: they continue to impose random deposit burdens on their customers and then proceed to demand payment of that in addition to usage charges. Then they penalize you with a 1.5% late fee charge, which includes the deposit amount THEY decided upon. So they're exhorting their customers not only for their unreasonably high prices, but for a deposit amount that doesn't help consumers, because no one can go without using con ed in new york. Why? because they have a full monopoly on gas and electricity. even if you go with another provider (who are too small to be competitive and whose rates reflect that) con ed still charges you for usage of their infrastructure. Which the City/State helped them put in place. Furture, even if a small landlord lives in the property and their homes meter provides some public use in the building, con ed charges that meter as a business. Meaning the landlord, who lives in a unit, is being upcharged as a business for his personal use. This is truly highway robbery and has to be stopped!!!!!!!!!!!!!!!!!!!!!

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Enforcement × Unnecessary Bureaucracy ×

Method Received Airtable Form

Created By 6/9/2026 6:01pm

Name

# Latoya Sampson

Email [redacted]

Professional Affiliation NYC Employee

Zip Code [redacted]

Public Comment

There's a lot of talk about affordable housing but it's not affordable for the working class, we pay medical, school, transportation, food ect without any government assistance. Affordable rent goes by your income before taxes, after taxes we're barely getting by. I have worked for the city for 30yrs and it's never been easy for the working class

Another issue is the Bronx office space for city employees as well as pay, BX employees get less promotions and pay and the buildings are the worse out of all boroughs to work in, most places are dated with a lot of maintenance problems,

Attachment(s) Drop files here or click to browse

Date Submitted June 9, 2026

Topic Department of Buildings (DOB) Issues

Method Received Airtable Form

Created By 6/9/2026 6:08pm

Name

Ed

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I have been a resident of Crown Heights for the past 10 years, and during that time I have seen homelessness in our neighborhood fluctuate significantly. While I have compassion for those who are struggling, the current situation is creating serious public safety and public health concerns that need to be addressed.

I urge the City to invest more aggressively in mental health treatment, supportive housing, and intervention programs that help people get the care they need rather than leaving them to suffer on our streets. Simply allowing people with severe mental illness to remain unsheltered is not a humane solution for them or for the community.

I would also like to specifically raise concerns about the Franklin Avenue bus stop at Fulton Street. The area has become unsafe for residents and commuters. People regularly sleep in and around the bus stop, and there have been instances of human feces, discarded needles, and other hazardous conditions. This creates an unacceptable environment for families, seniors, and anyone relying on public transportation.

I respectfully ask the City to address both the immediate sanitation and safety issues at this location and the broader challenge of connecting people experiencing homelessness and mental illness with meaningful treatment and support services.

Thank you for your attention to this issue.

Attachment(s)

Drop files here or click to browse

| | |
|---|---|
| Date Submitted | June 9, 2026 |
| Topic | Policing × Enforcement × |
| Method Received | Airtable Form |
| Created By | 6/9/2026 7:04pm |

Name

# Tanisha

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

We need an animal welfare department !

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/9/2026 7:35pm

Name

# Diana Teeter

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I am a library assistant (office coordinator) at the CUNY Graduate Center. I have a LOT of concerns about the CUNY budget. First concern: back in 2001 CUNY was asked to temporarily run on an austerity budget post 9/11 and as far as we know the budget was never restored, but we do have to take cuts every year. Second concern is how much contracted part time employees like myself make. We are limited by contract to only 20 hours a week. Some folks make minimum wage. A colleague at another campus has been with CUNY close to 25 years and is still just making minimum wage. 25 years on a job and taking home still just minimum wage? Third concern: I worked on campus as an essential worker during the COVID shutdown. At one point in time money was given to the CUNY campuses to give a bonus to the workers who came in while the campuses were shut down...but that money vanished and now I'm being gaslit and was told that money was never given to CUNY. Was it given to us or not? If so, where did it go? It was an announcement online that has since vanished.

CUNY schools are so important to the city and outside of the higher ups on campus and the very few tenured professors the adjunct teachers and support staff DO NOT get a living wage. I'm lucky that I have another job and just keep the CUNY job for insurance (which is actually fantastic insurance) but there are a lot of folks that can't make ends meet on what we are paid.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Budget Issues

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/9/2026 7:57pm |

Name

## Scott Qi

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |

Public Comment

Dear Members of the Charter Revision Commission

My name is Scott Qi, I appreciate the opportunity to speak regarding making the New York City government more efficient in serving New Yorkers and revising the New York City Charter. Personally, I am an urban planning student, and infrastructure projects and the public realm is at the center of my discipline.
Right now, transit projects in NYC are mostly controlled by the state. This blocks the opportunity for the mayor's ability to advance infrastructure projects when he or she wants to do so, without the governor saying yes. The charter should be revised to grant power for the city to study and move forward with transit projects, as well as the power to use financial tools like Tax Increment Financing to fund those projects.

Furthermore, I believe the charter needs to be revised regarding the process of deciding the use of city-owned land and right-of-way. These lands of rights of ways are extrmely valuable in our city, and without a thoughtful process, it could mean a loss of opportunity for New Yorkers. These decisions should be backed with data and studies, examination of the pros and cons of multiple alternatives, and incorporation of public feedback. These decisions should also be collaboratively reviewed between multiple agencies, so these valuable land can be used in the best way possible.

One such project is QueensLink, which is a proposal to bring both new subway service and new parkland to Queens by reactivating the former Rockaway Beach Branch. This project will be game changing for residents living in Southern Queens and out in the Rockaways, cutting hour-long commutes on buses to fast, frequent transit. However, the current city budget has decided to fund the QueensWay, AKA the Met Hub Project, which proposes building a linear park on the right of way, with no provisions for future rail reactivation. This is very disappointing and will leave Queens residents stranded in some of the worst commutes in the nation.

I believe these revisions will allow meaningful projects like QueensLink to be pulled off more efficiently. In the mean time, I urge the city to re-look into the QueensWay Met Hub Project, study and consider the alternatives, including building rails and trails together, or design the park project to preserve space for future rail reactivation.

Thank You

Attachment(s)

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| | |
|---|---|
| Date Submitted | June 9, 2026 |
| Topic | Budget Issues × Unnecessary Bureaucracy × |
| Method Received | Airtable Form |
| Created By | 6/9/2026 8:02pm |

Name

# Julie Wepplo

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | NYC Public Schools |
| Zip Code | [redacted] |
| Public Comment | Hi, I'm an itinerant speech therapist for NYCPS. I think $ and physical waste could be saved by coordinating unwanted furniture between schools and buildings. I've seen schools on one floor order chairs, while new looking ones sit discarded by another school in the same building on the curb. Limited storage space in buildings and lack of communication prevents sharing and saving resources. But could there be a few storage places in each borough? No $ shopdoe. Ideally there are photos to look through before it's delivered. Same thing with books & other materials! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Unnecessary Bureaucracy × Procurement Reform × |
| Method Received | Airtable Form |
| Created By | 6/9/2026 8:13pm |

Name

# Samantha Gates

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

The time restricted subway exit door access is DANGEROUS and just a horrible update. Aside from the clear hazard it poses in the event of emergency, it is a massive inconvenience to people with strollers, lugging their groceries or laundry, disabilities, etc. Whatever small amount of money it saves in regards to fare evasion is NOT worth the risk to human life if there is an emergency, OR the added delay in navigating a complex transit system with any form of handicap. This change makes me feel infinitely less secure, especially as a woman who frequently utilizes public transit alone.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Tenant Protection × Unnecessary Bureaucracy × Enforcement ×

Method Received Airtable Form

Created By 6/9/2026 8:17pm

Name

# Eric

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Not a NYC resident, but it's nice to see political LEADER set up a real government efficiency program and take feedback from constituents, unlike the last guy that started one and let a billionaire goon dictate all the "efficiency" decisions.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Unnecessary Bureaucracy

Method Received Airtable Form

Created By 6/9/2026 8:40pm

Name

# Disha Goswami

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Let's get rid of cars in NYC!! This can only be done by increasing our public transportation access.

We need to have better, cleaner, safer, quieter, and faster trains. Even if they're shut down for a few hours everyday, that okay, and we would be better than the situation we are in now.
Similar to how snow shovelers were hired, let's hire to clean trains and the platforms/stations. We also should improve the overall system and increase access across all 5 boroughs.

The other thing should be increasing ferries. We are blessed to be surrounded by water but don't optimize our transportation by water. We need more ferries, more frequent trips, and increase access across NJ, Brooklyn, Staten Island, queens, Bronx, Connecticut and more!

Let's make more streets bus only and make it better to go all around the 5 boroughs. Make it faster and safer while increasing overall access.

Last but not least add streets that are blocked to all vehicles. Let's walk more and give people the space by shutting down streets to vehicles. We'll be healthier and happier in NYC!!

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Street Redesigns × Miscellaneous ×

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/9/2026 9:00pm |

Name

# James

Email [redacted]

Professional Affiliation

Zip Code

Public Comment: Fix the van wyck already pls

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

Date Submitted: June 9, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Created By: 6/9/2026 10:08pm

Name

## Savail Majid

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

I encourage COGE to explore a bold but fundamentally more equitable shift in New York City's tax structure: eliminating the city income tax and replacing it with a net worth tax.

As someone who spent time functioning as a wealth and asset attorney, much of my work involved helping wealthy individuals and families legally minimize income tax exposure.

What I learned is that INCOME is often the easiest thing for those with substantial resources to restructure, defer, shelter, or avoid. WEALTH, however, is where true ability to pay resides. A net worth tax would be far more progressive, asking those who have accumulated significant assets to contribute more while allowing working and middle class New Yorkers to keep more of their paychecks.

Removing the city income tax would immediately increase disposable income for millions of residents, putting more money into the hands of people who actually spend it in the local economy. That increased spending power would support businesses, create economic activity, and make New York a more affordable place to live.

The Mamdani administration has shown a willingness to tackle ambitious challenges, and this is exactly the kind of transformative idea that deserves active consideration.

If we are serious about addressing inequality and building an economy that works for everyone, we should not be afraid to pursue structural reforms that others view as politically difficult.

The country is in need of a genuine rethinking of how wealth and economic participation are taxed, and New York City has an opportunity to set the standard. Bold tax reform has to start in New York.

Attachment(s)

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Date Submitted

June 9, 2026

Topic

Budget Issues

Method Received

Airtable Form

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|---|---|
| Created By | 6/9/2026 10:38pm |

Name

# Yisroel Aronow

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Please upgrade the subway's cell service to parity that of China's. It's not just that it's a constant nuisance to lose connection or that it's an embarrassment to our incredible city but I believe a solid and stable connection would be a great selling point to increase public transit usage.

Attachment(s)

Drop files here or click to browse

Date Submitted June 9, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/9/2026 11:03pm

Name

# Juanita James

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | The City should have a department where people can go and report rental scammers to retrieve their deposit and file charges. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Tenant Protection, Enforcement |
| Method Received | Airtable Form |
| Created By | 6/9/2026 11:34pm |

Name

# Nicole Redifer

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Fund the arts please!!! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 9, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/9/2026 11:56pm |

Name

# Marcela Moraga

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I just mive from a shelter with a $0 on my portion. Now I have to pay 667 wish is my 60% of my income ( ssi from my daughter) I will back to the shelter ... they told me its going to be 30%.

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Tenant Protection

Method Received Airtable Form

Created By 6/10/2026 12:38am

Name

# Marissa

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | The people of NYC overwhelmingly want Ryder's Law passed. Enough horses have died, enough residents and tourists have been endangered by horses running into traffic enough is enough. We don't know why a vegan with a "meat is murder" tattoo would vote down the bill the first time, but we can guess that something was up with the strange way city council voted. Now you're here and you're standing against corruption, so it's time to lead on this issue. Please please get Ryder's Law passed and stop this dangerous, outdated tourist pastime that's killing innocent animals and making NYC look like it's stuck in the past. The drivers can drive taxis or Ubers, they have plenty of other options. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Enforcement |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:01am |

Name

## Chris Rudkowski

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Project Manager, High Performance Government — City of Greeley, CO |
| Zip Code | |

Public Comment

I appreciate the creation of the Commission on Government Efficiency and the opportunity to provide public comment. I work in local government project management and process improvement, including cross-departmental initiatives focused on high performance government, customer experience, service delivery, and enterprise implementation.
One recommendation I would encourage the Commission to consider is that NYC should pair any charter, process, or service-delivery reforms with a durable implementation structure — essentially a citywide Project Management Office, Delivery Unit, or High Performance Government function. Large governments often have no shortage of good ideas, plans, technology pilots, or strategic priorities. The harder challenge is execution across agencies, especially when reforms require shared ownership, clear timelines, common metrics, change management, and accountability.

A centralized or hybrid PMO-style office could help NYC translate COGE recommendations into actual results by supporting enterprise project charters, cross agency governance, implementation roadmaps, service level agreements, process mapping, performance measures, benefits tracking, and regular public-facing progress updates. This office should not simply add another layer of bureaucracy. Its value would be in helping agencies remove barriers, coordinate work that crosses organizational lines, and ensure reforms are implemented in a way that improves the experience of residents, businesses, frontline staff, and community partners.

I would especially encourage COGE to consider recommendations in the following areas:

1. Establish a citywide implementation office or delivery unit for major cross-agency reforms, modernization projects, and service delivery improvements.

2. Require major reform initiatives to include a clear project charter, executive sponsor, accountable owner, timeline, public outcome measures, and implementation plan before launch.

3. Create a standard process for cross-agency service-level agreements where one agency's performance depends on timely review, approval, data, or support from another agency.

4. Build a public-facing performance and implementation dashboard that focuses not only on activity measures, but also on resident outcomes, cycle times, customer experience, cost avoidance, and service quality.

5. Use process improvement methods before defaulting to technology solutions, so the City avoids digitizing broken workflows without first simplifying the underlying process.

6. Invest in internal facilitation, project management, change management, and continuous improvement capacity so agencies have support turning recommendations into practice. See: Denvers peak academy for example.

In my experience, the most effective government efficiency work is not simply about cutting costs. It is about building the operating capacity to deliver better, faster, simpler, and more transparent services. A PMO or High Performance Government model could help NYC make COGE's work actionable and sustainable after the Commission's recommendations are issued.

Thank you for the opportunity to comment, and I would be glad to be a resource if helpful.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 10, 2026

Topic: Unnecessary Bureaucracy, Procurement Reform

Method Received: Airtable Form

Created By: 6/10/2026 1:11am

Name

# Keith Bolden

Email [redacted]

Professional Affiliation Qredible

Zip Code

Public Comment

Subject: Charter Efficiency Proposal: Preventing a $100M Tech Failure in NYC's Cannabis Program

New York City's cannabis equity program is being milked by old, monolithic legacy architectures that require manual custom coding at $175 per hour just to alter a basic agency workflow or compliance form. This model wastes critical taxpayer dollars that belong on the ground for safety, compliance, and social equity enforcement.

We do another have to guess at the cost of this tech failure we have a stark warning right next door. A California court recently handed their state cannabis program a massive legal defeat because their $100M tracking database relied on slow, manual reporting rather than automatically flagging compliance irregularities. This blind spot actively enabled illicit market diversion while burying compliant local business owners in bureaucratic backlogs.

New York City has a historic opportunity to claim first mover status, protect local entrepreneurs, and avoid a multi million dollar structural failure.

Please see the attached 15-minute capabilities brief. It outlines an agile, low-code API compliance overlay driven by an Immutable Blockchain Repository and Blind Testing Protocols. This framework delivers a 100% fraud proof supply chain that stops "lab shopping" in real time and provides the "Trust Infrastructure" needed to make local equity businesses instantly bankable and insurable.

As a Brooklyn native born and raised in East New York, I urge the Commission to review this attached blueprint so NYC can move from reactive chaos to pioneering national leadership.

Attachment(s)



The Master COGE Technical Submission....

Date Submitted: June 10, 2026

Topic: Procurement Reform ✕ | Unnecessary Bureaucracy ✕ | Enforcement ✕ | Reporting Requirements ✕

Method Received: Airtable Form

Created By: 6/10/2026 1:24am

The Master COGE Technical Submission

To: Commission on Government Efficiency (COGE) / Mayor’s Policy Team

Subject: Charter Efficiency Proposal: Eradicating Bureaucratic Backlogs & Securing Supply Chain Integrity in NYC’s Cannabis Program

Dear Chair Gaspard, Executive Director Cheng, and Members of the Commission,

As the Commission on Government Efficiency (COGE) reviews the New York City Charter to eliminate outdated bureaucratic barriers, stop predatory corporate waste, and modernize service delivery, a glaring operational crisis requires immediate structural intervention: the technical and administrative infrastructure supporting New York City's legal cannabis program.

I am submitting this proposal not just as a financial risk specialist with 40 years of complex regulatory compliance experience, but as a proud Brooklyn native born and raised in East New York—one of the historic "Seven Neighborhoods" identified by the Harlem Business Alliance as having borne the brutal, generational brunt of the War on Drugs. My deeply personal mission is to ensure that the equity promise made to East NY, Brownsville, Harlem, and our other disproportionately impacted communities isn't undermined by a chaotic, "misregulated" market. True government efficiency does not mean cutting vital services; it means equipping our city teams with automated, modern tools that remove administrative friction so our local social equity operators can actually survive and thrive.

The Monolithic Technology Trap vs. Fiscal Responsibility

Currently, the technology deployed to manage cannabis compliance relies on rigid, old monolithic architectures and legacy platforms retrofitted for an industry unlike any other. None of it was purpose-built for this highly complex, high-velocity landscape. For managing licensing and tracking, these outdated architectures cannot be configured by actual users. Instead, they require intensive, manual custom coding and large professional services relationships at $175 per hour just to alter a basic compliance field, change a form, or adjust an agency workflow.

They are all milking the government in an old-school tech model, continuously costing the taxpayer when that money is better spent on safety, compliance, and enforcement on the ground in our communities.

We no longer have to guess at the legal and public safety fallout of these rigid, retrofitted systems—we have a stark, real-world warning right next door. On December 9, 2025, an Orange County Superior Court Judge handed the California Department of Cannabis Control a stunning legal defeat (HNHPC, Inc. v. DCC). The court ruled that despite the state spending over $100 million on its tracking database, the technology "failed to comply" with mandatory statutory duties because it relied on slow, manual administrative report generation rather than automatically flagging compliance irregularities. This architectural blind spot actively enabled

"burner distribution licenses" to illicitly divert millions of pounds of legal cannabis to the black market while burying compliant local business owners under administrative backlogs.

New York City has a historic opportunity to act first, establish true proactive leadership, and avoid duplicating these multi-million dollar legal and structural failures. The city requires an agile, modern approach.

From Reactive Chaos to Proactive Leadership: A First-in-the-Nation Blueprint

Our team at Qredible—led by our Chairman and CEO Brian Fitzpatrick (who engineered the automated compliance systems for the mortgage industry following the Dodd-Frank Act)—has designed the definitive technical blueprint to fix this exact "trust gap."

By implementing this framework, New York City can deliver a "Heart and Lung Bypass" for NYC equity. Rather than an expensive, multi-million dollar "rip-and-replace" database project, Qredible provides an agile, low-code API compliance overlay that runs alongside existing systems to catch fraud, pesticide contamination, and illicit diversion in real-time.

By embedding the technical mechanisms of our Cannabis Testing Integrity and Verification Act framework into NYC's operational framework, the city can claim first-mover status and achieve three history-making efficiencies:

1. Defending Local Social Equity Brands via Mandatory Blind Testing

The city’s legal, social-equity retailers face catastrophic operational delays while waiting for slow, manual verifications of inventory, logistics, and supplier credentials. Furthermore, they are squeezed by an unstable wholesale market driven by predatory "lab shopping" and THC potency inflation. Qredible completely automates the distribution layer through a Centralized Platform that executes a Blind Testing Protocol. Testing laboratories receive samples with zero manufacturer identification or batch info beyond technical specifications. This removes all human bias and administrative friction, creating a 100% fraud-proof supply chain that ensures an equity brand in Brooklyn or Queens isn't destroyed by a quality scandal or a retroactive regulatory penalty.

2. Guarding Public Health via an Immutable Blockchain Repository

Under traditional, centralized databases, tracking down fraudulent laboratory testing data is a slow, retroactive auditing nightmare that allows contaminated products to sit on shelves for weeks. Qredible solves this by deploying an API-driven Blockchain Repository. The moment a laboratory issues an electronic Certificate of Analysis (eCOA), the testing data is cryptographically hashed and permanently locked using a unique Smart Contract ID. Because this distributed ledger is entirely immutable, the data cannot be manipulated, bypassed, or falsified by operators, labs, or legacy database administrators. If any irregular or failing testing data is detected, the software automatically executes a protocol that instantly flags the anomaly and freezes the batch in real-time—protecting working-class NYC consumers before an unsafe product ever hits a retail shelf.

3. Absolute Low-Code Independence for City Agencies

As NYC rules adapt on the fly to combat illegal storefronts and protect local neighborhoods, our technology adapts instantly. Because Qredible features a dynamic forms engine and user-configurable workflows, city policy teams can update compliance fields, adjust enforcement parameters, and alter licensing workflows via a simple administrative dashboard. This entirely eliminates dependency on third-party software developers and completely stops the predatory vendor change-order cycle.

The Impact: Giving NYC Entrepreneurs a "Trust Infrastructure"

We have built the technology New York needs to turn this program around. Beyond protecting public health, embedding this "Trust Infrastructure" allows small, local businesses to prove their compliance metrics in real-time. This makes them instantly "bankable" and "insurable"—solving the two single biggest financial hurdles facing NYC equity entrepreneurs today.

I want the impact of this cutting-edge framework to be felt first in the New York City neighborhoods I so dearly love. We can move NYC from reactive chaos to pioneering leadership, making our local operators the safest, most professional, and most profitable in the world.

As COGE finalizes its modernization and structural efficiency recommendations for the November ballot, we welcome the opportunity to provide a brief, 15-minute educational capabilities briefing to the Mayor’s policy team, the Commission staff, and Small Business Services (SBS) leadership to show how NYC can lead the nation.

Thank you for your tireless dedication to the efficiency, equity, and integrity of our city.

Best regards,

Keith Bolden

Qredible, Inc.

Name

# Nino Thomas

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Engineering |
| Zip Code | [redacted] |
| Public Comment | Small wins are the best wins, small mistakes are the best mistakes. If you're perception is great enough I believe you have the ability to actualize your goals through harmony. This city is a canvas and I believe in our artists. Mamdani is the man and I have faith in his ability to make art. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:26am |

Name

# Steven

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Curious how much local and state tax funds end up going to Fox News and if voters both local and state wide can do anything about it if so. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/10/2026 3:57am |

Name

# Chen z

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I would like to give a comment regard on money spending as a mayor or governor you guys kept saying you guys wanna help middle classes or care about them but why still no free buses or completely free cuny colleges no age limits, no student loans and wipe out tuition automatically like the request are offer right there and other stuff need to be done asap before next fall semester like as if education aren't that important or politic was just a lies a system to scam us to believed that education is justice if you guys aren't willing to step in foot towards the future instead backward just like that public school free meals like serious man shake my head literally you all going to college for what or speak those stupid stories

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Budget Issues

Method Received Airtable Form

Created By 6/10/2026 6:26am

Name

# Katy Burgio

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

NYC should employ a "save as you throw" pricing for waste/recycling disposal. The perception of it being "free" does not help improve recycling rates or incentivize fewer things to dispose of, nor is it really "free". The attached article takes a good look at the cost of current trash disposal.

Attachment(s)

www.vitalcitynyc.org

Date Submitted June 10, 2026

Topic Budget Issues

Method Received Airtable Form

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|---|---|
| Created By | 6/10/2026 6:48am |

Thank you for supporting Vital City's spring drive.

# The Hidden Cost of Trash

SANITATION ▪ STEPHEN SMITH ▪ MAR. 02 2026

## How to make waste removal much more affordable for New Yorkers

Last year, mayoral candidate Zohran Mamdani captured the public's imagination with a series of snappy affordability pledges: a rent freeze on stabilized units, fast and free buses, City-owned grocery stores and free childcare for all. But as the father of his vanquished opponent once said, "you campaign in poetry; you govern in prose."

Now, as mayor, he has to figure out how — or whether — to deliver on the promises made during his campaign. Childcare looks like a winner; even moderate Democrats were eager to work with him on it. On the flip side, even many New Yorkers who support free buses don't think the government should actually do it, and the campaign and now administration have been quietly shifting the emphasis from "free" to "fast." As for City-owned grocery stores, Vital City readers know how I feel.

That leaves the rent freeze. People can debate (including in Vital City) the wisdom of zeroing out increases on the roughly one-third of housing units in New York City that are subject to rent regulation. But the campaign promise was simple, clear and — if the Rent Guidelines Board goes along — squarely within the mayor's control. The administration has reaffirmed its promise of a four-year rent freeze.

The task now at hand is how to pay for it. Mamdani the candidate argued that landlords are already on average so far ahead that they can handle a few years without rent hikes. Mamdani the mayor understands that averages obscure o ng share of rent-stabilized buildings are in dire financial straits — which

Subscribe

even worse with a looming property tax hike. When costs exceed rents, buildings risk a return to the dark days when landlords simply walked away from their properties.

With a rent freeze seemingly a foregone conclusion, the administration has been casting about for how to rein in landlords' operating costs. The conversation has focused on things like insurance and property taxes, but there is one more tangible item that often gets overlooked: trash.

The rotting, leaking bags of trash piled onto the city's sidewalks have long been an embarrassment for the city, and the Department of Sanitation under Eric Adams finally made a move to do something about it, requiring some buildings to put refuse in bins. But hidden beyond the cleanliness struggles are big costs for New York City residential building owners.

The journey of a few hundred miles from curb to landfills, incinerators and recycling centers costs taxpayers around $35 per dwelling unit per month, facilitated by Department of Sanitation workers and private waste management companies. The cost to building owners to move trash, recycling and now compost just a few feet from the city's cellars and courtyards to the curb is, surprisingly, much higher. The cost has never been tallied up, so my organization, the Center for Building in North America, worked with the Center for Zero Waste Design to interview dozens of owners and pore over financial statements to figure out how much it costs, and published a report with our findings. To get this right, we found owners of everything from brownstones to large campuses, and worked with them to determine what share of their labor and other budgets were going towards waste handling and related work. The number that we arrived at is about $75 per month, on average, for each apartment in the city. While building owners pay the cost directly, one way or another, operating costs are passed along to residents. And at least for small and mid-sized buildings, this is a cost that is completely avoidable if New York City would adopt the same waste collection policies that you find across Europe and beyond.

Seventy-five dollars a month might not be a lot of extra cost for a new luxury apartment, but it's a sizable sum for most New Yorkers. Citywide, the median household income is around $81,000. That $75 a month means $900 a year — more

than 1% of all income that the typical New York City household earns before taxes goes towards paying to move their rotting banana peels, Amazon boxes and used yogurt containers from the trash room to the curb.

For rent-stabilized housing, $75 a month means the difference between a cost-neutral rent freeze and one that will cost owners dearly. The median rent in a rent-stabilized building is $1,384 a month, so if the City can deliver landlords an operating savings of $75 per month by relieving them of the duty to handle waste, that would pay for about two years of a rent freeze, assuming the alternative is rent hikes of around 2.5% per year.

Seventy-five dollars a month also means that new affordable housing that the City subsidizes will not be able to serve the tenants most in need. When the City finances new fully affordable housing, it tries to ensure financial sustainability by setting rents at levels that at least cover operating costs. It's the same when the City sets affordable rents in private developments receiving tax breaks, or built under the Mandatory Inclusionary Housing program. An extra $75 per month in costs for affordable housing translates to an extra $75 per month in rent, which means an extra $3,000 that applicants must demonstrate in yearly income to rent a given apartment (the City uses the same 40-times-your-rent formula that private landlords do).

It might seem surprising that it costs more than twice as much to move waste a few feet, from building to sidewalk, than it does for the almost 10,000-strong Department of Sanitation and its private contractors to take it hundreds of miles from curbs to landfills and incinerators as far away as South Carolina. But when you consider the inefficiency of the work, it starts to make sense — as does the logical solution.

My own five-story condo building in Williamsburg shows how high the costs of waste handling can be. We have a storefront on our ground floor, so residents trudge downstairs to leave bags of trash and recycling in the cellar. Three times a week, the management company sends a porter to haul the bags up the narrow staircase and onto the street. Back when buildings were still allowed to leave refuse on the sidewalk, that was the end of it. But in an attempt to clean up the streets, the City now requires that waste be placed in bins. So, after bringing the bags up, the worker has to bring

the bins up as well, where they sit on the curb until collection. The next day — another three times a week — they come back to the building to haul them back downstairs. Along the way, there is constant cleaning — cleaning the waste room, fishing pedestrians' stray trash out of bins that sat at the curb, spraying the bins down. And much of this work now has to happen after hours, with the City pushing the old 4 p.m. setout time to 6 p.m. or even 8 p.m. in an attempt to shrink dining hours for rats, in the process lengthening hours for supers and porters and driving up costs for those who employ them.

The actual work is unpleasant and physically taxing, but the real hassle is in traveling to and from the building six times a week. It's a small building with just seven apartments and minimal other cleaning needs, so most trips are just to move waste and bins between the cellar and the sidewalk. Co-op and condo fees have skyrocketed in the 2020s, and the growing difficulty of finding labor to move all of this waste around is one reason why. When accounting for how much of the building workers' time is spent hauling around bags and bins of waste, the total comes out to $750 per month for my building, or $107 for each of our seven units.

As it turns out, this is not an uncommon amount for a small building. One owner of a Brooklyn brownstone reported paying a service a whopping $214 per unit just to move bins from her front yard to the curb and back. Most owners, especially of bigger buildings with economies of scale, pay less, but the average for waste handling works out to $75 a month for each apartment.

Trash needs to be taken out, but there is a better way. Visitors to Spain might notice that there are large bins on the street, taking up a few parking spaces near the corner, and residents bring their trash and recycling down to them directly. There is no super, porter or "trash concierge" (as new luxury buildings are now branding it) to handle your waste. Your landlord or condo board has no involvement in your waste at all — it's between you and the City.

For large or luxury buildings with waste chutes or luxury expectations — and the rents and maintenance fees to go along with them — paying staff to ferry waste from the building to the curb might still make sense. Indeed, our research found that larger

buildings have lower per-unit handling costs. But for the typical row house or small apartment building, the sort of building that most New Yorkers live in, the waste-handling intermediary adds little value and imposes huge costs.

New York is a city that most people experience on foot, so one person in almost every household walks down their street every day. Carrying a bag to a bin somewhere on the block would not be that onerous (and for many buildings, like my own, it would even spare schlepping down a flight of stairs to the cellar or to a courtyard). Many buildings were not built with waste storage areas that are convenient or adequate to today's trash, so removing buildings from the business of storing their own waste would relieve residents of the smells of stinky bags of garbage in and around their buildings. It also means that far less of our public space has to be given over to trash, since mechanical collection from common containers means that the City can pick up waste more frequently.

There would be a related benefit: making the City's pickup job much easier. Beyond the costs and hassle to owners, the City pays tremendously for door-to-door collection. With the typical New York City lot being just 25 feet wide, sanitation workers must crawl down every block in the city two or three times a week and manually lift bags from the curb (and increasingly from inside bins) and then toss them into the back of a truck. The wall of parked cars between the sidewalk and the street means that it's not realistic to mechanically collect the suburban-sized bins the City is asking owners to put their waste out in. The work is back-breaking and the constant need to jump on and off of trucks in moving traffic is dangerous. When heavy snow creates an impassable wall between the street and the curb, collection grinds to a halt and bags pile up.

New York City has been dipping its toes into more efficient practices, but old paradigms have limited the appetite for innovation. The City calls its "Empire Bins" — large containers as part of a pilot program that hold far more waste than typical suburban-style bins, and which can be mechanically collected — "European-style," but the way they use them is not as efficient as in Europe. In New York, only building staff can access the containers, so building owners still have to pay to store waste on-site and have supers and porters carry it out to bins, meaning minimal cost savings.

The bins are also specific to one building, so they are limited to large properties lest entire streets be taken over by them, one in front of each house or small tenement — not something that New Yorkers would tolerate given competing demands for parking, the return of outdoor dining and curb extensions for pedestrian safety. And while Empire Bins are lifted mechanically, making collection far more efficient than the old manual methods, the Department of Sanitation has not updated its pick-up frequency to capitalize on these efficiencies — they still only collect two or three times a week (and just once for recycling and compost), compared to up to twice *per day* in Europe, allowing for far fewer bins and less smelly trash sitting out.

Moving to a system of City-owned containers might some day open up possibilities for waste management beyond what door-to-door collection can manage. In New York, most waste that could be recycled is not. In parts of Europe, properly sorting waste into separate streams is encouraged by charging for disposal of trash destined for landfills, while offering recycling for free. Collection from larger, City-owned containers also allows greater investment in infrastructure, moving waste containers underground, as in the Netherlands, keeping smells and bulky containers off the street, and enabling even greater quantities of waste to be collected in one go. Some places in Scandinavia have even taken this to the extreme with underground vacuum tube systems, eliminating the need to collect waste with trucks at all — a system that New Yorkers might be familiar with on Roosevelt Island, installed back when the city still had grand visions for improvement.

New York isn't the only city in North America that struggles with waste and could benefit from a new approach. The United States and Canada are historically low-density and suburban nations, leaving cities to struggle with suburban-style solutions. In Toronto, many new buildings must sacrifice huge amounts of ground-floor retail space to make way for enormous loading docks that can host enormous garbage trucks making three-point turns. Other American cities on the Northeast Corridor struggle with similar inefficiencies as New York — bins or even bags put out by individual buildings, but with mechanical collection blocked by a row of parked cars. In Philadelphia, a strike by sanitation and other municipal workers even forced the city to temporarily embrace a more efficient model — centralized collection points rather than door-to-door pick-ups — albeit in a slapdash, smelly way compared to the

modern sealed containers on every block that residents have access to in, say, Madrid or Prague.

It may feel to New Yorkers today like supers and porters hauling bags and bins back and forth from the curb are in the city's DNA, but waste practices have changed before. In 1971, the miracle of plastics let the city move away from Oscar the Grouch-style metal cans to thick contractors' bags. In 1982, reeling from the City's brush with bankruptcy, the sanitation workers' union agreed to cut three-man crews down to two workers per truck. Under the rat-hating administration of Eric Adams, the City is finally signing up for waste containerization — forcing bags into suburban-style bins and even larger containers. Now, with Mayor Mamdani's pledge to deliver on a rent freeze for rent-stabilized tenants and housing affordability for all, it may be time for New Yorkers to learn to take out their own trash.

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Stephen Smith is executive director of the Center for Building in North America. He lives in Brooklyn.

Name

# Sarah

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

This sounds too much like Elon's failed DOGE which was a complete disaster and utterly incompetent. Please rename it

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/10/2026 7:46am

Name

# Marvella

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

My concern is so much fake news displayed. What channel do we watch to get the truth?

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Miscellaneous

Method Received Airtable Form

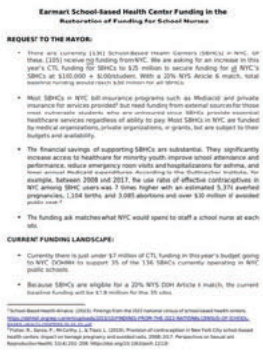
Created By 6/10/2026 8:04am

Name

# David Appel

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | NYC School Based Health Alliance |
| Zip Code | |
| Public Comment | Through the NYC DOH and DOE NYC provides for RN level nurses to provide school nurse level services at public schools with over 200 students, a NYC legal requirement. This is done through DOH and DOE employed school nurses, through NYC funded contract agency nurses, through 35 NYC school based health centers partially funded by NYC and 104 non city funded school based health centers.<br><br>There used to be 156 School based health centers in NYC but in the last 5 years 17 haves closed because of mounting deficits to the sponsoring health care agencies operating them.<br><br>If NYC provided funding at the level they pay for contract nurses it would do two things:<br><br>1. It would stabilize the 104 school based health centers that are struggling to stay open.<br><br>AND<br><br>2. At no additional cost to NYC create the foundation and set the stage for a flowering of new school based health centers in the neediest neighborhoods for the most vulnerable children in NYC - universal access to free medical, mental health, preventive services and often dental care by leaving the same funding in place that now pays contract agencies that provide school nurses that do not even provide immunizations. |

Attachment(s)



**Earmart School-Based Health Center Funding in the Restoration of Funding For School Nurses**

**REQUEST TO THE MAYOR:**

- There are currently 113[1] School-Based Health Centers (SBHCs) in NYC. Of these, (105) receive no funding from NYC. We are asking for an increase in this year's CTL funding for SBHCs to $25 million to secure funding for all NYC's SBHCs at $100,000 + $.00/student. With a 20% NYS Article 6 match, total baseline funding would reach $30 million for all SBHCs

- Most SBHCs in NYC bill insurance programs such as Medicaid and private insurance for services provided[2] but need funding from external sources for those most vulnerable students who are uninsured since SBHCs provide essential healthcare services regardless of ability to pay. Most SBHCs in NYC are funded by medical organizations, private organizations, or grants, but are subject to their budgets and availability.

- The financial savings of supporting SBHCs are substantial. They significantly increase access to healthcare for minority youth improve school attendance and performance, reduce emergency room visits and hospitalizations for asthma, and lower annual Medicaid expenditures. According to the Guttmacher Institute, for example, between 2008 and 2017, the use rates of effective contraceptives in NYC among SBHC users was 7 times higher with an estimated 5,374 averted pregnancies, 1,104 births, and 3,085 abortions and over $30 million in avoided public cost.[3]

- The funding ask matches what NYC would spend to staff a school nurse at each site.

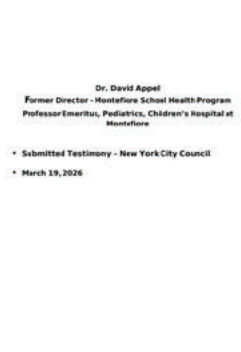
**CURRENT FUNDING LANDSCAPE:**

- Currently there is just under $7 million of CTL funding in this year's budget going to NYC DOHMH to support 35 of the 134 SBHCs currently operating in NYC public schools.

- Because SBHCs are eligible for a 20% NYS DOH Article 6 match, the current baseline funding will be $7.8 million for the 35 sites.

[1] School-Based Health Alliance. (2023). Findings from the 2023 national census of school-based health centers. https://sbhalliance.org/wp-content/uploads/2023/12/FINDINGS-FROM-THE-2023-NATIONAL-CENSUS-OF-SCHOOL-BASED-HEALTH-CENTERS.pdf

[2] Fisher, R., Garcia, P., McCarthy, J., & Tsao, L. (2019). Provision of contraception in New York City school-based health centers: Impact on teenage pregnancy and avoided costs, 2008-2017. Perspectives on Sexual and Reproductive Health, 51(4):231-238. https://doi.org/10.1363/psrh.12159



**Dr. David Appel**
**Former Director - Montefiore School Health Program**
**Professor Emeritus, Pediatrics, Children's Hospital at Montefiore**

- **Submitted Testimony - New York City Council**
- **March 19, 2026**

2026 Funding Ask - Mayor's Office [Prel...

Testimony before NYC Council Health C...

Date Submitted: June 10, 2026

Topic: Budget Issues

Method Received: Airtable Form

Created By: 6/10/2026 8:41am

# Earmark School-Based Health Center Funding in the Restoration of Funding for School Nurses

## REQUEST TO THE MAYOR:

- There are currently [136] School-Based Health Centers (SBHCs) in NYC. Of these, [105] receive ***no*** funding from NYC. We are asking for an increase in this year's CTL funding for SBHCs to $25 million to secure funding for ***all*** NYC's SBHCs at $100,000 + $100/student. With a 20% NYS Article 6 match, total baseline funding would reach $30 million for all SBHCs.

- Most SBHCs in NYC bill insurance programs such as Mediacid and private insurance for services provided[1] but need funding from external sources for those most vulnerable students who are uninsured since SBHCs provide essential healthcare services regardless of ability to pay. Most SBHCs in NYC are funded by medical organizations, private organizations, or grants, but are subject to their budgets and availability.

- The financial savings of supporting SBHCs are substantial. They significantly increase access to healthcare for minority youth, improve school attendance and performance, reduce emergency room visits and hospitalizations for asthma, and lower annual Medicaid expenditures. According to the Guttmacher Institute, for example, between 2008 and 2017, the use rates of effective contraceptives in NYC among SBHC users was 7 times higher with an estimated 5,376 averted pregnancies, 2,104 births, and 3,085 abortions and over $30 million of avoided public cost.[2]

- The funding ask matches what NYC would spend to staff a school nurse at each site.

## CURRENT FUNDING LANDSCAPE:

- Currently there is just under $7 million of CTL funding in this year's budget going to NYC DOHMH to support 35 of the 136 SBHCs currently operating in NYC public schools.

- Because SBHCs are eligible for a 20% NYS DOH Article 6 match, the current baseline funding will be $7.8 million for the 35 sites.

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[1] School-Based Health Alliance. (2023). *Findings from the 2022 national census of school-based health centers*. https://sbh4all.org/wp-content/uploads/2023/10/FINDINGS-FROM-THE-2022-NATIONAL-CENSUS-OF-SCHOOL-BASED-HEALTH-CENTERS-09.20.23.pdf

[2] Fisher, R., Danza, P., McCarthy, J., & Tiezzi, L. (2019). *Provision of contraception in New York City school-based health centers: Impact on teenage pregnancy and avoided costs, 2008–2017. Perspectives on Sexual and Reproductive Health, 51*(4), 201–209. https://doi.org/10.1363/psrh.12126

- NYC DOHMH, NYC DOE, and contracting agencies are funded to provide school nurse services in NYC public schools. Since SBHCs provide school nurse services, in addition to other essential health services, to all students, we can use funding for school nurse services to fund the [105] of [136] existing SBHCs that currently receive no funding from NYC.

**THIS MATTERS BECAUSE SBHCs ARE:**

- the best way to immediately boost mental health services for hard-to-reach children is to provide funding for the [105] unfunded longstanding SBHCs located in some of NYC's neediest neighborhoods.
- the best way to guarantee access to immunizations is to provide funding for the [105] unfunded longstanding SBHCs located in some of NYC's neediest neighborhoods.
- the best way to guarantee children with a significant chronic medical condition attend and fully participate in school activities is to provide funding for the 105 unfunded longstanding SBHCs located in some of NYC's neediest neighborhoods.

**Dr. David Appel**

**Former Director - Montefiore School Health Program**

**Professor Emeritus, Pediatrics, Children's Hospital at Montefiore**

- **Submitted Testimony – New York City Council**
- **March 19, 2026**

Good afternoon, my name is Dr. David Appel; I was a primary care pediatrician, now Professor Emeritus of Pediatrics at the Children's Hospital at Montefiore and former Director of the Montefiore School Health Program.

I would like to thank the Committee Chairs and the members of New York City Council's various committees for the opportunity to submit testimony on School-Based Health Centers (SBHCs).

In my opinion without baseline funding the financial viability of NYC's SBHCs are in jeopardy. Increased staffing costs and staff shortages, decreased school enrollment, and newly migrated children with fewer options and significant unmet needs all contribute to placing SBHCs in financial jeopardy. SBHCs are being forced to cut back the range of services and a significant number of SBHCs around the city have closed, being replaced by contract nurses at a cost similar to what we are asking to keep NYC's SBHCs in place. And it contributes to increased long term healthcare costs, higher teen pregnancy rates and lower graduation rates, raise levels of untreated mental health issues, and drives up ER use and hospitalizations for asthma.

I am here today to urge the City Council to use tax levy dollars to support SBHCs at the level of $100,000 per campus and $100 per student. Through NYS DOH Article 6 there is a 20% match to NYC funding for SBHCs so the cost is less than that for a School Nurse. **SBHCs are a very efficient way to spend city tax levy dollars.**

## Comparison of Services
## Example – High School with 2,500 students

| | **OSH SCHOOL HEALTH MODEL** | **SCHOOL BASED HEALTH CENTER MODEL** |
|---|---|---|
| **Model** | **NYCDOH School Nurse Service** | **NYC Full Service SBHC** |
| **Main Provider** | 2 RNs (Nurse) | Nurse Practitioner |
| **Other providers** | 3 hours of MD session a month | Fulltime, onsite - Family Medicine MD, Social Worker, LPN, Psychologist, Patient Care Technician, Receptionists |
| **Services** | ✓ First Aid<br>✓ Addressing 504 needs<br>✓ Diabetic monitoring if any<br>✓ Sports Physicals, Working Papers<br>While these are valuable services, for a modest additional investment students in our schools can have access to the services in the next column. | ✓ First Aid<br>✓ Addressing 504 needs<br>✓ Diabetic monitoring if any<br>✓ Sports Physicals, Working Papers<br>✓ Primary Care, including management of Chronic illnesses<br>✓ Laboratory tests<br>✓ Reproductive Health Care<br>✓ All available methods of contraception<br>✓ STI/HIV counseling education and testing and treatment for STI referrals to treatment for HIV + kids<br>✓ HPV vaccine for boys and girls, plus all other immunizations<br>✓ Mental Health Services provided by LMSW and psychologist |
| **Cost to the city** | **$300,000** (does not include the salary of NYC DOHMH MD support) | **$100,000 +$100/student = $350,000**<br>**20% is NYS Article 6 match** |

Name

# Candy Latino

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Professional lover of NYC |
| Zip Code | [redacted] |
| Public Comment | A trash roomba for the subway! More volunteer dates for trash clean up and sweeping in all Burroughs. Solar panel roofs on all the buildings and bus stops. All buildings should be required to have a green space or solar! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Department of Buildings (DOB) Issues |
| Method Received | Airtable Form |
| Created By | 6/10/2026 9:00am |

Name

# Stephanie altman

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Are you kidding. Named after doge. So tone deaf. I thought I loved him but as a fired govt employee, from USAID, I'm just disappointed. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/10/2026 9:00am |

Name

# Melissa Kags

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | These meetings all start at 5pm. How are you expecting real public comments when workers are only getting out of work at that time? |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/10/2026 9:28am |

Name

# Jessica Forero

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | There should be laws to assist homeowners from the board of the building in which they live in. The president of my board is harassing me and there's nothing I can do. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Tenant Protection |
| Method Received | Airtable Form |
| Created By | 6/10/2026 9:32am |

Name

# Juli Alvarez

Email [redacted]

Professional Affiliation Freelance Stylist

Zip Code [redacted]

Public Comment

I've lived in this city for 40 years. But I'm on the brink of that option disappearing for me. Like many New Yorkers, we are being priced out by greedy corporate landlords. When I moved into my current market rate apartment in FIDI (was once the most affordable area), the rent was $2500/month. Now it's $4300/month with a $350 mandatory yearly amenity fee (I've never used them) and a forced WIFI carrier fee of $70/month for their Smart Rent system that gives us keypad front doors. It doesn't matter how hard and how much I work, I can't make enough to afford this rent. And now, because I haven't been working enough for the past couple of months (economy is difficult in fashion, health issues, and surgery), I'm behind in rent and will be forced to leave in a matter of days. I'm 61. I've worked my ass off my whole life. I don't come from a rich family. I don't have a trust so I don't have to worry about money. That's not my reality, and I know I'm not the only one. The corporations in this country are given free reign to literally rob us blind and not one single elected official even speaks about this issue. My current work situation aside, because that will change, the rules on market rate rents are immoral, designed to keep us chasing our tail so they can steal our money and our future. Can you please address this? Is there something you can do? If anyone can, it's you, Mr. Mayor.

Attachment(s) Drop files here or click to browse

Date Submitted June 10, 2026

Topic Tenant Protection

| | |
|---|---|
| Method Received | Airtable Form |
| Created By | 6/10/2026 10:00am |

Name

# Elizabeth kang

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

We need more safe 3rd spaces for teens, park improvements, trash off streets and sidewalks.
Also cancel all LINK NYC contracts or at least re examine its role, purpose and scope.

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Franchises & Concessions

Method Received Airtable Form

Created By 6/10/2026 10:09am

Name

# Phil

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Noise cameras! Turn anything that lowers our quality of life (like honking car horns!) into a profit center. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Enforcement |
| Method Received | Airtable Form |
| Created By | 6/10/2026 10:09am |

Name

# Phil

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Noise cameras! Turn anything that lowers our quality of life (like honking car horns!) into a profit center. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Enforcement |
| Method Received | Airtable Form |
| Created By | 6/10/2026 10:09am |

Name

# Max Vilgalys

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

The city should eliminate environmental review requirements for projects that remove parking or other street space for private vehicles. This has emerged as a major logistical complication for allowing year round outdoor dining, an almost universally popular program. By now, there is ample evidence that taking space away from cars only leads to environmental benefits: it reduces incentives to own and operate vehicles, improving air quality, increasing safety, reducing emissions, improving public health, generating additional economic activity, and more. There is no logical reason to continue requiring review for these types of projects; it only adds costs and delays to improvements to New Yorkers' daily lives.

Attachment(s)

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Date Submitted June 10, 2026

Topic Unnecessary Bureaucracy × Street Redesigns ×

Method Received Airtable Form

Created By 6/10/2026 10:19am

Name

# Anonymous

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Government Non-profit Organizations are woefully underfunded and it is resulting in mismanagement, employee burnout, and negative ramifications for recipients of government benefits. Workers who are tasked to assist NYC's most vulnerable members should have adequate technology to service them efficiently, such as easier appointment scheduling, client verification tools, and streamlined systems that communicate effectively with each other. The current systems provided by HRA are bugged with glitches, use redundant mechanisms, and leave far too much room for error in a job where one mistake may cause someone undue stress and potentially cost the loss of their only safety net.

Employees are underpaid and frequently burnt out, unable to keep up with the large caseloads and given little grace for human error. The programs are also understaffed, resulting is reasonable vacation time causing program-wide issues and delays. The medical field provides an excellent example of the type of administrative technology that can exist that secures sensitive client information while still providing ease of use. There is no reason in our modern age for the systems these programs use to be this outdated and inefficient.

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Unnecessary Bureaucracy × Budget Issues ×

Method Received Airtable Form

| | |
|---|---|
| Created By | 6/10/2026 10:23am |

Name

# Rona Wang

Email [redacted]

Professional Affiliation

Zip Code

Public Comment: Divest from apartheid state Israel

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

Date Submitted: June 10, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Created By: 6/10/2026 10:34am

Name

## Cole Fitzgerald

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Good morning, Chairperson and members of the committee. Thank you for the opportunity to address concerns.

My name is Cole Fitzgerald, and I am a resident of Upper East Side. I moved to New York City nine years ago, right after graduating from college. As a millennial who has spent my entire professional career working on the digital transformation of online and mobile application services, the very apps and platforms that millions of people now use daily, I look at technology through a specific lens. I view it through the lens of user experience, security, and accessibility.

I love this city, but as a tech professional and a constituent, I am here today to urge the City to fundamentally rethink how it delivers digital services to its residents.

The Problem: A Fragmented Digital Experience
Right now, navigating New York City's digital infrastructure feels like stepping backward in time. In our private lives, we expect seamless, interconnected digital experiences. With a few taps on a smartphone, we can securely manage our finances, order groceries, or even purchase a car.

Unfortunately, interacting with city government is the exact opposite. It is a highly fragmented, frustrating experience characterized by digital silos.

The Friction of Multiple Front Doors
If I want to pay a parking ticket, check a property tax status, renew a permit, or interact with municipal services, I am forced to navigate a dizzying path of disparte websites and mobile applications. Each agency operates as its own island.

Credential Overload: For every different city service, I am forced to create a new username, a new password, and a separate profile.

The "Password Fatigue" Risk: Managing a dozen different logins for government sites leads directly to password fatigue. Users either forget their credentials, clogging up city help desks, or they reuse weak passwords across multiple sites, creating a massive cybersecurity vulnerability for both themselves and the city.

Navigational Confusion: There is no "universal front door." Residents shouldn't need to understand the organizational chart of City Hall just to figure out which website handles their specific inquiry.

The Reality: This immense friction does not just annoy tech-savvy residents; it drastically reduces government adoption. When a system is difficult to access, people simply give up. This disproportionately harms vulnerable New Yorkers who rely on these digital services the most.

The Solution: A Centralized Portal and Universal Login

To truly modernize, New York City does not need to reinvent the wheel, nor does it need to rely on proprietary, closed source traps. The city needs to adopt a modern, vendor-neutral architectural philosophy centered around two core pillars:

1. A Universal Identity Layer
The city must implement a centralized identity management framework. This means establishing a single, secure, universal login that works across every single city agency. A resident should log in once and have their identity securely verified and recognized whether they are checking an issue on 311, accessing housing resources, or applying for a municipal program.

2. A Centralized Digital Front Door
We need a unified portal that acts as the single entry point for all things NYC. Agencies can keep their backend systems, but the front-end user experience must be streamlined. When a user logs in, they should see a personalized dashboard showing their active interactions with the city, regardless of which department handles them.

Conclusion: Lowering Friction to Increase Trust
When we reduce friction, adoption skyrockets. By implementing a universal login and a centralized digital front door, the city will achieve three critical goals:

Increase Equity: Make services accessible to everyone, not just those with the patience to navigate fragmented websites.

Enhance Security: Centralizing identity allows the city to deploy robust, modern security protocols (like phishing resistant multi factor authentication) uniformly, rather than patching together legacy systems.

Save Taxpayer Dollars: Consolidating identity and portal infrastructure eliminates redundant tech spending across dozens of different agencies.

New York City should be a global leader in civic technology. We have the talent, and the technology exists today to fix this. It is time to tear down the digital silos and build a universal front door that serves all New Yorkers seamlessly.

Thank you for your time and your commitment to modernizing our city's technology. I am happy to answer any questions you may have.

Attachment(s)

Drop files here or click to browse

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Unnecessary Bureaucracy |
| Method Received | Airtable Form |
| Created By | 6/10/2026 10:36am |

Name

# Daddy Z

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | You're doing great! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Created By | 6/10/2026 10:46am |

Name

# Edwin Algarin

Email [redacted]

Professional Affiliation Self

Zip Code [redacted]

Public Comment

Vouchers are being misused by rearranging the long term form of dwelling in nyc. Once upon a time dwellings were composed of a living room, kitchen and bedroom/bedrooms. Unless is was specifically a efficiency dwelling.
The living room has been removed from the equation and renamed converted bedroom and being added the number of actual bedrooms the dwelling was initially designed for.
This means the voucher system can be manipulated because the living rooms is considered a bedroom and the larger voucher can be utilized. This sounds fishy
Do vouchers automatically rearrange the way an apartment was constructed as and room count.

So a 3 room dwelling which was constructed as a one bedroom unit is now a two bedroom. And a four room unit is now a three bedroom instead of a two bedroom.

I believe the voucher system is being depleted by mis categorization of dwellings in NYC fueled by greedy landlords and brokers and permitted by HRA who are desperate to get clients into dwelling that don't suit their needs and eventually lead to homelessness.

Please look into this

Edwin

Attachment(s) Drop files here or click to browse

Date Submitted June 10, 2026

| | |
|---|---|
| Topic | Tenant Protection × Enforcement × Department of Buildings (DOB) Issues × Unnecessary Bureaucracy × |
| Method Received | Airtable Form |
| Created By | 6/10/2026 11:21am |

Name

# Violet

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Student |
| Zip Code | |
| Public Comment | Hello! My name is Violet, and I'm a student from Brooklyn. I spent this past semester studying abroad in Italy and traveled around Europe quite a bit. One of my favorite things about many of the parks in Europe was that they had beer gardens built right into them. They created such a fun atmosphere, gave people a reason to spend more time in the parks, and were a great way to bring communities together, especially during the summer. I wanted to suggest something similar for Prospect Park. Central Park already has a number of restaurants and places where people can sit, eat, and have a drink, but Prospect Park has fewer options like that. I think a seasonal beer garden could be a great addition to the park, both for visitors and as a source of revenue. Thanks for your time and for all the work you do to make our parks such great places! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Franchises & Concessions |
| Method Received | Airtable Form |
| Created By | 6/10/2026 11:32am |

Name

# Tiya Gordon

Email [redacted]

Professional Affiliation It's Electric, Inc.

Zip Code [redacted]

Public Comment Please see attached comments!

Attachment(s)



It's Electric City Charter Recommendati...

Date Submitted June 10, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/10/2026 11:42am

June 11, 2026

New York City Commission on Government Efficiency (COGE)
Re: Brooklyn Hearing 1: Modernizing Government and Streamlining Government Technology

Dear Commissioners,

Thank you members of the New York City Commission on Government Efficiency for holding this hearing on Modernizing Government and Streamlining Government Technology. My name is Tiya Gordon, and I'm the co-founder and COO of It's Electric, a curbside EV charging startup. We are headquartered at the Newlab offices in the Brooklyn Navy Yard, in District 33.

**Recommendations for the City Charter: Flexible Franchise Framework and a Streamlined Revocable Consent Process**

My co-founder and I have unique professional backgrounds that inform our work deploying curbside EV charging infrastructure, or EVSE built specifically for cities. As the Project leader for all public-facing technology (hardware and software) for The 9/11 Memorial and Museum, which to date has hosted over 83 million visitors. I learned to design public facing technology that minimized failpoints in order to survive the public's use (and misuse) as well as withstand the elements.

My co-founder, Nathan King, is a licensed architect who has spent decades expediting permits for construction projects of various scales, typologies, and locations resulting in massive urban projects Prior to starting It's Electric, he led SOM's design team for the NYC Public Health Lab, which just opened in Harlem. The 230,000 square foot facility is a complex, multi-function intervention on a severely constrained site. The project's design was given an award for excellence by the NYC Public Design Commission and is one of the most advanced and sustainable laboratories ever built.

Together, this experience has shaped It's Electric's fundamental approach.Designing and permitting for public use. While we are well-acquainted with the revocable consent (RC) process in New York City. We believe there are ways to improve the RC process to make it more efficient, and to ensure that companies seeking to deploy infrastructure like EV charging – which help the city to meet its climate change and sustainability goals – are able to navigate the process more easily.

Recommendation #1: Establish a "Flexible Franchise Framework" to create an easier pathway for deploying public-private infrastructure for infrastructure in the Right of Way.

A franchise allows a private company to utilize a City-owned asset to provide a public service. The rules for creating and granting franchises is governed by Section 363, and covers all types of possible franchise arrangements.

For the deployment of infrastructure that addresses climate and social justice in the Right of Way (ROW), a separate and more streamlined franchise agreement could be built to increase the speed to deployment, reduce the cost of permitting and operation, and ensure a healthy competitive environment that encourages innovation and a drive towards lower cost. This new structure acknowledges that City ROW are now, and have always been, a critical location to deploy infrastructure that benefits all City residents. These City-wide franchises have included:

- Public telephones (later LinkNYC)
- Newstands
- Bus shelters

More recently, the City has used Concessions and Revocable Consent to allow for the deployment of mobility companies in the ROW, including:

- Citi Bike (City-wide exclusive bike share concession)
- East Bronx Scooter Share (limited concession)
- Charge Safe, Ride Safe bike battery charging (modified Revocable Consent)
- Department of Transportation/ConEd Curbside EV Charging Program (limited concession, pilot program)

In order for private entities to engage in City-wide infrastructure partnerships, there needs to be a clear path to a long term franchise agreement that ensures the private entity can access project financing and investment. Concession agreements have limited terms, and do not allow the private partner enough control of their assets. While franchise agreements provide more certainty, **the current charter rules granting a franchise take too long to enact, and require agency resources that prevent franchise authorizations from maturing. These limitations stifle interest and competition for infrastructure in the ROW, excluding newer and more innovative business models.**

A Flexible Franchise Framework would allow City agencies to create limited authorizations that could be quickly deployed, minimizing agency resources, and allowing the City a pathway to achieve its climate and social justice goals. These new franchises can be defined as a subsection to Section 363. A Flexible Franchise would include the following features:

- Limited initial deployment geography, but with a minimum 10-year term for deployments.
    - (ex., Citi Bike concession)
- Awarding of multiple franchise awardees under each authorization, to operate competitively within the same geography, or separately.
    - (ex., East Bronx Scooter Share pilot)
- Pathways for expansion and extension of pilot into a mature City-wide franchise
    - Flexible Franchise would include key performance metrics set by the administering agency
- Agency allowed to award flexible franchises without City Council, Community Board, and Franchise & Concession Review Committee reviews.
    - Alternatively, City Charter could impose timelines for such reviews.
- Uniform Land Use Review Procedure not required.
- Assets deployed in this Framework would not become City property at the termination of the agreement.

- As the initial deployment matures, and as the agency validates established performance metrics from the awardees, the program graduates into a mature franchise arrangement similar to what is established in Section 363.

Flexible Franchises could be limited to:

- Infrastructure Projects permitted in the ROW that address the City's goals for climate change and social justice, including clean transportation, mobility, and civic Internet of Things (IoT) deployments.
- Such agreements can be limited to "no bid" contracts - where the private entity is responsible for the cost of deployment against expected revenue from non-city sources.
- Permit fees waived, or minimized to cover only city administrative costs.
- Revocable Consent not required.
- The framework is intended to keep pace with technology. Today, we are contemplating EV charging stations, and over the next ten years, the City will need to respond to new technologies that have not yet been brought to market.

Recommendation #2: Waive or reduce RC fees for infrastructure investments that will help the City reach its strategic goals.

The City Charter directs the Mayor to develop a "strategic policy statement" every four years that summarizes "the most significant long-term issues faced by the city" and outlines both "policy goals…and proposed strategies for meeting such goals" (Section 17). The most recent such statement, "PlaNYC: Getting Sustainability Done," (April 2023) sets an ambitious target of cutting transportation emissions in half by 2030, a goal the Mayor hopes to meet through four primary strategies, including "[helping] New Yorkers who must drive to drive electric." Because one million New York drivers park on the street, the Adams administration rightfully recognized the crucial role that curbside EV charging will play in helping New Yorkers make the transition to EVs, setting a goal of installing 1,000 curbside chargers by 2025 and 10,000 chargers by 2030. We applaud the Mamdani administration for continuing these efforts.

As I am sure you are aware, staff at the NYC DOT have worked tirelessly to put this goal into action, including securing $15 million in Charging and Fueling Infrastructure grant funding in August 2024. However, the Trump Administration has demonstrated that we cannot rely on our federal partners to ensure that we as a city meet our sustainability goals. We encourage you to make it easier for private sector partners to make investments – with or without grant support – that will help us collectively reach our goals.

One way to do this is by waiving or reducing RC fees for projects that help the City meet its climate change targets. While we trust the Commission can craft language to this effect, we suggest adding a new Section 364(e) in the charter that states: "All revocable consents granted for uses that are for the express purpose of providing New Yorkers with the ability to utilize electrified transportation options, including but not limited to electric vehicle service equipment, shall not be required to pay annual fees to the City."

Thank you again for your consideration of this important topic, and please feel free to reach out if we can provide additional information.

Sincerely,



Tiya Gordon, co-founder & COO
[redacted]

**About It's Electric**

It's Electric is electric vehicle (EV) charging purpose-built for cities, with a mission to unlock access to clean vehicles for all urban drivers. Launched in 2021, It's Electric is solving an urgent challenge: municipalities like New York City are leading the way in setting policy targets to mandate a transition to EVs, but no scalable charging solutions existed for the millions of drivers who don't have access to a private driveway or garage. In New York City alone, one million drivers park on the street, many of them drivers of for-hire vehicles (FHVs). If we want all New Yorkers to have access to electric mobility, we must provide them with convenient and affordable public charging options where they already park: the curb.

It's Electric is addressing this challenge by harnessing spare electrical capacity from nearby buildings to deploy low-footprint curbside Level-2 EV chargers. We create a behind-the-meter connection to property owners' electrical panels to tap this excess capacity, thereby avoiding the barrier of grid limitations and the costly and time-consuming process of creating a new utility interconnection. Because of these significant savings, we can take on the capital and installation costs ourselves, without requiring contributions from our municipal partners or our host properties. Furthermore, we can afford to deploy in areas that don't yet have high rates of EV ownership yet – where we know utilization will initially be low – thus breaking the chicken-or-the-egg cycle that is currently stifling EV adoption in urban areas.

In return for hosting an It's Electric charger, host properties receive a portion of the charger's topline revenue, creating a new passive income stream for them while making it easier for everyone in their community to charge an EV.[1] And unlike other "public" chargers – which are often located in parking lots or garages that charge a fee to access – we are a truly public, no-fee charging option. With revenue sharing for host properties, plentiful access for (current and future) EV owners, and virtually no impact on municipal budgets – It's Electric is a win for everyone.

[1] Host properties earn approximately $800/year in passive income per charger (assuming a 25% utilization rate). The amount of revenue that host properties can expect to earn depends on a number of factors, including the cost of electricity, the charger utilization rate, and the price drivers pay for charging. It's Electric will set pricing in collaboration with the City.

Name

# David Martin

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Health Equity and Human Rights Advocate |
| Zip Code | [redacted] |

Public Comment

Public Comment on NYC Preliminary Racial Equity Plan

Workforce Equity, Organizational Accountability, and Economic Justice

To Whom It May Concern,

Thank you for the opportunity to comment on New York City's Preliminary Racial Equity Plan. I support the City's effort to confront systemic inequities and build accountability across public systems. I respectfully urge the City to more explicitly address the lived realities of working class New Yorkers, especially BIPOC residents employed in nonprofit and human-service sectors that are often sustained through public and private funding.

My perspective is informed by decades in the workforce, including extensive experience in nonprofit and direct-service environments. Across those experiences, I have observed recurring patterns that are often framed as ordinary workplace expectations but function as structural labor and racial equity issues. These conditions affect compensation, workload, hiring, advancement, health, retention, and long-term economic security.

Nonprofit and human service organizations play an essential role in delivering care, advocacy, housing support, benefits navigation, education, and other critical services across New York City. Yet the workers who carry out this mission-driven work are too often expected to absorb the pressures created by limited staffing, administrative inefficiencies, changing grant requirements, and unstable funding models. In practice, institutional strain is frequently transferred downward to frontline staff rather than resolved through better planning, fair compensation, or stronger management systems.

For many workers, especially those in direct service roles, the result is chronic overextension: doing more with fewer resources, navigating barriers to advancement, and remaining financially vulnerable despite years of service. These are not isolated workplace frustrations. They are workforce equity concerns directly relevant to the City's racial equity goals.

Key Concerns

1. Underpayment of Frontline Workers

Many direct-service employees perform demanding, high-responsibility work while earning wages that do not reflect the cost of living in New York City. In some workplaces, leadership compensation appears disconnected from the economic realities of frontline staff. Because many BIPOC workers are concentrated in lower-paid service roles, persistent underpayment can reinforce racial income and wealth disparities.

2. Excessive Workloads and Inadequate Staffing

Employees are frequently expected to absorb expanding duties as reporting

demands, vacancies, and program expectations grow, without corresponding increases in staffing, compensation, or timelines. Terms such as “multitasking” or “fast-paced environment” can sometimes mask weak workforce planning, understaffing, and operational dysfunction while shifting responsibility onto employees who do not control organizational systems.

3. Administrative Efficiency and Workflow Management

Frequent meetings, shifting priorities, duplicated requests, and last minute deadlines can undermine productivity. Workers are often expected to immediately regain focus after repeated interruptions and still produce high-quality results. Effective management should include realistic scheduling, clear communication, and sufficient uninterrupted time for thoughtful, detailed work.

4. Healthy and Functional Work Environments

Excessive noise, unmanaged disruptions, and a lack of consideration in shared workspaces can create barriers to concentration, morale, and performance. Professional environments should support respect, focus, and conditions that allow employees to succeed.

5. Advancement, Hiring, and Credential Barriers

Experienced employees are sometimes overlooked for promotion or screened out of opportunities because they lack graduate degrees, even when they possess strong real-world expertise. Hiring systems, including automated screening tools, should meaningfully recognize equivalent experience and reduce unnecessary barriers.

6. Layoffs and Long-Term Economic Harm

I experienced a layoff despite having no stated performance issues. Although I received temporary separation support and unemployment benefits, those protections ended while the challenge of securing new employment remained. This illustrates how job loss can create lasting instability, especially for experienced workers navigating a difficult hiring market.

7. Benefits and Long-Term Security

Some benefit structures shift significant financial risk onto employees through high deductibles, high out of pocket costs, or insurance products that become less affordable with age. Benefits should strengthen worker stability, not deepen financial strain.

Recommendations

New York City should consider:

* Fair wage standards tied to the true cost of living

* Transparent pay structures and salary bands
* Executive to frontline pay ratio reporting for publicly funded organizations
* Workload-to-staffing assessments
* Operational accountability for workflow and scheduling practices
* Respectful and productive workplace environment standards
* Equitable promotion and internal hiring pathways
* Recognition of equivalent experience alongside academic credentials
* Reviews of hiring systems for bias and unnecessary exclusion
* Stronger transition and reemployment support after layoffs
* Benefit standards that prioritize affordability and long term security
* Accountability measures for organizations receiving public funds

Closing

Racial equity must include how workers are paid, promoted, protected, and treated throughout their careers. New York City cannot claim equity while relying on underpaid and overburdened workers to sustain essential services.

The people who keep this city running deserve fair systems, dignified work, and a realistic path to long-term economic stability.

Thank you for your consideration.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 10, 2026

Topic: Unnecessary Bureaucracy, Reporting Requirements

Method Received: Airtable Form

Created By: 6/10/2026 11:50am

Name

# Stacey Sukoff

Email [redacted]

Professional Affiliation: Education Director at Community Based Organization/Early Childhood Educator

Zip Code [redacted]

Public Comment: Please address the pay parity for early childhood educators working in CBOs (community based organizations)! Salaries have been frozen for 4 years. Teachers that work in a CBO do not want to leave their community but in some cases could be making 20-30 THOUSAND more dollars, have union protections, and free healthcare working for a district pre k center or DOE elementary school. In your efforts to expand universal childcare, consider the impacts this has on many of our 3K and 4K students schools and teacher's livelihoods. CBO teachers NEED DOE pay, union membership, and free healthcare for universal childcare to succeed!

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

Date Submitted: June 10, 2026

Topic: Budget Issues

Method Received: Airtable Form

Created By: 6/10/2026 11:52am

Name

## Sergii Kultyshev

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Dear Mayor Mamdani,<br><br>Many cities speak about free or lower cost public transit, yet the financial mechanism behind such goals is rarely addressed. CityNode attempts to explore one possible approach through automated parcel movement integrated into existing transit infrastructure.<br><br>At its core, the concept is not simply a transportation idea, but a potential "Free Bus" support model — one that could help cities reduce dependence on passenger fares by creating an additional revenue stream from existing municipal infrastructure and unused transit capacity.<br><br>The principle is straightforward: buses already move throughout the city every day with unused carrying capacity. CityNode would explore whether small automated parcel logistics integrated into bus routes and stops could create a new layer of municipal transit revenue without disrupting passenger service.<br><br>I intentionally wanted to introduce the concept first at the policymaking level before it becomes limited by conventional technical review frameworks. My belief is that certain unconventional ideas deserve strategic consideration before being evaluated strictly through existing operational templates.<br><br>For that reason, I would greatly appreciate the opportunity for a brief Zoom meeting with yourself to present the broader strategic concept and potential pilot framework.<br><br>Kind regards,<br>Sergii Kultyshev |

Attachment(s)




Free Pilot_.png

Date Submitted: June 10, 2026

Topic: Budget Issues

Method Received: Airtable Form

Created By: 6/10/2026 12:07pm


CITYNODE
Free Mobility Pilot
FASST DELIVERY
DROP OFF
PICK UP

Name

# Steven DeMaio

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

The idea for this office is good, but the name evokes the sound of Elon Musk's DOGE. Don't undermine the effort with a poorly chosen name. Two alternatives:
COFA City Office of Financial Accountability
COFE = City Office of Financial Efficiency ("like coffee but without the extra F and E because, hey, that would be wasteful"--use that line for publicity)

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Miscellaneous

Method Received Airtable Form

Created By 6/10/2026 12:37pm

Name

## Andrew Strom

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

My idea to make the NYPD more efficient is to hold it to the same standards that apply to every other agency and department in the City. Public schools and public hospitals don't get to set staffing levels based on their wish lists for the ideal amount of staff. If they did, classrooms would have 15 students, and there would be more nurses in every hospital unit. But those same rules don't seem to apply to the NYPD, so they just run up overtime bills whenever top officials decide that they would like more officers on duty for particular events. According to press reports, approximately 6,000 individuals attended the watch party outside Madison Square Garden for Game 2 of the NBA finals, and NYPD had 1,000 officers at the event. That level of staffing is unaffordable, I'm sure that the NYPD top brass can draw up worst case scenarios that would always justify a huge number of police officers at any large gathering, but experience has shown that this type of police presence is not necessary, and is often counter-productive. The NYPD's insistence on overstaffing also puts an unnecessary strain on rank and file police officers. While some of them may want to rack up overtime hours, many would prefer not to. And, long hours add to the stress of being a police officer, and thus may make police officers more combative. It isn't anti-police to hold the police to the same standards as other agencies and departments when it comes to setting staffing levels, and it is long overdue.

Attachment(s)

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Date Submitted June 10, 2026

| | |
|---|---|
| Topic | Policing × Budget Issues × Unnecessary Bureaucracy × |
| Method Received | Airtable Form |
| Created By | 6/10/2026 12:47pm |

Name

# Phil

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Improve the collection of fines, parking tickets, and summons. Send text and email Alert to let people know about owed funds and warrants.

I have a friend who was unaware of an arrest warrant due to unpaid fines. He ended up spending a night in jail at taxpayer expense, and paying a lawyer to help him get in front of the judge. He was charged time served, and never ended up paying the actual money he owed to the city. It was a huge waste of time and money has stuck with me for years.

Attachment(s)

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Date Submitted June 10, 2026

Topic: Enforcement × Unnecessary Bureaucracy ×

Method Received Airtable Form

Created By 6/10/2026 12:59pm

Name

## Dominic Romano

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Dominic Romano, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
But as the City talks about streamlining government, I hope it also remembers the people building these projects.
For construction workers like me, infrastructure is not just about buildings or roads. It is an opportunity. Construction work allows people to provide for their families, pay rent, raise children, and build a stable life in this city.
What many people do not realize is that construction workers work themselves out of a job. Every day we show up to work, we are one step closer to that project ending. That is why city investments in infrastructure matter so much. When projects move, workers move. When projects stall, workers feel it.
I believe New York City has an opportunity to treat infrastructure not only as a way to improve the city, but as a tool for economic mobility. If public projects are moving faster and public dollars are being invested, workers should be able to build real careers from that investment.
And when projects do not include prevailing wages, there should still be a minimum standard for workers. At the very least, projects receiving public support should include a minimum wage and benefit package of $40 an hour so construction workers can support themselves and their families in one of the most expensive cities in the country.
The people building New York, like me, come from the same neighborhoods these projects are meant to serve. We represent this city. We take pride in building it.
As changes are considered to make government more efficient, I hope workforce opportunities, fair wages, and good careers remain part of the conversation.

Sincerely,

Dominic Romano
New York City Construction Worker

Attachment(s)

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| | |
|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Tenant Protection ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:06pm |

Name

## Iniko Carter

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Iniko Carter, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
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As changes are considered to make government more efficient, I hope workforce opportunities, fair wages, and good careers remain part of the conversation.

Sincerely,

Iniko Carter
New York City Construction Worker

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:07pm |

Name

## Douglas Franks JR

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Douglas Franks JR, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
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The people building New York, like me, come from the same neighborhoods these projects are meant to serve. We represent this city. We take pride in building it.
As changes are considered to make government more efficient, I hope workforce opportunities, fair wages, and good careers remain part of the conversation.

Sincerely,

Douglas Franks JR
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:09pm |

Name

## Paola Flores

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Paola Flores, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
But as the City talks about streamlining government, I hope it also remembers the people building these projects.
For construction workers like me, infrastructure is not just about buildings or roads. It is an opportunity. Construction work allows people to provide for their families, pay rent, raise children, and build a stable life in this city.
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I believe New York City has an opportunity to treat infrastructure not only as a way to improve the city, but as a tool for economic mobility. If public projects are moving faster and public dollars are being invested, workers should be able to build real careers from that investment.
And when projects do not include prevailing wages, there should still be a minimum standard for workers. At the very least, projects receiving public support should include a minimum wage and benefit package of $40 an hour so construction workers can support themselves and their families in one of the most expensive cities in the country.
The people building New York, like me, come from the same neighborhoods these projects are meant to serve. We represent this city. We take pride in building it.
As changes are considered to make government more efficient, I hope workforce opportunities, fair wages, and good careers remain part of the conversation.

Sincerely,

Paola Flores
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:10pm |

Name

## Karen Flores

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Karen Flores, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
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Sincerely,

Karen Flores
New York City Construction Worker

Attachment(s)

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| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:11pm |

Name

## Elsa Barrera

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Elsa Barrera, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Elsa Barrera
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:12pm |

Name

## Eli R Perry

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Eli R Perry, and I am a construction worker who lives and works in New York City.
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Sincerely,

Eli R Perry
New York City Construction Worker

Attachment(s)

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| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:13pm |

Name

## Erick Olivar

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Erick Olivar, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Erick Olivar
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Tenant Protection ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:14pm |

Name

## Geudy Polanco

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Geudy Polanco, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Geudy Polanco
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Tenant Protection ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:15pm |

Name

## Rishi D Chatto

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Rishi D Chatto, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Rishi D Chatto
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:16pm |

Name

## Jonathan Talledo

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Jonathan Talledo, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Jonathan Talledo
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Reporting Requirements ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:17pm |

Name

## Roxanne Dacres

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Roxanne Dacres, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Roxanne Dacres
New York City Construction Worker

Attachment(s)

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|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Tenant Protection ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:18pm |

Name

## Pete Rivera

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Pete Rivera, and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
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Sincerely,

Pete Rivera
New York City Construction Worker

Attachment(s)

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| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:19pm |

Name

## Carlos Murillo

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Carlos Murillo, and I am a construction worker who lives and works in New York City.
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Sincerely,

Carlos Murillo
New York City Construction Worker

Attachment(s)

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| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:19pm |

Name

## Jerson Azcona

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Written Testimony for the Charter Review Commission
Infrastructure Hearing
June 9, 2026

My name is Jerson Azcona , and I am a construction worker who lives and works in New York City.
I am submitting testimony because it is important for workers to be part of the conversation when we talk about infrastructure and improving how government works.
I support efforts to make city projects move faster and more efficiently. New Yorkers need housing, schools, public spaces, and infrastructure, and we all know projects can sometimes take too long to get done.
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Sincerely,

Jerson Azcona
New York City Construction Worker

Attachment(s)

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| Date Submitted | June 10, 2026 |
| Topic | Procurement Reform ✕ Unnecessary Bureaucracy ✕ Budget Issues ✕ Miscellaneous ✕ |
| Method Received | Airtable Form |
| Created By | 6/10/2026 1:22pm |

Name

## Rich O'Malley

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | New York Building Congress |
| Zip Code | |

Public Comment

June 9, 2026
Charter Revision Commission
Re: Commission on Government Efficiency

Good evening, Chair and members of the Commission,

The Building Congress represents more than 500 organizations and 250,000 skilled professionals and tradespeople who design, build, and maintain the infrastructure of New York and beyond. We hear from our members all the time about how they wish working with city government were easier and more efficient. We applaud Mayor Mamdani and his new administration for bringing you all together to discuss just that. And to invite all of us to give our thoughts.

Without going too into the weeds, which we recently did with the Mayor's SPEED Task Force, we see two primary areas for transformational efficiency improvements. One is a technological advance long overdue, and the other more an exchange of ideas.

In November 2025, NYC launched the 3D subsurface mapping initiative, 3DU. This new initiative holds the potential to save billions of dollars through efficiency improvements. We deem it critical for this administration to ensure its momentum. Today, every time a project team digs underground, they risk discovering unexpected utilities, voids, soil conditions, and other miscellaneous issues not in any records. When one party uncovers this information, it is not always consistently captured and shared. As a result, designers and builders may remain unaware of things actually known. This is costly, time-consuming, and a major source of delay and change orders. Our recommendation is to fully build out 3DU as a central, city run repository where every underground touch point is stored and continually updated.

Our next suggestion is to let agencies use best methods across the board to get stuff done. One might say, don't they do that now? Yes, separately, but every agency may not be empowered to do so the way another agency is able to. We find the Department of Design & Construction a good model, doing much of their work on-time and on-budget. But we have heard from staff across agencies about being constricted and not empowered to use the potentially best method out there for a particular project. We believe the administration, in partnership with the building and construction industry, should come with a set of citywide "procedural best practices" for things like contracting and procurement, that, once approved, allow any agency staff to utilize as best fits their project. So if someone at DOT wants to copy a DDC procurement process, and it is on the approved list, they can do so without any more hoops.

We have already seen this administration's commitment to speeding up processes that have long been gummed up by "the way we've always done it." This is especially true for building the housing our city desperately needs with the Mayor's Block by Block plan, which we fully and loudly support. Our

organization and our members aim to be partners in that efforts.

So once again we look forward to this continued process and appreciate the opportunity to testify this evening. Thank you.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 10, 2026

Topic: Unnecessary Bureaucracy, Procurement Reform, Department of Buildings (DOB) Issues

Method Received: Airtable Form

Created By: 6/10/2026 1:29pm

Name

# M. Blaise Backer

Email [redacted]

Professional Affiliation Self-employed

Zip Code [redacted]

Public Comment See uploaded attachment with 5 specific charter revision recommendations that facilitate better and more efficient stewardship of our public realm by nonprofit partners.

Attachment(s)



**Written Testimony of M. Blaise Backer**

Submitted to the New York City Charter Revision Commission

(Commission on Government Efficiency)

June 10, 2026

Chair Gaspard and members of the Commission:

My name is Blaise Backer. I served as Deputy Commissioner for Neighborhood Development at the NYC Department of Small Business Services during the de Blasio administration, where I oversaw neighborhood planning, nonprofit capacity building, grantmaking, and the City's network of Business Improvement Districts, and before that as Executive Director of the Myrtle Avenue Brooklyn Partnership. I now work with place management and stewardship organizations across the city—BIDs, park conservancies, plaza partners, Open Streets groups, and community development organizations—on the legal, financial, governance, and operational frameworks that underpin their relationships with city government and their communities.

This Commission's charge is government efficiency. I want to direct your attention to a set of Charter provisions where inefficiency is structural and fixable: the rules governing how the City partners with outside organizations to improve, maintain, operate, program, and generate revenue from public space—parks, plazas, sidewalks, and streets.

**The structural problem**

The Charter assumes the City manages its public spaces alone, agency by agency. In practice, New York's public realm is co-produced. Thousands of nonprofit and community organizations—by our working estimate, several thousand organizations collectively spending on the order of a billion dollars annually, a figure the forthcoming Public Realm Partners Survey, spearheaded by a coalition of advocates and researchers convened by the Urban Design Forum, will document—maintain horticulture, manage plazas, run markets and events, supplement sanitation, and raise private capital for public assets.

Yet when one of these organizations seeks formal authority to act in public space, Chapter 14 of the Charter defines exactly three instruments, in a

Written Testimony of M. Blaise Backer ...

Date Submitted June 10, 2026

Topic Miscellaneous

Method Received Airtable Form

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| Created By | 6/10/2026 1:50pm |

# Written Testimony of M. Blaise Backer

Submitted to the New York City Charter Revision Commission
(Commission on Government Efficiency)
June 10, 2026

Chair Gaspard and members of the Commission:

My name is Blaise Backer. I served as Deputy Commissioner for Neighborhood Development at the NYC Department of Small Business Services during the de Blasio administration, where I oversaw neighborhood planning, nonprofit capacity building, grantmaking, and the City's network of Business Improvement Districts, and before that as Executive Director of the Myrtle Avenue Brooklyn Partnership. I now work with place management and stewardship organizations across the city—BIDs, park conservancies, plaza partners, Open Streets groups, and community development organizations—on the legal, financial, governance, and operational frameworks that underpin their relationships with city government and their communities.

This Commission's charge is government efficiency. I want to direct your attention to a set of Charter provisions where inefficiency is structural and fixable: the rules governing how the City partners with outside organizations to improve, maintain, operate, program, and generate revenue from public space —parks, plazas, sidewalks, and streets.

## The structural problem

The Charter assumes the City manages its public spaces alone, agency by agency. In practice, New York's public realm is co-produced. Thousands of nonprofit and community organizations—by our working estimate, several thousand organizations collectively spending on the order of a billion dollars annually, a figure the forthcoming Public Realm Partners Survey, spearheaded by a coalition of advocates and researchers convened by the Urban Design Forum, will document—maintain horticulture, manage plazas, run markets and events, supplement sanitation, and raise private capital for public assets.

Yet when one of these organizations seeks formal authority to act in public space, Chapter 14 of the Charter defines exactly three instruments, in a

framework that dates to the 1989 Charter revision: the *concession*, the *franchise*, and the *revocable consent* (§ 362). All three were built for commercial use of public property—a restaurant in a park, a cable under a street. None contemplates stewardship: a nonprofit that maintains and programs a space and reinvests any revenue back into it. Stewardship instead runs through authority the Charter names but never standardizes—the "permits and licenses" preserved by § 383, and the "arrangements with private, voluntary or commercial agencies" that § 533(a)(10) and § 533(b)(4) permit Parks to enter only with case-by-case mayoral approval. On these thin foundations agencies have built decades of workarounds: license agreements, "maintenance and marketing" agreements, and program-specific arrangements with no charter standards, little term security, and terms reinvented program by program. The fragmentation is jurisdictional as well as legal: § 533(a)(1) gives Parks "parks, squares and public places" and their adjoining sidewalks, while § 2903 gives DOT the streets. Hybrid spaces—pedestrian plazas, Open Streets (Administrative Code § 19-107.1), medians, triangles—fall between those grants, and the organizations that steward them often deal with more than one agency, each with its own agreements, permits, fees, insurance requirements, and timelines. The result is precisely the kind of friction this Commission exists to remove: multi-year agreement negotiations, duplicative approvals, revenue rules that push value out of neighborhoods, and willing partners who give up.

Five recommendations follow. Each cites the Charter provision it would amend.

### 1. Create a fourth instrument in Chapter 14: the public realm stewardship agreement.

Section 362(a) defines a concession as a grant "for the private use of city-owned property" for which the City receives compensation. A conservancy maintaining a park, or a nonprofit operating a plaza under DOT's plaza program, is not engaged in private use in any meaningful sense—but where revenue is involved, the concession is often the only available legal form, so stewardship is processed through machinery built for vending and restaurants. The workaround is itself codified: the FCRC's rules contemplate agencies issuing permits for City property at administrative-cost-only fees "rather than a concession," requiring nothing but documentation forwarded to the Committee

(12 RCNY § 1-04)—an acknowledgment within the rules that a whole category of activity does not fit the existing boxes. The Charter should define a distinct instrument—a stewardship or partnership agreement—available to nonprofit organizations that maintain, operate, or program public space under agency oversight, with statutory conditions: guaranteed public access, public reporting, community board notice, and reinvestment of net revenue into the covered space. The definition should also fix the boundary with Chapter 13: when the City pays a steward for maintenance services, procurement rules govern; when a steward generates revenue in public space, Chapter 14 governs. Organizations doing both—most mature stewards do—today run two parallel legal processes for one body of work.

**2. Right-size the Franchise and Concession Review Committee for small and community-scale agreements (§§ 373–374).**

Section 374(a) bars any agency from granting a concession without either following FCRC procedures or obtaining FCRC approval, and § 373(d) exempts from review only concessions under thirty days with no renewal. That design is appropriate for a stadium concession; it is disproportionate for a seasonal greenmarket, a plaza kiosk, or a community-managed event series. The Charter should authorize: (a) template agreements pre-approved by FCRC rule, usable by responsible agencies without item-by-item review; (b) portfolio approvals, in which one FCRC action covers a defined class of small concessions across multiple sites; and (c) meaningful de minimis thresholds, indexed so they do not erode. The Committee's own rules show both the authority and its limits. Under its rulemaking power (§ 373(d)(1)), the FCRC has already created a streamlined "small concession" path (12 RCNY § 1-15)—but capped it at $249,999 in total compensation and a one-year term, two with a single renewal, so a recurring greenmarket or seasonal kiosk program must be re-solicited nearly every year. Its rules recognize "program-based concessions" (12 RCNY § 1-16(e))—a step toward portfolio treatment—but the resulting agreements must still be submitted for Committee approval. The thresholds are not indexed. The case for a charter amendment is to make right-sized review the mandatory default rather than a discretionary act of administrative self-restraint. Full Committee scrutiny should be preserved for major agreements and lifted from minor ones.

**3. Let a defined share of locally generated revenue stay with the**

**space that generates it.**

The Charter already states this principle—on paper. Section 2903(a)(13) provides that parking fees and fines "shall be paid into a special fund to be known as the 'traffic improvement fund,'" and § 2903(c)(6) directs marina and boat-launch fees into "a special fund for the continued maintenance, operation or reconstruction of public marine facilities." In practice, these dedications have not functioned: parking meter revenue is treated as general fund revenue, and successive administrations have declined to operate the fund as a true segregation. Concession and consent revenue generated in a park or plaza likewise flows to the general fund, while the space's maintenance depends on annual appropriation and partner fundraising. The lesson of § 2903 is not that dedication fails; it is that a bare authorization is ignored. A workable provision needs mandatory accounting, annual public reporting, and a defined nexus between where revenue is generated and where it is spent. The Charter should authorize dedicated public realm funds on those terms—established by space or district—retaining a defined share of concession, consent, and permit revenue for maintenance, operations, and programming where it is generated. Nothing proposed here need disturb the Council's appropriation power; the point is a charter-recognized default that revenue generated in a space is presumptively available to sustain it. This is an efficiency measure in the strictest sense: predictable operating funding protects the City's capital investments and reduces their lifecycle cost, and it gives revenue-generating activity in public space a public justification residents can see.

### 4. Provide bounded term security for partners that finance public improvements (§§ 383–384).

The inalienability of parks and streets under § 383 is a bedrock protection and should not be weakened—and any new instrument must also respect the state public trust doctrine. Under *Friends of Van Cortlandt Park v. City of New York* (2001), converting parkland to a non-park use requires an act of the State Legislature, and no charter amendment can change that. But long-term management is not alienation when the City retains title, control, and termination rights and the space remains fully public; that is how the City's existing conservancy management agreements already operate. What those partners lack is term security commensurate with what they invest. The Charter balances permanence against protection elsewhere: § 384(b)(4)

permits the Mayor, with borough board approval, to lease city property—other than inalienable property—to a local development corporation without competitive bidding for up to ninety-nine years. There is no parallel charter mechanism for the nonprofit stewards of public space, who are asked to raise philanthropic and private capital against agreements revocable at will or terminable on short notice. A bounded long-term stewardship agreement—subject to FCRC approval, community board review, and non-negotiable public-access covenants, with the City retaining title and termination for cause—would let serious partners anchor serious investment without alienating an inch of public land. The governance entities referenced in § 533(a)(9)—the Hudson River Park Trust, the Battery Park City Authority, and the Brooklyn Bridge Park Corporation—show what durable arrangements unlock; neighborhood-scale spaces deserve an equivalent that works within city law and within the public trust doctrine's limits.

### 5. Extend the 2025 expedited-review precedent to minor public realm actions.

Last November, voters approved Charter amendments creating expedited land use review for affordable housing and resiliency projects. The same logic applies to minor public realm actions that currently trigger full review: revocable consents with land use implications (§ 364(d)), "major concession" determinations (§ 374(b)), and property dispositions reviewed under § 384(b)(5). An expedited track with community board notice and compressed, enforceable clocks would shorten timelines for benches, kiosks, plaza improvements, and small partnership projects without removing public review.

## A closing observation

The City's permanent outdoor dining program is instructive. Local Law 121 of 2023 consolidated sidewalk and roadway dining under a single DOT-administered revocable consent program (Administrative Code §§ 19-160 et seq.; Charter § 364(e))—a real consolidation that replaced a fragmented pre-pandemic regime. But it required years of litigation, legislation, and rulemaking to retrofit one use case onto the Charter's 1989 framework, and even the consolidated program has bogged down in review: the permanent program restored community board review of revocable consent petitions, and the Council's April 2025 report on program delays found that only 67 of

roughly 3,800 applications—under two percent—had completed the full consent process. That is the friction my fifth recommendation addresses categorically: minor, repetitive consents need an expedited track with community notice and enforceable clocks, not case-by-case machinery designed for major grants. Open Streets ran for a year as an emergency improvisation before a 2021 local law made it permanent. Plaza partnerships run on improvised agreements. Each new form of shared stewardship should not require its own multi-year legislative campaign. That is what a charter-level fix offers this Commission: not a program, but the durable legal architecture under which the next twenty years of programs can be built quickly and accountably.

New Yorkers have demonstrated, at scale, that they will invest their own time, money, and organizational capacity in public space. The Charter should treat them as the operating partners they already are. Efficiency here does not mean government doing less; it means government no longer standing in the way of those doing more.

I would welcome the opportunity to assist the Commission and its staff with drafting, precedent research, or data on the stewardship sector.

Respectfully submitted,

M. Blaise Backer
Principal, Community Steward Solutions
Co-Founder, Commons Steward Collective
Former Deputy Commissioner, NYC Department of Small Business Services
[redacted]

Name

## Damali Rasheed

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Good afternoon Commissioners.

After reviewing the Charter sections governing DCAS, personnel administration, payroll administration, information technology, reports and records, and collective bargaining, I believe New York City does not suffer from a lack of systems. The City already operates numerous personnel and employment systems, including OASys, NYCAPS, Employee Self-Service (ESS), payroll systems, agency personnel systems, and various interagency databases.

The problem is that these systems often operate independently of one another and do not provide employees with meaningful access to information affecting their careers.

Employees frequently do not know:

• Where a personnel action is pending;

• Which office is responsible for a decision;

• What records are being used;

• When a decision will be issued; or

• Why a request was approved, denied, or delayed.

Throughout these hearings, a recurring concern has been the lack of accountability and transparency in government processes. I believe that concern extends to the City's civil service system.

My recommendations focus on the following Charter provisions:

Chapter 35 Department of Citywide Administrative Services (Sections 810 818)

Chapter 39 – Office of Payroll Administration (Sections 870–872)

Chapter 48 Information Technology and Telecommunications

Chapter 49 – Officers and Employees

Chapter 54 Collective Bargaining

My primary recommendations are:

1. Create a Citywide Personnel Tracking System.

Employees and applicants should be able to track transfers, reinstatement requests, salary determinations, eligible list matters, title changes, and

personnel status determinations through a centralized system.

2. Establish Mandatory Processing Deadlines.

The Charter should require timelines for personnel actions and require written explanations when deadlines cannot be met.

3. Require Written Determinations.

Every personnel action affecting an employee should result in a written determination explaining the basis for the action and identifying available appeal rights.

4. Create a Personnel Action Audit Trail.

Employees should be able to see what action was taken, who approved it, when it was approved, and what records were used.

5. Improve Interagency Coordination.

DCAS, OPA, agency HR offices, payroll offices, and labor relations offices should operate through integrated systems that reduce duplication and conflicting records.

6. Expand Employee Access to Records.

Employees should have electronic access to non-confidential records affecting salary, title, transfer status, appointment status, payroll actions, and civil service determinations.

7. Increase Public Accountability.

Annual reporting should include processing times, pending personnel actions, salary correction requests, and unresolved employee status determinations.

The City already has many of the tools necessary to accomplish these goals. What is missing is accountability, transparency, and integration.

When government creates a process, there should be:

• A timeline;

• A tracking mechanism;

• A responsible office;

• A written determination;

• Access to supporting records; and

• Accountability when the process fails.

Civil service employees are the backbone of City government. Improving transparency and accountability within personnel administration will improve not only employee experiences but also the quality of services delivered to New Yorkers.

Thank you for your consideration

Attachment(s)

Drop files here or click to browse

Date Submitted: June 10, 2026

Topic: Technology, Reporting Requirements, Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Unnecessary bureaucracy

Subtopic: Reform City personnel systems

Name

# K.V. Madison

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

1. Limit the time any news or other helicopter can hover in one area (5 minutes). 2. While it's great that there are many new things for kids and young people, don't forget the senior citizens. Covid caused many of the senior centers to cut programs and a lot of them haven't gone back even to where they were. 3. Protect the community gardens from housing encroachment -- especially in the East Village. And stop NYU from taking over spaces. There are so many empty storefronts: Require that they be used before other spaces. 4. And in that same platform, please force empty storefronts to be filled and not left empty, sometimes for decades! 5. At bus stops, add seating in more locations, and, if possible, bus shelters. Thanks!!

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Unnecessary Bureaucracy × Real Estate and Development × Tenant Protection × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

# David Turner

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I'd like for this group to disregard call for open primaries. The voters voted for the first time with RCV in 2021, the continued desire to change our election system is seeking to undermine primaries under the guise of increasing voter participation. Last year's election saw the first election where more than 2 million voters cast a ballot since 1969, the most in a democratic primary since the late 80s. It should be clear that increased voter participation will happen via strong and compelling campaigns not further burdening people to learn a new voting system.

Now for something more positive, I'd like to see the CRC try and figure out better ways speed along city work / and increasing city labor laws.

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Open Primaries × Unnecessary Bureaucracy × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Elections |
| Subtopic | Anti open primaries |

Name

# Milka Eshetu

Email [redacted]

Professional Affiliation: Business analyst at HPD

Zip Code:

Public Comment:

Lengthy RFP processes delay departments from getting the technology they need quickly and efficiently. Majority of NYC government still uses outdated technology and yet, we are now in the time of AI. When an RFP is awarded and development begins, it's impossible to follow industry best standards in the government space ie deploying quickly and allowing end users feedback to inform a 2nd, ultimately better, version. In fact, most things are built without end user feedback. Currently, there's a lengthy approval process to even start development, and user testing with the purpose of iterating development is unheard of in the government space. There are provisions in the charter ie §322 alternative procurement procedures, which require the Mayor's approval before seeking bids or proposals that allow the Mayor to create an alternate procurement process. This would help a lot of agency users get the tools they need especially in the housing space at NYC HPD. With all these new buildings being built, there needs to be technical infrastructure in place to support applications processing.

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

Date Submitted: June 10, 2026

Topic: Procurement Reform, Technology, Unnecessary Bureaucracy, Real Estate and Development

Method Received: Airtable Form

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|---|---|
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Procurement |
| Subtopic | Reform procurement process to reduce RFP time |

Name

# Aisha Akeju

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Please address the inefficiency and ineptitude rampant in the HRA. Wait times to speak with a person when you call can be upwards of three hours, or up to three days if you ask for a callback. That is, if you can find the correct phone number for what you need.

This is on top of the delays in receiving pertinent notices through the mail, leading to missed appointments. And receiving notices via the app is useless when the app doesn't have a feature to *notify the user* that there is a new notice or appointment to be aware of.

And then there's the AccessHRA website, which is outdated and buggy.

All in all, the whole organization needs an overhaul.

Attachment(s)

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Date Submitted June 10, 2026

Topic Unnecessary Bureaucracy × Technology × Enforcement ×

Method Received Airtable Form

Is it charter related?

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | Reform HRA |

Name

# Kay Xie

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Good day. Please consider making the remote work program permanent. It truly benefits employees who are able to participate, in terms of safety, flexibility, and work life balance. In addition, please ensure all government agency staff have up to date computers to work with. A lot of the current computers are painfully slow. Thank you. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 10, 2026 |
| Topic | Technology, Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Government Operations |

| | |
|---|---|
| Subtopic | Make flexible work program permanent |

Name

# Tamara Grant

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

some ideas I believe will make the city a better place:
-more accessible or discounted CUNY degrees for long time residents.
free college for foster youth/alumni
free or paid job trainings for foster youth
-priority in SYEP job applications for foster youth
-larger savings accounts and more financial workshops for foster youth
stricter background checks and requirements for people to become foster parents to avoid verbal and physical abuse, sexual abuse, neglect, etc.
-more regulations reguarding who can stay a social workers. when I went into foster care, I had to practically beg to escape my physically abusive home.
ease up on making the default goal reunification each case is different. however some people mistreat their children so badly the hell of foster care *is* the better option. i was beaten so badly that i could barely walk. my father neglected me and verbally abused me every chance he could get. thats what I desperately wanted to escape. however the system as it is now will try to force you right back into that environment. they knew because i told them i pleaded-i had many classic signs of an abusive upbringing and still do. but they ignored me in favor of just doing their job. please, Mayor Mamdani, no more.

Attachment(s)

Drop files here or click to browse

Date Submitted June 10, 2026

Topic Miscellaneous

| | |
|---|---|
| Method Received | Airtable Form |
| Is it charter related? | |
| | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

# David Hammer

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | PopWheels Inc |
| Zip Code | [redacted] |

Public Comment

Dear Commission on Government Efficiency,
My name is David Hammer and I am the President and co founder of PopWheels. PopWheels is a Brooklyn-born startup that operates a city-wide network of fire-safe outdoor swapping and charging stations for lithium-ion batteries. PopWheels' mission is to provide a safer alternative to risky, indoor battery charging. Our network of UL certified e bike batteries and outdoor charging cabinets boosts clean mobility, puts more money into the pockets of essential workers, and eliminates the lithium-ion battery fire crisis. The PopWheels solution is tested and proven technology. The FDNY's Letter of No Objection determined that our technology could contain and extinguish a battery fire in the unlikely event of thermal runaway, and PopWheels' 2023 pilot with the NYC DOT demonstrated that our system reduced at-home charging by nearly 90%. PopWheels' network of 50+ safe charging stations provided over 300,000 safe
charging sessions to delivery workers, commuter riders, and building residents across New York City.
City agencies and the New York City Mayor's Office have been crucial partners in our work to deploy this proven solution at scale. However, our experience working with City government to rapidly scale more safe charging stations across NYC has demonstrated that New York's challenge is not about whether a project or piece of infrastructure should be tested, certified, or approved. Rather, the City's central challenge lies in consolidating and streamlining the process by which already-tested-and-approved street level infrastructure can be rapidly scaled across all five boroughs.
Recommendation #1: Create a Fast Track Solution for Tested, Safe Infrastructure. Our first recommendation to the CRC is to establish a new "fast track" category for small-footprint infrastructure projects. This category would narrowly apply to previously approved technologies with an existing City footprint that meet a defined set of safety standards. Technologies with a track record of safety and compliance that meet the standards for this "fast track" category designation would receive streamlined review for future deployments. Such a designation could be used for many types of the small-footprint outdoor infrastructure that serves 21st century urban needs, including battery swapping cabinets, EV charging stations, curbside clean energy solutions, and other low-impact public-benefit technologies. City government should spend more time evaluating novel risks, not repeatedly re evaluating known solutions. Charter reform to create expedited review pathways for pre certified technologies and approved infrastructure categories would deploy the City's best technologies at scale without compromising safety.
Recommendation #2: Create a Single, Coordinated Agency Review Process for Infrastructure Deployments. Currently, companies looking to deploy proven, small-footprint outdoor infrastructure projects across NYC face an alphabet soup of city agencies during the review and approval process for individual projects. DOT, FDNY, DOB, utilities, and other agencies often review installations separately, forcing applicants to submit similar information multiple times. Likewise, sequential review delays project timelines.Agency review and approval guidelines can also contradict one another, with no central body to troubleshoot discrepancies. Therefore, our second

recommendation to the CRC is to create a centralized portal/project dashboard for small scale urban infrastructure projects led by a centralized, responsible body. Under this model, applicants would submit one application and have a single, centralized portal to obtain status updates and consolidated agency comments. A single coordinating agency or office would be empowered to serve as the portal's central point of contact: obtaining concurrent reviews by agencies relevant to the project and resolving any interagency inconsistencies. New Yorkers should not need to become experts in the organizational chart of city government to deploy a public safety solution.

The New York City Charter Review Commission has a unique opportunity to make a set of changes that would better scale the proven infrastructure solutions that meet the City's most pressing needs. Importantly, these recommendations do not weaken initial safety review, but rather improve coordination, accountability, and speed with which already-proven technologies are deployed to make the city safer, greener, and more livable for New Yorkers. New York faces urgent challenges, from climate to transportation to battery fire prevention. The technologies to address many of these problems already exist. The question remains whether our city government can evaluate and deploy the working solutions at the speed that New Yorkers need. We believe these reforms would help make that possible.

Sincerely,

David Hammer,

President and Founder, PopWheels Inc

Attachment(s)



PopWheels COGE Testimony.pdf

Date Submitted: June 10, 2026

Topic: Unnecessary Bureaucracy, Department of Buildings (DOB) Issues, Technology, Street Redesigns, Procurement Reform

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|---|---|
| Method Received | Airtable Form |
| Is it charter related? | Yes |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | Reform agency processes to make bike infrastructure easier to install |

**Patrick Gaspard, Chair, Commission on Government Efficiency**

**Re: Written Testimony — Manhattan Hearing 1**

# Testimony for COGE Manhattan Hearing 1: Streamlining Government for Infrastructure Projects and Public Realm

Dear Commission on Government Efficiency,

My name is David Hammer and I am the President and co-founder of PopWheels. PopWheels is a Brooklyn-born startup that operates a city-wide network of fire-safe outdoor swapping and charging stations for lithium-ion batteries. PopWheels' mission is to provide a safer alternative to risky, indoor battery charging. Our network of UL certified e-bike batteries and outdoor charging cabinets boosts clean mobility, puts more money into the pockets of essential workers, and eliminates the lithium-ion battery fire crisis. The PopWheels solution is tested and proven technology. The FDNY's Letter of No Objection determined that our technology could contain and extinguish a battery fire in the unlikely event of thermal runaway, and PopWheels' 2023 pilot with the NYC DOT demonstrated that our system reduced at-home charging by nearly 90%. PopWheels' network of 50+ safe charging stations provided over 300,000 safe charging sessions to delivery workers, commuter riders, and building residents across New York City.

City agencies and the New York City Mayor's Office have been crucial partners in our work to deploy this proven solution at scale. However, our experience working with City government to rapidly scale more safe charging stations across NYC has demonstrated that New York's challenge is not about whether a project or piece of infrastructure should be tested, certified, or approved. Rather, the City's central challenge lies in consolidating and streamlining the process by which already-tested-and-approved street level infrastructure can be rapidly scaled across all five boroughs.

**Recommendation #1: Create a Fast Track Solution for Tested, Safe Infrastructure.** *Our first recommendation to the CRC is to establish a new "fast track" category for small-footprint infrastructure projects*. This category would narrowly apply to previously approved technologies with an existing City footprint that meet a defined set of safety standards. Technologies with a track record of safety and compliance that meet the standards for this "fast track" category designation would receive streamlined review for future deployments. Such a designation could be used for many types of the small-footprint outdoor infrastructure that serves 21st century urban needs, including battery-swapping cabinets, EV charging stations, curbside clean-energy solutions, and other low-impact public-benefit technologies. City government should spend more time evaluating novel risks, not repeatedly re-evaluating known solutions. Charter reform to create expedited review pathways for pre-certified technologies and approved infrastructure categories would deploy the City's best technologies at scale without compromising safety.

**Recommendation #2: Create a Single, Coordinated Agency Review Process for Infrastructure Deployments.** Currently, companies looking to deploy proven, small-footprint outdoor infrastructure projects across NYC face an alphabet soup of city agencies during the review and approval process for individual projects. DOT, FDNY, DOB, utilities, and other agencies often review installations separately, forcing applicants to submit similar information multiple times. Likewise, sequential review delays project timelines.Agency review and approval guidelines can also contradict one another, with no central body to troubleshoot discrepancies. *Therefore, our second recommendation to the CRC is to create a centralized portal/project dashboard for small-scale urban infrastructure projects–led by a centralized, responsible body.* Under this model, applicants would submit one application and have a single, centralized portal to obtain status updates and consolidated agency comments. A single coordinating agency or office would be empowered to serve as the portal's central point of contact: obtaining concurrent reviews by agencies relevant to the project and resolving any interagency inconsistencies. New Yorkers should not need to become experts in the organizational chart of city government to deploy a public-safety solution.

The New York City Charter Review Commission has a unique opportunity to make a set of changes that would better scale the proven infrastructure solutions that meet the City's most pressing needs. Importantly, these recommendations do not weaken initial safety review, but rather improve coordination, accountability, and speed with which already-proven technologies are deployed to make the city safer, greener, and more livable for New Yorkers. New York faces urgent challenges, from climate to transportation to battery-fire prevention. The technologies to address many of these problems already exist. The question remains whether our city government can evaluate and deploy the working solutions at the speed that New Yorkers need. We believe these reforms would help make that possible.

Sincerely,



David Hammer,

President and Founder, PopWheels Inc

Name

## Ashley Roelofs

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Trust for Public Land |
| Zip Code | |

Public Comment

Good evening. My name is Ashley Roelofs, and I am a Program Coordinator at Trust for Public Land, a national nonprofit committed to connecting everyone to the outdoors. We have worked in New York City for decades to protect land and transform schoolyards and underutilized spaces across all five boroughs. Thank you for opening this hearing to public input.

I want to highlight six concrete areas where changes to city processes would make nonprofit partners more effective and stretch public dollars further.

First: Advance a portion of city funding to non-profit partners upfront. Nonprofits doing city-funded work must borrow – most often at commercial rates while waiting for reimbursement and then fundraise to cover the interest. Philanthropic dollars are effectively paying banks for city funded projects. Advancing even a portion of grant funding at the outset would solve this.

Second: Pay us back within 30 days. Reimbursement timelines vary widely across agencies. A citywide 30-day standard — enforced consistently — would reduce borrowing costs and help nonprofits plan. Some agencies already do this well. Make that the rule, not the exception.

Third: Build maintenance funding into capital projects. A facility or open space built without a maintenance budget is a future liability. Requiring a funded maintenance plan as a condition of capital approval would prevent deterioration and save money long term.

Fourth: Shorten the lag between budget adoption and disbursement, especially for Reso A funds. The current four month delay disrupts project timelines and increases borrowing. Even a modest reduction would make a meaningful difference.

Fifth: Improve cross agency coordination on capital projects. Siloed decision making adds time, cost, and duplication. Other cities including internationally — have developed coordination models that work. We encourage the Commission to look at those examples.

Sixth: Audit and streamline capital process steps. Some approval sequences have accumulated steps over time that may no longer be necessary. A plain-language review — is each step still needed? — could reduce friction without sacrificing accountability.

Thank you for the opportunity to comment.

QUESTIONS FROM PANEL and ANSWERS:

What percent would the advanced portion of city funding be, and what would your suggestion be for when the city encounters problems that come up?

Depending on the amount, could range from 25-50% advance, that gets replenished as the money gets spent.

The city can use their usual measures for investigation if it encounters problems.

What would you suggest the timeline on the funding maintenance plan be?

The funding for maintenance should exist ideally in perpetuity.

Give examples of other cities and their plans that are going this cross agency coordination well.

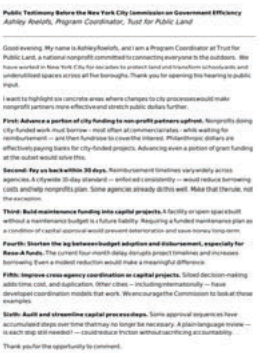
Bloomberg Associates and WRI.org work with cities globally and can likely provide strong examples of cities successfully coordinating across departments.

The School District of Philadelphia has a successful partnership with the Philadelphia Water Department for schoolyard development.

What are the other city agencies that you said are already enforcing reimbursement timelines well?

We've had good experiences with the School Construction Authority.

Attachment(s)



**Public Testimony Before the New York City Commission on Government Efficiency**
*Ashley Rwiehls, Program Coordinator, Trust for Public Land*

Good evening. My name is AshleyRwiehls, and I am a Program Coordinator at Trust for Public Land, a national nonprofit committed to connecting everyone to the outdoors. We have worked in New York City for two decades to protect land and transform schoolyards and underutilized spaces across all five boroughs. Thank you for opening this hearing to public input.

I want to highlight six concrete areas where changes to city processeswould make nonprofit partners more effectiveand stretch public dollars further.

**First: Advance a portion of city funding to non-profit partners upfront.** Nonprofits doing city-funded work must borrow – most often at commercialrates - while waiting for reimbursement — and then fundraise to cover the interest. Philanthropic dollars are effectively paying banks for city-funded projects. Advancing even a portion of grant funding at the outset would solve this.

**Second: Pay us back within 30 days.** Reimbursement timelines vary widely across agencies. A citywide 30-day standard — enforced consistently — would reduce borrowing costs, andhelp nonprofits plan. Some agencies already dothis well. Make that therule, not the exception.

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Thank youfor the opportunity to comment.

2026-June-COGE - Public Testimony Bef...

| | |
|---|---|
| Date Submitted | June 10, 2026 |
| Topic | Budget Issues ✕ Procurement Reform ✕ Unnecessary Bureaucracy ✕ Reporting Requirements ✕ Enforcement ✕ |
| Method Received | Airtable Form |
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Procurement |
| Subtopic | Pay nonprofits faster |

**Public Testimony Before the New York City Commission on Government Efficiency**
*Ashley Roelofs, Program Coordinator, Trust for Public Land*

---

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Name

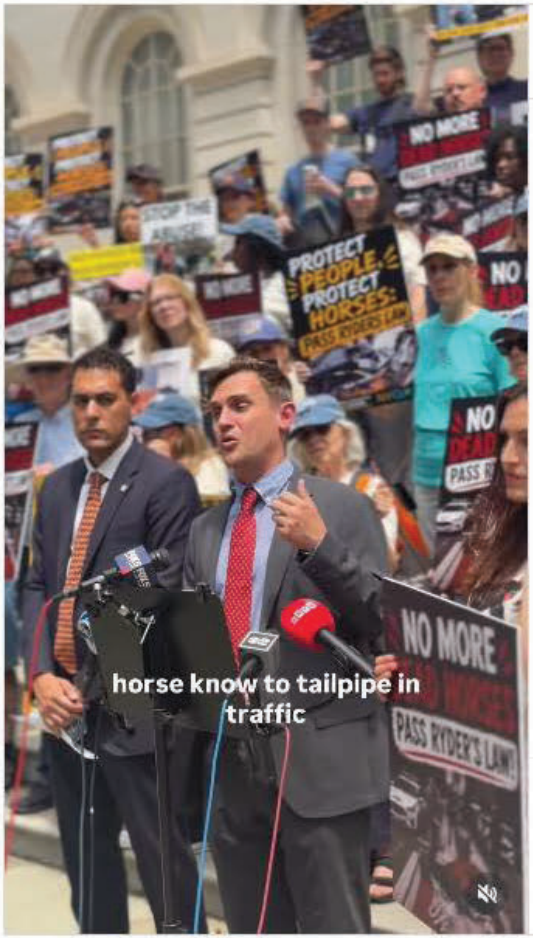
# Janet Iacolino

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| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | https://www.instagram.com/reel/DZao4N8p5Ex/?igsh=NmM2cXZsNGM5amN1 |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Animal welfare |
| Subtopic | Pass Ryder's law |

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Instagram

Log In Sign Up




cmcarlwilson and 5 others

**cmcarlwilson** 1w
Last night, we saw yet another carriage horse collapse and pass away in Central Park. This needs to stop now.

As a Council Member, it's my role to stick up for the most vulnerable in our society, and that includes the animals in our care. Our city is failing in its duty of care for the lives of these animals, for those vulnerable members of our society that toil all day, sometimes in extreme cold and heat, in unacceptable conditions for driver and horse alike.

I am proud to be a Co-Sponsor of this bill. We need to pass Ryders Law now.

**reneeolsen5** 3h

2.1K 213

June 10

Log in to like or comment.

Name

## Samaris Gener

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|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

More speed bumps around schools people are forced to slow down. This also keeps those aggressive drivers from following close and blowing the horn.

Add more lights on streets to help curb speeding. Fines are not the solution to every problem.

When 311 tickets are closed for abandoned vehicles/ noise complaints/ illegal parking / commercial vehicles parked in residential neighborhoods/ cones used to hold a parking space etc. Include photos/ upload video showing the ticket was investigated.

Follow up on the 311 complaints a week or two later people reoffend. It helps to keep from another 311 ticket to be opened again.

Have the departments responsible for quality of life issues go into to the actual neighborhoods. Knock on doors ask residents what they are experiencing. Public meetings are not the be all. Everyone can't make it to a public hearing. If a salesman can knock on doors why can't our city employees.

Out of state plates more than 30 days in NYC start ticking. Aren't new residents supposed to update the address within 30 days? To many drive recklessly, don't have insurance and leave cars parked for months in residential neighborhoods.

Have inspections of construction companies not just on active job sites look at the paperwork have them do mock work to determine if it is being done correctly. Home owners don't know if they are paying for sub par work to their homes. To many times the elderly and those in the black and brown communities are targeted.

Stop deed theft ! Go to the marginalized communities in person tell them what they can do. Some don't even know they are being targeted. Elderly don't always have access to the internet. What good is a notification of a transaction being made against a home. Require multiple verification points such as visiting a homeowner in person validate the identity get confirmation and then follow up. Move the inspectors around to help determine corruption. Jail and fine those responsible.

VANWYCK ! Construction have lasted over a decade investigate. There is definitely something wrong. Multiple and serious accidents. We need accountability make them pay the city back for overcharging. Fine them for breach of contract!

Help to create more parking in densely populated neighborhoods. If there's an empty lot create a community parking garage for residents.

Thank you

Attachment(s)

Drop files here or click to browse

Date Submitted: June 11, 2026

Topic: Enforcement, Department of Buildings (DOB) Issues, Tenant Protection, Real Estate and Development, Unnecessary Bureaucracy, Reporting Requirements, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Feedback

Subtopic

Name

# Julia Stoyanovich

Email [redacted]

Professional Affiliation New York University

Zip Code [redacted]

Public Comment please find attached

Attachment(s)



Stoyanovich COGE Testimony June 11,2...

Date Submitted June 11, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related? Yes

1

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Codify AI use in Charter |

Testimony of Julia Stoyanovich
Commission on Government Efficiency
Brooklyn Hearing 1: Modernizing Government and Streamlining Government Technology

June 11, 2026

Thank you, Chair Gaspard and members of the Commission, for the opportunity to testify! My name is Julia Stoyanovich. I'm a professor of computer science and data science at NYU and the founding director of the Center for Responsible AI. I've worked on AI governance in this city for nearly a decade. And I'm a proud New Yorker.

My proposal is simple: **To streamline the government's use of AI, we must codify AI governance in the New York City Charter.** The technology chapter, Chapter 48[1], is almost a punchline. It still governs cable television franchises and its most modern obligation is publishing an online map of street closures. There is not one word, anywhere in the Charter, about artificial intelligence or automated decision systems. You can hold that up: the city's foundational document regulates cable TV and says nothing about the systems now deciding who gets benefits, housing, or a school seat.

Codifying AI governance doesn't mean freezing technology into law. It means writing down three things the city already claims to believe but has never recorded anywhere that lasts.

**First: disclose it.** When the city uses an automated system to make a decision about you, you are told, in plain language. Today the Department of Education assigns every child a school-lottery number, then hands it to parents as a string of unreadable code.[2] That isn't transparency; it's transparency theater. Real disclosure means telling people, in words they understand, that a machine is deciding, what it's deciding, and how to question it. It is the cheapest accountability we have, and everything else depends on it.

**Second: prove it works.** No agency deploys one of these systems where the stakes are high — benefits, housing, hiring, schools — without showing that it actually works. And the city does

[1] https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCcharter/0-0-0-7578

[2] New York City's public-school admissions process assigns each applicant a randomly generated lottery number that breaks ties for seats at schools of their choice. After public pressure, the Department of Education began disclosing these numbers to families — but as long hexadecimal strings (e.g., a53c44d7-37c6-41a7-95d7-01c579814016), of which only the leading characters carry any meaning. In that form the number is effectively unreadable; the same information expressed as a percentile (e.g., "approximately the 65th percentile") would be something a family could actually act on. This is the difference between meaningful disclosure and disclosure in form only.

not buy what it cannot verify.[3] This isn't red tape. **It's the definition of efficiency:** a tool that doesn't work is the most expensive thing a government can buy.[4]

You don't have to look far. The city's own MyCity chatbot, costing over half a million dollars, told business owners they could pocket their workers' tips, told landlords they could turn away Section 8 tenants, told stores they could go cashless. All illegal. This administration shut it down to save money.[5] That instinct was exactly right — and it's the standard I'm asking you to put before the voters this November, so the next half-million-dollar mistake is never deployed in the first place.

**Third: let people contest it.** A decision you cannot question isn't a decision, it's a verdict. Anyone affected by one of these systems has a right to a real explanation, a right to appeal, and a right to reach a human being. Machines make mistakes, and they make them at scale. And the only protection against an error you can't see is a person you can actually reach. That isn't a courtesy. It's the difference between a government that serves people and one that processes them.

Disclose it. Prove it works. Let people contest it. Three lines in the Charter, three questions for the ballot.

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[3] The City Charter's procurement chapter (ch. 13) makes no reference to artificial intelligence, automated decision systems, algorithms, or software. Awards are made to the "lowest responsible bidder" (§ 313) or, for requests for proposals, by "balancing price, quality, and other factors" (§ 312(c)(1)(ii)); nothing requires evidence that a system performs the function for which it is procured. The sole reference to "technology" appears at § 312(c)(1)(iv), a "special case" exception permitting an agency to forgo competitive sealed bidding to test or evaluate "the service or reliability of such product or technology," a provision that eases acquisition of new technology rather than verifying that it works.

[4] Responsible AI governance is not in tension with efficiency; it is a precondition for it. Efficiency measured at a single step is misleading, because what matters is end-to-end cost. A system adopted to save money but deployed without validation routinely generates wrongful denials, appeals, litigation, manual rework, and lost public trust, costs that dwarf any up-front savings. Requiring proof that a tool works before the city buys it is ordinary procurement discipline: it stops the city paying for software that does not perform. Disclosure and a right to contest are not friction either: public services deliver value only when people trust and use them, and opacity drives eligible New Yorkers away. Clear, durable rules also let agencies adopt good tools with confidence and speed, instead of swinging between reckless adoption and paralysis. The deepest inefficiency is the status quo itself: eight years of task forces and roadmaps, relitigated with every administration.

[5] The city's MyCity chatbot advised business owners that they could take workers' tips, that landlords could refuse Section 8 vouchers (source-of-income discrimination, which is illegal), and that stores could go cashless (banned in NYC since 2020). See Colin Lecher, "NYC's AI Chatbot Tells Businesses to Break the Law," *The Markup* / THE CITY (Mar. 29, 2024). On its cost and discontinuation, see *The Markup*, "Mamdani to Kill the NYC AI Chatbot We Caught Telling Businesses to Break the Law" (Jan. 30, 2026).

**Why codify AI governance in the Charter?** Because we've tried everything else.[6] The city has promised responsible AI since 2018, since the Automated Decision Systems Task Force, on which I served. Task forces, roadmaps, action plans: we keep going in circles, because each one sits on sand. These commitments live in executive orders and internal policy: easy to launch, easy to let lapse. The Charter is the one place a commitment survives an election.

So let me close. You won't write this into the Charter; New Yorkers will, in November. What you decide is whether they get to vote on this proposal, and whether it reaches them in plain language they can actually weigh in on. Not putting it before them is itself a choice: to keep adopting AI with no rules. Let's get it right this time, and write it where it lasts.

Thank you. I look forward to your questions.

[6] New York City's existing automated-decision-system measures sit outside the Charter, in the Administrative Code and executive action: e.g., Local Law 49 of 2018 (the ADS Task Force), Local Law 144 of 2021 (bias audits for automated employment decision tools), the annual agency ADS reporting requirement, and the GUARD Act. Procurement details live in the Procurement Policy Board Rules. None is part of the city's foundational document.

Name

## Tom Harris

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Times Square Alliance |
| Zip Code | [redacted] |

Public Comment

Topic: Pedicabs

Pedicabs are for hire vehicles that should be licensed and regulated under the Taxi and Limousine Commission. This would greatly improve the industry and help protect drivers and the public.

Pedicabs can be a nice way to see our city for tourists and an environmentally friendly option. They can also be a costly harrowing experience. The problem is the rules are outdated and the current licensing scheme and NYPD enforcement is inefficient. This leads to pedicab drivers being taken advantage of by owners of pedicabs and then the drivers taking advantage of the consumers. Currently DCWP licenses the pedicabs, NYPD does enforcement, and criminal courts adjudicate the violations. The criminal enforcement action is almost always dismissed due to onerous discovery mandates. Violations with guilty verdicts are never attached to the license of the driver which could identify bad actors and allow DCWP to provide training and/or "points" on their license that could lead to further administrative action.

The rules are outdated. Pedicabs are prohibited from having electric motors leading to driver injury and fatigue. Insurance is expensive with few options leading to many more unlicensed pedicabs than licensed pedicabs. Current rules do not protect the consumer who too often are victims of predatory practices and overinflated costs for a short ride. The NYPD wastes a lot of time doing enforcement that is ultimately dismissed. These, ultimately futile, police interactions sometimes escalate to much more than a simple traffic stop.

The solution:

Long term: TLC is a better option for licensing and regulation. Pedicabs are "For Hire" vehicles and better suited to be under TLC. This would require increasing TLC staffing which could be cost neutral to the city if done correctly.
Under TLC: Licensing, enforcement, and regulations would live under one umbrella increasing efficiency. Enforcement would be civil in nature, removing a work place violation from the criminal justice system. This would be better for the industry, the drivers, and the consumers.

Short Term:

Legislation and rules that bring the industry to the 21st century including: allowing electric motors, fixed pricing and a metered system similar to a taxi, having the pedicab license, price structure, and operator license visible to the passenger while in the pedicab and increasing insurance options.

I have attached a comprehensive report was prepared that includes feedback from pedicab operators, the Midtown Justice Center (That hears these complaints and witnesses the dysfunction firsthand), the NYPD, and defense

attorneys, and community groups including the Times Square Alliance and Central Park Conservancy.

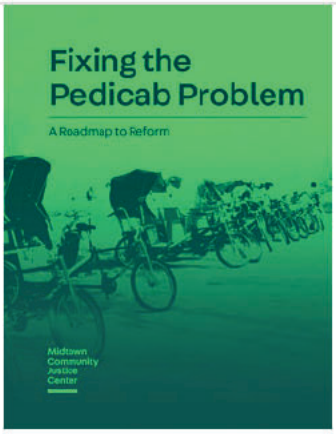
Rarely do all stakeholders agree on what the problem is and how to solve it. This report has 100% agreement on the problem and the solution.

Having pedicabs fall under the TLC is the way to efficient and effective legislation of an industry.

Attached is the report.

Thank you

Attachment(s)




MCJC_AP-Guide-Pedicab-Reform_0504...

Date Submitted: June 11, 2026

Topic: Enforcement ✕ | Unnecessary Bureaucracy ✕ | Department of Buildings (DOB) Issues ✕ | Technology ✕ | Tenant Protection ✕

Method Received: Airtable Form

Is it charter related? No

1

Charter Related: Yes

| | |
|---|---|
| Topic Simplified | Streets |
| Subtopic | License and regulate pedicabs under TLC |

# Fixing the Pedicab Problem

## A Roadmap to Reform



Midtown
Community
Justice
Center

A report by the Midtown Community Justice Center in collaboration with the Office of Council Member Gale Brewer, the Central Park Conservancy, and the Times Square Alliance.

**May 2026**

## Acknowledgements

The Midtown Community Justice Center wishes to thank Tom Harris and Michael Duggan from the Times Square Alliance, David Saltonstall from the Central Park Conservancy, and Council Member Gale Brewer and staffers Sam Goldsmith (former) and Shulamit Puder for their leadership and advocacy for reforming the pedicab industry and their many contributions to the roundtable and this report.

Danielle Mindess, Jordan Otis, Emma Embleton, and Joshua Farrell from the Midtown Community Justice Center steered this project. Harriet Holder and Emely Castillo Arias staffed the roundtable. Thanks to our Center for Justice Innovation colleagues Elizabeth Brantl and Hailey Nolasco from Government Relations and Emma Dayton, Daniel Logozzo, Rob Wolf, Samiha A. Meah, Michaiyla Carmichael, and Catriona Ting-Morton from Communications for their editing and design support.

Council Member Harvey Epstein and staffer Jackson Fischer-Ward, City Council Speaker Julie Menin and staffer Israel Martinez, former Council Members Erik Bottcher and Keith Powers and their staffers Carl Wilson, Franklin Richards, Hayley Brundige, and Ben Jacobs provided support and guidance. George Ntim from the Marriott Marquis hosted our roundtable. Bennett Stein and Aliza Saunders from Bennett Midland adeptly designed and moderated the roundtable discussion, and Maggie Wolk coordinated the engagement. Jessica Cruz, former Project Manager at the Mayor's Office of Public Safety, spearheaded the original pedicab reform efforts and generously allowed us to build upon her work. Jill Starishevsky and Inessa Abayev at the Mayor's Office of Criminal Justice prioritized this issue and worked with us to elevate it. Carlos Ortiz and Hali Radecker from the Department of Consumer and Worker Protection, Rachel Amar from the Office of Administrative Trials and Hearings, and Julia Chowdhury from the Office of Court Administration dedicated time and effort to getting the details right.

The Honorable John Zhuo Wang and his Court Attorney Rebecca Basescu Schwartz have dedicated considerable effort to ensuring fair and just outcomes for pedicab drivers and the Midtown community. Assigned Counsel Plan Attorneys Gideon Oliver and Dru Carey have provided consistent advocacy for pedicab drivers, and they shared extensive industry knowledge with us.

Special thanks to Makan Camara, Kenneth Winters, and Ibrahim Donmez from the New York Pedicab Alliance who offered their personal experiences and the experiences of their members—the legal pedicab drivers who are most directly impacted by the state of the industry, and whose relentless pursuit of reform got us here.

## For More Information

Danielle Mindess
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**Executive Summary: The Case for Comprehensive Pedicab Reform in New York City** 04

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**Background and History** 07

**The Long Failure of Enforcement** 07

**Pedicab Roundtable** 08

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# Executive Summary: The Case for Comprehensive Pedicab Reform in New York City

New York City's pedicab industry is fundamentally broken. In its current form, it works for no one.

It does not work for consumers, particularly out-of-town tourists, who are routinely targeted and exposed to opaque pricing and extreme overcharging by operators. It does not work for pedicab drivers, many of whom are exploited by pedicab fleet owners who operate underground rental businesses while shifting legal and financial risk onto drivers. It does not work for Broadway theatergoers, who increasingly face congested sidewalks and streets, blaring music, and aggressive solicitation in Midtown's already crowded Theater District. And it does not work for Central Park visitors, who must often run the gauntlet of pedicabs encircling the Park, competing aggressively for customers and undermining the visitor experience in one of the City's most treasured public spaces.

The consequences of this failure are well documented. Reputable news outlets have repeatedly reported on tourists being charged hundreds of dollars for short pedicab rides spanning only a few blocks, often after being misled about pricing or told a per-minute rate was a flat fee. These incidents are not isolated; they are symptoms of a regulatory system that has failed to keep pace with the realities of the industry.

Complaints to the City's 311 helpline also underscore the degree to which consumers are routinely taken advantage of in ways that leave them feeling angry and abused, with little recourse for corrective action.[1]

For years, the City has relied primarily on police enforcement—ticketing individual drivers, issuing summonses, and conducting episodic crackdowns. This approach has not had a meaningful impact. Enforcement is inconsistent, resource-intensive, and often misdirected at drivers rather than the business owners who control vehicles, pricing practices, and working conditions. High dismissal rates in court further undermine deterrence.

What is needed is not more of the same enforcement, but structural regulatory reform—a modernized framework that promotes safety, transparency, accountability, and fairness, while bringing the industry into the daylight in a manner that is good both for consumers and law-abiding drivers. The reforms below—developed by the Midtown Community Justice Center in close collaboration with the Office of Council Member Gale Brewer, and in consultation with a range of key stakeholders including the Central Park Conservancy, the Times Square Alliance, and the New York Pedicab Alliance—are designed to accomplish that.

## Core Reforms Needed

1. **Move Industry Oversight from Department of Consumer and Worker Protection (DCWP) to Taxi and Limousine Commission (TLC)**
   The pedicab industry requires the regulatory structure used by the Taxi and Limousine Commission for other for-hire vehicles, which includes low barriers to legal entry, clear accountability, and strong safety standards.
2. **Standardize Rates and Mandate Meters**
   Uniform pricing and mandatory meters are essential to protect consumers, reduce fraud, and legitimize the industry.
3. **Hold Vehicle Owners Accountable**
   Many pedicabs are owned by individuals who rent vehicles to drivers daily while evading responsibility for compliance.
4. **Legalize Safe Electric Motors and Ban Unsafe Ones**
   Electric motors are already deeply embedded in the industry and are a practical necessity for long shifts. Making all motors illegal has only empowered arbitrary enforcement.
5. **Create a Consistent Civil Enforcement Structure**
   Pedicab enforcement is fragmented and overly reliant on criminal summonses issued by the NYPD.
6. **Reform Court Processes**
   High dismissal rates for criminal summonses based on a lack of discovery compliance undermine enforcement and accountability.
7. **Create Basic Driver Support Infrastructure**
   Even compliant drivers are forced to break rules due to the absence of basic facilities.
8. **Ensure Accessible Insurance Premiums to Encourage Legal Operation**
   High insurance costs are a major barrier to legal pedicab operation. Currently, four insurance providers meet the insurance coverage requirements outlined in the Administrative Code. These providers charge annual premiums that are widely viewed as unsustainably high.

## Conclusion

The current pedicab system undermines consumer trust, exploits workers, degrades public spaces, and strains enforcement resources—while delivering none of the transparency or accountability New Yorkers deserve.

Comprehensive regulatory reform, modeled on proven frameworks already in use elsewhere in the City, offers a clear path forward. Done correctly, it will protect visitors, support a largely immigrant workforce, and restore order to Midtown and Central Park.


$4 PER
MINUTE PER
RIDE

## Background and History

Pedicabs, which combine a bicycle and carriage for passengers, are for-hire vehicles offering short-distance and scenic rides, primarily to tourists in Times Square and Central Park, and occasionally local commuters.

New York's pedicab industry traces back to 1994, when an environmentalist named George Bliss began assembling human-powered rickshaws in SoHo. Through the late 1990s and early 2000s, the fleet grew quietly around Midtown and Central Park—becoming a genuine commercial business with no licensing requirements, no mandatory insurance, no safety standards, and no enforceable rate rules.

By 2005, the industry's growth had alarmed the yellow cab and horse-carriage industries enough that they began lobbying the City Council aggressively. Council Member Christine Quinn—later Council Speaker—became the central legislative figure. Several bills were debated across the years, including one that would have capped licenses at 325, but ultimately the industry sued and won. A state court struck down the cap in 2008 as legally defective, leaving the industry in a practical enforcement vacuum while litigation wound through the courts.

The deadlock broke in June 2009, four days after a pedicab accident on the Williamsburg Bridge. Mayor Bloomberg and Speaker Quinn announced a compromise. The resulting law—Intro 1031-A—established the framework still nominally in place today: Department of Consumer and Worker Protection (DCWP) licensing for businesses and drivers, mandatory insurance, safety inspections, an 850-plate cap, and per-minute pricing displayed on exterior signage. Subsequent amendments in 2011 and 2012 refined seizure procedures and clarified fare rules. On paper, it looked like a workable structure.[2]

## The Long Failure of Enforcement

In hindsight, the 2009 framework has failed on nearly every front. Pricing fraud became endemic. A 2018 ABC7 investigation found more pedicab operators breaking laws than following them near Times Square on a single evening, with fares billed at $200, $400, or even $600 for short rides. DCWP at the time acknowledged it had no authority or operational capacity to conduct random on-street stops. By the early 2020s, individual passengers were being charged $500 to nearly $1,000 for 15 to 20-minute trips. Unlicensed operators multiplied unchecked. The city issued approximately 850 plates, but by 2024 an estimated 1,200 to 1,500 pedicabs were operating, many with forged credentials.

Residents near the Broadway theater district have faced amplified music audible inside performances. Licensed pedicab operators have been systematically undercut by more recent operators with no licenses and no insurance. A small number of pedicab fleet owners take advantage of drivers, often recent immigrants with very limited options for earning a living, renting vehicles by the day that are uninsured, display improper signage, and have broken seatbelts, and leaving drivers to bear the cost of criminal summonses.

Since November 2024, when the Office of Court Administration reopened the Midtown Community Justice Center's ("Justice Center") summons calendar, the Justice Center has adjudicated well over 2,000 cases related to pedicabs. The drivers who appear in the Justice Center's courtroom have shared a host of frustrations about the industry, including working conditions, tensions with NYPD, frequent ticketing (sometimes for minor infractions), and an inability to obtain accurate information about their open cases. Drivers who are licensed, insured, and driving registered vehicles are distressed by the proliferation of drivers operating illegally who give their industry a bad reputation and take their customers. In August of 2025, a pedicab driver named Musa Cetin took his own life while in police custody after getting arrested on an open summons warrant related to pedicab driving. Mr. Cetin's tragic death further underscored a dysfunctional industry that impacts lives and livelihoods.

The Justice Center has likewise fielded complaints about pedicabs from multiple stakeholders, including the Times Square Alliance, the Central Park Conservancy, Midtown businesses, community members, elected officials, and the New York Pedicab Alliance, which represents licensed pedicab drivers. These groups expressed frustration with the current system's inability to address challenges posed by pedicabs, including blocked entrances to hotels and theaters, loud music, tourists' complaints about excessive charges, and more. Council Members Brewer, Powers,[3] and Bottcher,[4] whose districts all include pedicab traffic, similarly receive complaints and requests for intervention from the same stakeholders. In 2025, the City's 311 system received 172 complaints related to pedicabs. Of those, 86 reported overcharging and another 35 reported an unlicensed pedicab operator.

What has emerged over time is a framework with enough restrictions to burden legal operators but not enough enforcement to deter problematic ones, much less the fleet owners who rent pedicabs to unscrupulous drivers. That imbalance has persisted for fifteen years.

## Pedicab Roundtable

As part of the Midtown Community Justice Center's mission-driven goal to improve public safety and community conditions, we sought first to understand the issue from all perspectives and then to convene key stakeholders to seek solutions.

In partnership with Council Members Brewer, Powers, and Bottcher, the Justice Center hosted a roundtable meeting about the pedicab industry on Thursday, November 13, 2025, at the Marriott Marquis in Times Square. The goal of the meeting was to develop a blueprint for a healthy pedicab industry. The meeting was facilitated by the civic sector consulting firm Bennett Midland.

### Participants

*Assigned Counsel Plan*

- Dru Carey, Defense Attorney
- Gideon Oliver, Defense Attorney

*Broadway Association*

- George Lence, Board of Directors

*Center for Justice Innovation*

- Danielle Mindess, Project Director, Midtown Community Justice Center
- Jordan Otis, Deputy Project Director, Midtown Community Justice Center
- Emma Embleton, Community Partnerships Coordinator, Midtown Community Justice Center
- Elizabeth Brantl, Government Relations Coordinator, Center for Justice Innovation

*Central Park Conservancy*

- David Saltonstall, Vice President for Government Relations, Policy and Community Affairs

*City Council*

- Council Member Brewer
- Sam Goldsmith, Policy and Communications Director, Council Member Brewer
- James Lu, Legislative Fellow, Council Member Brewer
- Carl Wilson, Chief of Staff, Council Member Bottcher
- Hayley Brundige, Legislative and Budget Director, Council Member Powers
- Franklin Richards, Director of Operations, Council Member Powers
- Katie Sinise, City Council Oversight and Investigations Division

*Department of Consumer and Worker Protection*

- Carlos Ortiz, Deputy Commissioner, External Affairs
- Karline Jung, Senior Legislative Analyst

*Department of Transportation*

- Colleen Chattergoon, Senior Borough Planner

*Driver Representative*

- Kerem Nuhoğlu, Times Square Pedicab Driver Representative

*Manhattan District Attorney's Office*

- Kofi Sansculotte, Financial Frauds Bureau Chief
- Estelle Strykers-Santiago, Executive Director, Community Partnerships Unit
- Alex Garcia, Community Engagement Coordinator, Community Partnerships Unit

*Marriott Marquis*

- George Ntim, Market Director of Diplomatic and Community Relations
- Zoe Pepper, Hotel Manager
- Teddy Mihaliadis, Director of Event Management
- Tom Schultz, Director of Security and Safety

*Mayor's Office of Criminal Justice*

- Inessa Abayev, Senior Counsel, Policy and Justice Operations

- Christian Klossner, Executive Director, Office of Special Enforcement

*Mayor's Office of Public Safety*

- Jessica Cruz, Project Manager
- Horace Norville, Chief Agency Liaison

*Midtown Community Justice Center's Presiding Judge and Staff*

- Hon. John Zhuo Wang
- Rebecca Basescu Schwartz, Court Attorney to Judge Wang

*New York Pedicab Alliance*

- Makan Camara, President
- Kenneth Winter, Public Affairs

*New York Police Department*

- Matthew Russo, Agency Attorney

*Office of Administrative Trials and Hearings*

- Rachel Amar, Senior Advisor to the Commissioner

*Times Square Alliance*

- Tom Harris, President
- Regina Fojas, Chief of Staff
- Ellen Goldstein, Senior Vice President, Policy, Planning and Research
- Michael Duggan, Vice President of Public Safety
- Caitlin Falk, Director, Policy and Research
- Riley Guggenhime, Coordinator, Policy and Research

**Key Questions**

Prior to the meeting, a planning committee consisting of Midtown Community Justice Center and City Council member staff met with stakeholders to collect and analyze answers to the following questions:

- If you could build the pedicab industry from scratch, what would it look like?
- What are the main barriers to achieving the vision you'd like to see? What or who will be required to make your vision a reality?

What are we (or could we be) doing today to reduce harm to all stakeholders? Could we be doing something in the immediate term to start to solve some of the identified challenges?

In the answers to these questions, the planning team heard broad agreement on the components of a healthy industry, including a regulatory framework and enforcement strategy that ensures all pedicabs operating in the city are registered and all drivers are licensed and insured. DCWP currently licenses pedicab businesses and pedicab drivers in New York City, with NYPD and Parks responsible for conducting all on-street enforcement. Stakeholders agreed that the Taxi and Limousine Commission (TLC) has the right infrastructure in place to license, regulate, and conduct enforcement for the pedicab industry. Therefore, the industry should be moved under the authority of TLC.

# Recommendations

**The roundtable generated robust conversation that produced the following goals and recommendations for how to achieve them.**[5]

## 1

## Move oversight of the industry to TLC and apply a regulatory framework similar to the City's other for-hire vehicle industries.

The pedicab industry must reduce barriers to licensing for drivers and modify the regulatory framework to promote safety and accountability. This will require:

- Streamlining the license application process and expediting license renewals, including by allowing drivers to pick up renewed licenses in person.
- Requiring training in industry rules and safe driving practices when issuing licenses and license renewals.
- Creating barcodes for license plates to connect vehicle registrations to owners.

## 2

## Ensure accessible insurance premiums to encourage legal driving.

High insurance costs are a barrier to legal pedicab operation. Lowering premiums and making insurance more accessible is necessary for industry legitimacy. This will involve the following considerations:

- Currently there are four insurance providers that meet the legal requirement for the amount and policy coverage set by the law. Unsustainably high annual premiums prevent many pedicab businesses from operating legally.
- Upon assuming responsibility for the industry, TLC must consider other insurers to create a competitive market and bring down costs to an amount that drivers can reasonably afford.

## 3

## Standardize rates and mandate meters.

Stakeholders support uniform pricing and mandatory, visible meters to protect tourists from overcharging, reduce fraud, and legitimize operators. This will require:

- Standardizing the per-minute price for pedicab rides and requiring the use of GPS-enabled meters similar to those used in other for-hire vehicles. Pricing may include variance based on ride duration (e.g. the price per minute is higher for rides under 20 minutes to account for quick trips versus scenic tours).

- Establishing a maximum rate per minute with a sunset provision for a higher standardized rate increase every two years.
- Requiring standard pricing signage for all pedicabs that is easily recognizable to potential customers. The New York City Administrative Code currently requires signs on both exterior sides and the rear of the pedicab, but drivers and vehicle owners create and hang the signs inconsistently. The signage package should include three signs, two for the exterior of the cab and one for inside the vehicle in a location visible to passengers. Standard signage issued with the seal of the oversight agency will not only ensure pricing transparency, but signal to riders which drivers are legitimate and operating legally.
- Developing app-based reservations, haling, and payment.

## 4

## Hold vehicle owners, not just individual drivers, responsible for operating legally.

Drivers often lack control over the condition of the pedicab, including working seat belts and proper signage. Regulation and enforcement should focus on business owners, not just individual drivers. This will require:

- Metal plates for front and back of the pedicab similar to license plates for cars.
- Barcodes on license plates tied to vehicles' owners allowing enforcement agencies to hold pedicab business owners accountable for fake plates, renting to unlicensed drivers, pedicabs operating without registration or insurance, improperly displayed rate signs, broken seat belts, and/or illegal motors.
- Pedicab owners maintaining logs of insurance and maintenance requirements for TLC's monitoring of compliance.

## 5

## Legalize safe electric motors and enforce proper motor use.

Electric motors are a practical and reasonable necessity for a 10-hour shift and already deeply integrated into the industry. All motors on pedicabs are currently illegal, which gives the NYPD cause to stop nearly any pedicab for a violation, even if the driver is otherwise operating legally. Legislation passed by the City Council is needed to permit proper motors and ban unsafe ones. This will require:

- Amending the Administrative Code to allow safe motors on pedicabs.
- Providing battery charging infrastructure in Midtown Manhattan to ensure safe charging to prevent battery fires.
- Training in lithium-ion battery safety.

## 6

## Create a consistent enforcement structure that favors administrative penalties versus criminal penalties.

Enforcement of relevant laws is inconsistent, with different priorities and interpretations depending on the officer or area (e.g., Times Square vs. Central Park). Enforcement is tied to individual drivers, not to pedicab operator licenses and business owners. The current system overly relies on the NYPD using criminal summonses to enforce rules related to licensing and proper vehicle maintenance. Compliance with the law will require logical and consistent enforcement by TLC to investigate and enforce industry regulations. This will require:

- Moving oversight of the pedicab industry to TLC.
- More consistent regulation of the industry by creating tiered consequences for driving infractions, including fines, vehicle seizure, and loss of license.
- Amending the law to allow enforcement by TLC.
- Training for the NYPD on new enforcement procedures and updated laws, how to correctly write summonses, and interacting professionally with drivers.
- TLC and NYPD working with the Manhattan District Attorney's Office to support investigative efforts in instances where drivers are suspected of overcharging.

## 7

## Improve court processes related to criminal summonses.

High summons dismissal rates undermine enforcement and limit effective deterrence. Infractions that land in court often get dismissed due to discovery requirements. Summons proceedings in New York City do not involve prosecutors and so rely on police officers to directly produce discovery—which is not typically a police officer function and can be very resource intensive—resulting in a nearly 100 percent dismissal rate on cases that go to trial. Non-criminal summonses are returnable to the Office of Administrative Trials and Hearings (OATH), while criminal summonses are returnable to the Midtown Community Justice Center. Court bifurcation creates inconsistency in the application of the law. Neither court tracks repeat behavior or reports summonses to DCWP, so there is no escalation of consequences or shared driving record between responsible agencies. This type of reporting would be challenging because infractions are tied to people who often have similar names and incorrectly documented birthdates rather than pedicab licenses. Comprehensive regulatory and enforcement reforms would alleviate much of the strain on the criminal court system, OATH, and the NYPD, which currently regulates the industry through a high volume of summonses.[6] This will require:

- Police officers recording vehicle VIN numbers or other identifying serial numbers on summonses.

- A tiered system of enforcement escalation tied to licenses and pedicab ownership, rather than as criminal matters.
- Removing jail as an option for pedicab-related offenses under the NYC Administrative Code. Although municipal code violations are exempt from the discovery requirements under Article 245 of the New York State Criminal Procedure Law, such violations are not exempt when the sentence includes a sentence of jail (CPL 245.10[a][iii]), which includes pedicab-related offenses. The failure to certify discovery compliance leads to dismissal of the majority of these cases at trial in criminal court.
- Sharing information about criminal summonses and driving records between the courts and TLC once a summons has been resolved with a guilty finding or plea and appeal time has expired. A final adjudication is needed to provide sufficient link to a violation against a licensed driver and business.

## 8

## Create infrastructure to support fair working conditions for drivers.

With no legal locations to stop for breaks or to use the bathroom, even drivers who otherwise operate legally must break the rules and risk receiving tickets for illegal stopping during a 10-hour shift. Remedying this will require:

- Working with the Department of Transportation to utilize existing infrastructure for taxi drivers to identify safe and legal places for drivers to stop, rest, and use the bathroom.
- Providing battery charging stations where drivers can safely charge legal batteries for electric motors.

# Next Steps

Reforming the pedicab industry will save city law enforcement and court system resources, reduce frustration among Midtown-area businesses and residents, protect tourists from exploitation, and allow legal drivers to avoid unnecessary legal system involvement and unfair competition with those operating illegally. By implementing achievable changes in legislation, policy, oversight, enforcement, and infrastructure, the pedicab industry could thrive. Pedicabs could offer a greener alternative mode of transportation, as originally envisioned by the founders of the industry, and provide tourists with a memorable and safe experience in the heart of New York City.

**For More Information** Danielle Mindess, Email: [redacted]

# Endnotes

[1] In 2025, the City's 311 system received 172 complaints related to pedicabs. Of those, 86 reported overcharging and another 35 reported an unlicensed pedicab operator.

[2] Sources include: *Time's Up! Environmental Organization*; *amNew York (2008)*; *ABC7/7 On Your Side (2018)*; *New York Post (2024)*; *Gothamist* (*2023*, *2025*); *NYC Council hearing transcripts (March 2025)*; *NYC Administrative Code §20-249 et seq.*; *Arizona Law Review (pedicab regulation study)*; *NYC Mayor's Office press releases (2025)*; *New York Pedicab Alliance; NYC Council Intros 0077-2026 and 0673-2026*.

[3] Council Member Powers' term ended on December 31, 2025. Council Member Virginia Maloney currently represents Manhattan Council District 4.

[4] Council Member Bottcher resigned from the City Council on February 4, 2026. The special election to fill his seat will be held on April 28, 2026.

[5] Many of the recommendations listed in this report will require changes to the New York City Administrative Code through legislation in the City Council.

[6] In 2025, 2,059 pedicab summonses were docketed at the Midtown Community Justice Center, the vast majority of which were dismissed. At least 697 pedicab summonses were returned to OATH; however, that figure is likely an undercount. As an impartial tribunal, OATH does not track or analyze its case data by respondent type (i.e. individual or business, etc.). Cases that come before OATH are decided on a case-by-case basis. Unless the type of respondent is a necessary element of the allegations on a summons, respondent type is not a factor considered at a hearing.

# Photo Credit

Original photos courtesy of the Central Park Conservancy. Edited by Samiha A. Meah.



midtownjustice.org

Name

## Julie Samuels

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |

Public Comment

My name is Julie Samuels, and I am the President and CEO of Tech:NYC. We are a nonprofit representing more than 550 technology companies ranging from early-stage startups to global leaders—all of whom share a commitment to fostering a digital ecosystem built on trust, safety, and responsible innovation.

I want to thank Mayor Mamdani and Chair Gaspard for convening the Commission on Government Efficiency and associated hearings. The fact that this Commission has dedicated an entire session to technology in government tells us you understand something important: you cannot modernize city government without modernizing the technology that powers it. We applaud that commitment, and Tech:NYC is here to help.

We come to this hearing as representatives of New York's technology sector to provide recommendations on areas where the Charter may need to be strengthened or clarified, particularly Chapter 1, which establishes the powers and duties of the Mayor; Chapter 13, which governs procurement; and Chapter 48, which establishes the Office of Technology and Innovation. We offer these not as legal prescriptions, but as policy directions we hope this Commission will translate into the structural changes the Charter can provide.

The core challenge is this: New York City government today operates like 40 or 50 independent companies, each with its own systems, its own data, and its own technology strategy or lack thereof. The result is duplication, delay, and frustration for everyday New Yorkers who simply want to access crucial public services. And to be clear — the technology needed to fix these problems already exists. This is not a question of invention. It is a question of will, coordination, and leadership.

We believe the Charter gives this city an opportunity to fix that and we'd like to suggest a few areas of focus.

First, unified technology leadership. The City needs a single, empowered office we envision a Deputy Mayor for Tech Transformation and Innovation with real budget authority, cross agency jurisdiction, and serving as a direct report to the Mayor. Right now, technology policy and technology operations are split across different offices that have historically not even reported to the same deputy mayor. No one has a complete picture of what the City spends on technology, how many systems exist citywide, or how those systems interact. Centralizing that function, and giving it genuine political authority and real budget, is the essential first step to any meaningful reform.

Second, breaking down agency silos. Too many agencies collect the same information from New Yorkers independently, on outdated and incompatible systems. Think about a family applying for childcare assistance while also trying to navigate housing benefits and public health services. That family is forced to interact with multiple agencies separately, submitting the same personal information over and over, with no coordination on the other end. Or consider a small business owner trying to open a neighborhood restaurant, bouncing between the Health Department, the Buildings Department, and the Fire Department each running its own independent process for what is, to that owner, one single goal. The Charter can and should mandate interoperability and shared platform development as a citywide standard. Agencies must be required to build technology that enables collaboration,

not prevent it. Data sharing between agencies is a key component of this goal, and the Charter can be expanded to both enshrine agency data and technology sharing. These goals are not successful without a top-down directive for agency collaboration and data sharing. Chapter 1 Section 8-h, the establishment of an Office of Information Privacy, as well as Chapter 1 Section 20 f are extremely relevant Charter sections that could be expanded to require inter-agency data sharing and ensure the protection of data as it is shared between agencies. This can and should be done in a way to protect New Yorkers' privacy.

Third, technology as an accountability tool. A citywide performance dashboard — built on consistent, real-time data — would give the public and city leadership a clear view of how agencies are performing against their goals. While the Mayor is provided this information internally, as outlined in Chapter 1 Section 8 e and Section 15 b, and while the city currently provides various public data sets as allowed under Chapter 1 Section 20-f, there is real-time and additional data that could be extremely useful to the public, and to enforce public confidence in the city, beyond what is included in the annual Mayor's Management Report. This same principle should extend to the nonprofit partners that deliver services on the city's behalf, through a unified real-time reporting system that could also be mandated by the Charter. We also need to tackle the procurement system that makes it so difficult to bring modern technology and new partnerships into government in the first place — that reform is long overdue.

Fourth, putting technology directly in New Yorkers' hands. The City should move aggressively to implement tools like a digital wallet and a unified digital portal a single, seamless interface through which New Yorkers can access city services across agencies without having to navigate each one independently. Meeting New Yorkers where they are, with rational and accessible tools, is what a 21st century city government owes its residents.

Fifth, New York City is home to over 25,000 tech enabled startups, all of which are built off of the passion of bringing innovative new ideas to life, and to creating new technologies and solutions. Many of these companies, as well as some more established technology companies, have the ability to partner with New York City to modernize both intergovernmental operations as well as public facing services - but are not being properly utilized. While Chapter 13 of the Charter allows for small purchases and sole source contracts, I encourage you to explore how further flexibility can be created to allow for additional procurement from local and innovative companies, while maintaining ethical protections. Additionally, Chapter 13 establishes a Procurement Policy Board and other measures to adapt rules and create new procurement rules; there are no mandates to seek public feedback on obstacles to procurement. I strongly recommend at least annual hearings or other ways for our innovative small businesses to enter dialogue with the city on obstacles to procurement.

And sixth, equity must be central to all of it. Nearly one third of New York City households still lack broadband access even as New York City employers have posted more openings for tech roles than any other job category since the pandemic. Some New Yorkers have fallen behind in access and opportunity, while others are left entirely behind. Closing that gap requires dedicated leadership. OTI and the City's Chief Digital Equity Officer must be

empowered with dedicated resources, real budget authority, and the tools necessary to expand broadband access to every corner of the five boroughs, because universal connectivity is not a luxury, it is a prerequisite for full participation in civic and economic life in New York City. This can be mandated by adding requirements to provide internet access to NYC residents in the Charter, under Chapter 48 (Department of Information Technology and Telecommunications). Additionally, workforce development programs should be implemented to prepare New Yorkers for in-demand tech jobs and ensure that tech companies hire from those pipelines.
Tech:NYC and our member companies are ready to be a partner in all of this work. We have the talent, the expertise, and the deep commitment to this city to help build a government that works as hard as New Yorkers do.

Attachment(s)



Charter Revision Commission COGE Tes...

Date Submitted: June 11, 2026

Topic: Technology, Procurement Reform, Unnecessary Bureaucracy, Reporting Requirements, Budget Issues

Method Received: Airtable Form

Is it charter related?: Yes

1

Charter Related: Yes

| | |
|---|---|
| Topic Simplified | Technology |
| Subtopic | City provided internet access |

My name is Julie Samuels, and I am the President and CEO of Tech:NYC. We are a nonprofit representing more than 550 technology companies—ranging from early-stage startups to global leaders—all of whom share a commitment to fostering a digital ecosystem built on trust, safety, and responsible innovation.

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We believe the Charter gives this city an opportunity to fix that — and we'd like to suggest a few areas of focus.

First, **unified technology leadership**. The City needs a single, empowered office — we envision a Deputy Mayor for Tech Transformation and Innovation — with real budget authority, cross-agency jurisdiction, and serving as a direct report to the Mayor. Right now, technology policy and technology operations are split across different offices that have historically not even reported to the same deputy mayor.

No one has a complete picture of what the City spends on technology, how many systems exist citywide, or how those systems interact. Centralizing that function, and giving it genuine political authority and real budget, is the essential first step to any meaningful reform.

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Name

# Alexander Kremenchutsky

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | IT |
| Zip Code | [redacted] |
| Public Comment | To Whom It May Concern,<br><br>I am writing to request help with the unclaimed funds process. For years, I have tried to claim funds connected to my mother and prior New York addresses where we lived, but the process keeps creating more paperwork, more delays, and more cost.<br><br>This is not only my issue. Unclaimed funds are supposed to be returned to New Yorkers, yet the current process makes it difficult for ordinary people to collect money that already belongs to them or their families. When someone has a clear relationship, prior address history, identification, and estate documents, the process should be efficient and reasonable.<br><br>I am my mother's only son, and there was a will. I am asking for a practical review of my claim and a clear explanation of what is truly required to release the funds.<br><br>New Yorkers should not have to fight through unnecessary bureaucracy to recover money that is rightfully theirs.<br><br>Website: https://ouf.osc.ny.gov/app/claim-search<br><br>Regards,<br>Alex |

Attachment(s)



| rting s Name | Address | City | State |
|---|---|---|---|
| POLITAN TY & TY NCE CO | [redacted] | STATEN ISLAND | NY |
| HOME ERVICES OKLYN NS INC | [redacted] | BROOKLYN | NY |
| N NEW IC | [redacted] | BROOKLYN | NY |

Prosterman.jpg

Date Submitted: June 11, 2026

Topic: Unnecessary Bureaucracy ✕ Reporting Requirements ✕

Method Received: Airtable Form

Is it charter related:

Charter Related: No

Topic Simplified: Feedback

Subtopic:

| Select an Action | Owner Name | Co-Owner Name | Reporting Business Name | Address | City | State | ZIP Code | Property Type | Year Reported | Property ID |
|---|---|---|---|---|---|---|---|---|---|---|
| + CLAIM SHARE | IRINA PROSTERMAN | | METROPOLITAN PROPERTY & CASUALTY INSURANCE CO | [redacted] | STATEN ISLAND | NY | [redacted] | OTHER AMTS DUE UNDER POLICY | 2003 | [redacted] |
| + CLAIM SHARE | IRINA PROSTERMAN | | FAMILY HOME CARE SERVICES OF BROOKLYN & QUEENS INC | [redacted] | BROOKLYN | NY | [redacted] | WAGES, PAYROLL, SALARIES | 2009 | [redacted] |
| + CLAIM SHARE | I PROSTERMAN | | VERIZON NEW YORK INC | [redacted] | BROOKLYN | NY | [redacted] | CREDIT BAL - ACCTS RECEIVABLE | 2008 | [redacted] |

Name

## Alexander Kremenchutsky

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | IT |
| Zip Code | [redacted] |

Public Comment

Dear New Yorkers,

I am requesting assistance with a serious consumer protection issue involving my solar agreement.

My solar provider, Sunnova, went bankrupt. My agreement included long term service and warranty obligations for the life of the solar panels. After the bankruptcy, servicing/management appears to have been transferred to SunStrong Management. The current servicer continues to demand full payment, but the warranty and service obligations under the original agreement are not being honored.

This leaves homeowners trapped: we are expected to pay the full contract value, while the company, servicer, or debt holder avoids the obligations that made the agreement valid. I have already spent thousands of dollars on roof repairs that should have been addressed under my solar agreement.

This is not only my issue. Many New Yorkers entered solar agreements believing they had long-term protection, only to be left exposed when companies fail, sell the debt, or transfer servicing. The City should not allow companies, servicers, or debt collectors to enforce payment while ignoring the service, warranty, and repair obligations attached to those contracts.

I am asking NYC to investigate whether these practices are unfair, deceptive, or abusive, and to help ensure that New York homeowners are not forced to pay full value for contracts that are no longer being fully honored.

https://restructuring.ra.kroll.com/Sunnova/

Respectfully,

Alex

Attachment(s)

Drop files here or click to browse

Date Submitted

June 11, 2026

Topic

Enforcement ✕ Tenant Protection ✕ Unnecessary Bureaucracy ✕ Miscellaneous ✕

Method Received

Airtable Form

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|---|---|
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

## Alexander Kremenchutsky

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|---|---|
| Email | [redacted] |
| Professional Affiliation | IT |
| Zip Code | [redacted] |

Public Comment

Lack of Public Parking Infrastructure in NYC

Current Issue
New York City continues to issue large numbers of parking tickets while failing to provide enough realistic public parking options for residents. In many neighborhoods, municipal parking capacity has not kept pace with population density, housing growth, commercial activity, and daily transportation needs. Older municipal lots could be modernized or converted into multi-level public parking facilities, yet the City continues to rely heavily on enforcement instead of infrastructure.

Problem This Causes for New Yorkers
This creates an unfair burden on working class and low income New Yorkers who need cars for work, childcare, school drop offs, medical appointments, elder care, and family responsibilities. Many residents are not parking illegally because they are careless; they are parking under pressure because there are not enough legal, affordable, and accessible public parking options. The result is a system where the City collects fines from residents while failing to solve the underlying problem.

This also hurts small businesses, seniors, parents, caregivers, and workers who cannot always rely on public transportation for every part of their daily lives. Parking enforcement should not become a substitute for responsible city planning.

Proposed Solution
NYC should review public parking capacity neighborhood by neighborhood and identify areas where municipal lots can be expanded, modernized, or converted into multi level public parking facilities. The City should also consider affordable resident parking programs, improved loading zones, short-term parking options near schools and medical offices, and targeted relief in neighborhoods where parking demand clearly exceeds available legal spaces.

New Yorkers should not be penalized year after year for an infrastructure problem the City has failed to address. The City should focus on practical parking solutions, not just ticket revenue.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 11, 2026

| | |
|---|---|
| Topic | Real Estate and Development × Enforcement × Unnecessary Bureaucracy × Department of Buildings (DOB) Issues × |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

## Marissa Rudd

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|---|---|
| Email | [redacted] |
| Professional Affiliation | For the Family NYC |
| Zip Code | [redacted] |

Public Comment

Testimony for COGE Public Hearing Brooklyn, June 11, 2025

Marissa Rudd, Founder & CEO, For the Family NYC

I'm a Brooklyn resident, the founder of For the Family NYC a community organization that works with families navigating public systems every single day.
I want to talk about the HRA — the Human Resources Administration — and why its inefficiency isn't just a bureaucratic inconvenience. It is a public health crisis.
I have spent hours in HRA offices watching families in crisis be turned away, put on hold, and lost in paperwork. I've watched parents who came in for emergency food assistance leave without it not because they didn't qualify, but because of a miscalculation, a missing form, or a supervisor who wasn't available to authorize a correction. I've watched families facing eviction sit in those offices for entire days and still leave without answers.

The red tape at HRA is so pervasive that it no longer reads like inefficiency. It reads like a system designed to exhaust people into giving up.
Here's what I'm asking this Commission to examine:

First qualification miscalculations. Families are regularly told they don't qualify for benefits they are legally entitled to. There is no fast-track appeals process. There is no accountability when a caseworker gets it wrong. The burden falls entirely on the family to fight their way back in.

Second — the follow-up loop. New Yorkers who apply for services often receive no confirmation, no timeline, and no case number they can use to check status. They call. They go in person. They are told to call again. This is a design failure, not an individual worker failure.

Third — supervisory bottlenecks. Front-line staff are often powerless to resolve issues that require managerial approval and those managers are not consistently accessible. Families wait hours for someone who may never appear.

This Commission has an opportunity to do what DOGE never could: make government actually work for the people who need it most. I'm asking you to prioritize HRA as a case study in what accountability and human-centered design could look like in city government.

The families I work with are not asking for more. They are asking for what they're already owed — faster, simpler, and more humane access to the services that keep them housed, fed, and healthy.

Thank you.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 11, 2026

Topic: Unnecessary Bureaucracy, Enforcement, Tenant Protection, Reporting Requirements

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Unnecessary bureaucracy

Subtopic: Reform HRA

Name

## Andrew Rigie

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| Email | [redacted] |
| Professional Affiliation | New York Hospitality Alliance |
| Zip Code | |

Public Comment

Dear Commission on Government Efficiency (COGE):
The New York City Hospitality Alliance, the not for profit organization representing thousands of
restaurants, bars, and nightclubs across the five boroughs urges COGE, the Charter Revision
Commission tasked with changing the Charter to make City government work better for New Yorkers,
to remove the revocable consent for sidewalk cafes and roadway cafes from the Dining Out NYC
program.
When the sidewalk café law was first adopted, it functioned as a straightforward licensing framework
administered by the Department of Consumer Affairs. In the years that followed, additional layers
were added: first, a zoning overlay, and later, a revocable consent requirement imposed on top of the
license.
Decades later, we have made progress in simplifying this system. The zoning overlay has been
eliminated as part of the effort to reduce red tape and modernize outdoor dining under the post□COVID outdoor dining system. However, the revocable consent requirement remains in place, and it
is now the primary source of delay, cost, and administrative burden.
This additional requirement adds months to what should otherwise be a simple licensing process. If
the City of New York is serious about creating a successful outdoor dining program - one that is
equitable, accessible to small businesses, and cuts red tape for restaurants in neighborhood across
the five boroughs, you must eliminate the revocable consent requirement.
Outdoor dining is a social and economic engine. It creates jobs, increases sales for small businesses
and generates additional sales tax revenue for the City. It brings foot traffic to commercial corridors,
allows New Yorkers and visitors to dine alfresco together, and supports vibrant, safe communities
across all five boroughs.
As it stands, the consent process introduces multiple unnecessary steps and significantly prolongs
the timeline for restaurants seeking to operate sidewalk or roadway cafés. The City now estimates a
minimum of six months for approval, much of that attributable to the consent process. As a result,
new restaurant owners, many of whom have opened in February, March, or April, are effectively
being told they cannot offer outdoor dining during their first year of operation. That outcome is both
impractical and counterproductive. For existing restaurants, being told they must wait more than half

a year to setup tables and chairs outside for their customers to dine at, is the exact kind of red table
that makes running a small business in New York City so frustrating.
Moreover, revocable consent is not required for other commercial uses of the public right of way,
such as fruit and vegetable stands or other food and merchandise vendors. Historically, even
individually owned sidewalk newsstands operated for decades without such a requirement.
Finally, eliminating the revocable consent requirement would not remove oversight or community
input. The Council would still retain the ability to require community board review as part of the
licensing process. This reform would simply align sidewalk and roadway cafés with numerous other
licensed activities by removing an unnecessary and burdensome additional layer.
For these reasons, we urge the City of New York, through COGE, to begin the process of eliminating
the revocable consent requirement and to establish a streamlined, efficient, and equitable framework
for outdoor dining.
If you have comments or question please contact the New York City Hospitality Alliance's Executive
Director Andrew Rigie at [redacted]

Attachment(s)


NYC HOSPITALITY ALLIANCE

2026-06-10COGEPublicHearing-Revoca...

Date Submitted: June 11, 2026

Topic: Revocable Consent ✕ | Unnecessary Bureaucracy ✕ | Real Estate and Development ✕ | Procurement Reform ✕

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| Method Received | Airtable Form |
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Simplifying sidewalk/roadway cafes |

NYC HOSPITALITY ALLIANCE

June 10, 2026

Dear Commission on Government Efficiency (COGE):

The New York City Hospitality Alliance, the not-for-profit organization representing thousands of restaurants, bars, and nightclubs across the five boroughs urges COGE, the Charter Revision Commission tasked with changing the Charter to make City government work better for New Yorkers, to remove the revocable consent for sidewalk cafes and roadway cafes from the Dining Out NYC program.

When the sidewalk café law was first adopted, it functioned as a straightforward licensing framework administered by the Department of Consumer Affairs. In the years that followed, additional layers were added: first, a zoning overlay, and later, a revocable consent requirement imposed on top of the license.

Decades later, we have made progress in simplifying this system. The zoning overlay has been eliminated as part of the effort to reduce red tape and modernize outdoor dining under the post-COVID outdoor dining system. However, the revocable consent requirement remains in place, and it is now the primary source of delay, cost, and administrative burden.

This additional requirement adds months to what should otherwise be a simple licensing process. If the City of New York is serious about creating a successful outdoor dining program - one that is equitable, accessible to small businesses, and cuts red tape for restaurants in neighborhood across the five boroughs, you must eliminate the revocable consent requirement.

Outdoor dining is a social and economic engine. It creates jobs, increases sales for small businesses and generates additional sales tax revenue for the City. It brings foot traffic to commercial corridors, allows New Yorkers and visitors to dine alfresco together, and supports vibrant, safe communities across all five boroughs.

As it stands, the consent process introduces multiple unnecessary steps and significantly prolongs the timeline for restaurants seeking to operate sidewalk or roadway cafés. The City now estimates a minimum of six months for approval, much of that attributable to the consent process. As a result, new restaurant owners, many of whom have opened in February, March, or April, are effectively being told they cannot offer outdoor dining during their first year of operation. That outcome is both impractical and counterproductive. For existing restaurants, being told they must wait more than half a year to setup tables and chairs outside for their customers to dine at, is the exact kind of red table that makes running a small business in New York City so frustrating.

Moreover, revocable consent is not required for other commercial uses of the public right-of-way, such as fruit and vegetable stands or other food and merchandise vendors. Historically, even individually owned sidewalk newsstands operated for decades without such a requirement.

NYC HOSPITALITY ALLIANCE

Finally, eliminating the revocable consent requirement would not remove oversight or community input. The Council would still retain the ability to require community board review as part of the licensing process. This reform would simply align sidewalk and roadway cafés with numerous other licensed activities by removing an unnecessary and burdensome additional layer.

For these reasons, we urge the City of New York, through COGE, to begin the process of eliminating the revocable consent requirement and to establish a streamlined, efficient, and equitable framework for outdoor dining.

If you have comments or question please contact the New York City Hospitality Alliance's Executive Director Andrew Rigie at [redacted] or [redacted].

Name

## Blaise Backer

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|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |

Public Comment

Chair Gaspard and members of the Commission:
My name is Blaise Backer. I served as Deputy Commissioner for Neighborhood
Development at the NYC Department of Small Business Services during the de Blasio administration, where I oversaw neighborhood planning, nonprofit capacity building, grantmaking, and the City's network of Business Improvement Districts, and before that as Executive Director of the Myrtle Avenue Brooklyn Partnership. I now work with place management and stewardship organizations across the city BIDs, park conservancies, plaza partners, Open Streets groups, and community development organizations on
the legal, financial, governance, and operational frameworks that underpin their relationships with city government and their communities.
This Commission's charge is government efficiency. I want to direct your attention to a set of Charter provisions where inefficiency is structural and fixable: the rules governing how the City partners with outside organizations to
improve, maintain, operate, program, and generate revenue from public space —parks, plazas, sidewalks, and streets.
The structural problem
The Charter assumes the City manages its public spaces alone, agency by agency. In practice, New York's public realm is co produced. Thousands of nonprofit and community organizations—by our working estimate, several thousand organizations collectively spending on the order of a billion dollars annually, a figure the forthcoming Public Realm Partners Survey, spearheaded by a coalition of advocates and researchers convened by the Urban Design Forum, will document—maintain horticulture, manage plazas, run markets and
events, supplement sanitation, and raise private capital for public assets.
Yet when one of these organizations seeks formal authority to act in public space, Chapter 14 of the Charter defines exactly three instruments, in a framework that dates to the 1989 Charter revision: the concession, the franchise, and the revocable consent (§ 362). All three were built for commercial use of public property a restaurant in a park, a cable under a street. None contemplates stewardship: a nonprofit that maintains and programs a space and reinvests any revenue back into it. Stewardship instead runs through authority the Charter names but never standardizes the "permits and licenses" preserved by § 383, and the "arrangements with private,
voluntary or commercial agencies" that § 533(a)(10) and § 533(b)(4) permit Parks to enter only with case by case mayoral approval. On these thin foundations agencies have built decades of workarounds: license agreements, "maintenance and marketing" agreements, and program-specific arrangements
with no charter standards, little term security, and terms reinvented program by program. The fragmentation is jurisdictional as well as legal: § 533(a)(1) gives Parks "parks, squares and public places" and their adjoining sidewalks, while § 2903 gives DOT the streets. Hybrid spaces—pedestrian plazas, Open Streets (Administrative Code § 19 107.1), medians, triangles fall between

those grants, and the organizations that steward them often deal with more than one agency, each with its own agreements, permits, fees, insurance requirements, and timelines. The result is precisely the kind of friction this Commission exists to remove: multi-year agreement negotiations, duplicative approvals, revenue rules that push value out of neighborhoods, and willing partners who give up.

Five recommendations follow. Each cites the Charter provision it would amend.

1. Create a fourth instrument in Chapter 14: the public realm stewardship agreement.

Section 362(a) defines a concession as a grant "for the private use of city□owned property" for which the City receives compensation. A conservancy maintaining a park, or a nonprofit operating a plaza under DOT's plaza program, is not engaged in private use in any meaningful sense—but where revenue is involved, the concession is often the only available legal form, so stewardship is processed through machinery built for vending and restaurants.

The workaround is itself codified: the FCRC's rules contemplate agencies issuing permits for City property at administrative-cost-only fees "rather than a concession," requiring nothing but documentation forwarded to the Committee (12 RCNY § 1-04)—an acknowledgment within the rules that a whole category of activity does not fit the existing boxes. The Charter should define a distinct instrument a stewardship or partnership agreement available to nonprofit organizations that maintain, operate, or program public space under agency oversight, with statutory conditions: guaranteed public access, public reporting, community board notice, and reinvestment of net revenue into the covered space. The definition should also fix the boundary with Chapter 13: when the City pays a steward for maintenance services, procurement rules govern; when a steward generates revenue in public space, Chapter 14 governs.

Organizations doing both most mature stewards do today run two parallel legal processes for one body of work.

2. Right-size the Franchise and Concession Review Committee for small and community scale agreements (§§ 373 374).

Section 374(a) bars any agency from granting a concession without either following FCRC procedures or obtaining FCRC approval, and § 373(d) exempts from review only concessions under thirty days with no renewal. That design is appropriate for a stadium concession; it is disproportionate for a seasonal greenmarket, a plaza kiosk, or a community-managed event series. The Charter should authorize: (a) template agreements pre approved by FCRC rule, usable by responsible agencies without item by item review; (b) portfolio approvals, in which one FCRC action covers a defined class of small concessions across multiple sites; and (c) meaningful de minimis thresholds, indexed so they do not erode. The Committee's own rules show both the authority and its limits. Under its rulemaking power (§ 373(d)(1)), the FCRC has already created a

streamlined “small concession” path (12 RCNY § 1 15) but capped it at $249,999 in total compensation and a one year term, two with a single renewal, so a recurring greenmarket or seasonal kiosk program must be re□solicited nearly every year. Its rules recognize “program-based concessions” (12 RCNY § 1 16(e)) a step toward portfolio treatment but the resulting agreements must still be submitted for Committee approval. The thresholds are not indexed. The case for a charter amendment is to make right sized review the mandatory default rather than a discretionary act of administrative self□restraint. Full Committee scrutiny should be preserved for major agreements and lifted from minor ones.

3. Let a defined share of locally generated revenue stay with the space that generates it.

The Charter already states this principle—on paper. Section 2903(a)(13) provides that parking fees and fines “shall be paid into a special fund to be known as the ‘traffic improvement fund,’” and § 2903(c)(6) directs marina and boat-launch fees into “a special fund for the continued maintenance, operation or reconstruction of public marine facilities.” In practice, these dedications have not functioned: parking meter revenue is treated as general fund revenue, and successive administrations have declined to operate the fund as a true segregation. Concession and consent revenue generated in a park or plaza likewise flows to the general fund, while the space’s maintenance depends on annual appropriation and partner fundraising. The lesson of § 2903 is not that dedication fails; it is that a bare authorization is ignored. A workable provision needs mandatory accounting, annual public reporting, and a defined nexus between where revenue is generated and where it is spent. The Charter should authorize dedicated public realm funds on those terms—established by space or district retaining a defined share of concession, consent, and permit revenue for maintenance, operations, and programming where it is generated. Nothing proposed here need disturb the Council’s appropriation power; the point is a charter recognized default that revenue generated in a space is presumptively available to sustain it. This is an efficiency measure in the strictest sense: predictable operating funding protects the City’s capital investments and reduces their lifecycle cost, and it gives revenue generating activity in public space a public justification residents can see.

4. Provide bounded term security for partners that finance public improvements (§§ 383–384).

The inalienability of parks and streets under § 383 is a bedrock protection and should not be weakened and any new instrument must also respect the state public trust doctrine. Under Friends of Van Cortlandt Park v. City of New York (2001), converting parkland to a non park use requires an act of the State

Legislature, and no charter amendment can change that. But long term management is not alienation when the City retains title, control, and termination rights and the space remains fully public; that is how the City's existing conservancy management agreements already operate. What those partners lack is term security commensurate with what they invest. The Charter balances permanence against protection elsewhere: § 384(b)(4) permits the Mayor, with borough board approval, to lease city property—other
than inalienable property to a local development corporation without competitive bidding for up to ninety nine years. There is no parallel charter mechanism for the nonprofit stewards of public space, who are asked to raise philanthropic and private capital against agreements revocable at will or terminable on short notice. A bounded long term stewardship agreement subject to FCRC approval, community board review, and non negotiable public-access covenants, with the City retaining title and termination for cause —would let serious partners anchor serious investment without alienating an inch of public land. The governance entities referenced in § 533(a)(9) the Hudson River Park Trust, the Battery Park City Authority, and the Brooklyn Bridge Park Corporation—show what durable arrangements unlock; neighborhood-scale spaces deserve an equivalent that works within city law and within the public trust doctrine's limits.

5. Extend the 2025 expedited review precedent to minor public realm actions.

Last November, voters approved Charter amendments creating expedited land
use review for affordable housing and resiliency projects. The same logic applies to minor public realm actions that currently trigger full review: revocable consents with land use implications (§ 364(d)), "major concession" determinations (§ 374(b)), and property dispositions reviewed under § 384(b)(5). An expedited track with community board notice and compressed, enforceable clocks would shorten timelines for benches, kiosks, plaza improvements, and small partnership projects without removing public review.

A closing observation

The City's permanent outdoor dining program is instructive. Local Law 121 of 2023 consolidated sidewalk and roadway dining under a single DOT-administered revocable consent program (Administrative Code §§ 19-160 et
seq.; Charter § 364(e))—a real consolidation that replaced a fragmented pre-pandemic regime. But it required years of litigation, legislation, and rulemaking to retrofit one use case onto the Charter's 1989 framework, and even the consolidated program has bogged down in review: the permanent program restored community board review of revocable consent petitions, and
the Council's April 2025 report on program delays found that only 67 of roughly 3,800 applications under two percent had completed the full consent process. That is the friction my fifth recommendation addresses categorically: minor, repetitive consents need an expedited track with community notice and enforceable clocks, not case by case machinery designed for major grants. Open Streets ran for a year as an emergency

improvisation before a 2021 local law made it permanent. Plaza partnerships run on improvised agreements. Each new form of shared stewardship should not require its own multi-year legislative campaign. That is what a charter-level
fix offers this Commission: not a program, but the durable legal architecture under which the next twenty years of programs can be built quickly and accountably.
New Yorkers have demonstrated, at scale, that they will invest their own time, money, and organizational capacity in public space. The Charter should treat them as the operating partners they already are. Efficiency here does not mean
government doing less; it means government no longer standing in the way of
those doing more.
I would welcome the opportunity to assist the Commission and its staff with drafting, precedent research, or data on the stewardship sector.

Attachment(s)



Written Testimony of M. Blaise Backer ...

Date Submitted: June 11, 2026

Topic: Revocable Consent ✕ | Franchises & Concessions ✕ | Unnecessary Bureaucracy ✕ | Real Estate and Development ✕ | Reporting Requirements ✕

Method Received: Airtable Form

Is it charter related? Yes

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| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Reform revocable consent |

# Written Testimony of M. Blaise Backer

Submitted to the New York City Charter Revision Commission
(Commission on Government Efficiency)
June 10, 2026

Chair Gaspard and members of the Commission:

My name is Blaise Backer. I served as Deputy Commissioner for Neighborhood Development at the NYC Department of Small Business Services during the de Blasio administration, where I oversaw neighborhood planning, nonprofit capacity building, grantmaking, and the City's network of Business Improvement Districts, and before that as Executive Director of the Myrtle Avenue Brooklyn Partnership. I now work with place management and stewardship organizations across the city—BIDs, park conservancies, plaza partners, Open Streets groups, and community development organizations—on the legal, financial, governance, and operational frameworks that underpin their relationships with city government and their communities.

This Commission's charge is government efficiency. I want to direct your attention to a set of Charter provisions where inefficiency is structural and fixable: the rules governing how the City partners with outside organizations to improve, maintain, operate, program, and generate revenue from public space —parks, plazas, sidewalks, and streets.

## The structural problem

The Charter assumes the City manages its public spaces alone, agency by agency. In practice, New York's public realm is co-produced. Thousands of nonprofit and community organizations—by our working estimate, several thousand organizations collectively spending on the order of a billion dollars annually, a figure the forthcoming Public Realm Partners Survey, spearheaded by a coalition of advocates and researchers convened by the Urban Design Forum, will document—maintain horticulture, manage plazas, run markets and events, supplement sanitation, and raise private capital for public assets.

Yet when one of these organizations seeks formal authority to act in public space, Chapter 14 of the Charter defines exactly three instruments, in a

framework that dates to the 1989 Charter revision: the *concession*, the *franchise*, and the *revocable consent* (§ 362). All three were built for commercial use of public property—a restaurant in a park, a cable under a street. None contemplates stewardship: a nonprofit that maintains and programs a space and reinvests any revenue back into it. Stewardship instead runs through authority the Charter names but never standardizes—the "permits and licenses" preserved by § 383, and the "arrangements with private, voluntary or commercial agencies" that § 533(a)(10) and § 533(b)(4) permit Parks to enter only with case-by-case mayoral approval. On these thin foundations agencies have built decades of workarounds: license agreements, "maintenance and marketing" agreements, and program-specific arrangements with no charter standards, little term security, and terms reinvented program by program. The fragmentation is jurisdictional as well as legal: § 533(a)(1) gives Parks "parks, squares and public places" and their adjoining sidewalks, while § 2903 gives DOT the streets. Hybrid spaces—pedestrian plazas, Open Streets (Administrative Code § 19-107.1), medians, triangles—fall between those grants, and the organizations that steward them often deal with more than one agency, each with its own agreements, permits, fees, insurance requirements, and timelines. The result is precisely the kind of friction this Commission exists to remove: multi-year agreement negotiations, duplicative approvals, revenue rules that push value out of neighborhoods, and willing partners who give up.

Five recommendations follow. Each cites the Charter provision it would amend.

### 1. Create a fourth instrument in Chapter 14: the public realm stewardship agreement.

Section 362(a) defines a concession as a grant "for the private use of city-owned property" for which the City receives compensation. A conservancy maintaining a park, or a nonprofit operating a plaza under DOT's plaza program, is not engaged in private use in any meaningful sense—but where revenue is involved, the concession is often the only available legal form, so stewardship is processed through machinery built for vending and restaurants. The workaround is itself codified: the FCRC's rules contemplate agencies issuing permits for City property at administrative-cost-only fees "rather than a concession," requiring nothing but documentation forwarded to the Committee

(12 RCNY § 1-04)—an acknowledgment within the rules that a whole category of activity does not fit the existing boxes. The Charter should define a distinct instrument—a stewardship or partnership agreement—available to nonprofit organizations that maintain, operate, or program public space under agency oversight, with statutory conditions: guaranteed public access, public reporting, community board notice, and reinvestment of net revenue into the covered space. The definition should also fix the boundary with Chapter 13: when the City pays a steward for maintenance services, procurement rules govern; when a steward generates revenue in public space, Chapter 14 governs. Organizations doing both—most mature stewards do—today run two parallel legal processes for one body of work.

**2. Right-size the Franchise and Concession Review Committee for small and community-scale agreements (§§ 373–374).**

Section 374(a) bars any agency from granting a concession without either following FCRC procedures or obtaining FCRC approval, and § 373(d) exempts from review only concessions under thirty days with no renewal. That design is appropriate for a stadium concession; it is disproportionate for a seasonal greenmarket, a plaza kiosk, or a community-managed event series. The Charter should authorize: (a) template agreements pre-approved by FCRC rule, usable by responsible agencies without item-by-item review; (b) portfolio approvals, in which one FCRC action covers a defined class of small concessions across multiple sites; and (c) meaningful de minimis thresholds, indexed so they do not erode. The Committee's own rules show both the authority and its limits. Under its rulemaking power (§ 373(d)(1)), the FCRC has already created a streamlined "small concession" path (12 RCNY § 1-15)—but capped it at $249,999 in total compensation and a one-year term, two with a single renewal, so a recurring greenmarket or seasonal kiosk program must be re-solicited nearly every year. Its rules recognize "program-based concessions" (12 RCNY § 1-16(e))—a step toward portfolio treatment—but the resulting agreements must still be submitted for Committee approval. The thresholds are not indexed. The case for a charter amendment is to make right-sized review the mandatory default rather than a discretionary act of administrative self-restraint. Full Committee scrutiny should be preserved for major agreements and lifted from minor ones.

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**space that generates it.**

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### 4. Provide bounded term security for partners that finance public improvements (§§ 383–384).

The inalienability of parks and streets under § 383 is a bedrock protection and should not be weakened—and any new instrument must also respect the state public trust doctrine. Under *Friends of Van Cortlandt Park v. City of New York* (2001), converting parkland to a non-park use requires an act of the State Legislature, and no charter amendment can change that. But long-term management is not alienation when the City retains title, control, and termination rights and the space remains fully public; that is how the City's existing conservancy management agreements already operate. What those partners lack is term security commensurate with what they invest. The Charter balances permanence against protection elsewhere: § 384(b)(4)

permits the Mayor, with borough board approval, to lease city property—other than inalienable property—to a local development corporation without competitive bidding for up to ninety-nine years. There is no parallel charter mechanism for the nonprofit stewards of public space, who are asked to raise philanthropic and private capital against agreements revocable at will or terminable on short notice. A bounded long-term stewardship agreement—subject to FCRC approval, community board review, and non-negotiable public-access covenants, with the City retaining title and termination for cause—would let serious partners anchor serious investment without alienating an inch of public land. The governance entities referenced in § 533(a)(9)—the Hudson River Park Trust, the Battery Park City Authority, and the Brooklyn Bridge Park Corporation—show what durable arrangements unlock; neighborhood-scale spaces deserve an equivalent that works within city law and within the public trust doctrine's limits.

### 5. Extend the 2025 expedited-review precedent to minor public realm actions.

Last November, voters approved Charter amendments creating expedited land use review for affordable housing and resiliency projects. The same logic applies to minor public realm actions that currently trigger full review: revocable consents with land use implications (§ 364(d)), "major concession" determinations (§ 374(b)), and property dispositions reviewed under § 384(b)(5). An expedited track with community board notice and compressed, enforceable clocks would shorten timelines for benches, kiosks, plaza improvements, and small partnership projects without removing public review.

## A closing observation

The City's permanent outdoor dining program is instructive. Local Law 121 of 2023 consolidated sidewalk and roadway dining under a single DOT-administered revocable consent program (Administrative Code §§ 19-160 et seq.; Charter § 364(e))—a real consolidation that replaced a fragmented pre-pandemic regime. But it required years of litigation, legislation, and rulemaking to retrofit one use case onto the Charter's 1989 framework, and even the consolidated program has bogged down in review: the permanent program restored community board review of revocable consent petitions, and the Council's April 2025 report on program delays found that only 67 of

roughly 3,800 applications—under two percent—had completed the full consent process. That is the friction my fifth recommendation addresses categorically: minor, repetitive consents need an expedited track with community notice and enforceable clocks, not case-by-case machinery designed for major grants. Open Streets ran for a year as an emergency improvisation before a 2021 local law made it permanent. Plaza partnerships run on improvised agreements. Each new form of shared stewardship should not require its own multi-year legislative campaign. That is what a charter-level fix offers this Commission: not a program, but the durable legal architecture under which the next twenty years of programs can be built quickly and accountably.

New Yorkers have demonstrated, at scale, that they will invest their own time, money, and organizational capacity in public space. The Charter should treat them as the operating partners they already are. Efficiency here does not mean government doing less; it means government no longer standing in the way of those doing more.

I would welcome the opportunity to assist the Commission and its staff with drafting, precedent research, or data on the stewardship sector.

Respectfully submitted,

M. Blaise Backer
Principal, Community Steward Solutions
Co-Founder, Commons Steward Collective
Former Deputy Commissioner, NYC Department of Small Business Services
[redacted]

# Written Testimony of M. Blaise Backer

Submitted to the New York City Charter Revision Commission
(Commission on Government Efficiency)
June 10, 2026

Chair Gaspard and members of the Commission:

My name is Blaise Backer. I served as Deputy Commissioner for Neighborhood Development at the NYC Department of Small Business Services during the de Blasio administration, where I oversaw neighborhood planning, nonprofit capacity building, grantmaking, and the City's network of Business Improvement Districts, and before that as Executive Director of the Myrtle Avenue Brooklyn Partnership. I now work with place management and stewardship organizations across the city—BIDs, park conservancies, plaza partners, Open Streets groups, and community development organizations—on the legal, financial, governance, and operational frameworks that underpin their relationships with city government and their communities.

This Commission's charge is government efficiency. I want to direct your attention to a set of Charter provisions where inefficiency is structural and fixable: the rules governing how the City partners with outside organizations to improve, maintain, operate, program, and generate revenue from public space —parks, plazas, sidewalks, and streets.

## The structural problem

The Charter assumes the City manages its public spaces alone, agency by agency. In practice, New York's public realm is co-produced. Thousands of nonprofit and community organizations—by our working estimate, several thousand organizations collectively spending on the order of a billion dollars annually, a figure the forthcoming Public Realm Partners Survey, spearheaded by a coalition of advocates and researchers convened by the Urban Design Forum, will document—maintain horticulture, manage plazas, run markets and events, supplement sanitation, and raise private capital for public assets.

Yet when one of these organizations seeks formal authority to act in public space, Chapter 14 of the Charter defines exactly three instruments, in a

framework that dates to the 1989 Charter revision: the *concession*, the *franchise*, and the *revocable consent* (§ 362). All three were built for commercial use of public property—a restaurant in a park, a cable under a street. None contemplates stewardship: a nonprofit that maintains and programs a space and reinvests any revenue back into it. Stewardship instead runs through authority the Charter names but never standardizes—the "permits and licenses" preserved by § 383, and the "arrangements with private, voluntary or commercial agencies" that § 533(a)(10) and § 533(b)(4) permit Parks to enter only with case-by-case mayoral approval. On these thin foundations agencies have built decades of workarounds: license agreements, "maintenance and marketing" agreements, and program-specific arrangements with no charter standards, little term security, and terms reinvented program by program. The fragmentation is jurisdictional as well as legal: § 533(a)(1) gives Parks "parks, squares and public places" and their adjoining sidewalks, while § 2903 gives DOT the streets. Hybrid spaces—pedestrian plazas, Open Streets (Administrative Code § 19-107.1), medians, triangles—fall between those grants, and the organizations that steward them often deal with more than one agency, each with its own agreements, permits, fees, insurance requirements, and timelines. The result is precisely the kind of friction this Commission exists to remove: multi-year agreement negotiations, duplicative approvals, revenue rules that push value out of neighborhoods, and willing partners who give up.

Five recommendations follow. Each cites the Charter provision it would amend.

### 1. Create a fourth instrument in Chapter 14: the public realm stewardship agreement.

Section 362(a) defines a concession as a grant "for the private use of city-owned property" for which the City receives compensation. A conservancy maintaining a park, or a nonprofit operating a plaza under DOT's plaza program, is not engaged in private use in any meaningful sense—but where revenue is involved, the concession is often the only available legal form, so stewardship is processed through machinery built for vending and restaurants. The workaround is itself codified: the FCRC's rules contemplate agencies issuing permits for City property at administrative-cost-only fees "rather than a concession," requiring nothing but documentation forwarded to the Committee

(12 RCNY § 1-04)—an acknowledgment within the rules that a whole category of activity does not fit the existing boxes. The Charter should define a distinct instrument—a stewardship or partnership agreement—available to nonprofit organizations that maintain, operate, or program public space under agency oversight, with statutory conditions: guaranteed public access, public reporting, community board notice, and reinvestment of net revenue into the covered space. The definition should also fix the boundary with Chapter 13: when the City pays a steward for maintenance services, procurement rules govern; when a steward generates revenue in public space, Chapter 14 governs. Organizations doing both—most mature stewards do—today run two parallel legal processes for one body of work.

**2. Right-size the Franchise and Concession Review Committee for small and community-scale agreements (§§ 373–374).**

Section 374(a) bars any agency from granting a concession without either following FCRC procedures or obtaining FCRC approval, and § 373(d) exempts from review only concessions under thirty days with no renewal. That design is appropriate for a stadium concession; it is disproportionate for a seasonal greenmarket, a plaza kiosk, or a community-managed event series. The Charter should authorize: (a) template agreements pre-approved by FCRC rule, usable by responsible agencies without item-by-item review; (b) portfolio approvals, in which one FCRC action covers a defined class of small concessions across multiple sites; and (c) meaningful de minimis thresholds, indexed so they do not erode. The Committee's own rules show both the authority and its limits. Under its rulemaking power (§ 373(d)(1)), the FCRC has already created a streamlined "small concession" path (12 RCNY § 1-15)—but capped it at $249,999 in total compensation and a one-year term, two with a single renewal, so a recurring greenmarket or seasonal kiosk program must be re-solicited nearly every year. Its rules recognize "program-based concessions" (12 RCNY § 1-16(e))—a step toward portfolio treatment—but the resulting agreements must still be submitted for Committee approval. The thresholds are not indexed. The case for a charter amendment is to make right-sized review the mandatory default rather than a discretionary act of administrative self-restraint. Full Committee scrutiny should be preserved for major agreements and lifted from minor ones.

**3. Let a defined share of locally generated revenue stay with the**

**space that generates it.**

The Charter already states this principle—on paper. Section 2903(a)(13) provides that parking fees and fines "shall be paid into a special fund to be known as the 'traffic improvement fund,'" and § 2903(c)(6) directs marina and boat-launch fees into "a special fund for the continued maintenance, operation or reconstruction of public marine facilities." In practice, these dedications have not functioned: parking meter revenue is treated as general fund revenue, and successive administrations have declined to operate the fund as a true segregation. Concession and consent revenue generated in a park or plaza likewise flows to the general fund, while the space's maintenance depends on annual appropriation and partner fundraising. The lesson of § 2903 is not that dedication fails; it is that a bare authorization is ignored. A workable provision needs mandatory accounting, annual public reporting, and a defined nexus between where revenue is generated and where it is spent. The Charter should authorize dedicated public realm funds on those terms—established by space or district—retaining a defined share of concession, consent, and permit revenue for maintenance, operations, and programming where it is generated. Nothing proposed here need disturb the Council's appropriation power; the point is a charter-recognized default that revenue generated in a space is presumptively available to sustain it. This is an efficiency measure in the strictest sense: predictable operating funding protects the City's capital investments and reduces their lifecycle cost, and it gives revenue-generating activity in public space a public justification residents can see.

### 4. Provide bounded term security for partners that finance public improvements (§§ 383–384).

The inalienability of parks and streets under § 383 is a bedrock protection and should not be weakened—and any new instrument must also respect the state public trust doctrine. Under *Friends of Van Cortlandt Park v. City of New York* (2001), converting parkland to a non-park use requires an act of the State Legislature, and no charter amendment can change that. But long-term management is not alienation when the City retains title, control, and termination rights and the space remains fully public; that is how the City's existing conservancy management agreements already operate. What those partners lack is term security commensurate with what they invest. The Charter balances permanence against protection elsewhere: § 384(b)(4)

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## A closing observation

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Respectfully submitted,

M. Blaise Backer
Principal, Community Steward Solutions
Co-Founder, Commons Steward Collective
Former Deputy Commissioner, NYC Department of Small Business Services
[redacted]

Name

# Ismail

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| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Dear mamdani, I'd love for you to visit Serbia and be our president also you'd fix so many issues here in our country and I absolutely would love a president like you. I hope this message finds you and you see this because I really would love to see you here. We have a sanjak region where it's mostly Muslims and you're always welcome here. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |

Subtopic

Name

## Jonathan Cohen

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

Public Comment

Good evening, and thank you to the Commission for the opportunity to testify.

My name is Jonathan Cohen, and I'm the CEO and co-founder of JOCO, a New York City based company that provides UL certified electric bicycles and battery charging infrastructure for delivery workers across the city.

Over the last several years, New York has faced serious safety concerns around uncertified lithium ion batteries and unsafe charging practices inside apartments and residential buildings. In response, companies like ours invested heavily in safer technologies - including UL-certified batteries, professionally managed charging systems, and FDNY-reviewed battery charging cabinets specifically designed to reduce fire risk.

The goal we all share is to make it less likely that substandard ebikes and chargers are stored and oprated inside of apartments. However, a major challenge we've encountered is that older regulatory frameworks and slow approval processes unintentionally delays the deployment of these safer technologies. In short, bureacracracy moves a lot slower than tech innovation and is now an impediment, rather then the guarantor of, e-bike batteries.

For example, electric car charging is required inside New York City parking garages today and can be installed without lengthy approval processes, despite it being 100-200 times more powerful than bike batteries. At the same time, companies deploying UL certified micromobility charging infrastructure designed specifically to eliminate unsafe apartment charging face lengthy approvals, overlapping reviews, unclear standards, and highly burdensome variance processes that limit their ability to scale.

At JOCO, we have spent years working collaboratively with the FDNY, DOB, and other agencies because safety is our top priority. Both agencies ar our partners, not adversaries. We appreciate the seriousness with which the City approaches fire safety. But when safe, certified infrastructure takes years to approve, it slows the replacement of unsafe charging practices that the City is actively trying to eliminate. Without a viable, marketable and scalable alternative, the public simply cant change the behavior that is leading to deaths.

The net result is fewer workers using certified batteries, fewer batteries being charged in professionally managed environments, and slower adoption of safer infrastructure.

I encourage the Commission to explore ways to utilized technology to modernize the regulatory and permitting process for emerging safety technologies, including clearer approval pathways, better interagency coordination and streamlined approvals that allow safe technologies to be deployed and scaled efficiently. We would be honored to give you suggested changes to the administrative code should you wish.

Thank you for your time.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 11, 2026

Topic: Department of Buildings (DOB) Issues, Unnecessary Bureaucracy, Technology, Enforcement, Real Estate and Development

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Unnecessary bureaucracy

Subtopic: Reform agency processes to make bike infrastructure easier to install

Name

## Phil Won

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|---|---|
| Email | [redacted] |
| Professional Affiliation | Council Member, NYC Council District 30 |
| Zip Code | [redacted] |

Public Comment

June 22, 2026

WRITTEN TESTIMONY OF COUNCIL MEMBER PHIL WONG
New York City Council, District 30 (Queens)
Before the Commission on Government Efficiency (COGE)
NYC Charter Revision Commission

My name is Phil Wong, and I am the Council Member representing the 30th District in Queens the communities of Middle Village, Maspeth, Elmhurst, Ridgewood, Glendale, and Rego Park. I am a member of the Common Sense Caucus, serve on the Committee on Public Safety, and sit on the City Council's Budget Negotiating Team — one of only two first-term members on that team.

I welcome COGE's mandate to make city government work more efficiently, and I submit this testimony to urge the Commission to be bold, specific, and unafraid of the politics. Real efficiency reform means touching the things that powerful interests prefer to leave untouched. The residents of District 30 working class and middle class homeowners, small business owners, seniors, immigrants who followed every rule, and hardworking taxpayers of every background — are paying more and getting less. That has to change.

I. Fix the Budget End the Gimmicks, Mandate Honesty

New York City faces a $10.4 billion projected budget gap in FY2027, potentially reaching $13.6 billion by FY2029. This is not a natural disaster. It is the predictable result of decades of structural budget gimmicks — chronically underbudgeting the same recurring line items year after year while claiming balance on paper. The NYC Comptroller has identified at least $3.76 billion in chronic underbudgeting in FY2026 alone.

Recommendation 1: Charter-mandate multi-year honest budget baselines. Require the Mayor's Office of Management and Budget to publish, alongside every Executive Budget, a reconciliation showing the difference between the prior year's projected and actual spending for the top 20 budget categories. Any variance exceeding 10% must trigger a mandatory public Council hearing within 30 days. No more papering over the truth.

Recommendation 2: Reform the Mayor's Management Report to measure outcomes, not just activity. The MMR currently tells New Yorkers what agencies are doing — inputs, outputs, activity. It does not tell New Yorkers whether programs are working. The Charter should require the MMR to include, for every agency and major program, a portfolio of indicators covering outcome, quality, and efficiency — not just how much was spent or how many units of service were delivered. Are people moving out of homelessness? Are streets getting safer? Are agencies solving problems or just showing up? New Yorkers deserve a government that measures results.

Recommendation 3: Establish a citywide performance management system. The Charter should require the Mayor to designate a senior official — at the Deputy Mayor level or equivalent as the City's Chief Performance Officer,

responsible for a performance review system that cascades from City Hall to agencies to individual programs. Public annual reporting must be required. Without this structure, agencies can spend billions and call it success because no one is measuring whether it actually worked.

II. Fix the Rainy Day Fund

New York City has a Rainy Day Fund in name only. Current rules do not mandate regular deposits to build the fund up, do not restrict withdrawals to actual fiscal emergencies or recessions, and set no target balance adequate to protect the city's long-term finances. With a $10-plus billion structural gap and rising federal uncertainty, if a recession arrives, there is no meaningful cushion.

Recommendation 4: The Charter should require the Mayor and City Council to enact a binding local law governing the Rainy Day Fund — one that mandates deposits tied to revenue growth, restricts withdrawals to declared fiscal emergencies, and sets a target balance adequate to cover at least six months of baseline services. Withdrawals from the fund should be prohibited until that governing law is in place. Taxpayers deserve a government that saves for a rainy day instead of spending everything on a sunny one.

III. Fix the Schools Consolidate the Empties, End Phantom Funding

The NYC Department of Education operates with a $44.6 billion budget — the highest per-pupil spending of any major urban school district in the nation — and yet enrollment has been declining for years. In the 2025 26 school year, enrollment fell 2.4%, a loss of approximately 22,000 students citywide. Despite this, there is no corresponding reduction in spending. The result is a system paying more for less, year after year.

At least 80 district schools have fewer than 150 enrolled students. At least 13 non specialized schools have fewer than 100 students, with enrollment declines of up to 67% over five years — particularly concentrated in the Bronx and Brooklyn. Some of these schools spend over $63,000 per pupil, rivaling the tuition of the city's most elite private institutions, yet produce poor academic outcomes. The average citywide cost is approximately $39,000 per pupil, making New York the most expensive urban district in the country.

Small, struggling schools with collapsing enrollment cannot provide students with the range of courses, advanced classes, counseling, or support services that a full school can offer. Keeping them open is not compassionate — it is a disservice to the very students they claim to serve.

Recommendation 5: The Charter should require the DOE to conduct a mandatory consolidation review of all schools with fewer than 100 enrolled students, with a structured, transparent process and a presumption toward merger or consolidation within two academic years. Transitions must include appropriate support for students and staff. This is not about punishing communities. It is about concentrating resources where students actually are, so they receive the education they deserve.

The second school funding problem is arguably even more wasteful: the "hold harmless" policy. Under this policy reinstated during the pandemic

and continued since schools that lose enrollment keep their full budgets regardless of how many students are actually sitting in their classrooms. In the current school year, two-thirds of the city's schools are reporting lower enrollment than budgeted, yet approximately $250 million remains parked in those budgets rather than being redirected to schools where students actually enrolled. The city spends approximately $30,000 per student. When a school loses 50 students and keeps the money anyway, that is $1.5 million that should be following those children — not protecting administrator headcount.

Fiscal watchdogs have called this policy "rewarding failure" and noted pointedly that it "maintains the existing system rather than benefiting students or taxpayers." It favors those within the institution — administrators and the teachers' union while the losers are children and taxpayers. It is a political choice, not an educational one.

Recommendation 6: The Charter should prohibit hold harmless school funding policies that allow schools to retain baseline budgets for students they no longer serve. Funding must follow students. Schools that grow should be rewarded. Schools that shrink should right size, with humane transition timelines and planning support — but not with a permanent blank check funded by taxpayers who are getting nothing in return.

IV. Fix Homeless Housing — End the Hotel Blank Check

The city spends $352 per night — $128,480 per year — to house a single person in emergency shelter. Total Department of Homeless Services spending reached $4.4 billion in FY2025, of which $2.4 billion was city tax levy. Spending on the unsheltered homeless tripled between FY2019 and FY2025. The unsheltered population grew anyway — by 26%. The city recently signed a $1.86 billion, three year contract with the Hotel Association of New York City to continue housing homeless families in hotel rooms.

It costs substantially less to help a family pay market-rate rent than to pay hotel-rate premiums for converted emergency shelter. That is not ideology — it is arithmetic. Continuing to sign billion dollar hotel contracts with no accountability for outcomes is not a housing policy. It is a transfer of taxpayer wealth to the hotel industry with nothing to show for it.

Recommendation 7: Charter-mandate a cost-effectiveness review before any city agency contracts emergency shelter at hotel or commercial rates when lower cost alternatives rental subsidies, transitional housing, community based options — are available. Require the reformed Mayor's Management Report to annually publish per-unit shelter costs by type, so taxpayers can see exactly what they are paying and compare it to alternatives.

Recommendation 8: Tie DHS shelter contracts over $50 million to outcome benchmarks — specifically, the percentage of occupants who transition to permanent housing within 12 months — as a mandatory condition of contract renewal. Spending without outcomes is not compassion. It is waste.

V. Sanctuary City Law Let Voters Decide

The NYPD rejected all 109 ICE detainer requests submitted in the last available fiscal year. The Correction Department complied with only 11 out of 201 detainer requests. These are not abstract statistics. They represent individuals released back into our communities after federal law enforcement identified and flagged them as priorities.

I voted against the Safer Sanctuary Act override earlier this year — one of seven votes against in a 44 7 Council tally. I represent immigrant communities proudly. I believe in protecting people from unjust enforcement. I also believe public safety is not a partisan value — it is a basic expectation every New Yorker has a right to hold. The current framework strips law enforcement of any discretion and shields individuals with serious criminal convictions from federal accountability. That is not protection; it is recklessness.

Recommendation 9: COGE should place on the November 2026 ballot a voter referendum on whether to reform NYC's sanctuary city laws — specifically, to restore a framework that permits cooperation with federal detainer requests for individuals convicted of serious crimes, while maintaining full protections for crime victims, witnesses, and individuals not charged with any offense. The Council's progressive majority blocked New Yorkers from voting on this for years. The Charter Revision Commission is the right vehicle to finally let the people weigh in.

VI. End the Water Bill Backdoor Tax

In March, I sent a formal letter to the NYC Water Board and the Department of Environmental Protection demanding the suspension of a longstanding practice: using $313 million in ratepayer water and sewer bill funds to subsidize general city expenses. This is a backdoor tax. Homeowners and renters across the city are paying it every month most without knowing it exists.

Recommendation 10: The Charter should explicitly prohibit the Water Board from transferring ratepayer funds to the general city budget for any purpose other than water and sewer system capital and operational expenses. Utility charges must pay for utilities. This is not complicated. It is basic honesty.

VII. Property Tax Equity for Queens and Outer-Borough Homeowners

District 30 homeowners along with homeowners across Staten Island, Southeast Queens, Eastern Brooklyn, and the Northeast Bronx pay effective property tax rates up to three times higher than homeowners in Manhattan and brownstone Brooklyn. This structural inequity is baked into the city's property tax assessment framework and it falls hardest on working class and middle class families who have no choice but to absorb it.

Property tax hikes are a nonstarter. In one of the highest taxed cities and states in the country, working families cannot afford more. But what they deserve — and do not have — is fairness. Outer-borough homeowners have been subsidizing Manhattan's lower effective rates for decades. The Charter should address this.

Recommendation 11: The Charter should mandate the creation of a permanent, independent Property Tax Equity Review Board with the authority to recommend uniform effective tax rate adjustments by property class. Its recommendations must be published publicly before any property tax rate is set, and the Mayor and Council must respond on the record.

VIII. Give Every New Yorker a Real Voice

Right now, public feedback depends on having money, political connections, or the ability to take a night off work to attend a hearing. That is not public accountability — it is access for the privileged. The residents of Middle Village, Maspeth, Elmhurst, and Ridgewood are not less important because they cannot make it to a hearing on a Tuesday evening in a law school auditorium.

Recommendation 12: The Charter should require the City to conduct a statistically valid, representative resident feedback survey at least every four years, with results published at the Community Board level and disaggregated by race, ethnicity, and household income. This survey would show how residents actually feel about quality of life in their neighborhoods, how they rate city services, and where government is succeeding or failing regardless of who has the time or connections to show up.

Conclusion

The residents of District 30 are not ideologues. They are homeowners, small business owners, seniors, working parents, veterans, and immigrants who came here legally and followed every rule. They do not ask for much from their government: spend their money wisely, keep them safe, and respect their intelligence.

For too long, city government has done the opposite concealing budget problems with gimmicks, spending billions on programs that don't work, and blocking New Yorkers from voting on the things that matter most to them. COGE has a mandate to fix what decades of political calculation broke. I urge the Commission to be bold enough to take it.

Respectfully submitted,

Phil Wong
Council Member, District 30

Attachment(s)




CM Wong COGE Testimony June 22 202...

Date Submitted: June 11, 2026

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

Method Received: Airtable Form

Is it charter related?: Yes

1

Charter Related: Yes

Topic Simplified: Budget

Subtopic: Multiple suggestions

DISTRICT OFFICE
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LEGISLATIVE OFFICE
[redacted]

EMAIL: [redacted]

THE COUNCIL OF
THE CITY OF NEW YORK
**PHIL WONG**
COUNCIL MEMBER, 30TH DISTRICT, QUEENS

COMMITTEES
FINANCE
EDUCATION
PUBLIC SAFETY
TRANSPORTATION AND INFRASTRUCTURE
FIRE AND EMERGENCY MANAGEMENT
VETERANS
WORKFORCE DEVELOPMENT

CO-CHAIR, COMMON SENSE CAUCUS
BLACK, LATINO AND ASIAN CAUCUS (BLAC)

June 22, 2026

**WRITTEN TESTIMONY OF COUNCIL MEMBER PHIL WONG**
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**Before the Commission on Government Efficiency (COGE)**
**NYC Charter Revision Commission**

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## I. Fix the Budget — End the Gimmicks, Mandate Honesty

New York City faces a $10.4 billion projected budget gap in FY2027, potentially reaching $13.6 billion by FY2029. This is not a natural disaster. It is the predictable result of decades of structural budget gimmicks — chronically underbudgeting the same recurring line items year after year while claiming balance on paper. The NYC Comptroller has identified at least $3.76 billion in chronic underbudgeting in FY2026 alone.

**Recommendation 1:** Charter-mandate multi-year honest budget baselines. Require the Mayor's Office of Management and Budget to publish, alongside every Executive Budget, a reconciliation showing the difference between the prior year's projected and actual spending for the top 20 budget categories. Any variance exceeding 10% must trigger a mandatory public Council hearing within 30 days. No more papering over the truth.

**Recommendation 2:** Reform the Mayor's Management Report to measure outcomes, not just activity. The MMR currently tells New Yorkers what agencies are doing — inputs, outputs, activity. It does not tell New Yorkers whether programs are working. The Charter should require the MMR to include, for every agency and major program, a portfolio of indicators covering outcome, quality, and efficiency — not just how much was spent or how many units of service were delivered. Are people moving out of homelessness? Are streets getting safer? Are agencies solving problems or just showing up? New Yorkers deserve a government that measures results.

**Recommendation 3:** Establish a citywide performance management system. The Charter should require the Mayor to designate a senior official — at the Deputy Mayor level or equivalent — as the City's Chief Performance Officer, responsible for a performance review system that cascades from City Hall to agencies to individual programs. Public annual reporting must be required. Without this structure, agencies can spend billions and call it success because no one is measuring whether it actually worked.

## II. Fix the Rainy Day Fund

New York City has a Rainy Day Fund in name only. Current rules do not mandate regular deposits to build the fund up, do not restrict withdrawals to actual fiscal emergencies or recessions, and set no target balance adequate to protect the city's long-term finances. With a $10-plus billion structural gap and rising federal uncertainty, if a recession arrives, there is no meaningful cushion.

**Recommendation 4:** The Charter should require the Mayor and City Council to enact a binding local law governing the Rainy Day Fund — one that mandates deposits tied to revenue growth, restricts withdrawals to declared fiscal emergencies, and sets a target balance adequate to cover at least six months of baseline services. Withdrawals from the fund should be prohibited until that governing law is in place. Taxpayers deserve a government that saves for a rainy day instead of spending everything on a sunny one.

## III. Fix the Schools — Consolidate the Empties, End Phantom Funding

The NYC Department of Education operates with a $44.6 billion budget — the highest per-pupil spending of any major urban school district in the nation — and yet enrollment has been declining for years. In the 2025-26 school year, enrollment fell 2.4%, a loss of approximately 22,000 students citywide. Despite this, there is no corresponding reduction in spending. The result is a system paying more for less, year after year.

At least 80 district schools have fewer than 150 enrolled students. At least 13 non-specialized schools have fewer than 100 students, with enrollment declines of up to 67% over five years — particularly concentrated in the Bronx and Brooklyn. Some of these schools spend over $63,000 per pupil, rivaling the tuition of the city's most elite private institutions, yet produce poor academic outcomes. The average citywide cost is approximately $39,000 per pupil, making New York the most expensive urban district in the country.

Small, struggling schools with collapsing enrollment cannot provide students with the range of courses, advanced classes, counseling, or support services that a full school can offer. Keeping them open is not compassionate — it is a disservice to the very students they claim to serve.

**Recommendation 5:** The Charter should require the DOE to conduct a mandatory consolidation review of all schools with fewer than 100 enrolled students, with a structured, transparent process and a presumption toward merger or consolidation within two academic years. Transitions must include appropriate support for students and staff. This is not about punishing communities. It is about concentrating resources where students actually are, so they receive the education they deserve.

The second school-funding problem is arguably even more wasteful: the "hold harmless" policy. Under this policy — reinstated during the pandemic and continued since — schools that lose enrollment keep their full budgets regardless of how many students are actually sitting in their classrooms. In the current school year, two-thirds of the city's schools are reporting lower enrollment than budgeted, yet approximately $250 million remains parked in those budgets rather than being redirected to schools where students actually enrolled. The city spends approximately $30,000 per student. When a school loses 50 students and keeps the money anyway, that is $1.5 million that should be following those children — not protecting administrator headcount.

Fiscal watchdogs have called this policy "rewarding failure" and noted pointedly that it "maintains the existing system rather than benefiting students or taxpayers." It favors those within the institution — administrators and the teachers' union — while the losers are children and taxpayers. It is a political choice, not an educational one.

**Recommendation 6:** The Charter should prohibit hold harmless school funding policies that allow schools to retain baseline budgets for students they no longer serve. Funding must follow students. Schools that grow should be rewarded. Schools that shrink should right-size, with humane transition timelines and planning support — but not with a permanent blank check funded by taxpayers who are getting nothing in return.

## IV. Fix Homeless Housing — End the Hotel Blank Check

The city spends $352 per night — $128,480 per year — to house a single person in emergency shelter. Total Department of Homeless Services spending reached $4.4 billion in FY2025, of which $2.4 billion was city tax levy. Spending on the unsheltered homeless tripled between FY2019 and FY2025. The unsheltered population grew anyway — by 26%. The city recently signed a $1.86 billion, three-year contract with the Hotel Association of New York City to continue housing homeless families in hotel rooms.

It costs substantially less to help a family pay market-rate rent than to pay hotel-rate premiums for converted emergency shelter. That is not ideology — it is arithmetic. Continuing to sign billion-dollar hotel contracts with no accountability for outcomes is not a housing policy. It is a transfer of taxpayer wealth to the hotel industry with nothing to show for it.

**Recommendation 7:** Charter-mandate a cost-effectiveness review before any city agency contracts emergency shelter at hotel or commercial rates when lower-cost alternatives — rental subsidies, transitional housing, community-based options — are available. Require the reformed Mayor's Management Report to annually publish per-unit shelter costs by type, so taxpayers can see exactly what they are paying and compare it to alternatives.

**Recommendation 8:** Tie DHS shelter contracts over $50 million to outcome benchmarks — specifically, the percentage of occupants who transition to permanent housing within 12 months — as a mandatory condition of contract renewal. Spending without outcomes is not compassion. It is waste.

## V. Sanctuary City Law — Let Voters Decide

The NYPD rejected all 109 ICE detainer requests submitted in the last available fiscal year. The Correction Department complied with only 11 out of 201 detainer requests. These are not abstract statistics. They represent individuals released back into our communities after federal law enforcement identified and flagged them as priorities.

I voted against the Safer Sanctuary Act override earlier this year — one of seven votes against in a 44-7 Council tally. I represent immigrant communities proudly. I believe in protecting people from unjust enforcement. I also believe public safety is not a partisan value — it is a basic expectation every New Yorker has a right to hold. The current framework strips law enforcement of any discretion and shields individuals with serious criminal convictions from federal accountability. That is not protection; it is recklessness.

**Recommendation 9:** COGE should place on the November 2026 ballot a voter referendum on whether to reform NYC's sanctuary city laws — specifically, to restore a framework that permits cooperation with federal detainer requests for individuals convicted of serious crimes, while maintaining full protections for crime victims, witnesses, and individuals not charged with any offense. The Council's progressive majority blocked New Yorkers from voting on this for years. The Charter Revision Commission is the right vehicle to finally let the people weigh in.

## VI. End the Water Bill Backdoor Tax

In March, I sent a formal letter to the NYC Water Board and the Department of Environmental Protection demanding the suspension of a longstanding practice: using $313 million in ratepayer water and sewer bill funds to subsidize general city expenses. This is a backdoor tax. Homeowners and renters across the city are paying it every month — most without knowing it exists.

**Recommendation 10:** The Charter should explicitly prohibit the Water Board from transferring ratepayer funds to the general city budget for any purpose other than water and sewer system capital and operational expenses. Utility charges must pay for utilities. This is not complicated. It is basic honesty.

## VII. Property Tax Equity for Queens and Outer-Borough Homeowners

District 30 homeowners — along with homeowners across Staten Island, Southeast Queens, Eastern Brooklyn, and the Northeast Bronx — pay effective property tax rates up to three times higher than homeowners in Manhattan and brownstone Brooklyn. This structural inequity is baked into the city's property tax assessment framework and it falls hardest on working-class and middle-class families who have no choice but to absorb it.

Property tax hikes are a nonstarter. In one of the highest-taxed cities and states in the country, working families cannot afford more. But what they deserve — and do not have — is fairness. Outer-borough homeowners have been subsidizing Manhattan's lower effective rates for decades. The Charter should address this.

**Recommendation 11: The Charter should mandate the creation of a permanent, independent Property Tax Equity Review Board** with the authority to recommend uniform effective tax rate adjustments by property class. Its recommendations must be published publicly before any property tax rate is set, and the Mayor and Council must respond on the record.

## VIII. Give Every New Yorker a Real Voice

Right now, public feedback depends on having money, political connections, or the ability to take a night off work to attend a hearing. That is not public accountability — it is access for the privileged. The residents of Middle Village, Maspeth, Elmhurst, and Ridgewood are not less important because they cannot make it to a hearing on a Tuesday evening in a law school auditorium.

**Recommendation 12:** The Charter should require the City to conduct a statistically valid, representative resident feedback survey at least every four years, with results published at the Community Board level and disaggregated by race, ethnicity, and household income. This survey would show how residents actually feel about quality of life in their neighborhoods, how they rate city services, and where government is succeeding or failing — regardless of who has the time or connections to show up.

## Conclusion

The residents of District 30 are not ideologues. They are homeowners, small business owners, seniors, working parents, veterans, and immigrants who came here legally and followed every rule. They do not ask for much from their government: spend their money wisely, keep them safe, and respect their intelligence.

For too long, city government has done the opposite — concealing budget problems with gimmicks, spending billions on programs that don't work, and blocking New Yorkers from voting on the things that matter most to them.

COGE has a mandate to fix what decades of political calculation broke. I urge the Commission to be bold enough to take it.

Respectfully submitted,



Phil Wong
Council Member, District 30

Name

# Gina Herd

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Can we please add the element of addressing our USA parenting style that causes most of our mental illness in this country. What the happiest countries in the world have in common is that of looking at child development 0 24. This changed how EVERYTHING was done. We can solicit the help of therapist(I will volunteer) to teach in pre-K and all city agencies. I will not rest until this is implemented. Thank you for reading this.

Attachment(s)

Drop files here or click to browse

Date Submitted June 11, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Education & Youth

| | |
|---|---|
| Subtopic | Early childhood education |

Name

# Stephen Louis

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | New York Law School |
| Zip Code | [redacted] |
| Public Comment | See attached regarding RABRC |
| Attachment(s) |  RABRC testimony.pdf |
| Date Submitted | June 11, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | Yes |

1

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | Reform RABRC to make commission determinations final |

NEW YORK LAW SCHOOL

[redacted]

**Comments to the New York City Charter Revision Commission regarding the process of the Report and Advisory Board Review Commission**

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

My name is Stephen Louis. I am Counsel to the Center for New York City and State Law and Distinguished Adjunct Professor of Law at New York Law School. Prior to taking this position in 2024, I was the Chief of the Legal Counsel Division and member of the executive staff of the New York City Law Department. As Legal Counsel Chief, I participated in discussions regarding the 2010 Charter Revision Commission's creation of the Report and Advisory Board Review Commission (RABRC), which was created to ensure that reporting requirements and advisory bodies would be reviewed on a regular basis to assess their continued usefulness. Subsequently, I was involved in the implementation of RABRC's Charter-mandated process, as set forth in Charter section 1113.

There is no question that legally mandated reports and advisory commissions perform an important, even essential role in City government. Agencies should be held accountable, and reporting requirements can ensure that both those who oversee those agencies, and the public at large, have

access to the data that drive those agencies' actions and indicate success or failure. Agencies also can benefit from advisory commissions that can look at issues from a different perspective and deliver alternative approaches for the provision of government services.

However, it is also clear that sometimes these reports and advisory commissions outlive their usefulness, sometimes because the report or commission is duplicative of other reports and commissions and sometimes because changed circumstances have so changed the mandates of the targeted agencies that the reports or commissions are no longer relevant to their mission. Agencies end up spending time and resources that could be better spent in other ways.

RABRC has served well in reviewing reports and advisory commissions and recommending their termination. And the City Council has often accepted those recommendations, However, it appears the process has not fully yielded the desired results, and relatively few reports and commissions have actually been eliminated. I am not going to suggest specific reports and commissions that should be ended, but I do suggest that the Charter Revision Commission consider approaches to either strengthen the RABRC process or change how reports and advisory commissions are created in the first place. These changes should not take away from the City Council its ultimate authority to mandate these reports and commissions, but might shift the process just enough to ensure

that reports and commissions remain relevant and meaningful well after their original mandate.

Under the current scheme, once RABRC has recommended the elimination of a report or commission, the City Council has 120 days to confirm or reject RABRC's finding. An alternative approach would be to make the RABRC determination final. The Council could, upon due consideration, pass a new local law reinstating the report or commission, but requiring a new local law might give the Council more of an opportunity to reconsider its original mandate, and/or modify it to be more relevant. One other alternative would be to continue the RABRC process as is, but also require that any local law mandating a report or advisory commission have an automatic sunset of a period of years, perhaps five or ten years, thus ensuring that all reports get a new hard look at regular intervals. Undoubtedly there are other approaches the Commission could take to improve the current process. I urge the Commission to look at this issue closely.

Name

## Monika Glowacka

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Graphic Designer |
| Zip Code | [redacted] |
| Public Comment | Dear Mayor Mamdani,<br><br>I would like to bring attention to an ongoing issue that many New Yorkers experience every summer: the smell on our streets. While businesses often are responsible for cleaning their storefronts and sidewalks, the cleaning products used can create an overwhelming mix of bleach, soap, garbage, and heat, especially during warmer months.<br><br>I recently came across a sanitation initiative in the French Quarters of New Orleans, LA that uses a lemon-scented street cleaning solution through a vendor called IV Waste, led by Sidney Torres. The program appears to have helped address street odors while maintaining cleanliness.<br><br>I would encourage New York City to explore whether a similar pilot program could be tested in high traffic areas. Improving street cleanliness is important, and a solution that both disinfects our streets and helps reduce unpleasant odors could make a meaningful difference for residents, workers, and visitors alike.<br><br>Thank you for your time and consideration.<br><br>Source: https://www.instagram.com/reel/DMXL4eTuFs2/ https://www.instagram.com/reel/DIPVMfBJuUx/ |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |

| | |
|---|---|
| Topic | Unnecessary Bureaucracy ✕ Technology ✕ Miscellaneous ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Streets |
| Subtopic | Make our streets smell better with a pilot program |

Name

# Britney

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

We need to have more public dog parks in the Bronx. Specifically, near Westchester Square and Parkchester areas. Dog owners resort to bringing their dogs to public parks with children and it's especially difficult in the summer when the parks are full and dogs don't have spaces to walk free. An empty lot could be purchased or a small area can be created where dog owners can allow their dogs to be loose for a little while. These areas can be communal, dog owners can leave poop bags and dog toys or even pools in that space for their pets to roam. Some pet parents are training their dogs and need a space where they can safely release their dogs and a small dog park can make a big difference.

Attachment(s)

Drop files here or click to browse

Date Submitted June 11, 2026

Topic Real Estate and Development × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

Charter Related No

| | |
|---|---|
| Topic Simplified | Public Realm |
| Subtopic | More dog parks in the Bronx |

Name

# Tairine (Ty) Rosa

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Muddy Paws Rescue (Board Member) and concerned NYC resident regarding animal welfare |
| Zip Code | [redacted] |

Public Comment

My name is Ty Rosa, and I am a New York City resident in Harlem. I am writing to ask the Commission to address a structural inefficiency in how our city funds animal welfare, and to recommend specific Charter and budget reforms.

New York City spends its animal welfare dollars backwards. The City Comptroller found that the city spends almost $54 million a year maintaining its shelter contract with Animal Care Centers of NYC (ACC), yet its spay/neuter program, the single most effective tool for reducing shelter intake, received an average of only $316,000 a year over the last three fiscal years reviewed. We pay for the expensive back end (sheltering, medical care, and euthanasia) while starving the cheap front end (prevention and keeping pets in their homes). That is the opposite of efficient government. National programs show that every $1 invested in spay/neuter returns roughly $3 in avoided shelter costs.

The result is a system that breaks down. In July 2025, ACC suspended citywide intake for the first time in its roughly 30 year history after crossing 1,000 animals in its care, publicly stating it was "at a breaking point." One in three animals surrendered to ACC is given up because of housing insecurity, not behavior, a problem the city could ease through prevention and retention programs rather than absorbing the full downstream cost.

The city is also quietly subsidized by nonprofits. More than 300 rescue organizations partner with ACC through its New Hope program to take in animals the city cannot house, including the hardest medical and behavioral cases. Foster based rescues like Muddy Paws Rescue have placed more than 10,000 dogs since 2016, roughly 900 to 1,100 a year, using a volunteer network of more than 2,000 foster homes, with essentially no recurring city funding. Every animal these groups pull is one the city does not have to house, treat, or euthanize. And when the city does invest even modestly, the leverage is enormous: a $500,000 allocation in 2025 funded the sterilization of 3,500 cats.

This Commission can fix the structure. The City Charter already creates a Mayor's Office of Animal Welfare (Section 581), but it was written to be optional ("may, but need not" be a real office) and today operates with a single full time staffer and a budget under $100,000. It is far too weak to oversee a $54 million system.

I respectfully urge the Commission to:

Strengthen the Office of Animal Welfare in the Charter, giving it a mandated structure, adequate staffing, and real authority to coordinate animal-welfare policy and funding.
Mandate transparent public reporting by ACC and the Health Department on intake, shelter and foster capacity, length of stay, live release and euthanasia rates, and funding, broken out by borough and using one standardized methodology.
Establish a recurring, baselined funding stream for prevention (spay/neuter)

and a formal grant mechanism for ACC's New Hope rescue partners, so the nonprofits carrying this load are supported rather than left to fundraise alone.

These are durable, structural reforms that fit the Commission's efficiency mandate. They would save money over time, make the system accountable to the public, and ensure New York City treats animal welfare as the essential service it is.

Please see attachment with additional information and research.

Thank you for your time and for the opportunity to comment.

Attachment(s)



The Case for Increasing NYC Funding for Animal Shelters and Rescue Nonprofits

An Evidentiary Research Backbone for a Public Comment to the Commission on Government Efficiency (COGE)

Summary

Key Findings

NYC Animal Shelter Funding Research....

Date Submitted: June 11, 2026

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

Method Received: Airtable Form

Is it charter related?: Yes

1

Charter Related: Yes

Topic Simplified: Animal welfare

| | |
|---|---|
| Subtopic | Improve animal welfare services provided by the City |

# The Case for Increasing NYC Funding for Animal Shelters and Rescue Nonprofits

### An Evidentiary Research Backbone for a Public Comment to the Commission on Government Efficiency (COGE)

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## Summary


- New York City structurally underfunds the prevention side of animal welfare. The NYC Comptroller found the city spends almost $54 million a year maintaining its ACC shelter contract but the spay/neuter program received an average of only $316,000 in each of the last three fiscal years reviewed, and animal-welfare advocates report that New York City spends just $2.89 per resident on animal care, among the lowest of large US cities. In July 2025, ACC suspended citywide intake for the first time in its roughly 30-year history after crossing 1,000 animals in care.
- Foster-based rescues like Muddy Paws Rescue and ACC's more than 300 New Hope partners absorb thousands of animals the city cannot house, yet receive essentially no recurring city funding. Meanwhile the Mayor's Office of Animal Welfare, created in the Charter, has just one full-time staffer and a budget under $100,000, leaving it too weak to drive accountability or coordinate funding.
- COGE should act on what a charter commission can durably change: strengthen the Office of Animal Welfare (replace the “may, but need not” language with real structure, staffing, and authority), mandate transparent public reporting on intake, capacity, outcomes, and funding, and create a structural basis for funding prevention and rescue partners, which national data show return roughly $3 for every $1 invested.


## Key Findings

**1. The contract ceiling is large, but the actual operating draw is far smaller, and prevention is starved.** ACC holds a 34-year contract (September 1, 2018 to June 30, 2052) with a “total not to exceed amount” of approximately $1.9 billion, which averages roughly $53.7 million per year once the $75 million Queens shelter allocation is removed. This is a maximum reimbursable amount, not a guaranteed payment. DOHMH officials told the City Council on March 24, 2025 that ACC's actual budget was $34 million in that year, rising to $37 million the next year (FY2025 to FY2026). In 2023 the operating budget was reported just under $18 million. The contrast with prevention is stark: per the Comptroller, the cost of maintaining animal shelters cost the City almost $1.9 billion, which on an annual basis translates to almost $54 million, while the spay/neuter program received an average of only $316,000 in each of the last three fiscal years reviewed.

**2. NYC spends strikingly little per capita compared with peer cities.** Advocates (Voters for Animal Rights / Flatbush Cats) report that New York City spends just $2.89 per resident on animal care, and less than 1% goes toward prevention programs that help keep pets with their

families. Prior local reporting found that Los Angeles and Houston each spend roughly three times NYC's per-capita amount on shelters. (A widely circulated comparison of $13.70 in Miami and $14.78 in Dallas appears in 2026 advocacy coverage but could not be traced to a named primary source; it should be attributed to advocates, not cited as official.)

**3. The system hit a documented breaking point in 2025.** On July 19-21, 2025, ACC suspended citywide intake for the first time in its roughly 30-year history after surpassing 1,000 animals in care. As ACC put it: with over 1,000 pets in our care we are at a breaking point. Even while intake was officially suspended, ACC still accepted more than 1,500 animals who had nowhere else to go.

**4. Housing instability and cost-of-living pressures are the primary drivers of surrenders.** ACC's Director of Communications stated that one out of every three animals that gets surrendered is surrendered for housing insecurity, as people move to places that don't accept pets in an extremely expensive city. This is compounded by veterinary inflation: pet services including veterinary care rose nearly 25% between 2021 and 2024, far outpacing general inflation.

**5. Rescues and the New Hope program are a financial lifeline the city does not fund.** ACC partners with more than 300 dedicated animal placement organizations (its New Hope partners), who take ownership of at-risk animals, including those with medical and behavioral needs, freeing shelter capacity. Muddy Paws Rescue alone has saved more than 7,700 dogs since 2016 and roughly 900 to 1,000 per year, entirely through a foster network of more than 2,000 homes, on 2024 revenue of $2,026,270. These organizations rely on donations and private grants, not city support.

**6. The Office of Animal Welfare is structurally weak by design.** NYC Charter Section 581 says the mayor shall establish an office of animal welfare, but that office may, but need not, be established as a separate office. In practice it has one full-time staffer and a budget under $100,000, with only advisory and coordinating power, no enforcement, regulatory, or budget authority.

**7. The economic and public-health case for investment is strong.** Spay/neuter funding is cost-avoidance: New Hampshire's program returns $3.15 in reduced shelter costs for every $1 spent. On public health, oral rabies vaccination was not conducted in NYC in 2024 because programmatic funding could not be identified, even as rabid raccoons reappeared near the city's borders.

# Details

## 1. ACC funding and the contract structure

DOHMH's contract with Animal Care Centers of NYC runs September 1, 2018 through June 30, 2052, with a “total not to exceed amount” of approximately $1.9 billion, of which $75 million was allocated to the Queens Animal Care Center; minus that allocation it averages approximately $53.7 million per year. Critically, this is a maximum reimbursable amount (MRA), not a guaranteed annual payment. Reported actual operating budgets have been far lower: just under $18 million in 2023; $34 million in FY2025 rising to $37 million in FY2026 per DOHMH

testimony. ACC reports aiding over 15,000 animals annually and employs roughly 400 full-time staff. The 34-year contract was executed in 2019 under Mayor de Blasio with no City Council vote and minimal public input, a structural fact critics argue blocks competition and accountability.

The spay/neuter Animal Population Control Program is the city's primary tool for addressing root causes, yet it averaged only about $316,000 per year over the three most recent fiscal years reviewed. DOHMH's contract with the ASPCA (Fiscal Years 2023-2029, total not to exceed $3 million, covering up to 24,000 surgeries at $125 each) produced 37 percent fewer surgeries than anticipated from FY2023 to FY2025. The program's only mandated revenue source is a $25.50 dog-license surcharge (the gap between the $8.50 license for altered dogs and the $34.00 license for unaltered dogs). Dog licensing has declined sharply, from about 93,200 in FY2021 to roughly 70,100 in FY2025, eroding the revenue base, while the Comptroller noted DOHMH did not solicit funding from other private or public funds despite the authority to do so. In September 2025 the City Council added $500,000 in the FY2026 budget to expand spay/neuter, allocated to Flatbush Cats to sterilize 3,500 cats, demonstrating that modest city funds can rapidly expand capacity.

## 2. Capacity crisis and intake data (2021-2026)

In July 2025, ACC crossed 1,000 animals in care for the first time. A snapshot from the crisis: 382 adult dogs, 13 puppies, 383 cats, 163 kittens, 47 rabbits, 12 guinea pigs and several birds, with 290 additional pets already in foster. Intake resumed by appointment on August 27, 2025, after four weekends of fee-waived adoption promotions sponsored by Best Friends Animal Society and the ASPCA created room.

Overcrowding predates 2025. In June 2023, an ACC board presentation showed the system was 65% over humane capacity for dogs and 15% over for cats, with dog and cat populations up 77% and 30% year over year; monthly euthanasia rose from 76 (January 2023) to 114 (May 2023). Surrenders are overwhelmingly driven by owner circumstances (housing, finances) rather than animal behavior.

On live release: ACC reports placement rates near or above 90% (it reported a 94% dog placement rate in 2020, declining to 89% for dogs by 2023). Independent analysis by The Scoop New York, which counts owner-requested euthanasia and deaths in care, calculates a combined live release rate that fell from 86% (2019) to roughly 78% in 2023 and 2024. Both sources agree the trend has worsened since the pandemic. This methodological dispute itself argues for mandated, standardized public reporting.

New facilities: The Paul A. Vallone Queens Animal Care Center (1906 Flushing Ave, Ridgewood) opened in 2024, a 50,000-square-foot, $75 million facility with capacity for about 300 animals (72 dogs, 110 cats). It became overcrowded within three weeks of its soft launch, prompting Council Member Robert Holden to tour the site over conditions concerns. A new Bronx full-service center (broke ground 2023, roughly $92 million) and a Brooklyn renovation ($48 million) are underway; ACC has said the new facilities will add about 600 kennels. Mayor Adams announced a $1 million investment in July 2025 to hire 14 additional staff and increase capacity in Manhattan and Queens.

## 3. National shelter context (2021-2026)

Shelter Animals Count reported approximately 607,000 animals euthanized nationally in 2024, with the euthanasia rate falling from 13% (2019) to 8% (2024), but dogs of all sizes staying in shelters longer, creating capacity pressure. In 2025, an estimated 4.7 million cats and dogs entered US shelters, with about 757,000 non-live outcomes. Best Friends Animal Society's preliminary 2025 data show a national save rate of approximately 82.5%, up roughly 12 points from 71% in 2016, with about 396,000 animals killed in 2025 and more than two-thirds of US shelters now meeting the 90% no-kill benchmark. Owner surrenders rose to about 30% of intake in 2025. Veterinary cost inflation (nearly 25% for pet services 2021-2024) and a lack of pet-friendly housing are repeatedly cited by national bodies (ASPCA, Shelter Animals Count) as the structural drivers keeping shelters full.

## 4. The role and funding of rescue nonprofits

ACC's New Hope program is the city's pressure-relief valve: more than 300 partner 501(c)(3) organizations take ownership of ACC animals, including the hardest-to-place medical and behavioral cases, and place them through their own networks. The Mayor's Alliance for NYC's Animals operates the Wheels of Hope transport program supporting these placements seven days a week. The financial logic is direct: every animal a rescue pulls is an animal the city does not have to house, feed, treat, or euthanize.

Muddy Paws Rescue exemplifies the model and its fragility. Founded in 2016, it is entirely foster-based (no physical shelter), has helped more than 10,000 dogs find homes, works with a foster network of more than 2,000 homes, and saves roughly 900 to 1,000 dogs per year. It is a partner of ACC, pulling at-risk dogs including large dogs when ACC is over capacity. Its FY2024 revenue was $2,026,270, with 9 employees and 200 volunteers, and it holds a four-star Charity Navigator rating. It depends on adoption fees, donations, and private grants (for example, $35,000 from PetSmart Charities in 2023) and receives no significant recurring city funding. Other jurisdictions fund their rescue partners directly: Maricopa County (AZ) and partners run dedicated funds for organizations assisting the municipal shelter, a model NYC lacks.

## 5. The structural / charter hook: Office of Animal Welfare

NYC Charter Chapter 23, Section 581 reads: the mayor shall establish an office of animal welfare; such office may, but need not, be established in the executive office of the mayor and may be established as a separate office, within any other office of the mayor or within any department. The permissive “may, but need not” language is the structural weakness. The office's stated power is only to advise and assist the Mayor in the coordination and cooperation among City agencies. Council Member Justin Brannan originally proposed a full city department of animal welfare; the 2019 legislation was watered down to a single office (effective March 25, 2020). The director testified at the September 13, 2024 Council Health Committee hearing that she is the only full-time staffer, and the office's budget is under $100,000. A charter commission is precisely the vehicle to fix structural deficiencies like this, by mandating a properly resourced office with defined authority and reporting duties.

## 6. Economic and public-health arguments

Public health: NYC conducts ongoing rabies surveillance (raccoons are the primary reservoir; 8 animals tested positive in 2024). Notably, oral rabies vaccination was not conducted in NYC in 2024 because programmatic funding could not be identified, even as neighboring Nassau and Suffolk counties saw a resurgence of rabid raccoons beginning summer 2024 and a rabid raccoon was identified in Queens near the Nassau border in November 2024. All animal bites must be reported to the DOHMH Animal Bite Unit within 24 hours for the 10-day rabies observation protocol. A well-funded, well-staffed shelter and animal-control system is the front line for bite follow-up, stray capture, quarantine, and lost-pet reunification, functions that generate costs elsewhere (emergency medicine, public-health labor, liability) when underfunded.

Economic: Animal control, shelter management, and euthanasia are significant municipal expenses, and every sterilization reduces future intake. The clearest documented return is New Hampshire's program, which returns $3.15 in reduced shelter costs for every $1 spent. This is cost avoidance, not new spending, the conservative fiscal case for prevention funding.

### 7. Comparative and best-practice data

The widely accepted no-kill benchmark is a 90% save rate over a 12-month period. Cities and states that have invested in accessible spay/neuter have seen measurable declines: Southside Virginia's subsidized program contributed to an 88.1% decrease in shelter euthanasia between 2012 and 2021; Texas appropriated $13 million for a new state spay/neuter pilot. Best Friends' 2025 data show four states (Delaware, New Hampshire, Rhode Island, Vermont) are already no-kill and nearly half of US states have issued no-kill proclamations since 2024, evidence that targeted public investment and policy attention move the metrics.

## Recommendations

**Stage 1 (highest priority, directly within COGE's charter authority):**

1. **Strengthen the Office of Animal Welfare structurally.** Amend Charter Section 581 to replace the permissive “may, but need not” language with a mandate for a standalone, adequately staffed and funded office with defined authority to coordinate, set targets, and report. A single staffer on a sub-$100,000 budget cannot oversee a roughly $54 million shelter system and a five-borough animal-welfare ecosystem.
2. **Mandate transparent, standardized public reporting.** Require DOHMH and ACC to publish regular (monthly and annual) data on intake, kennel and foster capacity, length of stay, live release rate (using a single standardized methodology that resolves the owner-requested-euthanasia dispute), euthanasia, and funding, broken out by borough and, where feasible, zip code. This is a classic accountability and transparency measure a charter commission can durably establish.

**Stage 2 (structural funding basis):**

3. **Create a recurring structural funding mechanism for prevention and rescue.** Establish a dedicated, baselined funding stream for spay/neuter (the program averaging only about $316,000 per year is the single clearest underfunding finding) and a formal grant mechanism for New Hope and rescue partners, modeled on jurisdictions that fund

their rescue ecosystem. The September 2025 $500,000 Flatbush Cats allocation shows the leverage of even modest city dollars.

4. **Tie ACC operating funding to capacity and outcome targets** rather than leaving it well below the contract ceiling while the system suspends intake.

Name

# Claire

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Teacher |
| Zip Code | |
| Public Comment | Cancel all contracts with EdTech companies, like iReady. Screens are demonstrably detrimental to student learning, and we need to be investing in real materials that support learning instead of wasteful if not outright harmful digital products. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Procurement Reform × Technology × |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Education & Youth |
| Subtopic | Remove screens from classrooms |

Name

# Ralph Yozzo

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Small homeowners should not be pawns in some perverse government game of chess. My apologies to chess.

We need real time transparency whole contracts and decisions and money transfers should be disclosed in real time.

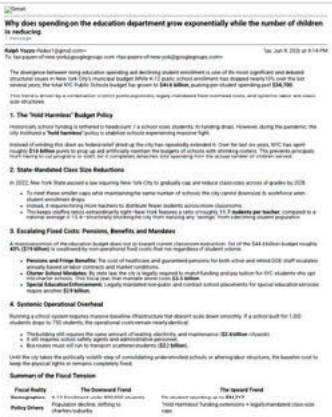
The office of Management and budget should be replaced with office of transparent budget

All the cryptic codes of units of appropriation with billions and billions of dollars have to be broken down into transparent contracts and money transfers and hiring decisions and connections to the patronage system

The exponential growth of the NYC expense budget must stop.

This is what's driving inflation.

Attachment(s)



Gmail Why does spending on the edu...



Gmail What is the largest percentage ...

| | |
|---|---|
| Date Submitted | June 11, 2026 |
| Topic | Budget Issues ✕ Reporting Requirements ✕ Unnecessary Bureaucracy ✕ |
| Method Received | Airtable Form |
| Is it charter related? | No |
| | 2 |
| Charter Related | Yes |
| Topic Simplified | Budget |
| Subtopic | Replace OMB with a transparent budget office |

Gmail

# Why does spending on the education department grow exponentially while the number of children is reducing

1 message

**Ralph Yozzo** [redacted] Tue, Jun 9, 2026 at 9:14 PM
To: [redacted]

The divergence between rising education spending and declining student enrollment is one of the most significant and debated structural issues in New York City's municipal budget. While K-12 public school enrollment has dropped nearly 10% over the last several years, the total NYC Public Schools budget has grown to **$44.6 billion**, pushing per-student spending past **$34,700**.

This trend is driven by a combination of strict political policies, legally mandated fixed overhead costs, and systemic labor and class-size structures.

## 1. The "Hold Harmless" Budget Policy

Historically, school funding is tethered to headcount: if a school loses students, its funding drops. However, during the pandemic, the city instituted a **"hold harmless"** policy to stabilize schools experiencing massive flight.

Instead of winding this down as federal relief dried up, the city has repeatedly extended it. Over the last six years, NYC has spent roughly **$1.6 billion** purely to prop up and artificially maintain the budgets of schools with shrinking rosters. This prevents principals from having to cut programs or staff, but it completely detaches total spending from the actual number of children served.

## 2. State-Mandated Class Size Reductions

In 2022, New York State passed a law requiring New York City to gradually cap and reduce class sizes across all grades by 2028.

- To meet these smaller caps while maintaining the same number of schools, the city cannot downsize its workforce when student enrollment drops.
- Instead, it requires hiring *more* teachers to distribute fewer students across more classrooms.
- This keeps staffing ratios extraordinarily tight—New York features a ratio of roughly **11.7 students per teacher**, compared to a national average of 15.4—structurally blocking the city from realizing any "savings" from a declining student population.

## 3. Escalating Fixed Costs: Pensions, Benefits, and Mandates

A massive portion of the education budget does not go toward current classroom instruction. Out of the $44.6 billion budget, roughly **43% ($19 billion)** is swallowed by non-operational fixed costs that rise regardless of student volume:

- **Pensions and Fringe Benefits:** The cost of healthcare and guaranteed pensions for both active and retired DOE staff escalates annually based on labor contracts and market conditions.
- **Charter School Mandates:** By state law, the city is legally required to match funding and pay tuition for NYC students who opt into charter schools. This fiscal year, that mandate alone costs **$3.5 billion**.
- **Special Education Enforcements:** Legally mandated non-public and contract school placements for special education services require another **$2.9 billion**.

## 4. Systemic Operational Overhead

Running a school system requires massive baseline infrastructure that doesn't scale down smoothly. If a school built for 1,000 students drops to 750 students, the operational costs remain nearly identical:

- The building still requires the same amount of heating, electricity, and maintenance (**$2.6 billion** citywide).
- It still requires school safety agents and administrative personnel.
- Bus routes must still run to transport scattered students (**$2.2 billion**).

Until the city takes the politically volatile step of consolidating under-enrolled schools or altering labor structures, the baseline cost to keep the physical lights on remains completely fixed.

## Summary of the Fiscal Tension

| Fiscal Reality | The Downward Trend | The Upward Trend |
|---|---|---|
| **Demographics** | K-12 Enrollment under 800,000 students. | Per-student spending up to **$34,717**. |
| **Policy Drivers** | Population decline, shifting to charters/suburbs. | "Hold Harmless" funding extensions + legally mandated class-size caps. |

| | | |
|---|---|---|
| **Fixed Overheads** | Fewer classrooms technically needed. | Rising healthcare, $3.5B charter payments, $2.6B facilities maintenance. |

Are you interested in seeing how the Independent Budget Office (IBO) projects these enrollment declines will impact city tax revenue over the next few fiscal years?

Gmail

# What is the largest percentage of spending in New York City budget break it down by category

1 message

**Ralph Yozzo** [redacted] Tue, Jun 9, 2026 at 9:14 PM
To [redacted]

The **largest single percentage** of spending in the New York City budget goes to **Education**, which exclusively funds the Department of Education (DOE).

According to data from the NYC Independent Budget Office (IBO), the city's expenditures break down into a clear visual framework—often represented as how the city spends every $100 of its budget. Education takes up nearly **30%** of all direct city spending. If you include localized agency pensions and fringe benefits directly tied to teachers and school staff, the education system's footprint expands closer to **36%** of total city expenditures.

## NYC Budget Breakdown by Main Category

The table below represents the generalized breakdown of how New York City allocates its total operational funding:

| Budget Category | Estimated Share (Per $100) | Major Agencies & Components |
|---|---|---|
| **Education** | **$29.71 (29.7%)** | Department of Education (DOE) |
| **Human Services** | **$16.37 (16.4%)** | Department of Social Services (DSS/HRA), Homeless Services (DHS), Administration for Children's Services (ACS) |
| **Miscellaneous / Fringe** | **$13.18 (13.2%)** | Citywide employee health insurance, judgments/claims, criminal justice coordination |
| **Public Safety & Judicial** | **$10.11 (10.1%)** | NYPD, FDNY, Department of Correction (DOC), District Attorneys |
| **City Employee Pensions** | **$8.90 (8.9%)** | Citywide pension system contributions |
| **General Government** | **$5.48 (5.5%)** | DCAS, Youth & Community Development, OTI, Finance, Mayoralty |
| **Debt Service** | **$4.14 (4.1%)** | Paying off principal and interest on municipal bonds |
| **Health** | **$3.49 (3.5%)** | Department of Health and Mental Hygiene (DOHMH), NYC Health + Hospitals |
| **Environmental Protection / Sanitation** | **$3.18 (3.2%)** | DSNY, Department of Environmental Protection (DEP) |
| **Housing** | **$1.56 (1.6%)** | HPD, NYCHA contributions |
| **City University (CUNY)** | **$1.32 (1.3%)** | Community colleges and higher-ed support |
| **Transportation & Infrastructure** | **$1.18 (1.2%)** | NYC DOT, Department of Parks & Recreation |
| **Libraries** | **$0.44 (0.4%)** | NYPL, BPL, QPL systems |

## Key Takeaways from the Data

- **The "Big Three" Legacy Blocks:** Education, Social Services, and Public Safety combined routinely account for roughly 55% to 60% of the entire municipal operating budget before citywide fixed overhead costs are factored in.
- **The Weight of Fixed Costs:** Combined, **City Employee Pensions ($8.90)** and **Debt Service ($4.14)** mean that out of every $100 the city spends, more than $13 goes immediately toward long-term financial liabilities and past investments before a single current public service is delivered.

Would you like to take a deeper look at the specific funding lines within one of these specific agency categories, or explore how the city's tax revenue streams support this spending?

Name

# Zscaler

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |

Public Comment

To Chair Patrick Gaspard, Executive Director Ann Cheng, and Members of the Commission on Government Efficiency:

Thank you for the opportunity for Zscaler to contribute to this important work. Zscaler is the zero trust cybersecurity leader. Zscaler's cloud platform accelerates digital transformation so that agencies can be more agile, efficient, resilient, and secure. Leveraging the largest security cloud in the world, Zscaler anticipates, secures, and simplifies the experience of doing business.

As the Commission examines how the New York City Charter can better equip City government to serve New Yorkers efficiently, equitably, and reliably, we offer the following perspective on one of the most consequential and underexamined dimensions of modern government operations: cybersecurity.

The Threat Is Real, and It Is Growing. Cyberattacks on municipal governments have become routine. Cities including Atlanta, Baltimore, New Orleans, and Dallas have each suffered ransomware attacks that paralyzed public services for days or weeks — disrupting benefits payments, emergency dispatch, court systems, and 311 services. New York City itself is among the most targeted jurisdictions in the country. Based on multiple reports, the cost of some individual municipal cyber incidents has exceeded $18 million in recovery and remediation and untold productivity loss. These are not abstract risks — they are direct threats to the services New Yorkers depend on every day.

Traditional Network Security Was Built for a Different Era. For decades, government IT relied on a "castle-and-moat" model: build a strong perimeter around a data center, trust everything inside it, and block everything outside. That model is obsolete. City employees now work remotely, citizens access services through mobile devices, and all rely on cloud-based applications that exist entirely outside any perimeter. Agencies share data across dozens of systems. The "moat" no longer exists yet many government networks still operate as if it does. Legacy perimeter security is expensive to maintain, brittle under attack, and fundamentally incapable of protecting a distributed, modern workforce. Government agencies report spending an estimated 80 percent of their IT budgets maintaining these outdated systems, leaving only 20 percent for innovation and improvement.

A Modern Approach Is More Agile, Resilient, and Cost-Effective. Agencies that modernize their technology infrastructure moving away from legacy, hardware dependent systems toward flexible, cloud aligned architectures consistently demonstrate dramatic cost savings and improved service continuity. McKinsey research finds that agencies shifting investment from maintenance to modernization achieve up to a 50 percent reduction in total IT costs over time. Modern infrastructure also enables agility the ability to rapidly scale services up or down, deploy new capabilities without multi-year procurement cycles, and restore operations quickly following any disruption.

Zero Trust Is the Modern Standard. Zero Trust Architecture (ZTA) is the internationally recognized framework for securing modern, distributed government operations. Standardized by the National Institute of Standards and Technology (NIST SP 800-207) and mandated for all federal agencies, Zero Trust operates on a simple, enduring principle: no user, device, or system is trusted by default every access request must be continuously verified. Critically, Zero Trust is not a product or a vendor — it is a methodology and a mindset. It is technology-agnostic, meaning it works with whatever systems a city chooses to use, today or in the future. Zero Trust can also reduce total cost of ownership over time by helping agencies retire ineffective and inefficient legacy technologies and simplify overlapping security stacks. It does not require ripping out existing infrastructure overnight; it is a framework that guides decisions over time. The enduring nature of Zero Trust ensures that innovation such as Artificial Intelligence and Quantum computing - is implemented and used safely. Gartner predicts by 2028, 50 percent of organizations will adopt zero-trust data governance as unverified AI generated data grows.

Zero Trust also advances equity. Because it enforces consistent, uniform security policy across every user and every system — regardless of agency, device, or neighborhood it closes the uneven protection gaps that too often leave lower income communities and vulnerable populations most exposed when city systems fail. Every New Yorker who interacts with City services digitally deserves the same level of protection.

Why This Matters to the Charter Revision Commission. Mayor Mamdani has charged the Commission with removing outdated barriers, equipping agencies with the tools they need to deliver programs effectively, and modernizing government to improve efficiency and savings. The New York City Charter already vests in the Office of Technology and Innovation a mandate to pursue long-range technology strategy, ensure data security, and provide telecommunications coordination in support of disaster recovery (NYC Charter §1072). Yet most of the Charter was written before cloud computing, remote work, ransomware, and artificial intelligence reshaped the threat landscape. A forward-looking update to the Charter is the inclusion of the creation of Cyber Command. A charter built for 21st-century government must continue to reflect 21st century realities.
Cybersecurity is not a technical footnote it is foundational infrastructure, as essential to service delivery as roads and buildings. A government that cannot protect its data cannot efficiently serve its people. A network that fails under attack cannot equitably deliver benefits, health services, or emergency response. And a technology framework locked into expensive legacy systems cannot be agile enough to keep pace with New Yorkers' needs.

The Commission has a rare opportunity to ensure that the City's governing document reflects the enduring principles not the specific technologies of a secure, modern, and resilient digital government. Zero Trust, as a durable and vendor-neutral framework, offers exactly that kind of principled foundation.

For questions or follow up on this submission please contact Drenan Dudley, Head of Zscaler State, Local, Tribal, and Territorial Government Partnerships, [redacted]

Attachment(s)



Zscaler Testimony to NYC COGE.docx

Date Submitted: June 11, 2026

Topic: Technology ✕ | Unnecessary Bureaucracy ✕ | Reporting Requirements ✕

Method Received: Airtable Form

Is it charter related? Yes

1

Charter Related: Yes

Topic Simplified: Technology

Subtopic: Improve cybersecurity

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For questions or follow up on this submission please contact Drenan Dudley, Head of Zscaler State, Local, Tribal, and Territorial Government Partnerships, [redacted]

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Name

## Katherine Listrovoy

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Hello. Let me start by saying that I love the impact the new NYC government has already made in all 5 boroughs under the leadership of Mayor Mamdani. Even more, love the transparency and frequent communication on socials on all ongoing projects, success stories, and honest updates on what still needs work. Having said that, given how high of a priority the well-being of children is to the new administration, can we do something about kids' playgrounds? The playgrounds in my area ([redacted] in Brooklyn) look like abandoned battlefields in some places. In other places, a construction of a single bathroom has been going on for what feels like 23.5 years, where half of the playground is fenced off and designated as "construction zone", and the other half is falling apart (see "West Playground" at W 1st Street and Ave Z in Brooklyn), making it very difficult for kids to enjoy any part of the playground. I myself have two girls under 10 years of age, and the neighborhood is full of families with kids. I do believe the "less fancy" neighborhoods deserve better playgrounds just as much as some other up and coming neighborhoods. Would appreciate if attention could be given to this.
Thank you.
Katie

Attachment(s)

Drop files here or click to browse

Date Submitted June 11, 2026

Topic

Department of Buildings (DOB) Issues ×
Unnecessary Bureaucracy ×
Enforcement ×
Real Estate and Development ×

| | |
|---|---|
| Method Received | Airtable Form |
| Is it charter related? | |
| | |
| Charter Related | No |
| Topic Simplified | Public Realm |
| Subtopic | Improve playgrounds |

Name

# Lakshmi kavya chunduri

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Capital Markets Technology Strategist \| capitalmarketsinsights.com |
| Zip Code | |
| Public Comment | I am an independent policy researcher and Capital Markets Technology Strategist who has built the US Tax Relief Opportunity Index — a data-driven analysis of tax burden, public services quality, and relief opportunities across all 50 states, using IRS SOI 2023, Tax Foundation 2026, Census ACS 2023, ASCE 2025, and Pew Fiscal 50 data.<br><br>New York ranks #1 in combined state and local tax burden nationally at 15.9% of income 59% above the national average of 10%. For a working class NYC household earning $75,000, this translates to $4,700–$6,200 in excess annual taxes versus the median US state.<br><br>I am submitting three data backed relief proposals for COGE's consideration: (1) Expand NYC Earned Income Credit and raise the income tax entry threshold — saving qualifying households $800–$1,400 annually; (2) Property tax class equalization to reduce renter pass through burden saving tenant households $400 $900 annually; (3) A NYC Sales Tax Rebate for households under $50,000, funded through hotel occupancy surcharge rebalancing.<br><br>Full interactive analysis and methodology: https://us_tax_relief_dashboard.netlify.app |

Attachment(s)




NY Tax Relief Policy Brief Mamdani.pdf

Date Submitted: June 11, 2026

Topic: Budget Issues, Tenant Protection, Real Estate and Development, Reporting Requirements

Method Received: Airtable Form

Is it charter related? No

1

Charter Related: Yes

Topic Simplified: Budget

Subtopic: Tax reform

**Lakshmi Kavya Chunduri**

Capital Markets Technology Strategist | [redacted]

June 2026

POLICY BRIEF

# New York's Working-Class Tax Crisis

Independent data analysis and targeted relief proposals for the Mamdani administration's affordability agenda

New York State imposes the highest combined state and local tax burden in the United States — averaging **15.9% of income** for working and middle-class households, compared to a national average of 10.0%. For a family earning $75,000 in New York City, that translates to roughly **$4,700–$6,200 more in annual taxes** than the same family would pay in the median US state. This brief, drawn from the US Tax Relief Opportunity Index (an independent, data-driven analysis covering all 50 states), identifies three specific, legislatively actionable relief opportunities aligned with Mayor Mamdani's affordability agenda.

| #1 | 15.9% | $6,200+ | ~2.8M |
|---|---|---|---|
| NY ranked highest tax burden nationally | Average state+local effective rate | Extra annual tax vs. US median state | NYC working-class households affected |

## KEY FINDINGS — WHERE THE BURDEN FALLS HARDEST

### Finding 1 — Income Tax: Steep rates with limited low-income relief

New York's top marginal rate of 10.9% is the third-highest in the nation. More critically for working-class households, the 6.85% bracket kicks in at just $17,150 for single filers — far below comparable income thresholds in peer states. NYC's additional 3.876% city income tax compounds this, meaning a sanitation worker or subway operator earning $65,000 faces a combined marginal rate exceeding 10.7% on most of their income — before federal taxes.

*Source: NY Tax Law §601; Tax Foundation 2026 State Tax Competitiveness Index*

### Finding 2 — Property Tax: Regressive burden on outer-borough renters

While NYC property taxes are nominally below the national average as a share of home value for Class 1 properties, the burden is structurally regressive: Class 2 rental buildings (where working-class families rent) carry effective rates 2–3x higher than owner-occupied homes, and landlords pass these costs through to rents. The ASCE 2025 infrastructure report cards show NY infrastructure scored C+, meaning residents pay high property taxes relative to service quality received.

*Source: NYC Dept. of Finance; ASCE 2025 Report Card; IRS SOI 2023*

### Finding 3 — Sales Tax: 8.875% in NYC hits low-income households disproportionately

NYC's combined sales tax rate of 8.875% (state 4% + NYC 4.5% + MTA 0.375%) is among the highest in the nation. Since lower-income households spend a higher share of income on taxable goods, the effective sales tax burden as a share of income is roughly 2.1x higher for households earning under $35,000 than for those earning over $150,000. Food and prescription drugs are exempt, but clothing, personal care, transit-adjacent purchases, and essential household goods are fully taxed.

*Source: NYS Dept. of Taxation; Census ACS 2023; Tax Foundation*

## THREE TARGETED RELIEF PROPOSALS

### Expand the NYC Earned Income Credit & Lower the Income Tax Entry Threshold

• Raise the income floor at which the 6.85% bracket applies from $17,150 to $35,000 for single filers, indexed to inflation.

• Expand the NYC Earned Income Credit from 30% to 45% of the federal EITC for households earning under $50,000.

• Estimated annual relief: $800–$1,400 per qualifying household.

• Estimated NYC revenue cost: $900M–$1.3B annually — partially offsetable through targeted commercial real estate tax reform.

***Why this fits the Mamdani agenda:*** *Directly addresses income tax regressive bite on sanitation workers, transit workers, healthcare aides, and other essential workers who form the backbone of Mayor Mamdani's base.*

### Property Tax Class Equalization — Reduce Renter Pass-Through Burden

• Reform Class 2 property assessment ratios to reduce the structural gap between owner-occupied and rental property effective rates.

• Cap annual assessment increases on Class 2 buildings at 4% where landlords demonstrate rent-stabilized tenant occupancy above 60%.

• Require transparency reporting: landlords must disclose property tax pass-through amounts in lease agreements.

• Estimated tenant benefit: $400–$900 per year per household in affected buildings.

***Why this fits the Mamdani agenda:*** *This is the most politically achievable proposal — it requires state legislative action but has strong precedent and aligns with existing rent stabilization infrastructure the city already administers.*

### Sales Tax Rebate Program for Households Under $50,000

• Create an annual NYC Sales Tax Rebate of up to $350 per household for NYC residents earning under $50,000, filed with city income tax return.

• Funded through a modest increase in the hotel occupancy surcharge (currently 5.875%), shifting burden from residents to visitors.

• Implementation model: mirror the existing NYC School Tax Relief (STAR) rebate administrative infrastructure.

• Estimated program cost: $680M–$850M; hotel surcharge increase of 1.5–2% generates approximately $600M–$750M annually.

***Why this fits the Mamdani agenda:*** *Directly reverses the regressive impact of the 8.875% sales tax on low-income New Yorkers without reducing the city's overall revenue base.*

**Interactive Tool Available:** The US Tax Relief Opportunity Index provides state-by-state burden analysis, service scorecards, and relief simulators for all 50 states. The New York module includes a household-level tax calculator showing exact burden vs. national average by income bracket and filing status. Available at: **https://us-tax-relief-dashboard.netlify.app**

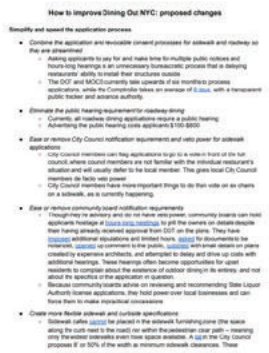
**Author:** Lakshmi Kavya Chunduri is a Capital Markets Technology Strategist with 10+ years of experience in financial services infrastructure. She publishes independent policy and market analysis at [redacted]

**Data Sources & Methodology:** IRS Statistics of Income (2023) · Tax Foundation State Tax Competitiveness Index (2026) · US Census ACS (2023) · ASCE Infrastructure Report Cards (2025) · Pew Fiscal 50 (2024) · Bureau of Economic Analysis (2024) · NYC Dept. of Finance · NYS Dept. of Taxation. Tax calculations use simplified bracket models. Revenue cost estimates are order-of-magnitude projections; formal fiscal notes from state and city budget offices are required before legislative action. For policy research and public education purposes only.

© 2026 Capital Markets Insights | Lakshmi Kavya Chunduri | AI-Assisted Analysis

Name

# Corey Hannigan

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Transportation Alternatives |
| Zip Code | |
| Public Comment | As requested at the June 9th hearing, please see (attached) our proposed specific changes to the charter regarding the outdoor dining program. |
| Attachment(s) |  How to improve outdoor dining in NYC ... |
| Date Submitted | June 11, 2026 |
| Topic | Real Estate and Development ✕ Department of Buildings (DOB) Issues ✕ Unnecessary Bureaucracy ✕ |
| Method Received | Airtable Form |

| | |
|---|---|
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Outdoor dining |

# How to improve Dining Out NYC: proposed changes

## Simplify and speed the application process

- *Combine the application and revocable consent processes for sidewalk and roadway so they are streamlined*
    - Asking applicants to pay for and make time for multiple public notices and hours-long hearings is an unnecessary bureaucratic process that is delaying restaurants' ability to install their structures outside
    - The DOT and MOCS currently take upwards of six months to process applications, while the Comptroller takes an average of 8 days, with a transparent public tracker and advance authority.

- *Eliminate the public hearing requirement for roadway dining*
    - Currently, all roadway dining applications require a public hearing
    - Advertising the public hearing costs applicants $100-$800

- *Ease or remove City Council notification requirements and veto power for sidewalk applications*
    - City Council members can flag applications to go to a vote in front of the full council, where council members are not familiar with the individual restaurant's situation and will usually defer to the local member. This gives local City Council members de facto veto power.
    - City Council members have more important things to do than vote on six chairs on a sidewalk, as is currently happening.

- *Ease or remove community board notification requirements*
    - Though they're advisory and do not have veto power, community boards can hold applicants hostage at hours-long meetings to grill the owners on details despite their having already received approval from DOT on the plans. They have imposed additional stipulations and limited hours, asked for documents to be notarized, opened up comment to the public, quibbled with small details on plans created by expensive architects, and attempted to delay and drive up costs with additional hearings. These hearings often become opportunities for upset residents to complain about the existence of outdoor dining in its entirety, and not about the specifics of the application in question.
    - Because community boards advise on reviewing and recommending State Liquor Authority license applications, they hold power over local businesses and can force them to make impractical concessions

- *Create more flexible sidewalk and curbside specifications*
    - Sidewalk cafes cannot be placed in the sidewalk furnishing zone (the space along the curb next to the road) nor within the pedestrian clear path – meaning only the widest sidewalks even have space available. A bill in the City Council proposes 8' or 50% of the width as minimum sidewalk clearances. These

sidewalk dimension requirements are even more onerous than the pre-pandemic Outdoor Dining program
    - Businesses with small frontages should be able to formally and simply request and receive approval from neighboring businesses to use their sidewalk or roadway space, as many have been doing informally.

- *Expand design options*
    - Onerous design guidelines severely restrict possible designs. For instance, if you want to create a vertical screen on your roadway dining structure, it must be transparent; must only be mounted on the roadway side of the structure, at the top and not the outside; can't be within 50' of a sign; can only reach 6' above the floor; and must be easily removable, wind-resistant, and made of fire-resistant grade materials.
    - Materials should be specified only when single materials are drastically safer than others.
    - More flexible dimension and material requirements would speed up the DOT's review process, which currently takes upwards of six months
    - The pandemic-era program relaxed design guidelines, resulting in creative and beautiful designs that contributed significantly to NYC's streetscape.

- *Simplify liquor licensing and liability insurance requirements*
    - Applicants are required to obtain separate liquor licenses for their sidewalk and roadway dining from their indoor licenses, and can't apply for these additional licenses until their application has been approved – drawing out the timelines before outdoor dining set-ups can begin operating further.
    - Liquor liability insurance also must be approved separately for outdoor spaces from indoor, adding additional costs and bureaucratic hurdles.

- *Provide support for application processes*
    - Allow applicants to save and return to their applications
    - An in-person service desk with translation services should be created to help guide applicants through the process.
    - Allow applicants to pay their revocable consent fees in quarterly installments to lessen the upfront cost.

- *Allow applicants to begin operation of their proposed outdoor dining set-ups while their applications are under review by DOT and MOCS*
    - This is already standard practice for the Comptroller and the State Liquor Authority.
    - Nearly as many outdoor dining applications are in processing limbo as are approved, restricting many businesses' operations during the busiest time of the year, as well as the Knicks championship games and World Cup
    - Some applications have taken more than a year to get approved

**Make it year-round**

- *Allow restaurants to participate in the outdoor dining program year-round*
    - Roadway dining is a key offering in the program, as many sidewalks are not wide enough to accommodate tables. But with only seasonal permitting, restaurants have to put up, take down, and store the materials to build out the structures each year. This is an additional cost and space requirement that shifts roadway dining out of reach for many businesses. Roadway dining can cost businesses more than $35,000, including thousands of dollars in city fees, construction costs, and insurance.
    - Pushing more businesses into the street would open up New York City's crowded sidewalks and ensure that pedestrians' mobility is prioritized. Even at the peak of the COVID-era program, the thousands of restaurants that moved into the street impacted less than 1% of New York's curbside parking spaces.
    - When restaurants have to prioritize structures that can be easily taken apart and stored, they have to sacrifice elsewhere, and the resulting structures are much less attractive and pleasant.
    - The winter season lasts just four months, so the effect of seasonality is mostly to discourage participation.
    - The winter months are unpredictable, and there are plenty of warm days in that time that businesses cannot capitalize on

**Resources:**

- Additional information
- Digging In to Dining Out, Open Plans

Name

## Tairine (Ty) Rosa

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|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Dear Members of the Commission on Government Efficiency,

My name is Ty Rosa, and I am a New York City resident in Harlem. I am writing about a government-modernization and technology-governance question that fits squarely within this Commission's review of how the City equips its agencies to work efficiently and accountably.

The City already issues a smartphone to every NYPD officer. The de Blasio administration launched a $160 million Mobility Initiative, and the Department now fields roughly 36,000 city owned iPhones. These devices do real work: they connect to the Domain Awareness System, pull real-time 911 data, and let officers file reports in the field. The problem is not the phones. It is that the City has never finished the job of governing them. On the very device the City pays for, an officer can still scroll social media or play a game while on patrol. Mayor Adams said publicly in 2022 that the City would take "very aggressive actions to make sure police are patrolling our subway system and not patrolling their iPhones," and his own office called on duty personal phone use "a tactical problem that could possibly pose a risk to both the officer and to members of the public." Years later, the device policy still has not closed that gap. This is also one of the most common complaints New Yorkers make about everyday policing: riders regularly describe officers standing in groups with their heads down on their phones while no one is watching the platform.

The fix is inexpensive and standard. Every modern enterprise manages its work phones through Mobile Device Management software, and federal criminal-justice security rules already require it for police devices. With the City's existing iPhones placed in "supervised" mode, the City can block the App Store, social media, and games on duty while preserving every legitimate work function. This is not new hardware and not a new contract. It is configuration of devices the City already owns, and it costs a rounding error against the more than $205 million the City paid in NYPD misconduct settlements in 2024 alone.

There is also an accountability and public-records dimension this Commission should care about. When public business happens on personal phones or disappearing message apps, it escapes the City's records and the public's right to know. City owned, centrally managed devices keep that business on auditable, FOIL-accessible systems and out of consumer apps, and they give oversight bodies a reliable record to review.

This is ultimately a structural question about how the City governs its technology, which is why it belongs before this Commission. I respectfully urge the Commission to:

Adopt a Charter level technology governance and device accountability standard requiring that City agencies issuing mobile devices to public-facing and public-safety personnel own and centrally manage those devices, so that personal and recreational use can be restricted while on duty.

Require that work communications on City issued devices be retained and accessible under public records law, and that City business not be conducted on disappearing-message apps.
- Ensure that the relevant oversight bodies have access to device-use audit records, so on duty conduct can be reviewed when needed.

These are durable, agency-neutral reforms that fit the Commission's mandate to modernize government and improve efficiency. They would make the City's existing investment work as intended, protect the public and officers, and keep government accountable.

I have attached a supplementary document with additional information and research.

Thank you for your time and for the opportunity to comment.

Attachment(s)


The Case for Restricted, City-Owned Work Phones for the NYPD
An Evidentiary Research Backbone for COGE
Summary
Key Findings

NYPD-Restricted-Phones-Research.pdf

Date Submitted: June 11, 2026

Topic: Technology, Policing, Support Oversight Agencies, Reporting Requirements

Method Received: Airtable Form

Is it charter related? Yes

1

Charter Related: Yes

| | |
|---|---|
| Topic Simplified | Technology |
| Subtopic | Improve City governance of mobile devices |

Name

# Tairine (Ty) Rosa

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Dear Members of the Commission on Government Efficiency,

My name is Ty Rosa, and I am a New York City resident in Harlem. I am writing to ask the Commission to fix a structural gap in how our city governs surveillance technology, and to recommend specific Charter reforms that would make every city agency accountable for the tracking tools it operates.

Over the last few years, New York City has quietly become one of the most heavily surveilled places in the country. The community mapping project DeFlock documents close to 1,000 automated license plate reader cameras across the five boroughs, many of them tagged to city agencies including the Department of Transportation. These are not speed or red light cameras that activate when a driver breaks the law. They photograph every passing vehicle, read its plate, and record where it was and when, building a searchable history of the movements of millions of New Yorkers who are suspected of nothing.

Here is the structural problem this Commission can solve. New York City has exactly one law governing surveillance technology, the POST Act of 2020, and by its own terms it applies only to the Police Department. Every other city agency that runs surveillance equipment, including the Department of Transportation, does so with no required public disclosure, no public comment before deployment, no independent audit, and no reporting on who receives the data. We hold one agency to a standard and leave the rest of city government's tracking networks entirely unaccountable. That is not efficient government. It is a gap, and it is exactly the kind of structural defect this Commission exists to repair.

The gap is dangerous because this data does not stay where it is collected. Across the country, these networks have been searched by local police on behalf of federal immigration authorities, and in one documented case to hunt for a woman who had an abortion. New York is a sanctuary city, and our laws forbid city agencies from helping federal civil immigration enforcement without a judicial warrant. Yet because no oversight law covers these cameras, there is no public accounting of whether our own surveillance data is being shared in ways that violate those protections.

The technology is also unreliable in ways that harm real people. Independent testing found that roughly one plate read in ten was wrong, and misreads have led to innocent drivers being stopped at gunpoint and jailed. Researchers have separately found these cameras' live video feeds sitting unsecured on the open internet. We are collecting enormous amounts of sensitive data on ordinary residents, sharing it widely, securing it poorly, and answering to no one.

Cities across the country are removing these cameras, and New York should not need a scandal to act. I respectfully urge the Commission to:

- Establish a surveillance oversight office in the Charter with authority over every city agency, not only the Police Department, so that no agency can

deploy tracking technology in secret.
Require public review before deployment, so that every agency must publish an impact and use policy and hold a public comment period before acquiring or operating any surveillance technology.
Mandate transparent annual public reporting on every surveillance system the city operates, including its data retention period and every instance of data sharing with other agencies, other states, and the federal government.
- Establish a Charter data firewall barring the sharing of city surveillance data with federal or out of state agencies for civil immigration enforcement absent a judicial warrant, and require that camera networks now operating without oversight be brought through public review or decommissioned.

These are durable, structural reforms that fit the Commission's efficiency mandate. They would consolidate a fragmented oversight system, restore public control over how New Yorkers are watched, and ensure that the city's most surveilled residents are protected rather than exposed.

I have attached a PDF with additional information and research.

Thank you for your time and for the opportunity to comment.

Attachment(s)


The Case Against Mass License Plate Surveillance in New York City
A Research Brief in Support of Charter-Level Surveillance Oversight
Purpose
1. New York City has built a mass vehicle tracking network
2. The structural problem: one law, one agency

Research_Brief_NYC_License_Plate_Surv...

Date Submitted: June 11, 2026

Topic: Technology ✕ | Support Oversight Agencies ✕ | Enforcement ✕ | Reporting Requirements ✕

Method Received: Airtable Form

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|---|---|
| Is it charter related? | Yes |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Improve City governance of mobile devices |

# The Case Against Mass License Plate Surveillance in New York City

A Research Brief in Support of Charter-Level Surveillance Oversight

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## Purpose

This brief documents the scale, the harms, and the accountability gap surrounding automated license plate reader (ALPR) camera surveillance in New York City. It is submitted to support a public comment urging the Commission to place a structural surveillance oversight amendment on the November 3, 2026 ballot. The core finding is simple: New York City has built a vast vehicle tracking network across multiple agencies, yet its only surveillance accountability law reaches a single agency, leaving the rest of city government to watch New Yorkers with no public oversight at all.

## 1. New York City has built a mass vehicle tracking network

- DeFlock, a community mapping project that documents the locations of automated license plate readers, maps close to 1,000 ALPR cameras across New York City, with many entries tagged to city operators including the Department of Transportation.
- These are not red light or speed cameras that activate only when a driver commits a violation. ALPR cameras photograph every passing vehicle, capture and read the plate, and record the date, time, and location, whether or not the driver is suspected of anything.
- At this density the cameras function as a dragnet: a continuous, searchable log of where ordinary New Yorkers drive, park, worship, seek medical care, attend protests, and visit family. The record of a person's movements, assembled over months, reveals far more than any single trip.

## 2. The structural problem: one law, one agency

- New York City's only surveillance accountability law is the Public Oversight of Surveillance Technology Act (POST Act), Local Law 65 of 2020, codified at Administrative Code Section 14-188.
- By its own terms, the POST Act applies only to the New York City Police Department. Its definition of surveillance technology covers equipment operated by or at the direction of the department, and every obligation it imposes runs to the NYPD alone.
- Every other city agency that operates surveillance infrastructure, including the Department of Transportation, falls outside the law. Those agencies face no requirement to publish an impact and use policy, no public comment period before deployment, no independent audit, and no obligation to report who their data is shared with.
- The result is an architectural defect. The city holds one agency's cameras to a standard and leaves the surveillance networks of the rest of city government entirely unaccountable.

This is the gap a Charter amendment can close, and it is squarely within the Commission's structural mandate.

## 3. How the technology works, and where it is heading

- ALPR systems use cameras and optical character recognition to read plates automatically, check them against lists, and store every read in a database that can be searched across time and across jurisdictions.
- Flock Safety, the largest vendor in this market, reports operating in more than 5,000 communities and performing more than 20 billion vehicle scans each month. Reporting by 404 Media places its network above 40,000 cameras nationwide.
- The technology no longer merely reads plates. Flock's Vehicle Fingerprint machine learning system identifies a vehicle by make, model, color, and distinguishing features such as bumper stickers, dents, and roof racks, which allows a vehicle to be tracked even with no plate visible. Newer plain language search tools let an operator query the national network in ordinary words.
- This is function creep by design. A system sold for one narrow purpose becomes a general tool for identifying people and reconstructing their patterns of life, and the data feeds machine learning models that grow more capable over time.

## 4. Mass surveillance and the erosion of privacy

- In Carpenter v. United States (2018), the Supreme Court held that the government conducts a search when it accesses the kind of comprehensive location record that lets it reconstruct a person's movements. Chief Justice Roberts warned that such tracking achieves near perfect surveillance.
- A Norfolk, Virginia court applied that reasoning to a Flock ALPR network in 2024, comparing the system to a tracking device and finding warrantless collection unconstitutional.
- New York's own constitution offers heightened protection. In People v. Weaver (2009), the New York Court of Appeals recognized the serious dangers of prolonged location tracking.
- New York City's ALPR network collects exactly this kind of comprehensive movement data on millions of people, with no warrant requirement and, outside the NYPD, no oversight whatsoever.

## 5. The cameras are turned against immigrants and other vulnerable New Yorkers

- ALPR data does not stay where it is collected. In May 2025, 404 Media reported that records from an Illinois police department showed more than 4,000 searches of a national ALPR network run by local and state police on behalf of, or as an informal favor to, federal authorities, including for immigration purposes, even though Immigration and Customs Enforcement held no contract of its own.

- The Electronic Frontier Foundation documented a search by a Texas official annotated to look for a woman who had an abortion, a query that reached thousands of networks and tens of thousands of cameras across the country.
- New York City is a sanctuary city. Local law bars city agencies from assisting federal civil immigration enforcement absent a judicial warrant. A surveillance network that can be queried, directly or indirectly, by federal or out of state agencies puts those protections at risk, and because no oversight law covers DOT and other agencies, there is no public accounting of whether city camera data is being shared in violation of sanctuary protections.

## 6. The technology is unreliable, and the errors are dangerous

- Independent testing of Flock's camera by the surveillance research firm IPVM found a 10 percent error rate, misidentifying roughly one plate in ten.
- Misreads have severe real world consequences. In one documented case, a single misread digit led to a driver being pulled from his car, attacked by a police dog, and jailed before the matter was settled.
- A system that scans every vehicle and acts on automated matches will produce wrongful stops at scale, and the people most often harmed are those least able to absorb the consequences of a police encounter that should never have happened.

## 7. The data is not secure

- In December 2025, security researchers found that Flock had left live video feeds and administrator panels for dozens of its AI enabled cameras exposed on the open internet, with no encryption and no login required.
- The Electronic Frontier Foundation obtained data representing more than 12 million searches of the Flock network logged by thousands of agencies over roughly a year, finding routine warrantless use far beyond any specific investigation.
- A surveillance database is only as safe as its weakest custodian. The more cameras the city operates without audit, the larger the breach surface and the greater the risk to every resident whose movements are logged.

## 8. Cities across the country are removing these cameras

- According to NPR (February 2026), at least 30 localities deactivated or cancelled their ALPR contracts in the prior year over surveillance and immigration concerns.
- Austin, Texas let its contract lapse after an audit found that a large share of police searches lacked proper documentation, then passed a law requiring council approval before any future license plate reader use.
- State officials in Illinois and California determined that the vendor's data sharing violated state law, and a United States senator's office documented federal agency access to the network and advised local officials that the surest protection for residents is to remove the cameras.

## 9. The efficiency case (why this fits the Commission's mandate)

- The Commission's charge is to make city government work more efficiently and to modernize how it operates. Surveillance oversight in New York is fragmented and outdated: a single 2020 law aimed at one agency, overtaken by a build out of tracking infrastructure across multiple agencies.
- Consolidating surveillance accountability into one Charter level structure that covers every agency is exactly the kind of structural modernization the Commission exists to recommend. It ends the patchwork, removes duplication, and gives the public one clear, enforceable standard instead of a single agency rule that the rest of government can sidestep.

## 10. What the Commission should do

A Charter amendment placed before the voters should:

1. Establish a Charter level surveillance oversight function with authority over every city agency, not only the Police Department.
2. Require every agency to publish an impact and use policy and complete a public comment period before acquiring or deploying any surveillance technology.
3. Mandate annual public reporting on every surveillance technology in use, its data retention period, and every instance of inter agency, out of state, and federal data sharing.
4. Establish a Charter data firewall barring the sharing of city surveillance data with federal or out of state agencies for civil immigration enforcement absent a judicial warrant.
5. Require that camera networks now operating without oversight be brought into compliance through public review, or be decommissioned.

Name

## Shane Quinlan

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|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | I would like funds diverted from EdTech products to resources for students and teaching professionals. EdTech products are not only ineffective, they are actively harmful to students. Kids like mine don't need "Dojo Island time" and I don't need them to be "proficient at screens for the workplace." I want my kids to think critically, retain what they learn, and develop lifelong skills backed by decades of research. No more techbro scams. No more flimsy "progress" promises. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Technology ✕ Budget Issues ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Education & Youth |

| | |
|---|---|
| Subtopic | Remove screens from classrooms |

A Name

## Leah Bannon

| | |
|---|---|
| A Email | [redacted] |
| A Professional Affiliation | |
| A Zip Code | [redacted] |

Public Comment

My name is Leah Bannon, I am speaking only in a personal capacity tonight. I have experience as a federal contractor, as a government employee and cross-agency advisor at 18F and the United States Digital Service, which was established by President Obama to fix big tech problems like healthcare.gov. I then stayed and accepted a position career civil servant.

I testify tonight to encourage you to prioritize enabling agencies to hire small, digital service teams who can coordinate with a centralized IT for shared resources. I do not recommend large IT contracts if you hope to deliver efficient, quality public services.

Even under the best circumstances, there is a pervasive and constant tax on efficiency and quality when contracting tech services due to their constant prioritization on business development. This arises in a myriad of ways I could speak to more in Q&A.

As an alternative,

In order to efficiently build excellent digital services the public wants, we have learned you need to start with small, empowered teams inside agencies.

Agencies often asked the US Digital Service to send engineers to help, but instead we sent

Small, multi-disciplinary teams of 6-8 experts in experience design, product strategy, legal or policy, as well as engineers
Who partnered closely with expert civil servants,
And interviewed members of the public,
To map out the public's end to end experience trying to obtain and manage a government service
And the underlying processes and systems civil servants use to deliver it

We used this service design approach to quickly identify the public's biggest pain points and the agencies' biggest opportunities for efficient improvements - often in about a month. This also allows us to obviate whole sections of a process, instead of endlessly fine tuning and building on bad ones.

Three main lessons we've learned from this model
First, these teams are most successful when they are hired and work directly in the agency, building with and for the people who will use the solutions they develop.
Second, they need to be able to rely on a centralized IT program that provides efficiencies of scale through shared services, infrastructure, practice area guidance, and quality check ins. This helps provide consistent experiences for the public and prevents each agency from reinventing the wheel or paying extra for the same tooling over and over.
and THIRD, over time, these teams should use what they've learned to reorient agencies around service delivery and the public's needs – you should

measure success by asking them to report on the public's top pain points and if they've resolved them
The public shouldn't need to understand how the government is structured to get a benefit or service

Finally, I can also recommend a USDS pilot program to quickly hire these qualified staff in alignment with government rules. USDS found success with a program that pooled applicants in a large hiring program, had SMEs review resumes first, and then handed those resumes over to HR approval. This then allowed HR to provide agencies with an approved and vetted list of candidates to recruit from.

Please see attached document for additional links and resources:
How to deliver good public digital services: Operational strategy and tactics
USDS improved hiring pilot program
18F De-risking Guide for contracting
UK Government Digital Service - Service Standard
18F's archive of guides and principles that guided their work
Digital State Capacity After the Age of DOGE from the Vanderbilt Policy Accelerator
USDS Discovery Sprints
What it will take to deliver for New Yorkers: modernize the civil service and hiring process
Colorado IT reform strategy

Attachment(s)



COGE testimony.pdf

Date Submitted: June 11, 2026

Topic: Technology, Procurement Reform, Unnecessary Bureaucracy, Reporting Requirements

Method Received: Airtable Form

| | |
|---|---|
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Hire digital service teams to coordinate with centralized IT |

My name is Leah Bannon, I am speaking only in a personal capacity tonight. I have experience as a federal contractor, as a government employee and cross-agency advisor at 18F and the United States Digital Service, which was established by President Obama to fix big tech problems like healthcare.gov. I then stayed and accepted a position career civil servant.

I testify tonight to encourage you to prioritize enabling agencies to hire small, digital service teams who can coordinate with a centralized IT for shared resources. I do not recommend large IT contracts if you hope to deliver efficient, quality public services.

Even under the best circumstances, there is a pervasive and constant tax on efficiency and quality when contracting tech services due to their constant prioritization on business development. This arises in a myriad of ways I could speak to more in Q&A.

As an alternative,

In order to efficiently build excellent digital services the public wants, we have learned you need to start with small, empowered teams inside agencies.

Agencies often asked the US Digital Service to send engineers to help, but instead we sent

- Small, multi-disciplinary teams of 6-8 experts in experience design, product strategy, legal or policy, as well as engineers
- Who partnered closely with expert civil servants,
- And interviewed members of the public,
- To map out the public's end to end experience trying to obtain and manage a government service
- And the underlying processes and systems civil servants use to deliver it

We used this service design approach to quickly identify the public's biggest pain points and the agencies' biggest opportunities for efficient improvements - often in about a month. This also allows us to obviate whole sections of a process, instead of endlessly fine tuning and building on bad ones.

Three main lessons we've learned from this model

- First, these teams are most successful when they are hired and work directly in the agency, building with and for the people who will use the solutions they develop.
- Second, they need to be able to rely on a centralized IT program that provides efficiencies of scale through shared services, infrastructure, practice area guidance, and quality check ins. This helps provide consistent experiences for the public and prevents each agency from reinventing the wheel or paying extra for the same tooling over and over.
- and THIRD, over time, these teams should use what they've learned to reorient agencies around service delivery and the public's needs – you should measure success by asking them to report on the public's top pain points and if they've resolved them

    - The public shouldn't need to understand how the government is structured to get a benefit or service

Finally, I can also recommend a USDS pilot program to quickly hire these qualified staff in alignment with government rules. USDS found success with a program that pooled applicants in a large hiring program, had SMEs review resumes first, and then handed those resumes over to HR approval. This then allowed HR to provide agencies with an approved and vetted list of candidates to recruit from.

- How to deliver good public digital services: Operational strategy and tactics – my whitepaper explains above concepts further
- USDS improved hiring pilot program
- 18F De-risking Guide for contracting
- UK Government Digital Service - Service Standard
- 18F's archive of guides and principles that guided their work
- Digital State Capacity After the Age of DOGE from the Vanderbilt Policy Accelerator
- USDS Discovery Sprints
- What it will take to deliver for New Yorkers: modernize the civil service and hiring process
- Colorado IT reform strategy

Name

# Naomi Kaufman

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

When an emergency vehicle goes by with its siren blaring - while I'm thankful for emergency vehicles - I wish that they weren't hurting my ears. Sometimes it's so loud even when streets are empty at 10pm or 2am. I think the sound is way above what we can/should tolerate? I think there should be a ramping down of the siren volume- to help reduce noise pollution.

Attachment(s)

Drop files here or click to browse

Date Submitted June 11, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic

Name

# Naomi Kaufman

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Ramps should be built in every subway station to make them accessible. Ramps are easy to use, don't need a lot of maintenance, they don't break down, you won't have to hold your nose because people probably won't all pee there (like they do in elevators). It's time to make all the stations accessible. Ramps are great! |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Real Estate and Development ✕<br>Department of Buildings (DOB) Issues ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | MTA |

Subtopic

Name

# Evelyn

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | None; resident |
| Zip Code | [redacted] |
| Public Comment | I am writing today about a complaint my mother made regarding her apartment building formally registered through 311. For many years now, she has encountered zero response and much less satisfactory resolutions to issues with her apartment using 311 (and certainly not through direct contact with her landlord which is virtually impossible to get a hold of. They never answer the phone or emails). In her case, the landlord is never accessible and we have to contact 311 to ever hear from anyone regarding repairs and issues in the apartment. Even when they respond through 311, they are rarely ever held accountable for anything. Certainly not for many years in her case. Most recently she has leaking in her apartment which took many months to be responded to despite there being a porter living on site (who is also lacy unresponsive or passes on messages to the landlord which are rarely ever responded to). Finally an inspector called my mother yesterday at nearly 8pm at night to verify the work that had been done!! My mother was ready for bed so late at night and naturally refused to allow the inspector in her apartment at such a late hour. The next day my mother received a notice that the case had been closed. The inspector had not even reviewed the work done in person by the landlord and yet was able to close out the case. There are many more examples like this where the landlord is doing whatever they want and are never addressing the needs and concerns of their tenants who pay rent. For decades. We have tried to reach out to various agencies including the assemblyman's office in past years, in vain. This is exhausting for me and my elderly mother who just wants to be in peace in a clean and safe apartment. What can be done? This is unfair. She pays rent like everyone else. At this point, 311 is enabling this behavior. |
| Attachment(s) | Drop files here or click to browse |

| | |
|---|---|
| Date Submitted | June 11, 2026 |
| Topic | Department of Buildings (DOB) Issues, Tenant Protection, Enforcement, Unnecessary Bureaucracy |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Housing |
| Subtopic | Complaint |

Name

# Davyd Ramirez

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I would like to propose the creation of an official government-only app marketplace for New York City.

Currently, residents must navigate many separate websites and apps for parking, transit, permits, public services, schools, sanitation, alerts, and payments. This creates confusion and allows fake or misleading apps to appear in traditional app stores.

The city could create a verified Government Secure Hub for Integrated and Essential Local Directory (GOVSHIELD) that contains only official city-approved applications and services.

Benefits include:

* Easier access to trusted government services
* Reduced scams and fake apps
* Better accessibility for elderly and non-technical residents
* Centralized login and identity verification
* Simplified payments through trusted platforms like Apple Pay and Google Pay
* Stronger cybersecurity and resident trust

The platform could begin as a simple verified directory of official city apps and later expand into a unified civic services platform.

This could eventually become a model or shared platform for other cities across the United States as an official government sponsored apps.

I had thoughts that Google and Apple should build this solution and no phone should be sold in NYC without this App Store.

| | |
|---|---|
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Technology × Unnecessary Bureaucracy × Miscellaneous × |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Technology |
| Subtopic | Create a government only app marketplace for NYC |

Name

# Nancy Sheran

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Some procedural suggestions for the COGE hearings in June 2026:

The June 11 COGE hearing was run much better than the June 10 hearing. Thank you for starting on time.

1. Mention on the pages below and on all appropriate places the guidelines for the meeting:
for example, Those who present their testimony in person are limited to 3 minutes.
https://www.nyc.gov/site/charter/meetings/2026-hearing-06112026.page
https://www.nyc.gov/site/charter/meetings/public_meetings_hearings.page

2. Crank up the microphones, and tell people to speak into the microphones.

3. Record the meetings and post them asap on the website on this page (change the title to "Public Hearings":
https://www.nyc.gov/site/charter/meetings/public-meetings-hearings.page.
Remove the "RSVP here" for past meetings and replace it with the recordings.

4. On the RSVP form, get the information to provide a translator, if needed, or ask them to call for assistance.

5. Have a timer clock on the podium where the speakers can see it.

Attachment(s)

Drop files here or click to browse

Date Submitted June 11, 2026

| | |
|---|---|
| Topic | Reporting Requirements ✕ Technology ✕ Unnecessary Bureaucracy ✕ Miscellaneous ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

# Ivy Smedstad

Email [redacted]

Professional Affiliation NYS ITS

Zip Code [redacted]

Public Comment

I really need Mayor Mamdani to run for NYS Governor, because if he can do this kind of amazing job with the most diverse city in the world, manage to bring everyone together in ways our country hasn't seen since 9/11, clear a persistent debt with the ease & panache of "IDGAF", & still maintain a humbleness that leaves him open to feedback & suggestions from citizens... I know he can't run for President, bc the laws won't allow that, but maybe a steering New York State in the same path he steered New York City will turn us all into a beacon of how great we CAN be, if we work together for the betterment of all of us. Because we all win when we ALL win.

Attachment(s) Drop files here or click to browse

Date Submitted June 11, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Feedback

Subtopic

Name

# llana rachnaev

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | |
| Public Comment | Please do something about the poor horses in central park. One died this week. Many over the years as well. I'd love to see the horse rides abolished. These horses are put to the brink and suffer everyday for over 12 hours |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 11, 2026 |
| Topic | Enforcement, Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Animal welfare |

Subtopic

Name

## George Gallego

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | CEO Access Initiatives LLC, Managing Partner - El Barrio Co. Restaurant, Founder Axis Project Inc. Co-Founder Wheels of Progress Inc. |
| Zip Code | [redacted] |

Public Comment

Good evening, Commissioners,

My name is George Gallego. I am a Native New Yorker, a husband, a father, owner of multiple small businesses, and the founder of multiple nonprofit and community based organizations created to address unmet needs in our city, needs that too often fall through the cracks of government systems.

In that sense, I come before you as a social entrepreneur: someone who has spent his life building practical solutions where systems were missing, incomplete, too slow, or simply not designed for the people who needed them most.

I am the founder of Axis Project, a nonprofit that creates adaptive fitness, wellness, community, and empowerment opportunities for people with disabilities. I am the owner of Access Initiatives, a Social Adult Day Center serving seniors and people with physical disabilities. I am Co-Founder of Wheels of Progress, which helps people transition from nursing homes and institutional settings back into the community. I am also a restaurant owner in East Harlem, formerly Contento, rebranded as El Barrio Co., a fully accessible restaurant that became nationally recognized not only for food and hospitality, but for showing what inclusion can look like when it is built into the business model from day one.

I am here because I believe in New York City. I believe in government. I believe in public systems. But I also believe that when government becomes too slow, too fragmented, too confusing, and too disconnected from the people doing the work on the ground, it unintentionally punishes the very people and organizations trying to solve the City's problems.

I am not here simply to complain. I am here as someone who has built businesses, created jobs, served vulnerable communities, paid rent, dealt with inspections, applied for funding, navigated compliance, supported families, and carried the financial risk when systems did not move, did not communicate, or did not make sense.

I am not asking for special treatment. I am asking for smarter government — government that recognizes community based problem solvers as partners, not obstacles.

As a restaurant owner, I experienced how difficult it can be to navigate permits, inspections, approvals, utilities, accessibility requirements, outdoor dining, liquor licensing, construction issues, and landlord related challenges. Each agency may have its own process, but from the perspective of a small business owner, it often feels like there is no single roadmap and no one person responsible for helping you get to the finish line.

As the owner of a Social Adult Day Center, I deal with another layer of bureaucracy. We serve seniors and people with physical disabilities — people who depend on structure, transportation, meals, wellness, safety, dignity, and

community. But when payments are delayed, audits are unclear, requirements change, or systems do not communicate efficiently, the organization is still expected to operate. Staff still need to be paid. Rent still needs to be paid. Members still need services. The risk gets pushed down to the provider.

As a nonprofit founder, I have seen how difficult it is for grassroots organizations to access government funding, even when we are closest to the problem and often closest to the solution. Too many funding opportunities are written in ways that favor larger institutions with grant writing departments, compliance teams, and cash reserves. Smaller, community rooted organizations may have the trust, the track record, and the lived experience, but not the administrative machinery to compete fairly.

As Co Founder of Wheels of Progress, helping people move from institutional settings back into the community, I have seen how fragmented systems become when housing, benefits, healthcare, accessibility, transportation, employment, and community support are treated as separate problems. For the person trying to come home, these are not separate problems. They are one life. Government needs to be organized around the person, not around the agency chart.

And as a representative of the disability community, I want to be clear: accessibility is not a special-interest issue. It is a government efficiency issue. When a business, program, sidewalk, building, website, transportation system, permit process, or public meeting is not accessible, the government has failed not only disabled people, it has failed seniors, families, workers, caregivers, veterans, and the broader public.

The question before this Commission should not only be: how do we make government faster?

The better question is: how do we make government work better for the people who are already solving public problems?

I want to offer a few recommendations.

First, New York City should create a true one stop navigation system for small businesses, nonprofits, and community organizations. Not just a website with links, but a real accountable system where an organization can be assigned a navigator who helps coordinate permits, inspections, funding, compliance, and problem solving across agencies.

Second, the City should create a fast-track process for mission-driven small businesses and social enterprises that are filling public gaps, especially in disability services, aging, community health, workforce development, accessible hospitality, adaptive recreation, and neighborhood based care. If an organization is reducing institutionalization, creating jobs, serving seniors, supporting people with disabilities, improving health outcomes, or activating vacant commercial space, the City should treat that organization as part of its public infrastructure.

Third, funding opportunities must be simplified and made more accessible to smaller organizations. The City cannot say it wants grassroots innovation and then design funding systems that only large organizations can realistically survive.

Fourth, and this is an idea I have previously raised in a meeting with the New York City Comptroller's office: New York City should explore a strategy to reinvest a portion of the money it manages, deposits, invests, or influences into local social entrepreneurs and community based entities that are filling real gaps in public systems.

I am not talking about charity. I am talking about smart, local, values based investment.

Organizations like Axis Project, Wheels of Progress, Access Initiatives, and other social enterprise models across the city are doing work that reduces public costs, improves quality of life, creates jobs, keeps people out of institutions, supports caregivers, activates commercial space, and strengthens neighborhoods.

If the City can invest money in large financial institutions, major development projects, and outside systems, then it should also explore ways to invest in the community-based problem solvers who are producing direct public value right here in New York City.

That could include low-interest loans, credit enhancements, loan guarantees, recoverable grants, bridge funding, real estate acquisition support, operating capital, or dedicated investment vehicles for disability led, minority led, neighborhood based, and mission driven businesses and nonprofits.

The City should not only fund services after a crisis. It should invest in the people and organizations preventing the crisis.

Fifth, New York City should create a coordinated unit for accessibility and compliance support for small businesses and nonprofits. Many organizations want to be accessible and compliant, but the process can be confusing, expensive, and intimidating. Instead of waiting for violations, lawsuits, or complaints, the City should help organizations build accessibility correctly from the beginning.

Finally, the City should measure efficiency differently. Efficiency cannot only mean cutting costs or moving paperwork faster. Efficiency should mean fewer people stuck in institutions due to underfunded community support. It should mean fewer vacant storefronts because small businesses cannot survive the approval process. It should mean fewer grassroots organizations shutting down due to late reimbursement. It should mean more New Yorkers getting services from organizations they trust, in neighborhoods they know, from people who understand their lives.

I have spent my life building where systems were missing. I did it as a wheelchair user. I did it as a business owner. I did it as a nonprofit founder. I did it in East Harlem. I did it with and for people who are too often left out of the planning process.

But no one should have to fight this hard to do good work in New York City.

My request to this Commission is simple:

Build a City government that recognizes community based problem solvers as partners, not obstacles.

Give us clear pathways. Give us accountable contacts. Give us timely decisions. Give us fair access to funding. Give us access to investment capital. Give us the tools to comply, grow, hire, serve, and stay in our communities.

Because when New York City invests in the people already filling the gaps, the whole city becomes stronger.

Thank you for the opportunity to testify.

Attachment(s)



Written Testimony of George Gallego
Submitted to the New York City Commission on Government Efficiency
Hearing: Streamlining Government for Small Business and Community Organizations

Good evening, Commissioners.

My name is George Gallego. I am a Native New Yorker, a husband, a father, owner of several small businesses, and the founder of multiple nonprofit and community-based organizations created to address unmet needs in our city, needs that too often fall through the cracks of government systems.

In that sense, I come before you as a social entrepreneur: someone who has spent his life building practical solutions where systems were missing, incomplete, too slow, or simply not designed for the people who needed them most.

I am the founder of Axis Project, a nonprofit that creates adaptive fitness, wellness, community, and empowerment opportunities for people with disabilities. I am the Co-Owner of Access Initiatives, a Social Adult Day Center serving seniors and people with physical disabilities. I am the Co-Founder of Wheels of Progress, which helps people transition from nursing homes and institutional settings back into the community. I am also a restaurant owner in East Harlem through Contento, now rebranded as El Barrio Co., a fully accessible restaurant that has become nationally recognized not only for food and hospitality but also for showing what inclusion can look like when it is built into the business model from day one.

I am submitting this testimony because I believe in New York City. I believe in government. I believe in public systems. But I also believe that when government becomes too slow, too fragmented, too confusing, and too disconnected from the people doing the work on the ground, it unintentionally punishes the very people and organizations trying to solve the City's problems.

I am not writing to complain. I am writing as someone who has built businesses, created jobs, served vulnerable communities, paid rent, dealt with inspections, applied for funding, navigated compliance, supported families, and personally carried the financial risk when systems did not move, did not communicate, or did not make sense.

I am not asking for special treatment. I am asking for a smarter government, a government that recognizes community-based problem solvers as partners, not obstacles.

New York City says it wants small businesses, community organizations, accessibility, innovation, equity, neighborhood investment, and public-private partnerships. But too

Testimony of George Gallego.pdf

Date Submitted: June 12, 2026

Topic: Unnecessary Bureaucracy, Real Estate and Development, Tenant Protection, Enforcement, Budget Issues, Reporting Requirements, Technology

Method Received: Airtable Form

| | |
|---|---|
| Is it charter related? | No |
| | 1 |
| Charter Related | No |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | Improve small business services |

**Written Testimony of George Gallego**
**Submitted to the New York City Commission on Government Efficiency**
**Hearing: Streamlining Government for Small Business and Community Organizations**

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I am not writing to complain. I am writing as someone who has built businesses, created jobs, served vulnerable communities, paid rent, dealt with inspections, applied for funding, navigated compliance, supported families, and personally carried the financial risk when systems did not move, did not communicate, or did not make sense.

I am not asking for special treatment. I am asking for a smarter government, a government that recognizes community-based problem solvers as partners, not obstacles.

New York City says it wants small businesses, community organizations, accessibility, innovation, equity, neighborhood investment, and public-private partnerships. But too

often, the systems we have created make it extremely difficult for the people doing that work to survive, let alone grow.

**That is the heart of my testimony.**

The City has thousands of people and organizations trying to do the right thing: open businesses, hire locally, serve seniors, support people with disabilities, activate vacant storefronts, create culturally competent services, prevent institutionalization, expand community health, and bring real solutions into neighborhoods. But instead of a clear pathway, we often face a maze.

Each agency may have its own process. Each process may have its own forms, timelines, contacts, rules, and technical language. But to the small business owner, nonprofit leader, or community provider, it often feels like no one is responsible for helping you get from idea to opening, from compliance to funding, or from problem to resolution.

That is not efficient government. That is, the government is organized around itself instead of around the people it serves.

**My Experience Across Multiple Sectors**

As a restaurant owner, I experienced how difficult it is to navigate permits, inspections, approvals, utilities, accessibility requirements, outdoor dining, liquor licensing, construction issues, and landlord-related challenges. Contento was not just a restaurant. It was a statement about what accessibility, hospitality, and inclusion could look like in New York City. Yet even with a successful, nationally recognized business, the systems around small business ownership were often fragmented, time-consuming, and difficult to navigate.

As the owner of a Social Adult Day Center, I deal with another layer of bureaucracy. Access Initiatives serves seniors and people with physical disabilities, New Yorkers who depend on structure, transportation, meals, wellness, safety, dignity, and community. These are not abstract services. They are the difference between isolation and connection, decline and stability, institutionalization and community life.

Yet the administrative and funding systems around this work can be slow, inconsistent, and overly complicated. When payments are delayed, audits are unclear, requirements change, or agencies and managed care entities do not communicate efficiently, the organization is still expected to operate. Staff still need to be paid. Rent still needs to be paid. Members still need services. The risk gets pushed down to the provider.

As a nonprofit founder, I have seen how difficult it is for grassroots organizations to access government funding, even when we are closest to the problem and often closest to the solution. Too many funding opportunities are written in a way that favors larger institutions with grant-writing departments, compliance teams, and cash reserves. Smaller, community-rooted organizations may have the trust, the track record, the cultural competence, and the lived experience, but not the administrative machinery to compete fairly.

As part of Wheels of Progress, helping people move from institutional settings back into the community, I have seen how fragmented systems become when housing, benefits, healthcare, accessibility, transportation, employment, and community support are treated as separate problems. For the person trying to come home, these are not separate problems. They are one life. Government needs to be organized around the person, not around the agency chart.

And as a representative of the disability community, I want to be clear: accessibility is not a special-interest issue. It is a government efficiency issue.

When a business, program, sidewalk, building, website, transportation system, permit process, public meeting, or funding opportunity is not accessible, the government has failed not only disabled people, but also seniors, families, workers, caregivers, veterans, and the broader public.

Accessibility is not a favor. It is infrastructure. It is economic participation. It is public safety. It is community development. It is good government.

**The Larger Issue**

The question before this Commission should not only be: how do we make government faster?

The better question is: how do we make government work better for the people who are already solving public problems?

If New York City wants innovation, it must make room for the innovators who are already here. If it wants equity, it must invest in the people who already have trust in communities. If it wants efficiency, it must reduce the unnecessary burden on small businesses, nonprofits, and social enterprises that produce public value every day.

The City should not only measure efficiency by how quickly an agency processes a form. It should measure efficiency by whether a senior can remain in the community rather than enter an institution. Whether a person with a disability can access health, fitness, employment, and social connections. Whether a neighborhood business can

open without being crushed by delays. Whether a grassroots organization can receive funding before it is forced to close. Whether public dollars are reaching organizations that are closest to the people.

Efficiency should mean fewer people falling through the cracks.

**Recommendations**

I respectfully offer the following recommendations.

**1. Create a True One-Stop Navigation System**

New York City should create a real one-stop navigation system for small businesses, nonprofits, and community organizations. This should not simply be a website with links. It should be an accountable support structure in which organizations can be assigned a case manager or agency navigator to coordinate permits, inspections, funding, compliance, problem-solving, and interagency communication.

A small organization should not have to become an expert in every agency's internal process just to open, operate, expand, or receive payment.

**2. Establish a Fast-Track Process for Mission-Driven Small Businesses and Social Enterprises**

The City should create a fast-track process for mission-driven small businesses and social enterprises that are filling public gaps, especially in disability services, aging, community health, workforce development, food access, accessible hospitality, adaptive recreation, transition services, and neighborhood-based care.

If an organization is reducing institutionalization, creating jobs, serving seniors, supporting people with disabilities, improving health outcomes, or activating vacant commercial space, the City should treat that organization as part of its public infrastructure.

**3. Simplify Funding Access for Smaller Organizations**

Funding opportunities must be simplified and made more accessible to smaller organizations. Applications should be clearer. Reporting requirements should be proportionate to the size of the award. Payment timelines should be reliable. Technical assistance should be available before, during, and after the application process.

The City cannot say it wants grassroots innovation and then design funding systems that only large organizations can realistically survive.

**4. Reinvest City-Influenced Capital Into Local Social Entrepreneurs**

This is an idea I previously raised in a meeting with the New York City Comptroller's office, and I believe it deserves serious consideration by this Commission.

New York City should explore a strategy to reinvest a portion of the money it manages, deposits, invests, or influences into local social entrepreneurs and community-based entities that are filling real gaps in public systems.

I am not talking about charity. I am talking about smart, local, values-based investment.

Organizations like Axis Project, Wheels of Progress, Access Initiatives, and other social-enterprise models across the city are doing work that reduces public costs, improves quality of life, creates jobs, keeps people out of institutions, supports caregivers, activates commercial space, and strengthens neighborhoods. These organizations are often solving problems that the government would otherwise have to pay more to address later.

If the City can invest money in large financial institutions, major development projects, and external systems, then it should also explore ways to invest in community-based problem solvers that produce direct public value right here in New York City.

That could include low-interest loans, credit enhancements, loan guarantees, recoverable grants, bridge funding, real estate acquisition support, operating capital, or dedicated investment vehicles for disability-led, minority-led, neighborhood-based, and mission-driven businesses and nonprofits.

The City should fund services not only after a crisis. It should invest in the people and organizations preventing the crisis.

**5. Create an Accessibility and Compliance Support Unit**

New York City should create a coordinated accessibility and compliance support unit for small businesses and nonprofits.

Many organizations want to be accessible and compliant, but the process can be confusing, expensive, and intimidating. Instead of waiting for violations, lawsuits, or complaints, the City should help organizations build accessibility correctly from the beginning.

This support could include technical assistance, site reviews, plain-language compliance guides, accessibility improvement grants, and coordination between

agencies so that businesses are not forced to navigate conflicting information on their own.

**6. Address the Commercial Real Estate Burden on Community-Serving Organizations**

The City must address the commercial real estate burden on community-serving organizations. Many of us are not struggling because our missions are weak. We are struggling because rent, build-out costs, utility delays, permitting delays, and landlord issues can destroy years of community work.

If the City wants stable community organizations, it must help stabilize the physical spaces where that work happens. That could include real estate acquisition support, long-term lease support, tax incentives for landlords who rent to mission-driven organizations, access to vacant City-owned or City-supported spaces, and capital support for accessibility improvements.

**7. Establish Interagency Accountability Timelines**

Government agencies must communicate with each other better. When one approval depends on another, there should be a clear process, a clear contact, and a clear deadline.

Small organizations should not be left guessing who is responsible, what is missing, or how long something will take. Interagency coordination should not be the burden of the applicant. It should be a basic function of efficient government.

**8. Measure Efficiency by Public Value, Not Only Internal Process**

Finally, the City should measure efficiency differently.

Efficiency cannot only mean cutting costs or moving paperwork faster. Efficiency should mean fewer people stuck in institutions due to underfunded community support. It should mean fewer vacant storefronts because small businesses cannot survive the approval process. It should mean fewer grassroots organizations shutting down because reimbursement is late. It should mean more New Yorkers getting services from organizations they trust, in neighborhoods they know from people who understand their lives.

Efficiency should be measured by whether the government makes it easier for good work to happen.

**Conclusion**

I have spent my life building where systems were missing.

I did it as a wheelchair user. I did it as a business owner. I did it as a nonprofit founder. I did it in East Harlem. I did it with and for people who are too often left out of the planning process.

But no one should have to fight this hard to do good work in New York City.

The City has an opportunity here. Streamlining government is not just about convenience. It is about survival. It is about whether small businesses can open, whether community organizations can grow, whether disabled people and seniors can live with dignity, and whether social entrepreneurs can build solutions before they are buried under paperwork.

My request to this Commission is simple:

Build a City government that recognizes community-based problem solvers as partners, not obstacles.

Give us clear pathways. Give us accountable contacts. Give us timely decisions. Give us fair access to funding. Give us access to investment capital. Give us the tools to comply, grow, hire, serve, and stay in our communities.

And most importantly, give the people closest to the problems a real seat at the table when solutions are being designed.

**Because when New York City invests in the people already filling the gaps, the whole city becomes stronger.**

I would welcome the opportunity to speak further with the Commission, the Comptroller's office, and relevant City agencies about how these ideas could be developed into practical policy, pilot programs, and investment strategies.

Thank you for the opportunity to submit this testimony.

Respectfully submitted,

George Gallego
Founder, Axis Project
Co-Owner, Access Initiatives

Wheels of Progress
Owner, El Barrio Co.Restaurant

**Home Address:**
[redacted]

**Service Address:**
[redacted]

**Mobile:** [redacted]
**Email:** [redacted]

Name

# Alayna Berg

Email [redacted]

Professional Affiliation: Social Worker

Zip Code [redacted]

Public Comment:

In a city full of immigrants and people who moved from other states, there should be an easier process to validate or transfer professional licensing, making licensing for many professions reciprocal. By eliminating unnecessary barriers to professionals who move to NYC, you are creating economic stability for those families. I travel about two hours each way to work in NJ because my LSW, equivalent to an LMSW is not valid in NY and I've been told, annoyingly hard to transfer or apply for NY status. I understand this is a state issue but we can advocate and make it an NYC issue. We should make it an NYC issue

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

Date Submitted: June 12, 2026

Topic: Unnecessary Bureaucracy, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Topic Simplified: Unnecessary bureaucracy

| | |
|---|---|
| Subtopic | Professional licensing |

Name

## Eric Starr

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Ultrapass Identity Corp |
| Zip Code | [redacted] |

Public Comment

Good evening, Commissioners. My name is Eric Starr. I'm the founder and CEO of Ultrapass, a public benefit corporation with one mission: to make it simple for people to get what they're entitled to from their government, without proving the same facts over and over.

I'm not here as a policy expert. I'm here as a builder. A few years ago, my company worked with the Office of Technology and Innovation on a "tell us once" credential for Fair Fares. The idea was simple: a New Yorker already verified for one program shouldn't have to start from scratch for the next one. We signed an NDA. And then, silence. No yes, no no, no reason. We tried again with NYCHA in 2023. Same story.

For a long time I thought the problem was that no one would say yes. But the deeper problem is this: even when an agency wanted to move, there was nothing to build on. New York has no shared, citizen-controlled foundation for a verified fact to travel across agencies. We keep asking the city to solve, one pilot at a time, what it should build once.

The rest of the world already figured this out. Estonia lets you tell the government something once, and logs every time anyone looks at your data. Singapore lets people reuse government verified information with a tap and their consent. India built it for over a billion people. Europe is putting a digital wallet in every citizen's pocket by next year. New York doesn't have to copy any of them. We can learn from all of them and, because we're arriving later, build it better, and more privacy preserving, than anyone.

So here is my recommendation. Amend Chapter 48 of the City Charter to require that new city systems for identity, benefits, and payments be built as a secure, decentralized Digital Public Infrastructure, on open global standards.

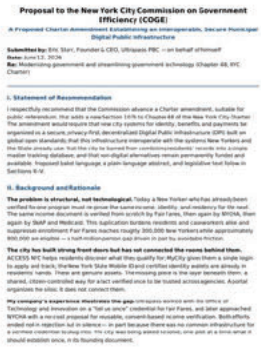
Three things make it New York's own. First, it builds on what already exists and what New Yorkers already use, MyCity, ACCESS NYC, the New York State Mobile ID, and certified identity wallets. There's nothing new to download; we connect the tools the city and the state have already built. Second, it puts the credential in your pocket, not in a master database, and forbids the city from tracking when or where you use it. That is data sovereignty. Your data belongs to you, not to an agency. And third, it protects every New Yorker who will never own a smartphone, by keeping paper and in person service funded and legal, permanently.

And it prepares New York for what comes next, which is artificial intelligence. AI is coming to government whether we plan for it or not. Without a citizen controlled data layer, AI agents either can't act for you, or they overreach, using information you never agreed to share. Decentralized DPI is the governance layer that lets us adopt AI with real controls instead of fear: an agent acts only with your consent, sees only what you disclose, and leaves an audit trail behind it. Data sovereignty is what turns AI from something done to citizens into something that works for them.

So put it on the ballot. Let New Yorkers vote to make modernization a promise the city can't quietly walk away from the way it walked away from me.

Thank you.

Attachment(s)



Ultrpass x COGE Formal Recommendati...

Date Submitted: June 12, 2026

Topic: Technology, Unnecessary Bureaucracy, Reporting Requirements

Method Received: Airtable Form

Is it charter related? Yes

1

Charter Related: Yes

Topic Simplified: Technology

Subtopic: Provide centralized digital City services

# Proposal to the New York City Commission on Government Efficiency (COGE)

## A Proposed Charter Amendment Establishing an Interoperable, Secure Municipal Digital Public Infrastructure

**Submitted by:** Eric Starr, Founder & CEO, Ultrapass PBC — on behalf of himself
**Date:** June 12, 2026
**Re:** Modernizing government and streamlining government technology (Chapter 48, NYC Charter)

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## I. Statement of Recommendation

I respectfully recommend that the Commission advance a Charter amendment, suitable for public referendum, that adds a new Section 1076 to Chapter 48 of the New York City Charter. The amendment would require that new city systems for identity, benefits, and payments be organized as a secure, privacy-first, decentralized Digital Public Infrastructure (DPI) built on global open standards; that this infrastructure interoperate with the systems New Yorkers and the State already use; that the city be barred from combining residents' records into a single master tracking database; and that non-digital alternatives remain permanently funded and available. Proposed ballot language, a plain-language abstract, and legislative text follow in Sections III–V.

## II. Background and Rationale

**The problem is structural, not technological.** Today a New Yorker who has already been verified for one program must re-prove the same income, identity, and residency for the next. The same income document is verified from scratch by Fair Fares, then again by NYCHA, then again by SNAP and Medicaid. This duplication burdens residents and caseworkers alike and suppresses enrollment: Fair Fares reaches roughly 300,000 New Yorkers while approximately 800,000 are eligible — a half-million-person gap driven in part by avoidable friction.

**The city has built strong front doors but has not connected the rooms behind them.** ACCESS NYC helps residents discover what they qualify for; MyCity gives them a single login to apply and track; the New York State Mobile ID and certified identity wallets are already in residents' hands. These are genuine assets. The missing piece is the layer beneath them: a shared, citizen-controlled way for a fact verified once to be trusted across agencies. A portal organizes the silos; it does not connect them.

**My company's experience illustrates the gap.** Ultrapass worked with the Office of Technology and Innovation on a "tell us once" credential for Fair Fares, and later approached NYCHA with a no-cost proposal for reusable, consent-based income verification. Both efforts ended not in rejection but in silence — in part because there was no common infrastructure for a verified credential to plug into. The city was being asked to solve, one pilot at a time, what it should establish once, in its founding document.

**The model is proven internationally, and New York can improve on it.** Estonia's X-Road lets each agency keep its own records while honoring a "once-only" principle, logging every access so residents can see who viewed their data. Singapore's Singpass/Myinfo lets people reuse government-verified data with their consent at population scale. India's India Stack, with its consent layer, demonstrates the approach at the scale of more than a billion people. The European Union, under eIDAS 2.0, will place a device-held digital identity wallet in every citizen's hands. New York need not copy any one system; it can combine the best of each and, because several drew criticism for centralizing data, leapfrog that mistake by keeping the credential in the resident's own wallet, with no master database behind it.

**Data sovereignty and responsible AI adoption.** Placing the credential in the resident's wallet, rather than in a central government database, establishes data sovereignty: the resident owns and controls their data, sharing only what they choose, only when they choose. This is also the foundation for adopting artificial intelligence responsibly. As AI agents begin to interact with government services, a citizen-controlled data layer is what allows those agents to act with proper governance and controls — operating only with the resident's consent, accessing only the data disclosed, and leaving an auditable trail. Without such a layer, AI in government risks either being unusable or overreaching. Decentralized DPI turns AI into a tool that works for residents rather than something done to them.

**What happens in New York will be repeated.** As the nation's largest city, New York sets patterns that other governments adopt. The governance choices made here — consent, decentralization, and citizen control — will echo well beyond the five boroughs. They are worth making deliberately, and worth securing in the Charter so that modernization becomes an obligation the city cannot quietly abandon.

## III. Proposed Ballot Question

**Proposal 1: Establishing an Interoperable, Secure Municipal Digital Public Infrastructure**

This proposal amends Chapter 48 of the New York City Charter to require that new city systems for identity, benefits, and payments be organized under a secure, privacy-first Digital Public Infrastructure built on global open standards. It allows city credentials to securely interact with the New York State Mobile ID and other certified third-party digital wallets, while strictly banning the city from combining personal records into a single master tracking database. It also guarantees that traditional, paper-based alternatives for all city services remain fully funded and permanently available.

*Shall this proposal be approved?* ☐ YES ☐ NO

## IV. Plain-Language Abstract (Voter Guide)

Voting YES updates the City Charter to modernize how New York City builds its technology. It instructs the Office of Technology and Innovation (OTI) to transition municipal identity and benefit networks into a secure, open-standard Digital Public Infrastructure.

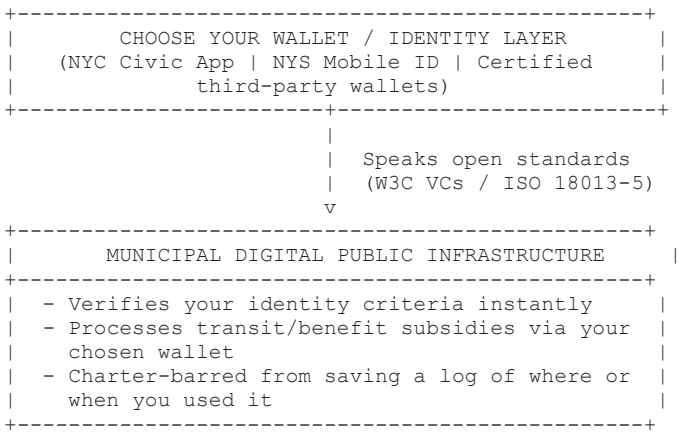
For maximum convenience, city systems must work seamlessly with technologies residents already use — allowing residents to verify city benefits using the New York State Mobile ID or by holding city-issued credentials inside certified digital wallets. To protect civil liberties and prevent identity theft, the city cannot track when or where you use your wallet, nor combine your transit, financial, and health records into a single profile. Finally, to protect New Yorkers who do not use smartphones, this measure makes it illegal to phase out physical, face-to-face, or paper-based city services.

## V. Proposed Legislative Text

Section 1. Chapter 48 of the New York City Charter is amended by adding a new Section 1076 to read as follows:

> **§ 1076. Municipal Digital Public Infrastructure and Interoperable Ecosystem.**
>
> **(a) Establishment of Digital Public Infrastructure.** The department shall design, deploy, and oversee an open-standard Digital Public Infrastructure to streamline how residents receive city identification, public assistance, and municipal payments.
>
> **(b) Adoption of global open standards.** All components of the Digital Public Infrastructure shall be built using open-source core frameworks and globally accepted interoperability standards, including but not limited to W3C Verifiable Credentials and ISO/IEC 18013-5 protocols for mobile driver's licenses (mDL).
>
> **(c) Multi-wallet and state identity compatibility.** The Digital Public Infrastructure must support a diverse ecosystem of user choices. The framework shall allow residents to verify their residency or age using the New York State Mobile ID, and must permit the secure storage and presentation of city-issued credentials via native city applications, major mobile operating-system wallets, or any third-party digital wallet that certifies compliance with the city's cryptographic privacy standards.
>
> **(d) Privacy, data sovereignty, and one-way trust.** To prevent surveillance and data breaches within the Digital Public Infrastructure, the department is prohibited from linking distinct agency databases to create a master database of citizen behavior. When a user presents a city credential via a third-party wallet or state identity framework, the city shall act strictly as a point-to-point verifier. The department and all city agencies are prohibited from logging, tracking, or sharing historical records of individual wallet verifications or transactions, except where required by explicit statutory financial-auditing laws.
>
> **(e) Permanent analogue safeguards.** Participation in any tier of the Digital Public Infrastructure shall be entirely voluntary. The city must permanently maintain and fully fund physical service windows, paper applications, and non-digital alternatives for every municipal service. No person shall be denied public transit, housing, health services, or voting access due to a lack of digital technology or refusal to use the Digital Public Infrastructure.

## VI. How the Ecosystem Coordinates




## VII. Implementation Considerations and Offered Next Steps

I would be glad to provide, at the Commission's request, two supporting frameworks that would accompany implementation: (1) a **Technical Certification Framework** defining precisely how a third-party wallet qualifies to securely hold an NYC-issued credential, including the cryptographic privacy standards referenced in § 1076(c); and (2) a **transaction-flow specification** for an OMNY transit reader securely accepting an ISO/IEC 18013-5 New York State Mobile ID, demonstrating point-to-point verification consistent with § 1076(d).

## VIII. Conclusion

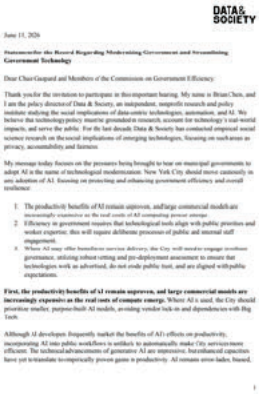
This amendment turns "modernizing government" from an aspiration into a permanent obligation in the city's founding document: a citizen-controlled, standards-based foundation that connects existing systems rather than merely organizing them — built for privacy, for resident choice, for responsible AI governance, and for the New Yorkers who will never use a smartphone, by law. I respectfully urge the Commission to advance it for public referendum.

Thank you for your consideration.

*Eric Starr · Founder & CEO, Ultrapass PBC* [redacted]

Name

# Brian J. Chen

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Data & Society |
| Zip Code | |
| Public Comment | See attachment. |
| Attachment(s) |  6 11 Data Society COGE statement.pdf |
| Date Submitted | June 12, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | No |

1

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | City should consider AI risks along with benefits |

DATA&
SOCIETY

June 11, 2026

**Statement for the Record Regarding Modernizing Government and Streamlining Government Technology**

Dear Chair Gaspard and Members of the Commission on Government Efficiency:

Thank you for the invitation to participate in this important hearing. My name is Brian Chen, and I am the policy director of Data & Society, an independent, nonprofit research and policy institute studying the social implications of data-centric technologies, automation, and AI. We believe that technology policy must be grounded in research, account for technology's real-world impacts, and serve the public. For the last decade, Data & Society has conducted empirical social science research on the social implications of emerging technologies, focusing on such areas as privacy, accountability, and fairness.

My message today focuses on the pressures being brought to bear on municipal governments to adopt AI in the name of technological modernization. New York City should move cautiously in any adoption of AI, focusing on protecting and enhancing government efficiency and overall resilience:

1. The productivity benefits of AI remain unproven, and large commercial models are increasingly expensive as the real costs of AI computing power emerge.
2. Efficiency in government requires that technological tools align with public priorities and worker expertise; this will require deliberate processes of public and internal staff engagement.
3. Where AI may offer benefits to service delivery, the City will need to engage in robust governance, utilizing robust vetting and pre-deployment assessment to ensure that technologies work as advertised, do not erode public trust, and are aligned with public expectations.

**First, the productivity benefits of AI remain unproven, and large commercial models are increasingly expensive as the real costs of compute emerge.** Where AI is used, the City should prioritize smaller, purpose-built AI models, avoiding vendor lock-in and dependencies with Big Tech.

Although AI developers frequently market the benefits of AI's effects on productivity, incorporating AI into public workflows is unlikely to automatically make City services more efficient. The technical advancements of generative AI are impressive, but enhanced capacities have yet to translate to empirically proven gains in productivity. AI remains error-laden, biased,

inaccurate, and dysfunctional, especially if it is not carefully built to fulfill a narrow purpose.[1] Even from a purely technical perspective, there is little evidence on the effectiveness and impact of AI tools.[2] Its failures at the essential functions of civil servants are well-documented: Mayor Mamdani has described how a "functionally unusable" AI chatbot, deployed by the prior administration, wasted public funds while adding no value.[3]

Whatever benefits the City might realize through the use of generative AI, it will need to carefully consider them against the steep costs of commercial large language model (LLM) usage. Off-the-shelf AI models designed by private companies like Anthropic, OpenAI, and Microsoft are very expensive. Even corporate America is beginning to balk at the high costs of LLM usage.[4] Global energy shocks are making the matter worse: developers are increasingly restructuring enterprise contracts and passing the cost of energy market volatility onto the customer.[5] Given its fiscal constraints, the City needs to carefully consider whether AI adoption is worth its true costs. Incautious adoption of AI by City agencies risks undermining the administration's work to allocate and spend public funds efficiently.

Where City agencies wish to consider procuring AI models, the City should prioritize alternatives to commercial AI models offered by Big Tech, looking toward smaller, purpose-built, and open-source models that might help the City avoid vendor lock-in and escalating energy costs. There is a growing trend toward "frugal AI," an increasingly popular term to describe more environmentally-friendly, task-specific, open-source AI that minimizes data and resource consumption.[6] Because such models can be customized to be narrowly scoped, they are often cheaper and tend to outperform more generalized LLMs. Even private businesses are realizing the benefits to smaller, purpose-built AI models; Salesforce has described them as "more sustainable" and "more cost effective, easier to fine-tune, and operate faster, improving the user experience."[7] As an alternative to Big Tech-developed generative AI models, this approach has several benefits: enhanced performance, greater public trust, greater energy

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[1] *See, e.g.*, Inioluwa Deborah Raji, et al., *The Fallacy of AI Functionality*, FAccT '22 (June 20, 2022), https://dl.acm.org/doi/10.1145/3531146.3533158.
[2] Imogen Parker, Anna Studman, Elliot Jones, *Learn fast and build things*, Ada Lovelace Institute (Mar. 14, 2025), https://www.adalovelaceinstitute.org/policy-briefing/public-sector-ai/.
[3] Colin Lecher and Katie Honan, *Mamdani to kill the NYC AI chatbot we caught telling businesses to break the law*, The Markup (Jan. 30, 2026), https://themarkup.org/artificial-intelligence/2026/01/30/mamdani-to-kill-the-nyc-ai-chatbot-we-caught-telling-businesses-to-break-the-law.
[4] Bradley Olson, *Corporate America Is Starting to Ration AI as Cost Skyrockets*, Wall Street Journal (May 28, 2026), https://www.wsj.com/tech/ai/corporate-america-is-starting-to-ration-ai-as-cost-skyrockets.
[5] Hannah Lipstein, *Greening AI in the Public Sector: An introductory handbook for procurement*, Data & Society Research Institute (June 2026) (forthcoming).
[6] Timnit Gebru, *Frugal AI*, AI Now Institute (Feb. 10, 2026), https://ainowinstitute.org/publications/frugal-ai.
[7] Boris Gamazaychikov, *Unveiling Salesforce's Blueprint for Sustainable AI: Where Responsibility Meets Innovation*, Salesforce (Dec. 19, 2025) https://engineering.salesforce.com/unveiling-salesforces-blueprint-for-sustainable-ai-where-responsibility-meets-innovation/.

efficiency that translates to cost savings, and more customizable control to enable greater municipal autonomy.[8]

**Second, government efficiency in technology must ensure that tech systems are aligned with public priorities and worker expertise. Doing so will require a deliberate process of public and internal engagement.**

In line with the Mayor's Office of Mass Engagement, public input should always be part of decisions to procure technological systems that may impact City services. It is essential to recognize the forms of expertise that residents and affected communities contribute. They should play a key role in problem formulation, ensuring that novel technology adoption is well-articulated to the needs on the ground. For example, communities are already expressing deep concerns about how the City may be engaging tech vendors for the use of AI in the City's public schools.[9] Community groups can help identify blind spots: key risks and problems that must be addressed before a project should move forward.[10] Further, the most strategically important time to elicit community input is before a procurement process begins.[11] Technical speed and "efficiency" of tech systems matter only to the extent that they align with established community preferences.

Similarly, worker input should be solicited well before procurement to help define the goals of an AI system, articulate them to agency needs, and anticipate harms. Tech-enabled efficiency metrics often "cut off workers' abilities to define the value added — or not added — by AI systems within their workplaces, distorting both professional norms and how efficiency itself is defined."[12] Deliberate worker engagement can help to bring forward values that should shape the drive for efficiency, such as "collaborative, human-driven processes; prioritization of health and safety; [and the] foregrounding of objectives that serve the public good and society at large[.]"[13]

**Third, to realize the efficient use of new technologies, including AI, procurement should prioritize governance that enhances transparency and ensures that systems are fit for purpose. Otherwise, hastily deployed technology systems are likely to burden the City with expensive, underperforming technology.**

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[8] Lipstein.
[9] Matthew Haag, *Majority of City Council Members Urge Mamdani to Pause A.I. in Schools*, New York Times (June 9, 2026), https://www.nytimes.com/2026/06/09/nyregion/nyc-schools-council-members-ai-ban.html.
[10] Meg Young, et al., *Gear Shift: Driving Change in Public Sector Technology through Community Input*, Data & Society Research Institute (June 2025), https://datasociety.net/library/gear-shift/.
[11] *Id.*
[12] Alexandra Mateescu, Aiha Nguyen, and Sanjay Pinto, *Last Place in the AI-First Economy*, Data & Society Research Institute (April 1, 2026), https://datasociety.net/library/last-place-in-the-ai-first-economy/.
[13] *Id.* at 9.

It is critical for the City to bolster its procurement protocols to ensure that it is acquiring and deploying technologies that are fit for the task at hand. Existing public sector procurement processes often are not effective in ensuring transparency and fairness around AI products, or for avoiding vendor lock-in.[14] Market concentration and knowledge asymmetries exacerbate these issues. City procurers need consistent guidance and terminology to help them buy AI well.

Purchasing is the primary opportunity to conduct risk assessments on AI for civil rights, privacy, cybersecurity, and other essential protections for New Yorkers. Without careful evaluation and risk assessment, public agencies risk adopting expensive AI systems that violate people's rights and fail to work as intended. Governance mechanisms should include independent testing, ongoing monitoring, and redress mechanisms for affected individuals.[15] These mechanisms are critical not only to accountability but to onboarding technology that can meaningfully drive improvements in City services. The City Council has made important steps towards this goal by passing the 2025 GUARD Act, but to date those mandates remain unfulfilled.

Although efficiency is often framed purely in terms of speed and technical capacity, the efficient use of new technologies takes time: time to identify impactful opportunities for computational tools, time to frame agency needs and requirements, time for stakeholder engagement, and time for intentional development, slow rollout, testing, and course-correction. Responsible AI procurement requires more lengthy evaluation periods to ensure that government work is proceeding cautiously and without errors.

Respectfully,

Brian J. Chen, Policy Director

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[14] Imogen Parker, Anna Studman, Elliot Jones, *Learn fast and build things*, Ada Lovelace Institute (Mar. 14, 2025), https://www.adalovelaceinstitute.org/policy-briefing/public-sector-ai/.
[15] Emanuel Moss, et al., *Assembling Accountability: Algorithmic Impact Assessment for the Public Interest*, Data & Society Research Institute (June 19, 2021), https://datasociety.net/library/assembling-accountability-algorithmic-impact-assessment-for-the-public-interest/.

Name

## Patrick Hall

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Storefront Small Business Owner Operator |
| Zip Code | [redacted] |

Public Comment

Statement of Patrick Hall

Commission on Government Efficiency (COGE)

June 10, 2026

Good evening.

My name is Patrick Hall. My wife Christine and I own Élan Flowers in TriBeCa, a storefront business that has served New York City since 1983.

For me, this is not theoretical.

It is payroll.

It is occupancy costs—whether that's rent, a mortgage, property taxes, or all three.

It is insurance—both liability and health insurance.

It is employees, customers, suppliers, and neighborhood life all happening at the same time.

One thing I have learned over the years is that small businesses are not a category.

We are an ecosystem.

A new business is different from a legacy business.

A restaurant is different from a flower shop.

A sole proprietor is different from a storefront with twenty employees.

Yet too often government creates one-size-fits-all solutions for businesses that are anything but one-size-fits-all.

And that leads me to my main point:

Listen before legislating.

Before a new requirement is added, before a mandate is created, before a program is launched, bring in the people who will actually have to live with it.

I don't think most small business owners lack ideas.

I think they lack time.

Most of us do not have government affairs teams, policy staff, consultants, or

lawyers reviewing every new regulation.

We are trying to keep the doors open.

We are not asking government to do our job for us.

We are asking government to understand the job we are already doing.

One idea I would encourage this Commission to consider is requiring a Small Business Economic Impact Statement for every piece of legislation, regulation, or major policy affecting small businesses.

Not just asking whether something helps the economy.

Ask what it costs a privately owned, owner-operated small business in time, paperwork, compliance, risk, and money.

Bring in the shop owners who are working behind the counter, managing payroll at night, and trying to figure out whether they can hire one more person.

Give them a seat at the table.

My hope is that we can build a clearer bridge between the people writing policy and the people living with the consequences of it.

A bridge that is practical, respectful, and honest.

We do not need anyone to romanticize small businesses.

We need systems that recognize how little margin—and how little time—many of us actually have.

If we can get that right, I believe New York can do more than celebrate storefronts.

It can help them survive, stabilize, grow, and continue serving the neighborhoods that depend on them.

Thank you for the opportunity to testify.

Attachment(s)



Written Testimony of Patrick Hall.pdf

Date Submitted: June 12, 2026

Topic: Unnecessary Bureaucracy, Reporting Requirements, Procurement Reform

Method Received: Airtable Form

Is it charter related? No

1

Charter Related: Yes

Topic Simplified: Government Operations

Subtopic: Requiring a small business economic impact statement for every piece of legislation, regulation, or major policy affecting small businesses.

Written Testimony of Patrick Hall

Commission on Government Efficiency (COGE)

June 10, 2026

My name is Patrick Hall. My wife Christine and I own Élan Flowers in TriBeCa, a storefront business that has served New York City since 1983.

We purchased the business in 2015 and made a deliberate decision to keep it a storefront serving the neighborhood that helped it survive 9/11, Superstorm Sandy, and COVID-19. Since then, we have worked to steward the business through extraordinary challenges while growing from three employees to more than twenty.

Thank you to Mayor Mamdani, the Commission on Government Efficiency, and everyone involved in creating this opportunity for public input.

I am submitting this testimony as a small business owner, employer, resident, and advocate.

My central recommendation is simple:

LISTEN BEFORE LEGISLATING.

Government works best when policymakers understand the practical realities of the people who must live with the policies they create.

Small businesses are often described as the backbone of the economy. Yet many business owners experience government primarily through permits, inspections, audits, fines, compliance requirements, reporting obligations, and administrative processes.

Most small businesses do not have government affairs departments.

Most do not employ lobbyists.

Most do not have attorneys reviewing every new regulation.

Most owners are simply trying to survive while managing payroll, staffing, inventory, customer service, marketing, occupancy costs, insurance, taxes, and compliance simultaneously.

One observation I have made repeatedly is this:

"I don't think most small business owners lack ideas. I think they lack time."

That reality should shape how government communicates with and regulates small businesses.

A one-size-fits-all program usually fits the business that has time to apply, not necessarily the business that needs help the most.

Small businesses are not a category.

We are an ecosystem.

Different industries, different business models, different neighborhoods, and different stages of business development require different approaches.

The owner of a new business faces different challenges than the owner of a forty-year-old business.

A sole proprietor faces different realities than a business with twenty employees.

Policy should recognize those differences.

RECOMMENDATION #1:
SMALL BUSINESS ECONOMIC IMPACT STATEMENTS

I encourage the Commission to recommend that every proposed law, regulation, mandate, or major policy affecting businesses include a Small Business Economic Impact Statement.

The analysis should answer questions such as:

• What will implementation cost a small business?

• How many hours of administrative work will be required?

• What additional compliance obligations will be created?

• Will the impact differ for a five-person business versus a five-hundred-person business?

• Could unintended consequences harm neighborhood businesses while benefiting larger organizations?

This would improve decision-making and create greater transparency.

Many policymakers have never personally experienced the day-to-day realities of operating a small business. A formal impact review would help ensure those realities are considered before new requirements are imposed and would encourage policymakers to think through implementation before legislation becomes regulation.

RECOMMENDATION #2:
OPERATOR REVIEW PANELS

Before major policies affecting small businesses are finalized, government should convene panels of actual operators from different industries and neighborhoods.

Not industry associations.

Not consultants.

Not professional advocates.

Operators.

The people making payroll, paying rent, hiring employees, and dealing with regulations every day.

These conversations often reveal practical implementation challenges that are invisible during policy design.

I would encourage a format that allows agency leaders and policymakers to ask questions directly of business owners and engage in active dialogue. Some of the most useful insights emerge when assumptions can be tested against operational reality in real time.

RECOMMENDATION #3:
SIMPLIFY ACCESS TO GOVERNMENT

Many government programs fail not because they lack value but because they are difficult to find, difficult to understand, or difficult to navigate.

Even when a business qualifies for assistance, owners are often required to invest significant time, paperwork, and upfront resources before receiving support.

Government should prioritize:

• Plain-language communication

• Consolidated information portals

• Reduced paperwork

• Simplified application processes

• Better coordination across agencies

The easier it is to understand government, the more effective government becomes.

RECOMMENDATION #4:
MEASURE TIME AS WELL AS MONEY

Government often evaluates costs in dollars.

Small business owners experience costs in time.

Before creating a new requirement, policymakers should ask:

Who will have to implement this?

How many hours will it require?

What other responsibilities will be delayed or displaced as a result?

And have we spoken directly with the business owners who will have to live with it?

Bring in the shop owners who are working behind the counter, managing payroll at night, and trying to figure out whether they can hire one more person.

Give them a seat at the table.

Time is one of the scarcest resources available to small business owners.

Policies that consume time carry real economic consequences.

RECOMMENDATION #5:
BRING YOUR LEGISLATOR TO WORK DAY

If we want policymakers to understand small businesses, we should create opportunities for them to experience small businesses.

I would encourage New York City to establish an annual "Bring Your Legislator to Work Day" during Small Business Week.

The concept is simple.

Every elected official, economic development professional, small business support provider, and regulatory agency leader would be encouraged to spend a full workday inside a small business in the communities they serve as part of their official duties.

Not for a photo opportunity.

Not for a press conference.

Not for a ceremonial visit.

To work.

To observe.

To listen.

To learn.

Spend a day behind the counter.

Watch a delivery arrive late.

See what happens when an employee calls out.

Observe the paperwork, compliance requirements, customer demands, staffing challenges, and financial decisions that accumulate throughout a normal day.

Experience firsthand what it means to balance payroll, occupancy costs, insurance, regulations, taxes, customer service, and survival all at the same time.

Many policies that seem simple from the government side can feel very different from the storefront side.

There is no substitute for lived experience.

If we want government to listen before legislating, understand before regulating, and experience before prescribing, then we should create opportunities for policymakers and agency leaders to spend time walking in the shoes of the people they serve.

Government works best when it understands the realities of everyday life, and few experiences would provide more insight than a day spent inside a small business.

CONCLUSION

Small business owners are not asking government to do our job for us.

We are asking government to understand the job we are already doing.

New York's small businesses are resilient.

We innovate.

We employ.

We serve our neighborhoods.

We create opportunity every day.

The recommendations in this testimony all point toward the same goal:

Listen before legislating.

Understand before regulating.

Experience before prescribing.

Government works best when it is informed by the lived experience of the people it serves.

Thank you for the opportunity to contribute.

Respectfully submitted,

Patrick Hall

Co-Owner, Élan Flowers

TriBeCa, Manhattan

ÉLAN FLOWERS



Name

## Carlos Sanchez-Bakman

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | County Committee Elect for ED26, Voting member of CB15, local volunteer (LCP of Happy House community center), Marine Park Alliance, NYC Earth Stewards, Climate Cafe, Wolf Pack (The Young Turks) |
| Zip Code | [redacted] |

Public Comment

The items listed below are not so much agency granular as they are potential goal posts to aim for as long term investments in a more interconnected and positively pluralist city. They imply a greater "feet on the ground" presence for agency interaction with the residents of the city, educating and empowering locals along the way and normalizing civics into general awareness within all communities. I believe the greatest impact COGE can possibly have is to make the civilian body feel as if the city is theirs and that the pathways to improved living standards overall is effortless once the will power is coordinated.

1) Promote community board awareness. Apartment buildings should have notices and there should be protected community posting boards in rural neighborhoods that county committee members and community board members have access to in order to help organize their neighbors.

2a) Southern Brooklyn needs a comprehensive transit solution. According to locals (including many unaided seniors that need more reliable ways to independently get around):
It's a transportation desert
- there's too many cars and too little parking
- there's not enough transit police to curb out-of-state vehicles, abandoned vehicles, commercial vehicles (like tractor trailers), street racing and double parking
- Believe it or not, this convenience matter prevents focus on larger issues like the economy, education, housing, civil rights and the environment within the bubble of local civics

2b) One comprehensive solution comes in 3 phases:
- A framework for local community patrols to better understand and report violations against local traffic policy. There should be a 311 page dedicated to how resident communities can help the police and transit by being educated eyes and ears on the street, and reporting in a streamlined way to help the city ticket and penalize these infractions.
- The city should facilitate "community driver" programs for dollar van services, with driver training, public insurance rates and official registration, along with an office that helps driver cooperatives use repurposed vehicles claimed by the city to serve transportation deserts, and transition that cooperative into worker-owned companies in contract with the city.

A capital investment must be recommended to community boards to designated public parking zones. However these public parking zones must be multipurposed into solar-grid expansions, EV charging hubs, and beautified by sponsored and local murals and community gardens within walk paths woven into the design. Additionally, there should be cameras and staffing that facilitates the space to also host the "community driver" vehicles that locals can check out when they wish to conduct a shift.

3) We should undertake an era of "enterprise districting" that combines human capital investment, social equity investments, resource redundancies and micro-economies:
- Ask the question: How would a given community survive economic collapse?

Transitioning lawns and backlots into local agricultural spaces, and issuing vertical farm and rooftop garden tax breaks for participating property owners can feed into a city-owned grocer network.

- Subsidized solar energy training can create a local career paths for expanding the solar energy grid and properly maintaining it

A public investments office can offer neighborhoods opportunities to learn about collective equity opportunities so that districts can grow the funds needed to own their own property, businesses, clean air and water, and even maintain ownership of their data. Most of us cannot participate in the markets and it sets us apart from the scant few who can invest in a portfolio that keeps up with inflation.

- The most successful community districts should be compared to the least successful districts in terms of quality of life. Where possible, community centers should be provided with grants and tax benefits for directly addressing the issue. English literacy, employment, food insecurity, etc. Community centers should be tied into effecting the solutions specifically confirmed by city wide metrics as well as their own neighborhood knowhow.

A public aid fund should be established where any verified municipal volunteer service can be logged and recorded as a donation for a tax rebate OR added to the collective funding allotted for community investment. Street cleanups, mutual aid, carpooling, public safety patrols, civic meeting attendance all should be encouraged with some real compensation empowering themselves and/or their community.

4) Billionaires and large corporations launder their reputations through investments in the arts. It's one path to uncork the hoarded wealth of the "elites" until wealth taxes become a normalized concept. A lot of art has little commercial value, but the occasional hit is all you need. When the humanities are properly sponsored and stewarded, a garden of writers, illustrators and painters, musicians, filmmakers, craftspeople and more can create a cultural civic identity that encourages sponsorship. Think boutique communities like Key West. While this is typically served by grassroots and local interest, from a tourism standpoint it benefits the city to generally encourage. Every district needs a public studio space, equipment room, and arts laboratory or media lab. This should be a space that encourages collaboration, serves good coffee, has plenty of work space and can be utilized for exhibitions. Every community district needs a place to breed genius. The investment should be secured for one or two districts at a time, with community boards in partnership to designate the areas they would approve of these facilities to be built.

5) There are ongoing changes surrounding the second amendment and commercial gun availability. Not all police are educated on the changes to concealed carry laws. There needs to be a transparent, and front-facing city-wide engagement on this issue. There should be free training at the DMV for firearms safety offered in accordance with license renewals. There should be a civilian version for peace officer designation (registered at the local police precincts) if a civilian is permitted to own and carry a firearm. And there should be more outreach from NYPD community affairs (in association with the civilian police academy) to train local patrol groups in verified witnessing, community profiling and networking, and structured pathways to public

safety associated firearms use (the most subtle support for a regulated militia that doesn't allow for this wave of concealed carry permitting to happen off the radar, allowing any amount of guns to flow into the city - especially with the Trump family investing in Amazon-styled arms delivery to residents).

6) Multicultural forums should be sponsored by the city that promote discussions and projects that include the efforts of a combination of demographics. Race, age, creed and class collaborations should be honored, highlighted and demonstrative to our youth and the country at large at what the benefits of a melting pot actually look like. At least one visible yearly event is should be undertaken, with ongoing partnership among cultural communities to facilitate partnerships city-wide. And it shouldn't just feature these groups but also experts in the field of humanism. At truly New York City inspired event that aims to tear down tribalism as a national product.

7) The city should coordinate a central hub for sponsored academic studies that the public can suggest, weigh in on and vote on for priority. Historical, sociological, economic, environmental studies, you name it. If I have a club concerned about where we're at with CO2 emissions, the impact of AI on our mental health, etc. or our community board wants a see what a truly modern shoreline could look like and cost, and it requires more manpower than a department agency can manifest, we should be able to propose on a city site what we want our tax dollars to invest research into that shares equal voice with the city council.

Thank you for your time.  This was a nice opportunity to share.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 12, 2026

Topic: Unnecessary Bureaucracy, Enforcement, Technology, Policing, Support Oversight Agencies, Miscellaneous

Method Received: Airtable Form

Is it charter related?

Charter Related: No

| | |
|---|---|
| Topic Simplified | Feedback |
| Subtopic | |

Name

# Jerry Schaefer

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Question-suggestion- cars riding on the shoulder of highways to cut in front of other cars- eg...belt parkway, LIE, etc... can cameras or better enforcement be arranged to Consistently ticket so that they learn tules of the road and stop holding up traffic for those who wait patiently and follow the rules. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 12, 2026 |
| Topic | Enforcement |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Streets |
| Subtopic | Automated enforcement for illegal shoulder usage |

Name

# David A. Lee

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Please see attached file for my full testimony.

Attachment(s)



**Testimony to the New York City Charter Revision Commission — Brooklyn Hearing 1: Modernizing Government and Streamlining Government Technology**

David A. Lee

Transparency and accessibility to public data are the paramount priorities of effective digital governance. In the recent decade, the City has made strides towards the ideal of intuitive data infrastructure, particularly in the enactment of Local Law 11 of 2012[1] (the "Open Data Law") under Mayor Michael Bloomberg, giving rise to NYC Open Data. Subsequent statutes, such as Local Laws 37 and 38 of 2014[2], mandated digital and machine-readable publication of the sources of City law (the Charter, Administrative Code, and Rules of the City) and The City Record, respectively.

In the spirit of continuing to maintain the inexorable march towards full data openness and facilitating efficiency of governance in the digital realm, I propose three amendments to the Charter for the Charter Revision Commission to consider. These proposals are intended to provide a systematic approach towards building a state-of-the-art data infrastructure fit for the age of AI, and to offer an incremental step towards fully empowering New Yorkers to understand and hold their City government to account.

1. **Impose machine-readability requirements for the Annual Comprehensive Financial Report in adherence to federal law.** Under § 93-r of the Charter, the Comptroller is required to "publish a statement" detailing the City's revenues and expenditures and its sources, the state of the general fund stabilization reserve fund, debt service and other matters pertaining to the City's fiscal state. This document is commonly called in public finance lingo the Annual Comprehensive Financial Report, or ACFR, and has historically been an unwieldy document largely inaccessible to all but devoted disciples of fiscal policy minutiae.

   Critically, the ACFR is the only source in the myriad of the City's fiscal policy publications that lists the actual revenues and expenditures of the City for each fiscal year, a level of specificity that none of the Preliminary, Executive, and Adopted budgets published by the Office of Management and Budget under the mayoralty reach.

   This motivation for this proposal is not exclusive to the public interest. There is also an impending federal requirement to publish ACFR data in structured and

David A. Lee CRC COGE Testimony, 6 11...

Date Submitted June 12, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related? Yes

1

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Make budget data more accessible and improve agency data sharing |

# Testimony to the New York City Charter Revision Commission — Brooklyn Hearing 1: Modernizing Government and Streamlining Government Technology

**David A. Lee**

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   The motivation for this proposal is not exclusive to the public interest. There is also an impending federal requirement to publish ACFR data in structured and

[1] Local Law 11 of 2012 ("Open Data Law").

[2] Local Laws 37 and 38 of 2014.

machine-readable format. Pursuant to the Financial Data Transparency Act of 2022[3], which amends the Securities Exchange Act to require machine-readable data for municipal securities disclosures, the Securities and Exchange Commission (SEC) is in the process of promulgating data standards that all municipalities in the business of bond issuance must adhere to. As home to several such bond-issuing authorities (the Transitional Finance Authority and the Municipal Water Finance Authority, to name two), the City and its authorities extensively file with the Municipal Securities Rulemaking Board (MSRB) Electronic Municipal Market Access (EMMA) system.

Although the rulemaking[4] process by the SEC remains underway with the specifics of data structuring requirements still outstanding, in anticipation of new rules, the City should enshrine in its charter clear mandates for data standards to accompany publication of the Annual Comprehensive Financial Report by the Office of the Comptroller. Fortunately, former Comptroller Brad Lander instituted for the FY2022 ACFR the practice of providing the financial and statistical tables available for download.[5] However, due to the importance and centrality of the ACFR in crafting fiscal policy, specifying structured, machine-readable publication of ACFR data as a Charter requirement should be taken into consideration by this Commission.

**Recommendation:**

- Amend § 93(l) of the Charter to mandate the publication of bulk structured and machine-readable data alongside the Annual Comprehensive Financial Report.

2. **a. Require more granular subdivisions of expense budget data beyond the unit of appropriation.**

   **b. Mandate consistent data ontology that facilitates long-term studies of City fiscal policy; particularly, stable labeling of units of appropriation and budget codes over time through the creation of a schema crosswalk.**

   Data for the expense budget, published by the Mayor's Office of Management and Budget (OMB), is structured in varying levels of granularity. The hierarchy, beginning at agency-wide summaries, progresses down to units of appropriation (U/A), consisting of personal service (PS) and other than personal service (OTPS) spending, which

[3] 15 U.S.C. §§ 78o–4(b), as amended Pub. L. 117–263, div. E, title LVIII, § 5823(a), Dec. 23, 2022, 136 Stat. 3427

[4] As of June 8, 2026, the Securities and Exchange Commission has established joint data standards as a means of "promot[ing] interoperability of financial regulatory data across the agencies by establishing common identifiers for entities, geographic locations, dates, and certain products and currencies." See press release no. 2026-53.

[5] NYC Comptroller's Office Releases Fiscal Year 2022 Annual Comprehensive Financial Report, October 28, 2022.

subdivides once more into discrete budget codes.

In certain publications, such as the Expense Funding — All Source document[6], the budget code subdivision is absent. Budget data that is bereft of total disaggregation of a unit of appropriation's components inhibits the City's objective of transparency. A simple amendment to the corresponding Charter clause, codified in § 100, can rectify this omission of critical budget data presentation.

Furthermore, longitudinal studies of fiscal policy trends in New York City are profoundly complicated by inconsistencies in the OMB's labeling of units of appropriation and budget codes. This makes true semantic consistency of similarly-named U/As an unnecessarily laborious matter to resolve, and risks introducing inaccuracies into the analyses on which fiscal policy decisions rest. A budget ontology that rigorously links budget items to their hierarchy, source of funding, and otherwise makes these semantic relationships unambiguously clear would greatly aid policymakers and the public in coming to informed conclusions about the budgetary process.

**Recommendations:**

- Amend § 100(c) of the Charter to require subdivisions beyond the unit of appropriation in all budget publications.
- Add a new section § 100(i) of the Charter to establish a rigorous ontology for budget data.

3. **Eliminate bottlenecks in inter-agency data-sharing that are created by the requirement for memoranda of understanding.** Data must not only be transparent; it is semantically useful only when it is interoperable between systems. Agencies must frequently engage in data-sharing among themselves in rendering service delivery. Institutional frictions, however, hinder the effectiveness of the state. Consequently, the aggregate administrative capacity of the government is weakened with personnel consigned to duplicative data management efforts, cross-agency collaboration incurs steep transaction costs due to the paucity of interoperable data, and government responses to acute crises (such as the COVID-19 pandemic) become sclerotic.

   Currently, city agencies codify data-sharing agreements in the form of a memorandum of understanding (MOU). Although these can help establish guardrails to protect individual privacy and safeguard personally identifiable information (PII), the process of negotiating an MOU is lengthy and tedious, and sacrifices agility and force-amplifying response to acute problems for sluggish procedure.

[6] Expense Funding — All Source, New York City Mayor's Office of Management and Budget.

A *City & State* article from November 2022[7] underscores that the appetite to substantively implement a unified data sharing infrastructure was strong as recently as the last mayoral administration. The tension between ubiquitous data sharing and constituent privacy, however, need not be seen as zero-sum at all. In this, Jennifer Pahlka writes[8] in *Eating Policy* about how the tension between privacy and fluidity in data flows can be balanced with thoughtful engineering of application programming interfaces, or APIs:

*But not being able to export all the data in a system is why APIs exist. APIs are designed to provide specific, limited functionality through predefined endpoints with proper authorization controls. They're meant to facilitate secure, controlled data exchange between systems. Properly designed APIs include: authentication (verifying identity), authorization (permission levels), rate limiting (preventing excessive requests), data filtering (returning only necessary information), and audit logging (tracking all access). A core principle of API design is to return only the data needed for a specific task, not entire databases. (For example, an agency might need to know if a company filed taxes in the previous year. An API might return a simple yes or no without divulging other sensitive information.)*

**Recommendation:**

- Amend chapter 48 of the Charter to include a new § 1077 on inter-agency data sharing, minimizing institutional and legal frictions in coordinating and standardizing semantic interoperability, while protecting constituent privacy.

# Proposed Amendments to the Charter

1) **Amend § 93-l of the Charter to mandate the publication of bulk structured and machine-readable data alongside the Annual Comprehensive Financial Report.**

§ 93-l. Within four months after the close of each fiscal year, the comptroller shall publish a statement for such year, including a full and detailed statement of the revenues and expenditures of the city and the surplus at the end of the fiscal year, including the average daily collected deposits in bank accounts of the city, the investment performance of city pension and other investment funds, an itemized statement of all taxes due and uncollected at the close of the fiscal year, the reserve for estimated uncollectible taxes, and the uncollected parking violation fines receivable, an itemized statement of the condition of the sinking funds, and any

[7] A 'missed opportunity' in using data for New York City social services, report says. Annie McDonough, November 22, 2022.

[8] Opposite is not a winning strategy. Jennifer Pahlka, April 16, 2025.

other assessable improvement funds, and of the tax appropriation and general fund stabilization reserve fund as at the close of the fiscal year, the different sources of city revenue, including itemization of receivables due from state or federal sources by program and fiscal year, and the amount received from each, the several appropriations made for the fiscal year, the objects for which they were made and the amount of expenditures made under each, the money borrowed on the credit of the city, the amount of each loan, the authority under which it was made and the terms on which it was obtained, and such other information in regard to such fiscal year as may be determined by the comptroller or by law. The statistical and factual tables contained in such statement, and the underlying data from which such tables are derived, shall simultaneously be published as public data sets in a non-proprietary, structured, machine-readable format permitting automated processing and capable of being downloaded in bulk, on the single web portal established pursuant to section 23-502 of the administrative code and in accordance with the technical standards applicable thereto, notwithstanding any exclusion set forth in section 23-501 of such code; provided that nothing herein shall require disclosure of information to which access is required to be denied pursuant to federal or state law.

2) **a) Amend § 100-c of the Charter to require subdivisions beyond the unit of appropriation in all budget publications.**

§ 100-c. Each proposed unit of appropriation shall represent the amount requested for personal service or for other than personal service for a particular program, purpose, activity or institution; provided, however, that a single unit of appropriation for personal service or a single unit of appropriation for other than personal service may represent the amount requested for more than one particular program, purpose, activity or institution if the council has adopted, on the recommendation of the mayor, or if the council has adopted on its own initiative and the mayor has approved, a resolution setting forth the names, and a statement of the programmatic objectives, of each program, purpose, activity or institution to be included in such a single unit of appropriation. Copies of such resolutions must be included as an appendix to any preliminary budget, executive budget, and adopted budget to which they apply. If, in accordance with such a resolution, a proposed unit of appropriation for other than personal service shall represent the total amount requested for other than personal service for more than one proposed unit of appropriation for personal service, the amount of such unit of appropriation for other than personal service which is allocable to each unit of appropriation for personal service shall be set forth for informational purposes at the end of each such unit of appropriation for personal service. If, in accordance with such a resolution, a proposed unit of appropriation for personal service shall represent the total amount requested for personal service for more than one proposed unit of appropriation for other than personal service, the amount of such unit of appropriation for personal service which is allocable to each unit of appropriation for other than personal service shall be set forth for informational purposes at the end of each such unit of appropriation for other than personal service. Any unit of appropriation representing the amount requested for more than one program, purpose, activity or institution shall be accompanied by a schedule allocating the amounts within such unit among each such program, purpose, activity or

institution, and such schedule shall be published simultaneously with the budget document in which such unit appears as a public data set in a structured, machine-readable format.

**b) Add a new section § 100-i of the Charter to establish a rigorous ontology for budget data.**

i. Each unit of appropriation, budget code, object code, program, purpose, activity or institution, and revenue source identified in the departmental estimates, the preliminary expense budget, the executive expense budget, the expense budget as adopted, any modification thereof, the financial plan and any update thereof, and any supporting schedule to any of the foregoing, shall be designated by a unique identifier, which shall:

1. remain constant across all such documents within a fiscal year and across fiscal years;

2. where any such identifier or its associated name is created, changed, subdivided, combined or discontinued, be accompanied by a crosswalk, published as a public data set simultaneously with the document in which such change first appears, mapping each new or changed identifier to each predecessor identifier, together with a restatement of the amounts presented for the [four] preceding fiscal years under the revised structure;

3. conform to the uniform system of accounting and reporting established by the comptroller pursuant to subdivision (m) of section 93, such that amounts presented in each such document are reconcilable to amounts recorded in the city's accounting system; and

4. be published, together with all associated names, descriptions and amounts, as public data sets in a structured, machine-readable format simultaneously with the publication of each such document.

**3) Amend chapter 48 of the Charter to include a new § 1077 on interagency data sharing, minimizing institutional and legal frictions in coordinating and standardizing semantic interoperability, while protecting constituent privacy.**

§ 1077 — Interagency data sharing

a. For purposes of this section:

(1) the term "identifying information" has the meaning set forth in section 23-1201 of the administrative code;

(2) the term "de-identified data" means data from which identifying information has been removed or aggregated such that there is no reasonable basis to believe the data can be used, alone or in combination with other reasonably available information, to identify or locate an individual, in accordance with standards, including standards for the suppression of small cells, promulgated by the chief privacy officer designated pursuant to subdivision h of section 8.

b. Except where disclosure is prohibited by federal or state law, each agency shall, upon written request of another agency, the council, the comptroller, the public advocate, a borough president, or a community board specifying the purpose of the request and the function authorized by law to which it relates, share data, other than identifying information, necessary for such purpose, within thirty days of such request, in a structured, machine-readable format conforming to standards promulgated pursuant to paragraph 8 of subdivision c of section 20-f. Where responsive data contains identifying information, the disclosing agency shall provide de-identified data responsive to the request within such period.

c. Identifying information may be shared pursuant to this section only between agencies, and only:

(1) in accordance with chapter 12 of title 23 of the administrative code, including approval by the privacy officers of both the disclosing and receiving agencies;

(2) pursuant to a written agreement specifying the purpose of the disclosure, limiting the data disclosed to the minimum necessary for such purpose, prohibiting re-disclosure except as authorized by such chapter, and establishing a retention period after which such data shall be securely destroyed or returned; and

(3) subject to logging of each such disclosure by the privacy officers of both agencies.

d. Where data shared pursuant to this section is confidential or otherwise protected by law, the receiving entity shall maintain all such protections, and such sharing shall not constitute a waiver of any privilege or confidentiality protection.

e. Nothing in this section shall be construed to require, authorize, or permit any collection, disclosure, retention, or use of identifying information that is restricted or prohibited by chapter 12 of title 23 of the administrative code, by any other local law, by any executive order limiting the collection or disclosure of identifying information, or by federal or state law; where any such provision affords greater protection to identifying information than this section, such provision shall govern. This section establishes a minimum obligation to share data other than identifying information and shall not be construed to limit any right of access to information existing under any other provision of law.

f. The office of data analytics shall establish standard terms and procedures for sharing pursuant to this section, including a model written agreement for the purposes of subdivision c, and shall report annually, on its website and as a public data set, the number of requests made, fulfilled and denied pursuant to this section, the reasons for each denial, and the number of

disclosures of identifying information made pursuant to subdivision c, disaggregated by disclosing and receiving agency.

Name

# Saskia Haegens

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

Please find attached a memo concerning recommendations to reform CECM/SAPO.
While CECM/SAPO is regulated by the Rules of the City of New York, this is certainly a great candidate for improving government efficiency.

Briefly — we recommend 1) creating one desk for all event permitting to shift the onus of interagency coordination from the applicant to CECM, 2) consolidating permit requirements and removing the countless redundancies in the current system, and 3) actively facilitating community-organized events (this includes e.g. right-sizing insurance requirements).

Attachment(s)



MEMO - Reform the Street Activity Per...

Date Submitted June 12, 2026

Topic Unnecessary Bureaucracy × Procurement Reform × Miscellaneous ×

| | |
|---|---|
| Method Received | Airtable Form |
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Reform CECM/SAPO |

**MEMORANDUM**

**TO:**
Mayor Zohran Mamdani
Chief of Staff Elle Bisgaard-Church
First Deputy Mayor Dean Fuleihan
Deputy Mayor for Operations Julia Kerson
Deputy Mayor for Housing and Planning Leila Bozorg

**FROM:** Saskia Haegens, Alex Morano, John Surico

**SUBJECT:** Street Activity Permit Office (SAPO) reform recommendations

Within the Mayor's Office of Citywide Event Coordination and Management (CECM) is the Street Activity Permit Office (SAPO), which coordinates and oversees block parties, parades, Open Streets, health fairs, running and cycling events, and markets — anything that requires a City-issued permit for the use of streets, sidewalks and plazas, no matter how large or small. Making it easy for New Yorkers to access and activate the public space outside their home is essential to cultivating civic life-building activities across the five boroughs.

However, the City's event permitting process is notoriously burdensome, with onerous insurance and maintenance terms, duplicative paperwork, and time-consuming reviews. These practices make obtaining permits extremely difficult, cutting off scores of New Yorkers from enjoying the public space where they live. Similar burdens persist within the permitting process for the City's parks and green spaces. The result is an uneven landscape of access that disproportionately benefits New Yorkers of means: there are those who have the time, money and resources to learn how to navigate City permit applications, and those who do not.

In addition to block parties and similar community-centered events, the City's public space programming and street activations rely heavily on local community partners, which includes nonprofits such as BIDs, block associations, and volunteers. Yet these partners are also subject to an arduous and arbitrary permit application process, even though they provide services the City actively benefits from. This current system is both counterproductive and counterintuitive.

Just this last year, Open Streets volunteers said SAPO required parents to sign liability waivers before their children could accept Halloween candy during the NYCDOT's "Trick or Streets" program. In another instance, organizers were told the day before a major event they had planned on an Open Street that it wasn't allowed, even though they filed applications weeks in advance. Adding simple elements, like amplified music, a small platform or food, triggers separate permit requirements with agencies like NYPD, DOB, and DOHMH, respectively, each of which come attached with their own processes and fees.

**The City's permitting process must be rebuilt to create a process through which New Yorkers and partner organizations can easily take advantage of public space to cultivate civic and community life, support local businesses, and encourage active transportation.**

**Recommendations**

- **Create a one-stop-shop for all event permitting (i.e., streets, plazas, parks) that shifts the burden of interagency coordination from the applicant to CECM.**
    - Designate CECM officials to coordinate with assigned counterparts at relevant agencies who can quickly address any issues, as the office's title states;
    - Form a new working group of NYCDOT, NYC Parks and other pertinent partner agencies to commit to rebuilding the permitting application process from the ground up by the second year of the Mamdani administration.
- **Remove redundancies throughout the permitting application process by:**
    - Consolidating permitting for public space events such that event organizers do not need to submit multiple permit requests to multiple agencies for simple events (e.g., include amplified sound in the CECM event permit application instead of requiring a separate application to NYPD);
    - Eliminating the redundant permit requirement for community partners with an executed agreement with the City to provide public realm programming, including plaza partners, Open Streets partners, and private Parks partners.
- **Facilitate and encourage the use of streets and parks for community-organized events, by streamlining the entire application process and mandating CECM take a high-quality customer service approach. This should include:**
    - Increase staffing at relevant agencies like CECM, NYCDOT and NYC Parks to more quickly and efficiently handle public space permitting across more neighborhoods, reducing last-minute responses that leave organizers scrambling or unsure if they can hold their event;
    - Create tiered insurance requirements based on the scale and nature of the event to rightsize risk and prevent burdensome costs for small and simple activations (e.g., no insurance required for story time with attendance of ten, but CGL policy required for a market and music performance attracting hundreds);
    - Explore a city-state partnership for a risk retention group insurance consortium, pooling the demand of longstanding public space programmers and organizers to lower costs and incentivize competition;
    - Provide technical assistance to build up capacity with community partners through an expanded "Public Space Academy";
    - Provide a new option for multi-day or seasonal activity permits so schools, community groups and block associations can get approval for the entire length of their programming plans (rather than applying for recurring programming via repetitive paperwork);

- Deliver permit approvals for events based on size and duration (e.g., under certain number of attendees or days for non-profit and community organizations needs turnaround within certain number of days/weeks);
- Eliminate permit fees for nonprofit community organizations and local merchant groups or small businesses;
- Consider the creation of a “Public Realm Fund” where existing SAPO fees can be tangibly returned to neighborhoods in the form of free public programming and community beautification efforts;
- Create a fully public, real-time dataset of citywide events by type to better understand how New Yorkers are using our public space, amplify public access to these events, and assess inequities to help guide policy and resources to foster greater participation in activating a vibrant public realm in all neighborhoods.

**Conclusion**

Today, CECM and SAPO present a key hurdle to creating and catalyzing New York City’s precious public space, cutting off countless residents from the many benefits that come with thriving community hubs. For years, major advocacy groups have been calling for change, but to no avail. Led by the Office of the Public Realm, some progress has been made in recent years to streamline applications for Open Streets and Open Culture — both pandemic-era programs that are now permanent — but still, immediate actions can be taken by the Mamdani administration to ensure New Yorkers are set up to succeed in their own backyard.

Name

## Mira Zaki

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

My name is Mira Zaki, I've lived in NYC for almost 20 years, and my experience since 2023 demonstrates that the New York City safety net is a closed loop designed to exhaust the resident while protecting the bureaucracy.

1. The Homebase Gatekeeping and "Categorical Exclusion" Model
Homebase, the city's flagship prevention program, functions as a barrier rather than a resource.

The "Wait and Deny" Loop: In 2026, I waited nine weeks for a caseworker assignment only to be disqualified in five minutes. This process is inherently predatory; if I were categorically ineligible, that determination could and should have been made at the initial intake.

Discriminatory Infrastructure: During an in-person appointment, I was forced to navigate a broken elevator despite my documented osteoarthritis.

The Categorical Exclusion Trap: Staff explicitly told me that unless I am a mother with children, a veteran, or a victim of domestic violence, I do not qualify for primary subsidies. This is a policy of "Categorical Exclusion" that abandons disabled, non SMI/SUD residents who are nonetheless facing life threatening housing emergencies.

2. The Advocacy and Legal "Hollow Intake"
I have been failed by the full spectrum of legal and tenant advocacy: DRNY, Legal Aid, Mobilization for Justice (MFJ), the Mental Health Law Project (MHLP), and Housing Conservation Coordinators (HCC). These organizations utilize a "hollow intake" model. They accept applicants into their process, providing false hope, only to disclose months later that they are at capacity. This prevents tenants from seeking other counsel until it is too late to prevent displacement.

3. The Call Center and Supervisory Failure
The city relies on untrained, low level call center representatives who lack centralized case files and decision-making authority. I have been subjected to "administrative harassment"—including 16 uncoordinated, uninformed calls in a single day and pushed to the point of tears by supervisors who offer only denial instead of assistance. Forcing residents to wait on hold for 6+ hours is a deliberate policy of attrition.

4. Financial Exploitation and Infrastructure Failure
HRA's reliance on archaic paper checks causes systemic, monthly payment delays. These delays trigger late fees and "pre-lien" status for my storage unit (Manhattan Mini Storage #1754874), placing my professional photography archive at constant risk of auction. HRA refuses to adopt modern electronic (ACH) payments used by the IRS and private industry and refuses to reimburse the late fees caused by their own administrative delays.

5. Lack of Oversight and Constituent Accountability

The city's oversight mechanisms are non functional "complaint graveyards." I have contacted over 15 entities, including the Office of the Public Advocate, City Council, the Manhattan Borough President, and even the Mayor (via certified mail which remains unsigned). Constituent Affairs units respond only with automated emails or dismissive redirects to the very offices that previously denied me.

Recommendations for the Commission:

End the "Gatekeeping" Model: Reform Homebase to act as a direct service provider. Staff must be empowered to provide immediate emergency relief based on documented displacement, not categorical labels.

End the Call Center Model: Replace the current intake system with a Case Specific Management System where every resident has a named, trained caseworker with actual decision-making authority.

Mandate Advocacy Transparency: Charter mandated rules requiring all city funded advocacy organizations (DRNY, Legal Aid, etc.) to disclose their capacity limitations at the moment of inquiry.

Modernize Financial Disbursal: Mandate that all emergency payments be made via electronic transfer (ACH).

Accessibility as a Constitutional Right: Mandate that all administrative portals be fully compliant with the ADA and accessible via desktop.

Binding Ombudsman: Create an independent authority with the power to issue binding directives to agency staff to resolve crises immediately.

Fast-Track Tenant Protections: Reform the DHCR to include an emergency adjudication lane for rent overcharge cases where the tenant is facing imminent displacement.

I am a certified WBE business owner and a long-term resident of New York. I have done everything a citizen can do to navigate these systems, only to find that the bureaucracy is designed to protect itself, not the people. The Charter must be rewritten to prioritize the needs of the resident over the maintenance of an unresponsive, performative bureaucracy. I have hundreds of pages of attachments and I'd be happy to speak further. There's no way to summarize, so I am not including any documents here.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 12, 2026

| | |
|---|---|
| Topic | Unnecessary Bureaucracy ✕ Tenant Protection ✕ Enforcement ✕ Reporting Requirements ✕ Technology ✕ Support Oversight Agencies ✕ Department of Buildings (DOB) Issues ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | |

Name

# Aquanetta Wright

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Ferry Godmother Productions, Inc. |
| Zip Code | [redacted] |
| Public Comment | As someone who was appointed by the Mayor to serve on the City of Newburgh Charter Revision Commission. I am very aware of the importance of the responsibilities you are charged with. Unfortunately, when I attended the virtual meeting on Tuesday, I was unable to speak due to time constraints. I have attached what I was going to say that evening, along with a brief presentation of my suggestion and my company's MWBE Capability Statement. I welcome the opportunity to continue the conversation. |

Attachment(s)



New York City Charter Suggestion 2026...




Aquanetta Ferry Godmother Wright Ch...




Capabilities Statement.pdf

Date Submitted: June 12, 2026

Topic: Procurement Reform, Miscellaneous

Method Received: Airtable Form

Is it charter related?: Yes

3

Charter Related: No

Topic Simplified: Education & Youth

| | |
|---|---|
| Subtopic | Invest in work to learn programs |



**Ferry Godmother Productions**

NYS MWBE certified Event Producer & Mktg

Hello

My name is Aquanetta Wright, and I am a born-and-raised Harlem resident, the owner of Ferry Godmother Productions, a certified MWBE, and a 100% service-connected disabled veteran-owned business.

For many years, I have had the privilege of working with hundreds of New York City youth through SYEP and other programs, as well as college students and graduates from across the country. Together, we have explored the power of arts, writing, video game development, virtual reality, and entrepreneurship to create opportunities and build brighter futures.

Today, New York City stands at an important crossroads.

Artificial intelligence, virtual reality, gaming, and digital media are changing how people work, create, and earn a living. The careers our young people will pursue tomorrow are evolving faster than ever before.

That is why I believe this City has an incredible opportunity to lead by investing in Work-to-Learn programs that combine arts, technology, entrepreneurship, AI, virtual reality, digital media, and video game development.

These are not just creative activities. They are industries. They are businesses. They are careers.

Recent economic data shows that arts and cultural production contributes more than $164 billion to New York State's economy, while New York City's creative economy generates approximately $110 billion in economic activity and supports hundreds of thousands of jobs.

The question is not whether the arts have economic value. The question is whether we are preparing enough young people to participate in that opportunity.

Today's workforce needs more than technical skills alone. Young people need opportunities to innovate, create intellectual property, and understand entrepreneurship. AI can generate content, but people create culture, ideas, and community.

Organizations like ours provide hands-on experience in digital art, animation, storytelling, virtual reality, video game development, and entrepreneurship. We help young people discover their talents while learning how to transform creativity into careers, businesses, and economic opportunity.

Government cannot do this work alone. Schools cannot do this work alone. Strong partnerships with experienced community-based businesses are essential.

I encourage New York City to expand Work-to-Learn programs, partner with MWBEs, and invest in emerging industries that will help prepare our youth for the future.

Our young people have the talent, creativity, and potential to lead the future economy. I welcome the opportunity to work with City leaders to turn creativity into careers and ideas into businesses through arts, technology, and entrepreneurship, and to help build a stronger future for the next generation of New Yorkers.

# A MANDATE FOR THE FUTURE

MWBE CERTIFIED OWNED

DISABLED VETERAN OWNED



PRESENTED BY
AQUANETTA "FERRYGODMOTHER" WRIGHT

FERRY GODMOTHER PRODUCTIONS



FERRY GODMOTHER PRODUCTIONS



JUNE 2026

# NEW YORK CITY AT A CRITICAL CROSSROADS



The rapid rise of AI, VR, and digital media is transforming how New Yorkers work and create.

Current youth workforce programs are rooted in 1990s legislation and lack modern mandates.

Failing to act now risks leaving City of New York youth behind in the global digital economy.

# THE NYC CHARTER GAP

**New York City should establish youth work-to-learn pathways in artificial intelligence, gaming, virtual reality, animation, illustration, digital storytelling, and immersive entrepreneurship so young people are prepared not only to obtain jobs—but to launch studios, creative agencies, technology ventures, and community-based businesses in a growing AI economy.**

## Outdated Legislation

Section 733(c) references the 1998 Workforce Investment Act—drafted before the smartphone era.

## Current mandates do not require the City to prepare youth for AI, machine learning, or automation.

Without a Charter mandate, tech-readiness programs remain optional and subject to budget cuts.



# $110B CREATIVE ECONOMY

- 1 in every 8 dollars in NYC economic activity is tied to the creative economy (~13% of city output).
- 62,000+ creative workers in NYC are already self-employed—a strong indicator that entrepreneurship is a major pathway in this sector.
- Creative media employment in NYC surged nearly 20% by 2022 after the pandemic recovery period.

**New York City already has a $110 billion creative economy. AI is not replacing creativity—it is changing how creative value is produced. Youth who gain paid work-to-learn experiences in gaming, virtual reality, animation, illustration, writing, immersive media, and entrepreneurship will be better positioned to create businesses, retain intellectual property, and generate future tax revenue for the city.**

# SUGGESTED NYC CHARTER / POLICY LANGUAGE

- AI literacy beginning in middle and high school
- Paid AI + creative internships
- Youth apprenticeships with creative and technology employers
- Community-based makerspaces
- Workforce pathways into gaming, illustration, animation, media production, and entrepreneurship
- Priority access for underserved and disability communities






# EVOLVING WORK-TO-LEARN

## BEYOND HOBBIES

VR, Gaming, and AI are not just entertainment—they are high-growth industries that require specialized entrepreneurship training.

## REAL-WORLD IMPACT

Success requires moving beyond technical training toward innovation and intellectual property ownership for NYC youth.

## FUTURE CAREERS

SYEP must evolve to include digital art, storytelling, and business scaling in the modern gig and ownership economy.

**"Humans create culture. AI generates content. We must train the creators."**

# THE POWER OF MWBE PARTNERSHIPS



Local MWBEs bring deep community roots and industry expertise government cannot replicate.




Industry partnerships bridge the digital divide and deliver real-world training.

MWBEs help young people learn to create and scale sustainable businesses.



# PROPOSED CHARTER AMENDMENT

**"The City of New York shall be responsible for developing programs that explicitly prepare NYC youth for careers in emerging technologies, including AI, machine learning, VR, and digital media production... partnering with certified MWBEs to provide relevant Work-to-Learn opportunities."**

- **MODERNIZE SECTION 733**
  Explicitly include AI and emerging tech as core DYCD responsibilities.
- **ENTREPRENEURIAL FOCUS**
  Shift from general employment to innovation within the creative economy.






# CONCLUSION

If NYC invests in youth work-to-learn programs in gaming, virtual reality, animation, illustration, writing, AI content creation, and entrepreneurship, young people can participate in sectors that already generate over $110 billion locally today while building ownership opportunities in the fastest-growing creative markets of the next decade.



# THANK YOU

PRESENTED BY
AQUANETTA “FERRYGODMOTHER” WRIGHT
FERRY GODMOTHER PRODUCTIONS
CERTIFIED





SUBMITTED
JUNE 2026

# A MANDATE FOR THE FUTURE

MWBE CERTIFIED OWNED

DISABLED VETERAN OWNED





PRESENTED BY
AQUANETTA "FERRYGODMOTHER" WRIGHT

FERRY GODMOTHER PRODUCTIONS

FERRY GODMOTHER PRODUCTIONS

JUNE 2026

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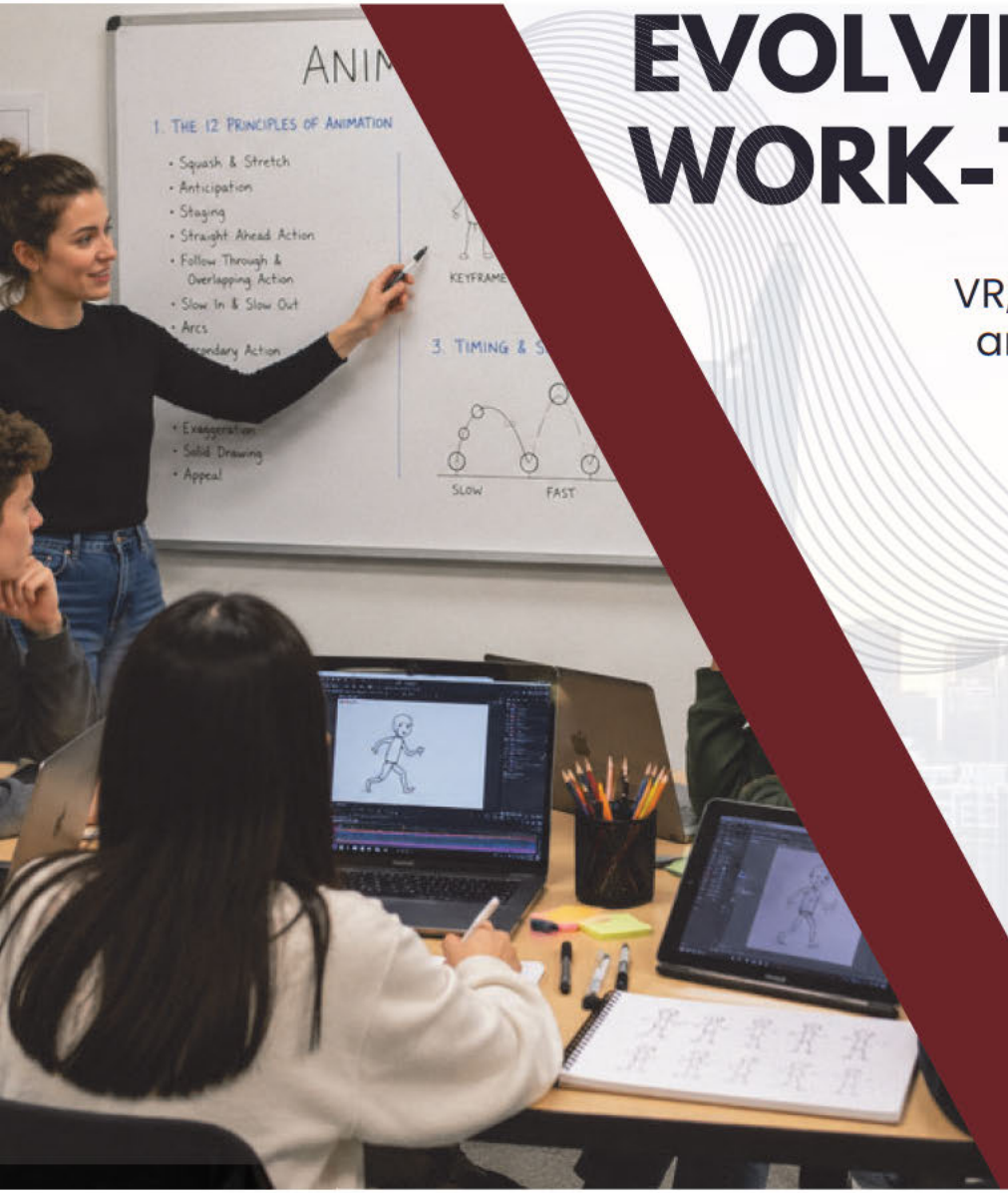
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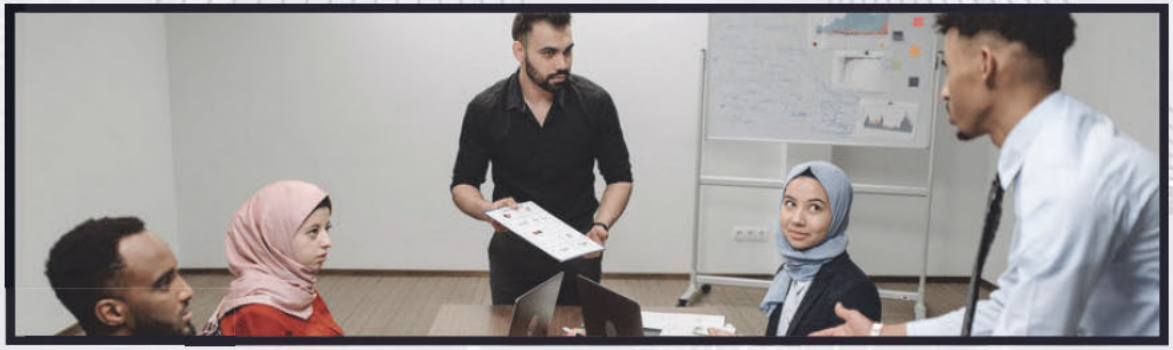
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# THANK YOU


PRESENTED BY

AQUANETTA "FERRYGODMOTHER" WRIGHT

FERRY GODMOTHER PRODUCTIONS

MWBE CERTIFIED

[redacted]

[redacted]

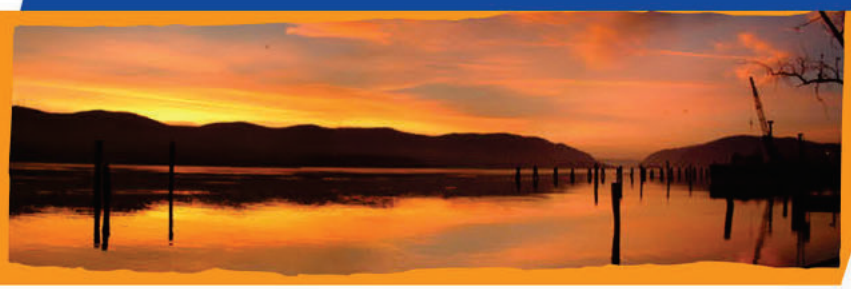





SUBMITTED
JUNE 2026

# Ferry Godmother Productions

## CAPABILITIES STATEMENT





Ferry Godmother Productions, inc. is a New York State-certified MWBE in event production, advertising, marketing, audio, and video production. With over 35 years in internship and event administration, we offer entrepreneurial and business training across various levels in the arts, business, and video game development. Our professional-level approach extends to training high school and college students, as well as undergraduate, master's, and Ph.D. degree holders.

Dunn : [redacted]
TAX ID: [redacted]

## Collaborations

- As Chairperson of the Board of Ethics and a Key Stakeholder in the Master Plan for Newburgh, NY, produced concerts and special events to foster strong community ties, collaborating closely with non-profit organizations and elected officials.
- Teach Event Production and facilitate seminars as guest speakers for 11th and 12th graders on the importance of math in business at Newburgh Free School District.
- Train high school students in the importance of city government at Orange County Community College (LPP)
- An internship worksite for an NYC high school, AITHOS and not-for-profit programs like SYEP, ISP, HANAC, and Pathfinders.

## Differentiators

- Produce unique programs and concerts featuring Grammy winners, nominees, and known locals.
- Established as the oldest and longest premier destination for concerts in the Hudson Valley, fostering community engagement and boosting tourism.
- A flexible, 100% remote, and impactful option for entrepreneurial and career readiness.
- Ethical, diverse, and inclusive. A Black, Hispanic, lesbian, senior, disabled veteran-owned business.
- Thorough grasp and active engagement with local and nationwide youth markets enabling swift development and implementation of curricula, projects, and trainings.
- Develop work-learn curriculums that are cost-effective, efficient, and impactful educational solutions.
- Hands-on, real-world scenarios with improve student engagement and academic performance.
- Contribute to the economic development and reputation of municipalities, organizations, and businesses.

## Core Competences

**Work-Learn**

Delivers a high-quality experience on 14 teams, preparing students and graduates for career and entrepreneurial success.

- Marketing
- Script Writing
- SEO
- Social Media
- Illustration
- 2D Animation
- 3D Animation
- Video Game Broadcasting
- 2D/3D Video Game Development
- Business Development
- Blog Content Creation
- Website Development
- Manager Training
- Video Editing

**Event Production**

- Production Management: Venue, scheduling, licenses and permissions, line-up management, volunteers, attendees, risk management, and exhibitors.
- Event Management: Event contracts, but not limited to talent, partnerships, marketing vendors, sponsors, suppliers, audio, video, lighting, and post evaluations.
- Marketing Management: Branding strategies, analysis and advertising, social media, graphic designs, 2d/3d animations, commercials and virtual reality games, websites, online and offline media buys.
- Financial Management: Oversee budget, grants, sponsorship and in-kind development, suppliers, vendors, and tickets.

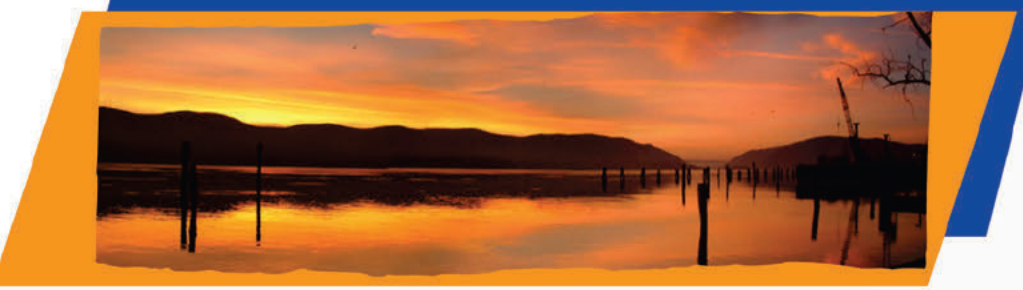
[redacted]


**Aquanetta Ferrygodmother Wright**
President & Executive Producer
[redacted]


## CLIENTS and PRODUCTIONS

NEWBURGH ENLARGED CITY SCHOOL DISTRICT
Newburgh Free Library
STORM KING ART CENTER
THE BILLIE HOLIDAY THEATRE
Brooklyn, NY
ORANGE COUNTY ARBORETUM
Healthy Body Mind & Spirit HEALTH FAIR
Sacred Fellowship Ministries
Brooklyn, NY

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[redacted]


**Aquanetta Ferrygodmother Wright**
President & Executive Producer
[redacted]


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STORM KING ART CENTER

THE BILLIE HOLIDAY THEATRE
Brooklyn, NY

ORANGE COUNTY ARBORETUM

Healthy Body Mind & Spirit HEALTH FAIR
Sacred Fellowship Ministries
Brooklyn, NY

Newburgh Jazz Series · Orange County Pop Rock Doo Wop · Newburgh Gospel Series · African American Heritage Music Trail · Newburgh Jewish Music Series

Name

# Yejia Chen

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I liked Brad Lander's idea of putting parts of the original City of Yes up to the public as a ballot measure. It would be very efficient to get housing built if we could skip all the steps needed to upzone.

My neighborhood, Park Slope, has great transit access, and it's really sad to see one-story buildings within a couple blocks of a subway station, and seeing that they're zoned for barely more than that. More people should be able to live in this neighborhood, and all neighborhoods in the city.

Separately, I would really appreciate if you could publish a static file of the transcript of these meetings, with the speaker clearly noted. As someone with difficulties processing speech, attending the live meetings and watching the recording are not accessible to me. I'm not sure if the YouTube transcript is accurate, but it doesn't show who's speaking, and I don't see a way to download it as a file so I can view it without having to scroll as much (it's very small on my computer).

Thank you for your consideration.

Attachment(s)

Drop files here or click to browse

Date Submitted June 13, 2026

Topic Real Estate and Development ✕ Technology ✕

Method Received Airtable Form

| | |
|---|---|
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Housing |
| Subtopic | Improve zoning process |

Name

# Aiesha Osborne

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Hello! i would like to talk about our drainage problem in Brooklyn and the other boroughs. I believe the trash clogging the drains are an issue but also the drain pipes need to be overhauled and or cleaned on an ongoing basis. Any time theres a rainstorm there is flooding in East Flatbush, without fail. My district's old office was moved due to flooding from improper drainage. This needs to be addressed.

Attachment(s)



IMG_0142.mov

Date Submitted June 13, 2026

Topic Department of Buildings (DOB) Issues ✕ Unnecessary Bureaucracy ✕ Enforcement ✕

Method Received Airtable Form

| | |
|---|---|
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Quality of life |
| Subtopic | Drainage problems |



Name

# Rebecca Poole

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Council of New York Cooperatives & Condominiums (CNYC Inc) |
| Zip Code | |
| Public Comment | The Council of New York Cooperatives & Condominiums is a member-funded not-for-profit organization providing information, education and advocacy to and for cooperatives and condominiums across the five boroughs since 1975. In support of the work being undertaken by COGE, CNYC recommends the development and implementation of a uniform and easily accessible platform for providing filtered up-to-date compliance information and data across all city agencies. This would not only improve the ability of property owners, including co ops and condos, to remain in control of compliance at a reduced cost, but could also be used by city legislators as they consider new legislation, rules, and codes. In conjunction with OpenData week this year, CNYC launched a Co op and Condo Data Dashboard, which brought together information from across multiple agencies, including the Department of Buildings, the Department of Finance, the Division of Housing, Preservation and Development, and the Landmarks Preservation Commission. While successful, our first of its kind dashboard proved challenging to develop due to a lack of consistency and standardization across city agencies. CNYC is eager to partner with the Commission to resolve these issues and drive the city's goal of affordable housing forward. Our full testimony is attached below. |

Attachment(s)



Council of New York Cooperatives & Condominiums
INFORMATION, EDUCATION AND ADVOCACY

**Testimony before the Commission on Government Efficiency (COGE)**
Modernizing government and streamlining government technology
Brooklyn Law School, 250 Joralemon Street, Brooklyn, NY 11201

June 11, 2026

Good evening, members of the Commission. Thank you for the opportunity to testify.

My name is Nathan J. Lichtenstein, and I am a board member of the Council of New York Cooperatives & Condominiums, a member-funded not-for-profit organization providing information, education and advocacy to and for co-ops and condos in the five boroughs and beyond.

CNYC's co-op and condo member buildings range in size from 2 apartments to well over 6,000 units and are home to multiple generations of New Yorkers spanning the economic spectrum.

In a city with one of the lowest homeownership rates in the nation - 30%, compared with the nationwide average of 66% - co-ops and condos provide the only pathway to affordable homeownership, according to the New York City's Comptroller's Report on Homeownership in 2024. 99% of homes available for purchase for less than $400,000 were co-op and condo homes.

The housing cost burden on co-op and condo homeowners has escalated over the past five years, as the cost of insurance, utilities, repairs and maintenance, and real estate taxes have increased substantially. The impact on affordability has been exacerbated by the cost and demands of compliance with new city regulations; This is where I will focus my testimony, as streamlining existing technology platforms and processes can have a positive impact on housing costs.

On an annual basis, volunteer co-op and condo board members must ensure compliance with over 100 local laws and codes spread across all city agencies. Failure to comply increases potential liability, stalls projects requiring permits, jeopardizes insurance policies and underlying loans and adds to the costs faced by co-op and condo homeowners who already self-fund all preservation and compliance projects.

As compliance mandates have grown, the lack of a central platform to provide access to information, updates, and filing has become more problematic. Without the ability to easily check applicability and updated requirements, co-ops and condos may miss deadlines, plan to undertake projects based on outdated information, fall prey to predatory businesses, and incorrectly prioritize the expenditure of limited funds.

NJL COGE Testimony - June 11 2026.pdf

Date Submitted: June 13, 2026

Topic: Technology ✕ | Department of Buildings (DOB) Issues ✕ | Real Estate and Development ✕ | Unnecessary Bureaucracy ✕

Method Received: Airtable Form

Is it charter related: No

1

Charter Related: Yes

Topic Simplified: Technology

Subtopic: Implement a uniform compliance data platform

Council of New York Cooperatives & Condominiums
INFORMATION, EDUCATION AND ADVOCACY

[redacted]

**Testimony before the Commission on Government Efficiency (COGE)**
Modernizing government and streamlining government technology

[redacted]

June 11, 2026

Good evening, members of the Commission. Thank you for the opportunity to testify.

My name is Nathan J. Lichtenstein, and I am a board member of the Council of New York Cooperatives & Condominiums, a member-funded not-for-profit organization providing information, education and advocacy to and for co-ops and condos in the five boroughs and beyond.

CNYC's co-op and condo member buildings range in size from 2 apartments to well over 6,000 units and are home to multiple generations of New Yorkers spanning the economic spectrum.

In a city with one of the lowest homeownership rates in the nation - 30%, compared with the nationwide average of 66% - co-ops and condos provide the only pathway to affordable homeownership; according to the New York City's Comptroller's Report on Homeownership in 2024, 99% of homes available for purchase for less than $400,000 were co-op and condo homes.

The housing cost burden on co-op and condo homeowners has escalated over the past five years as the cost of insurance, utilities, repairs and maintenance, and real estate taxes have increased substantially. The impact on affordability has been exacerbated by the cost and demands of compliance with new city regulations; This is where I will focus my testimony, as streamlining existing technology platforms and processes can have a positive impact on housing costs.

On an annual basis, volunteer co-op and condo board members must ensure compliance with over 100 local laws and codes spread across all city agencies. Failure to comply increases potential liability, stalls projects requiring permits, jeopardizes insurance policies and underlying loans and adds to the costs faced by co-op and condo homeowners who already self-fund all preservation and compliance projects.

As compliance mandates have grown, the lack of a central platform to provide access to information, updates, and filing has become more problematic. Without the ability to easily check applicability and updated requirements, co-ops and condos may miss deadlines, plan to undertake projects based on outdated information, fall prey to predatory businesses, and incorrectly prioritize the expenditure of limited funds.

[redacted]

CNYC recommends the city develop and implement a uniform and easily accessible platform for providing filtered up-to-date compliance information and data across all city agencies. This would not only improve the ability of property owners, including co-ops and condos, to remain in control of compliance at a reduced cost, but could also be used by city legislators as they consider new legislation, rules, and codes.

In conjunction with OpenData week this year, CNYC launched a Co-op and Condo Data Dashboard, which brought together information from across multiple agencies, including the Department of Buildings, the Department of Finance, the Division of Housing, Preservation and Development, and the Landmarks Preservation Commission. While successful, our first-of-its-kind dashboard proved challenging to develop due to a lack of consistency and standardization across city agencies.

Buildings cannot be easily identified for aggregate reporting across agencies. A co-op or condo may be referenced by their street address, borough/block/lot ("BBL") number, DOB building ID number ("BIN"), HPD registration number, co-op ID, condo ID, or both. An authoritative source on the number of apartments is non-existent or grossly inaccurate depending on the type of building, requiring manual tabulation or reading of certificates of occupancy.

Making this information more easily accessible to the public is doable, and there is precedent for the City to offer a "helper" service to make this more easily accessible to the public. The Department of City Planning offers both the GeoSearch and Geoservice APIs to map street addresses to BIN and BBL numbers. Combining the data building owners and operators need to ensure compliance into a single, authoritative source using existing city data would be a welcome step in streamlining compliance goals.

Implementing a Single Sign-On ("SSO") platform across city agencies would also help prevent the difficulties encountered by board members during updates to the co-op/condo tax abatement portal and the implementation of the new BEAM-ESPM-DOBNow platform. The city has already taken steps towards this goal with the implementation of NYC ID for the DOB:NOW portals. Expanding this to all housing-related portals will further reduce friction.

In closing, New York City's co-op and condo homeowners are essential to the city meeting its affordable housing goals by continuing to stabilize neighborhoods, self-fund the preservation of existing housing, and ensure an affordable homeownership model continues. The administrative and logistic burden of compliance under the current set-up is harmful to that goal. However, with the development of this commission there is an opportunity to streamline compliance, reduce costs, and increase awareness and efficiencies by centralizing information and creating uniformity across agencies.

The Council of New York Cooperatives & Condominiums is eager to partner with the Commission on these issues, and in developing and testing solutions to help move the city's goal of affordable housing forward. Thank you.

Council of New York Cooperatives & Condominiums (CNYC Inc)
Nathan J. Lichtenstein, Board Member and Chair of Technology Committee

Name

# Anamaria Torres

Email [redacted]

Professional Affiliation: Former Foster Child

Zip Code [redacted]

Public Comment: I'll attach a document on my thoughts for improvements to the foster care system in NYC

Attachment(s)



Foster care improvements.pdf

Date Submitted: June 14, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Is it charter related? No

1

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Education & Youth |
| Subtopic | Foster care |

**1. Stronger Oversight and Accountability for Foster Parents — Especially Those Taking Teens**

There needs to be a more effective system for monitoring foster parents, particularly those who exclusively take in teenagers. Teens are often placed with the least oversight, despite being among the most vulnerable.

I personally experienced situations where basic care and responsibility were absent. For example, there was an instance where my foster parent ignored a call from the police because she didn't recognize the number — if the officers hadn't intervened, I would have been left in custody overnight for a minor offense. Situations like this reveal a lack of engagement and responsibility that should never be acceptable.

Oversight should include:

- Clear expectations around availability and responsiveness
- Consequences when foster parents fail to act in the child's best interest
- Regular, unannounced check-ins that go beyond surface-level compliance

**2. Clear Standards for Housing Stability and Safety**

No foster youth should be told they cannot be in their home during the day simply because they are not in school or employed. I was told I could not be in the house from 8 a.m. to 5 p.m. despite having nowhere else to go.

In other cases, I was effectively told to "stay wherever I wanted" as long as I showed up for monthly check-ins — so the foster parent could continue receiving payments. This creates an environment where youth are technically "placed," but practically abandoned.

A foster home should be:

- A place of safety and stability
- Available to the child, not conditional on convenience
- Evaluated not just on paperwork, but on lived reality

**3. Financial Accountability and Income Requirements for Foster Parents**

Foster parents should be required to have a viable source of income outside of foster care payments. When a foster parent is receiving $2,000 or more per month for a child, yet the child lacks basic necessities like clothing and shoes, something is fundamentally broken.

It is unacceptable for foster youth to survive primarily on a small personal allowance while adults profit from their placement. Funds intended for child care should be traceable, and there should be accountability for how that money is used.

This could include:

- Minimum income requirements outside foster stipends
- Periodic audits or spending reviews tied to child welfare
- Direct provisions (clothing, school supplies) rather than assuming funds are used appropriately

**4. Real Preparation for Adulthood: Financial Literacy and Employment Opportunities**

The system does not do enough to prepare youth for independence. Agencies should be providing:

- Mandatory financial literacy courses
- Paid internships and employment partnerships for working-age youth
- Real-world job experience, not just resume workshops

Employment should be part of care planning, not something youth have to figure out alone.

**5. Language Access and Skill-Building for Opportunity**

Language should never be a barrier to support or opportunity. Agencies should offer:

- Language classes for youth who do not speak English
- Optional language learning programs for those interested in gaining an additional skill

Language access helps foster connection, confidence, and employability — especially for youth aging out of care.

**6. Investment in Creative Expression and the Arts**

There should be dedicated programs and funding that allow foster youth to engage in creative spaces — whether that's painting, photography, music, writing, film, or other forms of art. Creative expression is not a luxury for foster youth; it is often one of the few healthy outlets available for processing trauma, building identity, and developing confidence.

Agencies could partner with:

- Community art studios and cultural centers
- Music programs, recording spaces, and media labs
- Local artists willing to mentor foster youth

These programs should be accessible, funded, and treated as legitimate developmental tools — not optional extras. Creative skills also translate into real career paths and should be recognized as such.

**7. Access to Trade Skills and Vocational Training**

Alongside traditional education, foster youth should have clear access to trade skills and vocational pathways. Not every young person thrives in a purely academic environment, and the system should not penalize that.

This includes:

- Funding for trade school programs (electrical, plumbing, HVAC, carpentry, cosmetology, culinary arts, etc.)
- Paid apprenticeships and hands-on training opportunities
- Support with tools, certifications, transportation, and work clothing

Trade skills offer stability, independence, and dignity — and for many foster youth, they provide a faster, more realistic path to self-sufficiency than college alone.

Here are some ways these things can be done financially

**1. Tax Incentives for Donated Time, Space, and Materials**

Companies, studios, and skilled professionals that donate their time, space, or materials to foster youth programs should be eligible for clear and meaningful tax incentives.

This could include:

- Tax deductions or credits for donated studio time, classroom space, equipment, or supplies
- Write-offs for professional hours donated (artists, tradespeople, instructors, mentors)
- Property tax abatements or local tax incentives for spaces regularly used by foster youth programs

By formalizing these incentives, agencies can encourage private-sector participation without relying solely on public funding.

**2. Public–Private Partnerships With Local Businesses and Unions**

Agencies can form partnerships with:

- Art studios, music venues, galleries, and media labs
- Trade unions, vocational schools, and apprenticeship programs
- Small businesses willing to train and mentor youth

In exchange for participation, partners could receive:

- Tax benefits
- Public recognition and certification as a "Youth Support Partner"
- Priority consideration for city or state contracts where applicable

This turns foster youth support into a shared civic responsibility rather than a siloed agency expense.

**3. Redirecting Existing Foster Care Funds Toward Direct Youth Development**

Rather than increasing overall spending, a portion of existing foster care funds could be reallocated toward direct services for youth — particularly older youth and those preparing to age out.

Examples include:

- Setting aside a fixed percentage of per-diem foster care payments for youth enrichment and skill-building
- Creating youth-controlled development accounts for creative programs, trade training, or certifications
- Offering vouchers instead of reimbursements to ensure funds are used as intended

This approach improves outcomes without requiring entirely new funding streams.

**4. Grant Matching and Outcome-Based Funding**

Cities and agencies can leverage:

- Matching grants that pair public funds with private or philanthropic contributions

- Outcome-based funding models that tie continued support to measurable results (job placement, certifications earned, program completion)

This reassures policymakers that funding is tied to tangible outcomes, not vague programming.

**5. Shared Community Spaces to Reduce Overhead**

Instead of building new facilities, programs can operate out of:

- Community centers
- Libraries
- Schools after hours
- Union halls, studios, and unused commercial spaces

This drastically reduces overhead while increasing neighborhood integration and visibility.

Name

# Jill Moses

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|---|---|
| Email | [redacted] |
| Professional Affiliation | The Inspired Community Project |
| Zip Code | [redacted] |

Public Comment

My name is Jill Moses, MA, BCBA, NYS LBA, and I am the Founder and Chief Executive Officer of The Inspired Community Project (TICP), a Bronx based nonprofit organization providing childcare, behavioral health services, developmental supports, and family advocacy to neurodivergent children and their families.
I am writing to encourage the Commission on Government Efficiency to consider Child Care Assistance Program (CCAP) funding, waitlist reduction, and family transition planning as essential components of New York's Universal Child Care strategy.

New York has made an extraordinary commitment to expanding access to childcare through Universal 2-K, 3-K, and Pre-K initiatives. These investments represent an important step toward ensuring all children have access to high quality early childhood education and care.
However, if the goal is universal access, then we must also address the tens of thousands of families who need childcare today and are unable to access it because the Child Care Assistance Program waitlist remains closed.

In March 2025, a Robin Hood-funded report from the Center for New York City Affairs at The New School warned that without action, New York City would face a significant childcare assistance funding crisis. More than a year later, those concerns have materialized. Recent reporting indicates that approximately 25,000 children remain on the CCAP waitlist, with new families effectively locked out of the system since May 2025.

At the same time, New York continues to invest billions of dollars in childcare and early childhood education. Providers across the city have available capacity. Families are seeking care. Yet the mechanism that would connect those families to existing childcare seats remains unavailable.
From an efficiency perspective, this presents a unique opportunity.

Rather than viewing CCAP separately from Universal Child Care, New York should treat waitlist reduction and voucher access as part of the Universal Child Care implementation strategy itself.

In fact, if the ultimate goal of Universal Child Care is a system in which families no longer need childcare vouchers because affordable, accessible care is universally available, then the transition of families currently waiting for assistance should be a defined part of the implementation plan.
A successful Universal Child Care strategy should answer a simple question: What happens to the families who need care today while the universal system is still being built?
For the approximately 25,000 children currently on the CCAP waitlist, the answer cannot be "wait indefinitely." Whether through voucher access, direct enrollment into publicly funded programs, or a combination of both, there should be a clear pathway for these families to access care as New York moves toward its universal childcare goals.

If vouchers are ultimately intended to play a smaller role in a future universal

system, then the responsible approach is not to leave families on a waitlist while that future is developed. The responsible approach is to make waitlist reduction and family transition planning a core measure of success for Universal Child Care implementation.

Doing so would immediately:
• Reduce bureaucratic barriers for tens of thousands of working families.
• Increase utilization of existing licensed childcare capacity.
• Generate measurable increases in childcare access while new Universal Child Care capacity continues to be developed.
• Strengthen childcare providers by filling currently available seats.
• Allow policymakers to demonstrate immediate progress toward universal access goals.
• Ensure that public investments are producing tangible outcomes for families now, not only years from now.

At The Inspired Community Project, I currently have open childcare seats available. I have personally turned away five eligible families just this week because they cannot access childcare vouchers. Those children could begin receiving services immediately. Their parents could return to work, maintain employment, or pursue educational opportunities immediately. The infrastructure already exists.

This is not simply a funding issue. It is an implementation issue.

For children with disabilities and developmental delays, the stakes are even higher. Childcare often serves as the primary setting where children build communication skills, social skills, independence, and school readiness. For many neurodivergent children, childcare is also where developmental needs are identified early and where critical supports are coordinated during the most important years of development. Every day spent waiting for access is a missed opportunity during a period when intervention can have lifelong impact.

The Commission on Government Efficiency has an opportunity to recommend a solution that advances two goals simultaneously: increasing the efficiency of existing public investments and accelerating the state's progress toward Universal Child Care.
By incorporating CCAP funding, enrollment expansion, waitlist reduction, and family transition planning into the broader Universal Child Care conversation, New York can immediately expand access for thousands of children using infrastructure that already exists while continuing to build the system of the future.
Universal Child Care should not be measured only by the number of new seats created. It should also be measured by how effectively we connect families to the seats that already exist and how successfully we transition families from today's childcare assistance system into tomorrow's universal one.

Clearing the CCAP waitlist and creating a transparent transition plan for those

families is one of the fastest and most efficient ways to demonstrate the impact of New York's commitment to Universal Child Care.

Thank you for your consideration and for your commitment to improving the effectiveness and efficiency of government services for New Yorkers.

Respectfully,
Jill Moses, MA, BCBA, NYS-LBA
Founder & Chief Executive Officer
The Inspired Community Project, Inc.
[redacted]

Attachment(s)



The Inspired Community Project - Publi...

Date Submitted: June 14, 2026

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

Method Received: Airtable Form

Is it charter related? No

1

Charter Related: No

Topic Simplified: Education & Youth

| | |
|---|---|
| Subtopic | Child care |

June 2026

Public Comment to the COGE

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Respectfully,



Jill Moses, MA, BCBA, NYS-LBA
Founder & Chief Executive Officer
The Inspired Community Project, Inc.
[redacted]

Name

## Robert Gordon

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|---|---|
| Email | [redacted] |
| Professional Affiliation | Recoding America Fund; Harvard Kennedy School |
| Zip Code | |

Public Comment

My name is Robert Gordon. I'm a vice president at Recoding America, a national non profit founded by Jennifer Pahlka to help governments transform for a fast-changing world. I've been a White House deputy and an NYC DOE employee. My dad worked at HRA for 30 years.

Excellent public services demand an excellent civil service system for recruiting and retaining great staff, but New York's is broken. There are about twice as many vacancies as before the pandemic, in jobs the city desperately needs: to issue permits for housing, to award contracts for roads, to collect taxes and deliver benefits.

Much of the challenge is at the state level. But much is in the city's hands.

Twenty-six hundred job titles, many with obscure names like "administrative staff analyst." An obstacle course for applicants, starting with exams that take months to grade and may not be given for years.14 15 months from to hire, per a recent Council hearing.

On the manager's side, a forced choice among just three top exam scorers. If they say no, rigid requirements to go down a list that may be years old.

The objectives here are good. Nobody wants a return to Tammany Hall.

But, and as I say this coming from an organization that works on these issues nationally, other states and cities determine merit, prevent corruption, and respect organized labor without such a labyrinth.

Boston, Denver, and Seattle Massachusetts, Minnesota, and Colorado either skip exams or limit them to a few departments like police and fire.

A "rule of three" operates in only four states.

And most states have half or a third as many job classifications as New York.

There's no reason to believe these placs are more corrupt, nor their employees less qualified.

Complexity favors powerful or popular interests that get access to workarounds–hiring exceptions, special authorities. Those with less influence lose out. And when the city can't hire the people it needs, it relies on contractors who cost more.

A better way is possible. Create broader job titles that match the labor market and create career paths. Let managers hire based on skills and experience, not just test scores. Fight corruption with targeted oversight, not straightjackets.

Here are two ideas that fit specifically in your charge:

First, even in a world of state authority, consider changing the charter to take advantage of state-offered flexibilities like the NY HELPS program that temporarily suspended exams for many hard to fill titles. It resulted in over 40,000 new state hires. Unlike 45 counties, New York City opted out. A new mayor and charter amendment can opt in.

Second: establish a commission to overhaul the city's civil service system, like the SPEED commission on housing. Not nibbling around the edges, like more authorities and better websites. But real change, soup to nuts.

Millions of New Yorkers are all-in on this Administration's ambitious vision. Fix hiring so that the city can deliver.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 14, 2026

Topic: Procurement Reform ✕ | Unnecessary Bureaucracy ✕ | Reporting Requirements ✕ | Miscellaneous ✕

Method Received: Airtable Form

Is it charter related?

Charter Related: Yes

Expand

Topic Simplified: Unnecessary bureaucracy

Subtopic: Improve City hiring and civil service

Name

# Krystal Lane

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

I believe educators who work at public charter schools should get parking passes! We used to years ago but then it was stripped away from us. Teaching is so demanding and it's not often possible to move cars around for street cleaning because we're in the classroom. I really can't emphasize enough how life changing this would be to so many crucial people in our city!

Attachment(s)

Drop files here or click to browse

Date Submitted June 14, 2026

Topic Miscellaneous

Method Received Airtable Form

Is it charter related?

Charter Related No

Topic Simplified Education & Youth

| | |
|---|---|
| Subtopic | Give teachers parking placards |

Expand

Name

## Jessie Fields

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|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Testimony of Dr. Jessie Fields before the NYC Charter Revision Commission Thursday, June 11, 2026 at Brooklyn Law School

Good evening Commissioners.

I am Dr. Jessie Fields, a Harlem community doctor. I am affiliated with Mount Sinai Hospital.

And I am a member of the New York City Maternal Mortality Review Committee.

I am on the Board of a national youth development program, the All Stars Project, that was founded in New York City.

And I am a leader in the citywide effort to protect public housing in our city.

I am an independent because I believe that independence is fundamental to prioritizing the important matters of health, housing, human rights and community empowerment—the people's issues—above partisan politics.

But because I choose to be politically independent, my right to vote as an American citizen in New York City is taken away and I cannot vote in primary elections in New York City. I cannot vote because I choose to be independent of political parties.

This issue of the disenfranchisement of independent voters is a civil rights issue.

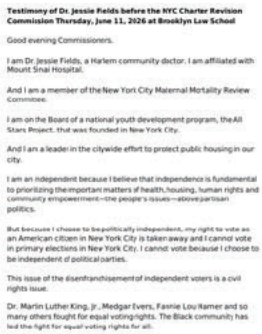
Dr. Martin Luther King, Jr., Medgar Evers, Fannie Lou Hamer and so many others fought for equal voting rights. The Black community has led the fight for equal voting rights for all.

The disenfranchisement of 1.2 million New Yorkers, a majority of whom are Black, Hispanic and Asian (see  Analysis of Racial Composition of NYC Independent Voters) must end. Many independents are also young people, under the age of 40.

The barriers to voting, for all New Yorkers, must be lifted. You have the opportunity to put such an initiative on the ballot to open the primaries, I urge you to do so.

Thank you.

Attachment(s)



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Testimony of Dr. Jessie Fields before the...

Date Submitted: June 14, 2026

Topic: Open Primaries

Method Received: Airtable Form

Is it charter related: Maybe

1

Charter Related: Yes

Topic Simplified: Elections

Subtopic: Pro open primaries

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Thank you.

Name

# Alfred C. Cerullo, III

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|---|---|
| Email | [redacted] |
| Professional Affiliation | President & CEO Grand Central Partnership & City Planning Commissioner; former Council Member, former Commissioner of Finance, former Commissioner of Consumer Affairs |
| Zip Code | [redacted] |

Public Comment

New Yorkers were promised that 311 would be a simple, centralized way to tell the city when something was wrong and to get it fixed. In its early years, the system largely delivered on that promise when calls were taken seriously, agencies paid attention, and there was a sense that complaints moved the machinery of government. Over time, though, 311 has shifted from being a tool for problem solving to a tool for record keeping. It still generates tickets and statistics, but too often it does not generate actual results on the ground. Many users now experience it as a black box where complaints disappear rather than as a responsive lifeline to city services.

One major weakness is how rigid and box driven the system has become. Residents and business improvement districts are often forced to squeeze complex, evolving or overlapping conditions into narrow categories that do not really fit what they are seeing. Problems that cut across multiple agencies or that don't match any existing drop-down option end up misclassified or minimized. Once a complaint is forced into the wrong box, it can easily be routed to the wrong place, misunderstood, or dismissed as outside the scope of the category selected. That rigidity discourages people from using the system and distorts the data the city relies on to understand what is actually happening in neighborhoods.

Another recurring frustration is that complaints are frequently closed out without any meaningful resolution. Tickets may be marked "resolved," "no violation found," or "not under agency jurisdiction" even when the underlying condition clearly persists. For those on the ground, like BID staff reporting chronic safety or cleanliness problems, it can feel as though the system is designed more to clear the city's queue than to clear a problem. When a report is bounced as "not our jurisdiction," it comes without clear guidance on who is responsible or how the complaint will be handed off. The burden falls back on the complainant to start over, which is the opposite of what a centralized system is supposed to do. The first responding agency should transfer the complaint to the correct agency or one that can coordinate interagency response, when required. A complaint should remain in the city's control once reported until it is resolved not closed out shifting the burden back to the public who has no ability to resolve the condition.

Timeliness and communication are also glaring shortcomings. BIDs trying to flag urgent issues in real time routinely receive automated notices that a response may take weeks, sometimes even months. During that long interval there is no straightforward way to follow up, provide additional information, or engage in a back and forth with the relevant agency. Complainants are left guessing whether anyone has actually looked at their report or whether conditions have changed on the ground since it was filed. This absence of two-way communication erodes trust and turns what should be a collaborative process into a one sided transaction that often ends in silence.

What is needed is a modern, responsive reporting system that matches the complexity and urgency of real urban conditions. That means more flexible ways to describe problems, rather than forcing them into ill fitting predefined

categories; clearer pathways for cross agency coordination when an issue does not neatly belong to a single department; and genuine accountability for how and when complaints are resolved. It also requires tools that allow residents, BIDs and other stakeholders to communicate directly with agencies, share updates and photos, and see in plain language what actions have been taken or why a particular remedy is not possible. Rebuilding 311 into a system that is focused on outcomes rather than just entries in a database would not only fix more problems more quickly, but it would also signal that the city is genuinely listening, and that perception, in turn, is essential to improving both quality of life and the public's sense of safety.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 15, 2026

Topic: Reporting Requirements ✕ | Unnecessary Bureaucracy ✕ | Technology ✕ | Enforcement ✕

Method Received: Airtable Form

Is it charter related?

Charter Related: No

Topic Simplified: Government Operations

Subtopic: Improve 311

Name

# Ashley Roelofs

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Trust for Public Land |
| Zip Code | |
| Public Comment | I have submitted a written testimony on behalf of Trust for Public Land already, but I wanted to follow up to provide further examples of another city who does cross agency coordination well to back up the following suggestion from my testimony:<br><br>"Fifth: Improve cross-agency coordination on capital projects. Siloed decision-making adds time, cost, and duplication. Other cities including internationally have developed coordination models that work. We encourage the Commission to look at those examples."<br><br>Chicago has a great example with their office of underground coordination, which helps streamline permitting for construction projects. The Office of Underground Coordination (OUC) is a distribution agency within the Chicago Department of Transportation (CDOT), Division of Infrastructure Management (DOIM), responsible for managing all requests related to existing utility information and construction in or adjacent to the Public Way. The OUC has streamlined this process with E-Plan (Electronic Plan Review), which can speed up review times and reduce paperwork, expedited review options where certain projects may qualify for faster processing if they meet criteria and pay applicable fees, and a collaborative review with the 27 member consortium to ensure comprehensive checks before work begins to reduce the risk of costly utility damage. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 15, 2026 |

| | |
|---|---|
| Topic | Unnecessary Bureaucracy ✕ Department of Buildings (DOB) Issues ✕ Technology ✕ Real Estate and Development ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Unnecessary bureaucracy |
| Subtopic | Improve agency coordination on capital projects |

Name

## Jessica Jeavons

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I'm a former DOHMH employee -- a few processes create significant inefficiencies for government staff: (1) It seems like whenever a mistake occurs (for example, someone sends a communication to an elected official without appropriate approval; a contract is signed without appropriate approval, etc.), City leadership generates a system-wide correction, even in cases where the error is likely to be infrequent or relatively low impact. This is deeply inefficient as an old bureaucracy, NYC has accrued tons of system wide corrections that make it incredibly slow. (2) Decision making seems to often be based on fear, rather than on an objective assessment of the risks and benefits based on an agreed-upon framework. Consider adopting a risk appetite that describes where NYC is more risk seeking and less risk accepting, and then ask people to utilize that risk appetite to make decisions. Allow decision making closer to where the work is happening to speed decision making and decrease barriers to doing good work. (3) Consider how ad hoc requests from City Hall impact departments and staff. When departments are asked by City Hall to answer a question or respond to a problem immediately, but without real autonomy, staff are beholden to last minute requests that derail their regular work. They feel pressure to "show" how fast and smart they are. These staff are experts in what they do. When you have an ad hoc request, consider how it will impact department and what they'll need to slow or stop to respond to a City Hall request.

Attachment(s)

Drop files here or click to browse

Date Submitted

June 15, 2026

| | |
|---|---|
| Topic | Unnecessary Bureaucracy ✕ Reporting Requirements ✕ Support Oversight Agencies ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

# Zoraida Walcott Oliveira

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

My Immigrant Story and Plea for Freedom: Involving Systemic Racism, Collusion, Corruption, Organized Crime, Domestic Terrorism and the Enforced Safety Measures for Ultimate Protection of the Oliveira Family

Attachment(s)



LETTER TO NYC MAYOR MAMDANI & C...

Date Submitted: June 15, 2026

Topic: Miscellaneous | Enforcement | Tenant Protection

Method Received: Airtable Form

Is it charter related? No

1

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

# LETTER TO NYC MAYOR MAMDANI & MOVE TO NYC - 6/15/2026 (ROUGH DRAFT)

6/15/2026

Mayor Zohran Mamdani
[redacted]

Re: **My Immigrant Story and Plea for Freedom: Involving Systemic Racism, 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 expose the systemic racism, domestic terrorism, collusion, corruption, organized crime, 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 city of New York as well as in New Jersey.

As I highlight important aspects, (both good and **dark**) of my life, it's important for you to recognize the pattern recognition and date symbolism.

I'm a Muslim and a '*Mixed Masala*', 53 year old woman, born on [redacted]. I am a multilingual, Black Latina, with Indian, Chinese, Dominican Republic, St. Croix, Virgin Islands heritage, and a native New Yorker. I was covertly born [redacted] in New York City to my mother, Thelma [redacted], and my biological father, the Honorable Minister Louis Eugene Walcott Farrakhan, (who were not legally married at conception nor at the time of my birth). I also have a 'twin' brother Fernando, and niece, that lives in Florida and older sister, Xiomara, 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], and still alive today. (For the record, the notable, General Chui, 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 [redacted]. 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) on [redacted], and lived on [redacted]. Thereafter, they moved to [redacted] in the Bronx.

Surprisingly, years later, she met up with Pastor Aimee [redacted], 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 [redacted] and was also fortunate enough to have cared for Dr. Betty Shabazz, Malcolm X's wife during visit there. After over 34 years of dedicated service, she retired from the hospital. My father then graduated from medical school at [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 Basian) also lived in the Bronx, but then moved to [redacted], NJ, to raise her large family. Her youngest sister, Clara [redacted] (arranged marriage to a Swiss), eventually moved to Switzerland after getting married, and her eldest living sister, Gloria [redacted] (arranged marriage to a Dominican), is still a longtime resident in [redacted].

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 the Bronx. Growing up, their family were like relatives to us and we spent a lots of times hanging out together.

I attended and graduated from [redacted] High School, also in [redacted], in the Bronx, and had my prom at the Marina Del Rey. I was also afforded the opportunity to learn about the maritime

field, and did a summer internship at [redacted], after my senior year in high school.

I was raised in the borough of The Bronx, until 18 years old, during a quintessential time and the birth of hip hop. I am 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. Yet, all of the moments are attached to memories of eating a slice of pizza, cochifrito, a toasted bagel or a patty with coco bread, on any given day.

Music was a significant part of my life and remember my obsession with the legendary Puerto Rican, boy band '*Menudo'*. Johnny was my favorite band member and I had every form of memorabilia, from keychains, posters to clothing and 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.

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 special, 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 the College of Saint Rose in Albany. 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] 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 to the Bronx, 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, Historical Black College & University, (HBCU) Clark Atlanta University in Atlanta,

Georgia, with a degree in Psychology. It was the end of my senior year, that my husband, Ricardo [redacted] and I 'were introduced' on his neighboring campus, of Morehouse College, in Atlanta Georgia, by our mutual friend, Morehouse College student, Bakari [redacted] (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 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, then to NYC when his father, Dr. Ney [redacted], got accepted to the engineering program at Columbia University. He lived in the residential buildings designed for student and family housing for a few years. Consequently, he attended Borough of Manhattan Community College, and then transferred to the prestigious, Historical Black College & University, (HBCU), Morehouse College, Atlanta, Georgia. 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.

We also had an arranged marriage ceremony (out of my Indian custom and for my Brazilian immigrant husband, Ricardo, 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 President Luis 'Lula' DaSilva of Brazil, 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 College of Saint Rose 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 Morehouse, was also a groomsman at our wedding. The marriage was ordained in the presence of our guests, on [redacted], and we had a large, monumental wedding reception at Leonard's of Great Neck, Long Island. To date, we been 'married over 27 years'....

We moved to [redacted] and lived on [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 the Bronx 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.

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 [redacted], I was diagnosed with fibroids and had a miscarriage due to 'fetal demise'. Months later, I was pregnant again, and fortunately had my daughter at [redacted], in Manhattan. Due to womb issues, I eventually sought after a non-pharmaceutical solution of naturopathic healing and consulted with [redacted] and Wellness Guru, [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. 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 the 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.

As a retiree, my mother came 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. It was my duty to help her with her unfinished, challenging and stalled divorce. I drafted, wrote and submitted countless letters, legal briefings and divorce documents. 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 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.

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 Rio de Janeiro, Brazil. 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 Brazil for almost 5 years and lived there as expats. We 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 ([redacted]), family business, *Equipemar Enngenharia e Serviços Ltda (a specialized Brazilian maritime and civil engineering company,* headquartered in Niterói, Brazil, 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.

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 we did our best to keep in touch daily. Yet, within 6 months of moving to Brazil, she suddenly died [redacted], (which turned out to be a **murder** by the elks lodge occult gang organization), 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!

With a moments notice, our close, family longtime friend, Kevin [redacted], notified me of her passing and I immediately returned to the Bronx to assist her death and other relevant matters. Moreover, I had to finalize her affairs before returning to Brazil.

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 Bronx Supreme Court. As such, she was disgraced and only received her entitled divorce, after her death!

While living in Brazil for almost 5 years and my husband lost yet another job, we 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'),** 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 the Bronx. 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] Public Schools, 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 [redacted] 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 [redacted] NJ (son of my mother's half-sister, Ines [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, and rendered me homeless, which is why I ended up relocating so many times with family and friends.** 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'. 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).

I've always had a substantial affinity towards politics as it runs in my family. Congresswoman Stacey Plaskett, of the U.S. Virgin Islands and Senator Diane Capehart of St. Croix are my first cousins, and my paternal grandfather, Henrique Walcott was a notable and distinguished speech writer for prestigious politicians.

I have also campaigned for various Democratic elections including Tamara Harris for Congress in NJ House of Representatives, 11th district and Ras Baraka for Governor of New Jersey. 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 an Effective Legislative Advocate as a constituent in the state of New Jersey 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 Morristown Supreme Court, by U.S. Judge Peter Bogaard and attorney Gail Mitchell. Similarly, I specifically contacted my **cousin, Congresswoman Stacey Plaskett, of the Virgin Islands**, and 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 illegalities and the tremendous injustices endured by my family for many years. 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.

Nonetheless, 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. 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!
- Most impactful, was another instance when I was residing with my sister's best friend at [redacted] and 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 the Bronx, 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 the Bronx, 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.

Thereafter, I moved back to [redacted] New Jersey, to a more stable residence for a period of time to get my bearings.

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 of Columbia University with a Ph.D in engineering. 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.

As I preparing and to settling my business 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 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.

Therefore, as reparations, I hereby request that along with your crucial, historic and respected role as mayor, in conjunction with the 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....😞

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*.

Yesterday, 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)**

Thank you in advance for your utmost support, understanding and cooperation. I look forward to moving back to the best city in the world and to have you as my mayor.

Sincerely,

Zoraida Walcott Oliveira

Name

# Rebecca Macklis

Email [redacted]

Professional Affiliation: The Municipal Art Society of New York (MAS)

Zip Code:

Public Comment:

I am reaching out on behalf of myself and MAS President Keri Butler.

MAS attended the first public input session focused on streamlining government for infrastructure and the public realm, and is inspired to see the commission thinking big about these issues.

We are developing some pointed recommendations based on our ongoing advocacy, but before submitting, and to ensure our proposals are most actionable, we would love the opportunity to connect at a staff-level offline for a more in-depth conversation to discuss the CRC's process and focus.

If available for this type of conversation, we can provide some time slots for next week.

Look forward to connecting.

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

Date Submitted: June 15, 2026

Topic: Unnecessary Bureaucracy, Street Redesigns, Real Estate and Development

Method Received: Airtable Form

| | |
|---|---|
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Public Realm |
| Subtopic | |

Name

# Nancy Chen

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Small business owner |
| Zip Code | [redacted] |
| Public Comment | Dear mayor, the side residential streets of bayside are very dark, especially near the LIRR train stop. It's hard to see when walking at night and feels less safe. Would it be possible to help install more streetlights? |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 15, 2026 |
| Topic | Department of Buildings (DOB) Issues, Enforcement, Street Redesigns |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Public Realm |
| Subtopic | More streetlights in Bayside near LIRR |

Name

# Tony Alfieri

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Architect |
| Zip Code | [redacted] |

Public Comment

In 2019 NYC agreed to a $1.55 billion settlement (https://www.politico.com/states/new_york/city_hall/story/2019/07/23/new_york-city-makes-a-155b-500-person-commitment-to-accessible-street-corners) with disability advocates to have the DOT upgrade curb cuts at intersections to comply with accessibility guidelines. In the abstract, this is a fantastic victory and it should be applauded.

The City then commissioned a survey of the non-compliant locations in 2019 to catalog corners that would be upgraded, but never executed the repairs because of the pandemic. By the time repairs got underway, many of the locations had already been addressed as part of other DOT work, which is why you may have noticed some corners getting dug up twice only a year or two apart. Furthermore, this sidewalk upgrade work is expected to extend through 2034, with seemingly no coordination with other DOT street work.
By ADA standards, cross slopes must have no more than a 2% rise, but some of these curbs are being replaced for having 2.3% slopes. There's no prioritization that identifies the most egregious locations or how the immediate expenditure of funds will benefit the most New Yorkers. Instead of digging up the same curb cuts multiple times, only to build them back essentially as they were, I'd propose the following:

1. Most importantly, utilize the new electronic database mapping system the voters approved in the 2025 ballot initiative to create a GIS database of planned street improvements that includes the full catalog of these curb cut upgrades. This master GIS database could serve as a palimpsest so when ConEd, DOT or other city agency digs up an area, it can be restored with a single round of repair. Digging up the same spot multiple time is a tremendous waste and broadcasts the city's inefficiency to neighborhood taxpayers.
2. Within that database, prioritize the most egregious points of non compliance so people see material improvements rather than negligible difference as is shown in the attached photos.
3. Bundle the curb cut improvements with adjacent upgrades such as sidewalk extensions. Again, it broadcasts the inefficiency of the DOT when a street improvement addresses one concern, and rebuilds the condition so the other deficiencies are effectively recreated.

Attachment(s)



SampleCurbCutRedundancy_StEdwards...

Date Submitted: June 15, 2026

Topic: Street Redesigns, Technology, Unnecessary Bureaucracy, Enforcement

Method Received: Airtable Form

Is it charter related: No

1

Charter Related: No

Topic Simplified: Streets

Subtopic: Improve accessibility and DOT street improvement data




Before:
St. Edwards St.
The sidewalk and curb cuts seem perfectly functional.




In Process:
St. Edwards St.
The perfectly functional sidewalk and probably ever-so-slightly excessively sloped curb cuts have been ripped out.




After:
St. Edwards St.
The curb cuts and adjacent sidewalk have been reconstructed in a seemingly identical manner as they were before

Name

# Katarina

Email [redacted]

Professional Affiliation

Zip Code

Public Comment

I would like to offer a public comment regarding city conditions and quality of life. I believe sanitation in the city requires improvement, particularly in terms of cleanliness and maintenance in high traffic areas.

In addition, noise pollution has become a growing concern for many residents. I would encourage the city to consider implementing and enforcing reasonable noise regulations, including fines for repeated violations, especially in residential neighborhoods and during late hours.

Such measures could improve livability for residents and potentially generate revenue that can support city services and sanitation efforts.

Attachment(s)

Drop files here or click to browse

Date Submitted June 16, 2026

Topic Enforcement × Unnecessary Bureaucracy × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

Charter Related No

| | |
|---|---|
| Topic Simplified | Quality of life |
| Subtopic | |

Name

## Charles Diamond

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Please find attached written testimony in furtherance to my in-person testimony at last week's Manhattan public hearing. Also attached are detailed proposed amendments to specific sections o of the Charter in both word and PDF format. Please do not hesitate to contact me if I can provide further information or be of any assistance to the Commission.<br>Best Regards,<br>Charles T. Diamond, Esq. |

Attachment(s)



Detailed Proposed Amendments_Writte...



Detailed Proposed Amendments_Writte...



Written Testimony to 2026 Charter Revi...

Date Submitted: June 16, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Is it charter related? Yes

3

Charter Related: Yes

Topic Simplified: Procurement

| | |
|---|---|
| Subtopic | Reform procurement |

Written Testimony – Charles T. Diamond
Proposal to the 2026 Charter Revision Commission – Chapters 1 and 13 (Procurement)
Detailed Proposed Amendments

# Chapter 1: Mayor

## Section 20-t. Office of contract services.*

a. Office of contract services. The mayor shall establish an office of contract services. Such office may, but need not be, established in the executive office of the mayor and may be established as a separate office or within any other office of the mayor or within any department the head of which is appointed by the mayor. Such office shall be headed by the director of contract services who shall be appointed by the mayor. The mayor may delegate to the director the powers conferred upon the mayor pursuant to chapters 13 and 14. For the purposes of this section, the term "director" means the director of the office of contract services.

b. City chief procurement officer. The director shall serve as the city chief procurement officer, provided that to the extent such officer exercises the powers delegated directly to the mayor pursuant to chapters 13 and 14, such powers may be otherwise delegated.

c. Powers and duties. The director shall have the power and duty to:

1. Perform all reviews, make all determinations, and give all approvals and certifications to be performed, as delegated by the mayor pursuant to chapters 13 and 14;

2. Coordinate and oversee the procurement activity of mayoral agency staff, including the agency chief contracting officers, and any offices that have oversight responsibility for procurement;

3. Designate persons to serve as a clerk of the franchise and concession review committee, as authorized by the mayor;

4. Review departmental and specialized contract guidelines and procedures for conformance with citywide contract guidelines and regulations;

5. Conduct pre-audit and post-audit reviews of selected contracts to ensure adherence to citywide contracting and procurement procedures;

6. Develop guidelines, as appropriate, for professional qualifications for mayoral agency chief contracting officers and procurement staff;

7. Establish rules, provide guidance, and issue directives to agencies regarding contracting, procurement, invoicing, payment, and auditing;

8. Establish, operate, and maintain computerized procurement and contracting systems and any other systems used by mayoral agencies to carry out procurement and contracting and related functions, and to provide technical and user support to agencies and the public in connection with the use of such systems;

9. Establish, operate, and maintain a computerized public database that includes data and information on city procurement and contracting, including disaggregated data regarding agency solicitations, contracting, and contract management;

10. Establish rules and fees to support the operation, maintenance, and usage of such computerized procurement and contracting systems;

11. Coordinate citywide information on contracts and contractors, coordinate with agency chief contracting officers, and provide technical assistance to agencies on contract and procurement related issues;

12. Conduct training programs and provide educational materials in relation to city procurement and contracting for agencies and for the public, and in collaboration with relevant agencies, promote awareness of city contracting opportunities and understanding of city procurement processes;

13. Provide guidelines and coordinate the activity of agencies in connection with the grant of a concession, franchise, or revocable consent; and

14. Perform such other functions and duties as may be delegated by the mayor.

d. Delegation and designation.

1. The director may delegate to the agency chief contracting officer of each agency the duties listed in this paragraph, provided that the mayor must authorize such delegation in the case of powers conferred upon the mayor by law:

(a) Certification pursuant to section 327 that the procedural requisites for the solicitation and award of contracts have been met upon adequate assurance that the agency possesses the capacity to comply with procedural requirements; and

(b) Any other approvals or functions required by law, rule, or regulation, except that the approval of the mayor required under subdivision b of section 317 shall not be delegated to an agency chief contracting officer.

2. The director shall periodically, and at least once annually, review each agency chief contracting officer's performance of the functions delegated, and if such performance is found unsatisfactory, the director shall revoke the agency chief contracting officer's authority to exercise such function and the director shall resume the exercise of such function.

3. The director may designate employees of the office to exercise any of the powers and duties set forth in this section upon the specific or general direction of the director. Any reference to the director or city chief procurement officer includes the persons who have received such designation.

e. Annual reporting. No later than October 1 of each year, the director shall submit to the speaker of the council and publish on the office's website an annual report including, but not limited to:

1. Procurement timelines, disaggregated by procurement method and agency, including late registration and timelines promulgated by the Procurement Policy Board;
2. Contract management timelines, disaggregated by agency, including the length of invoice review and payment processing times;
3. Compliance of each agency with the rules, directives, and applicable procedural requisites, including findings and corrective actions taken;

4. Compliance of each agency with procurement timelines, including findings and corrective actions taken; 5 A summary of pre-audit and post-audit reviews conducted, including findings and corrective actions taken;

. 6 Any active delegations made by the director to agency chief contracting officers and any revocations thereof, including those made under the authority of subdivision a of section three hundred twenty-seven;

7. A review of the competitiveness within applicable industries in which the city procures, including an analysis of the quantity of responses received by city agencies by industry, and strategies to improve competitiveness in the best interests of the city;

8. A review of instances in which agencies may be paying disparate costs for the same or similar contracted services and strategies where it would be appropriate to consolidate or standardize such purchasing in the best interests of the city; and,

9. All emergency procurements entered into pursuant to section three hundred fifteen, including, for any contracts active at the time of the report, the timeline to transition to normal procurement procedures.

f. Rules, guidelines, and procedures. The director is authorized to promulgate rules, guidelines, and procedures as may be necessary and appropriate to effectuate the purposes of this section.

g. Construction.

1. Any power of the director specified in this section that is conferred upon the mayor pursuant to law shall be exercised by such director only to the extent such exercise is consistent with a delegation by the mayor.

2. Nothing in this section shall be construed to alter or impede the authority of the procurement policy board or the franchise and concession review committee. Any rule, directive, or guideline issued pursuant to subdivision f of this section that does not implement a power conferred upon the mayor by law shall be superseded by any applicable rule of the procurement policy board and franchise and concession review committee.

*(Became effective 6/2/2026)*

## Chapter 13: Procurement

### Section 310. Scope.

Except as otherwise provided in this charter or by statute,

1. all goods, services or construction to be paid for out of the city treasury or out of moneys under the control of or assessed or collected by the city shall be procured as prescribed in this chapter; provided, however, that for (i) the office of an independently elected city official, or (ii) the council, where the provisions of this chapter require action by the mayor or an appointee of the mayor in regard to a particular procurement except for mayoral action pursuant to subdivision c of section three hundred thirty-four, such action shall not be taken by the mayor or such appointee of the mayor, but shall be taken respectively, by (i) by such elected official or (ii) the speaker of the council, or another member of the council designated by the speaker with the approval of a majority of the members of the council, and

2. all goods, services or construction to be procured by an entity, the majority of the members of whose board are city officials or are individuals appointed directly or indirectly by city officials shall be procured as prescribed in this chapter; provided, however, that where the provisions of this chapter require action by the mayor or an appointee of the mayor in regard to a particular procurement except for mayoral action pursuant to subdivision c of section three hundred thirty-four, such action shall not be taken by the mayor or such appointee of the mayor, but shall be taken by the governing board of such entity or by the chair of the board or chief executive officer of such entity pursuant to a resolution adopted by such board delegating such authority to such officer.

### Section 311. Procurement policy board.

a. There shall be a procurement policy board consisting of five members, three of whom shall be appointed by the mayor and two of whom shall be appointed by the comptroller. Each member shall serve at the pleasure of the appointing official. Members shall have demonstrated sufficient business or professional experience to discharge the functions of the board. At least one member appointed by the mayor and one member appointed by the comptroller shall not hold any other public office or public employment. The remaining members shall not be prohibited from holding any other public office or employment provided that no member may have substantial authority

for the procurement of goods, services or construction pursuant to this chapter. The mayor shall designate the chair.

b. The board shall promulgate rules as required by this chapter, including rules establishing:

1. the methods for soliciting bids or proposals and awarding contracts, consistent with the provisions of this chapter;

2. the manner in which agencies shall administer contracts and oversee the performance of contracts and contractors;

3. standards and procedures to be used in determining whether bidders are responsible;

4. the circumstances under which procurement may be used for the provision of technical, consultant or personal services, which shall include but not be limited to, circumstances where the use of procurement is (a) desirable to develop, maintain or strengthen the relationships between non-profit and charitable organizations and the communities where services are to be provided, (b) cost-effective, or (c) necessary to (i) obtain special expertise, (ii) obtain personnel or expertise not available in the agency, (iii) to provide a service not needed on a long-term basis, (iv) accomplish work within a limited amount of time, or (v) avoid a conflict of interest;

5. the form and content of the files which agencies are required to maintain pursuant to section three hundred thirty-four and such other contract records as the board deems necessary and appropriate;

6. the time schedules within which city officials shall be required to take the actions required by this chapter, sections thirteen hundred four and thirteen hundred five, or by any rule issued pursuant thereto, in order for contracts to be entered into, registered or otherwise approved, and time schedules within which city officials should take action pursuant to any other provision of law or rule regarding individual contracts, which rules shall specify the appropriate remedies, including monetary remedies, for failure to meet the terms of any applicable schedule for taking such actions. The board may set forth exceptions to these rules. The promulgation of rules defining time schedules for actions by the division of economic and financial opportunity of the department of small business services and the division of labor services of such department shall require the approval of each division, as such rules pertain to actions required of such divisions, prior to the adoption of such rules by the procurement policy board;

7. the time schedules within which agencies shall be required to complete distinct stages of the procurement process, as determined by the board, as well as standardized time schedules for contract management actions, such as payment procedures, which rules shall specify the appropriate remedies for failure to meet the terms of any applicable schedule. The board may set forth exceptions to these rules.

8. procedures for the fair and equitable resolution of contract disputes;

9. rules relating to the making of small purchases in a manner that will advance the purposes of the program for minority- and women-owned business enterprises and emerging business enterprises established pursuant to subdivision b of section thirteen hundred four;

10. rules authorizing the submission of a protest by a vendor or a vendor's designated representative of a determination of any procurement action by an agency, except for determinations related to accelerated procurements, emergency procurements, and small purchases; and

11. such other rules as are required by this chapter.

c. The board may promulgate such additional rules, policies and procedures consistent with and as may be necessary to implement the provisions of this chapter. The board shall annually review

all of its rules, policies and procedures and make such revisions as the board deems necessary and desirable. Nothing herein shall prevent the board from reviewing its rules, policies, and procedures, and making such revisions as the board deems necessary and desirable, more than once per year.

d. The board shall promulgate rules to facilitate the timely and efficient procurement of client services, and to ensure that such contracts are administered in the best interests of the city. Such rules shall include but not be limited to: (i) rules authorizing city agencies to meet annual financial audit requirements through the acceptance of consolidated audits across multiple contracts and multiple agencies; (ii) rules providing for expedited renewal or extension of existing client services contracts; (iii) rules mandating the promulgation of draft and final contract plans by all agencies procuring client services.

e. The board shall submit an annual report to the mayor, comptroller, and council setting forth the professional standards for agency contracting officers adopted by the mayor, including any applicable certification process.

f. In the promulgation of any rules pertaining to the procurement of construction or construction related services, the board shall consult with any office designated by the mayor to provide overall coordination to the city's capital construction activities.

g. The board shall make such recommendations as it deems necessary and proper to the mayor and the council regarding the organization, personnel structure and management of the agency procurement function including, where appropriate, recommendations for revision of this charter or local laws affecting procurement by the city. Such reports may include recommendations regarding agency use of advisory groups to assist in preparation of bids or proposals and selection of contractors. The board shall also review the form and content of city contract documents and shall submit to the law department recommendations for standardization and simplification of contract language.

h. The board shall not exercise authority with respect to the award or administration of any particular contract, or with respect to any dispute, claim or litigation pertaining thereto.

i. In addition to other rules authorized by this section, the board may provide by rule that:

1. agencies may make procurements of goods, services and construction for amounts not exceeding one million five hundred thousand dollars from businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter without a formal competitive process.

2. agencies may award contracts for goods and services on the basis of best value to the bidder or offerer which optimizes quality, cost and efficiency, among responsive and responsible bidders or offerers. Such basis shall reflect, wherever possible, objective and quantifiable analysis and may include the prospective bidder's record of complying with existing labor standards, maintaining harmonious labor relations, and protecting the health and safety of workers. Such basis may also identify a quantitative factor for awarding of contracts for bidders or offerers that are businesses certified as minority or women-owned business enterprises pursuant to article fifteen-a of the executive law and section thirteen hundred four of the charter. Where an agency identifies a quantitative factor pursuant to this paragraph, the agency must specify that businesses certified as minority or women-owned business enterprises pursuant to article fifteen-a of the executive law as well as those certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter are eligible to qualify for such factor. Nothing in this paragraph shall be construed as a requirement that such businesses be concurrently certified as minority or

women-owned business enterprises under both article fifteen-a of the executive law and section thirteen hundred four of the charter to qualify for such quantitative factor.

3. the rule or rules promulgated to implement paragraph one of this subdivision shall provide that the city shall, commencing on the first of October of the first full calendar year following the adoption of such rule or rules, submit an annual report to the governor and the state legislature of the total number and total dollar value of procurements of goods and services for amounts not exceeding the dollar amount threshold for making procurements without a formal competitive process as established by rule pursuant to paragraph one of this subdivision from:

(i) businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter;

(ii) all other businesses; and

(iii) information about the number of businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of this charter able to perform the specific type and scale of work involved in each procurement.

**Section 312. Procurement; general rule and exceptions.**

a. Prior to entering into, renewing, or amending a contract valued at more than one million dollars to provide standard or professional services, or prior to renewing or amending a contract to provide standard or professional services that, following such renewal or amendment, would have a value of more than one million dollars, including agency task orders pursuant to multi-agency task order contracts, but excluding emergency procurements, government-to-government purchases, required source procurements as described in paragraph (2) of subdivision (d) of section 1-02 of title 9 of the rules of the city of New York, contracts that have a total value of more than one million dollars but for which the value of standard or professional services included in such contract is one million dollars or less, small purchases from businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter, and the procurement of legal services or consulting services in support of current or anticipated litigation, investigative or confidential services, an agency shall follow the procedure established herein and the mayor shall comply with the reporting requirements set forth in paragraph 8. A contract or agency task order shall not be artificially divided in order to reduce the value of such contract or agency task order to avoid the requirements of this section.

1. Prior to issuing an invitation for bids, request for proposals, or other solicitation, or renewing or amending an existing contract, the agency shall determine whether such contract is the result of or would result in the displacement of any city employee within the agency. For the purpose of this section, the term “displacement” shall mean a reduction in the number of funded positions, including but not limited to, that resulting from the attrition; layoff; demotion; bumping; involuntary transfer to a new class, title, or location; time-based reductions, or reductions in customary hours of work, wages, or benefits of any city employee.

(a) There shall be a presumptive determination that a proposed contract is the result of or would result in displacement if any of the following events occurred in the three year period preceding the date the agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract:

(1) the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose; or

(2) the announcement of spending reductions in connection with a budgetary program, including but not limited to a Program to Eliminate the Gap, that could result or has resulted in the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose; or

(3) any other statement by an agency or the mayor of a specific anticipated employment action that could result or has resulted in the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose.

(b) If the agency determines that displacement would not occur, it shall include a certification to that effect, signed by the agency head, in any invitation for bids, request for proposals, or other solicitation, or with any contract renewal or amendment. Such certification shall detail the basis upon which the agency determined that displacement would not occur, construing broadly the nature of the services sought and providing information including but not limited to: (i) whether any civil service title or job title within the agency currently performs the services solicited or services of a substantially similar nature or purpose, the names of such titles, and the extent to which agency employees within such titles currently perform such services; (ii) whether the solicited services expand, supplement, or replace existing services, and a detailed description comparing the solicited services with such existing services; (iii) whether there is capacity within the agency to perform the services solicited and, if there is no such capacity, a detailed description specifying the ways in which the agency lacks such capacity; (iv) for the term of the proposed contract, the projected headcount of employees within such titles or employees who perform such services or services of a substantially similar nature or purpose; and (v) confirmation that none of the events set forth in subparagraph a of this paragraph occurred within the agency in the three year period preceding the date such agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract.

(c) If the agency determines that displacement would occur, the agency shall determine the costs incurred and the benefits derived in performing the service, consistent with the scope and specifications within the solicitation, renewal, or amendment, with city employees, and shall submit such analysis, with all supporting documentation, prior to issuance of any solicitation or entry into any contract renewal or amendment, to the comptroller.

2. Immediately upon receipt of bids, proposals, and other solicitation responses, or prior to the renewal or amendment of an existing contract, the agency shall submit such determination, analysis, and supporting documentation to the council and to the appropriate collective bargaining representatives representing employees who would be affected pursuant to paragraph 1 of subdivision a of this section.

3. Prior to award of a contract, a renewal, or an amendment, the agency shall perform a comparative analysis of the costs expected to be incurred and the benefits expected to be derived from entering into, renewing, or amending a contract with the proposed vendor, based on such vendor's best and final offer, and such agency's analysis of the costs incurred and the benefits derived from providing the service with city employees. If the agency head intends to award, renew, or amend the contract, he or she shall submit the reasons therefor, together with such analysis, and all supporting documentation, to the comptroller, the council, and the appropriate collective bargaining representatives representing employees who would be affected pursuant to paragraph 1 of subdivision a of this section.

4. The council may, within thirty days after receipt of such reasons, analysis, and supporting documentation hold a hearing on this matter. No contract award, renewal, or amendment shall be made prior to the expiration of this thirty-day period or a council hearing, whichever is sooner.

5. (a) All cost and comparative analyses required under this section shall be conducted in accordance with standard methodology of the office of management and budget, and consistent with the rules of the procurement policy board, as both are modified herein, subject to further modification by local law. Such analyses shall include all reasonable costs associated with performing the service using city employees and all reasonable costs associated with performing the service under the proposed contract or contract renewal or amendment.

(b) Such analyses shall further include the total number, qualifications, job descriptions, and titles of all personnel to be employed by the vendor under the proposed contract or contract renewal or amendment, as well as the nature and cost of salaries and benefits to be provided to such personnel.

(c) Such analyses shall further include, but not be limited to, the cost of employee supervision directly related to the provision of the service, vendor solicitation, contract preparation, contract administration, monitoring and evaluating the contractor, capitalization of equipment over the period such equipment shall be in use, supplies, the cost of providing the equivalent quantity and quality of service by city employees compared to the cost of providing such service by contract, based upon the best and final offer of the proposed vendor, and such other factors as will assist in arriving at full and accurate cost determinations and comparisons.

6. The reasons given to award, renew, or amend the contracts shall include all factors that have been considered in determining whether contracting for this service is in the best interest of the city, whether or not such reasons are contained within the cost or comparative analyses. Such factors shall include, but not be limited to, the potential for contractor default, the time required to perform the service, and the quality of the service to be delivered.

7. The mayor or his or her designee may prepare and implement a plan of assistance for displaced city employees, which may include, but need not be limited to, training to place such employees in comparable positions within the contracting agency or any other agency. The cost of such assistance plan may be included within the cost of contracting-out in the cost and comparative analyses.

8. (a) For the purposes of this paragraph, the term “agency” means a city, county, borough or other office, position, administration, department, division, bureau, board, commission, authority, corporation, advisory committee or other agency of government, the expenses of which are paid in whole or in part from the city treasury, and shall include but not be limited to, the department of education, the health and hospitals corporation, and the New York city housing authority, but shall not include any court, or any local development corporation or other not for profit corporation or institution, including such a corporation or institution maintaining or operating a public library, museum, botanical garden, arboretum, tomb, memorial building, aquarium, zoological garden or similar facility.

(b) The mayor shall, no later than July 31st of each year, produce and publish on the mayor's office of contract services website a plan and schedule for each agency detailing the anticipated contracting actions of each such agency for the upcoming fiscal year. The plan and schedule shall include: (i) information specific to each prospective invitation for bids, request for proposal, or other solicitation, including, but not limited to, the nature of services sought, the term of the proposed contract, the method of the solicitation the agency intends to utilize, the anticipated fiscal

year quarter of the planned solicitation, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services; and (ii) information specific to each proposed contract renewal or amendment, including, but not limited to, any modifications sought to the nature of the services performed under the contract, the term of the proposed renewed or amended contract, the reason(s) the agency intends to renew or amend such contract, the month and year of the expiration of the existing contract, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services.

(c) If an agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract, but the mayor fails to include such prospective invitation, request, solicitation, renewal or amendment in the plan and schedule or such invitation, request, solicitation, renewal or amendment provides a longer contract term than the term provided in the plan and schedule or otherwise differs from the information included in the plan and schedule with respect to the nature of the services sought, the civil service or job titles within the agency that perform the services sought or services of a substantially similar nature or purpose, or the headcount of employees within such titles, the mayor shall provide public notice ten days before such agency issues such invitation, request, or solicitation, or enters into such renewal or amendment. Such notice, which shall be posted on the website of the mayor's office of contract services and in the city record, shall include: (i) information specific to the prospective invitation for bids, request for proposal, or other solicitation, including, but not limited to, the nature of services sought, the term of the proposed contract, the method of the solicitation the agency intends to utilize, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services; or (ii) information specific to the proposed contract renewal or amendment, including, but not limited to, any modifications sought to the nature of the services performed under the contract, the term of the proposed renewed or amended contract, the reason(s) the agency intends to renew or amend such contract, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services.

b. 1. Except as provided for in sections three hundred fourteen, three hundred fifteen and three hundred sixteen, contracts shall be awarded by competitive sealed bidding under such rules as shall be made by the procurement policy board, except that, in a special case as defined in subdivision b of this section, the head of an agency proposing to award such contract may order otherwise in accordance with policies and procedures established by the procurement policy board.

2. A determination by the head of an agency to use other than competitive sealed bidding except as provided for by sections three hundred fourteen and three hundred sixteen shall be made in writing, stating the reasons why competitive sealed bidding is not practicable or not advantageous and why the method of procurement selected pursuant to section three hundred seventeen is the most competitive alternative that is appropriate under the circumstances. The head of the agency shall include the determination or a summary of the determination in the notice of solicitation, or for an emergency procurement in the notice of award, required to be published pursuant to section three hundred twenty-five of this chapter.

c. 1. For the purposes of this chapter, the term "special case" shall be defined as a situation in which it is either not practicable or not advantageous to the city to use competitive sealed bidding for one of the following reasons:

(a) specifications cannot be made sufficiently definite and certain to permit selection based on price alone;

(b) judgment is required in evaluating competing proposals, and it is in the best interest of the city to require a balancing of price, quality, and other factors;

(c) the good, service or construction to be procured is available only from a single source;

(d) testing or experimentation is required with a product or technology, or a new source for a product or technology, or to evaluate the service or reliability of such product or technology; or

(e) such other reasons as defined by rule of the procurement policy board.

2. The procurement policy board may provide by rule that it is either not practicable or not advantageous to the city, for one of the reasons set forth in paragraph one of this subdivision, to procure a specified type of good, service or construction by competitive sealed bidding.

**Section 313. Competitive sealed bidding.**

a. The term competitive sealed bidding shall mean a method of procurement where the award of a contract is made to the lowest responsible bidder whose bid meets the requirements and criteria set forth in the invitation for bids.

b. Procedures for competitive sealed bidding.

1. Bids shall be solicited through an invitation for bids, which shall include a purchase description and a notice of where vendors may obtain a copy of all contractual terms and conditions applicable to the procurement. A notice of the intention to solicit bids shall be publicly advertised in accordance with the provisions of section three hundred twenty-five of this chapter. The terms of such contracts shall be settled by the corporation counsel as an act of preliminary specification to an invitation for bids.

2. The agency letting the contract may reject all bids if it shall deem it for the interest of the city so to do; if not, it shall, without other consent or approval, award the contract to the lowest responsible bidder, unless the mayor shall determine in writing, justifying the reasons therefor, that it is the best interest of the city that a bid other than that of the lowest responsible bidder shall be accepted. Such determination shall be published in the City Record. Tie bids are to be decided by the agency letting the contract and the award made. Whenever a contract is awarded to other than the lowest bidder because the lowest bidder is determined by the agency not to be a responsible bidder or because the lowest bid is determined by the agency to not meet the requirements and criteria set forth in the invitation for bids, the agency making such determination and awarding such contract shall immediately notify the lowest bidder of such determination and shall file in the agency contract file a statement in detail of the reasons therefor.

3. Any bidder who is declared not responsible by an agency and any bidder whose bid is determined by an agency to not meet the requirements and criteria set forth in the invitation for bids may, within five days of receipt of notice of the agency decision, appeal such decision to the agency head. A determination of an agency head of an appeal of a decision of non-responsibility may be appealed to the mayor who shall take final action regarding such matter. A determination of an agency head of an appeal of a decision that a bid does not meet the requirements and criteria set forth in the invitation for bids shall be final.

c. No bid shall be valid unless accompanied by a deposit in the amount and manner set forth and specified in the proposal; provided, however, that the procurement policy board shall establish such requirements for bid deposits as are necessary and practicable, and, pursuant to rules and standards, may waive the bid deposit requirement for specific classes of purchase or types of transactions. Upon the award of the contract the deposits of unsuccessful bidders shall be returned to them, and the deposit of the successful bidder shall be returned upon execution of the contract and furnishing of the required security.

d. Every invitation for bids shall contain a provision that in the event of the failure of the bidder to execute the contract and furnish the required security within ten days after notice of the award of the contract, the deposit or so much thereof as shall be applicable to the amount of the award made shall be retained by the city, and the bidder shall be liable for and shall agree to pay on demand the difference between the price bid and the price for which such contract shall be subsequently relet, including the cost of such reletting and less the amount of such deposit. No plea of mistake in such accepted bid shall be available to the bidder for the recovery of the deposit or as a defense to any action based upon such accepted bid.

### Section 314. Small purchases.

a. Notwithstanding any other provision of this charter, the procurement policy board and the council may, by concurrent action, establish dollar limits for procurement of goods, services, construction, or construction-related services that may be made without competition or without public advertisement. Awards pursuant to this section shall be made in accordance with rules of the procurement policy board.

### Section 315. Emergency procurement.

a. Notwithstanding the provisions of section three hundred twelve of this chapter, in the case of unforeseen danger to life, safety, property or a necessary service, an emergency procurement may be made with the prior approval of the comptroller and corporation counsel, provided that such procurement shall be made with such competition as is practicable under the circumstances, consistent with the provisions of section three hundred seventeen of this chapter. The term of any emergency contract awarded pursuant to this section shall not exceed ninety days, except with the prior specific determination of the comptroller and the corporation counsel that a longer term is necessary to avoid or mitigate serious danger to life, safety, property, or a necessary service and that such danger cannot be successfully avoided or mitigated through normal procurement methods. A written determination memorializing the basis for the emergency, the level of competition that was actually used, the contractor ultimately selected, and the term of the contract, including a justification for any term exceeding ninety days and why such longer term meets the requirements of this section, shall be placed in the agency contract file, and shall further be submitted to the council no later than fifteen days following approval by the comptroller and corporation counsel of the contract award, and the determination or summary of such determination shall be included in the notice of the award of contract published pursuant to section three hundred twenty-five of this chapter.

b. Agencies shall produce a draft and final plan, the final version of which is to be published on their website no later than July 1 each year, detailing the contracting actions available to the agency in the case of an unforeseen increase in the need for the existing contracted

portfolio of goods, services, or construction. Such draft and final plan shall include, but is not limited to, planning for a 25%, 50%, and 100% increase in existing contractual needs, as well as any specific scenario applicable to the agency's contracted portfolio.

c. No later than October 1 each year, in accordance with section twenty-t, the Office for Contract Services shall issue a summary of such agency emergency contracting plans and include a citywide plan identifying areas of potential overlap, interagency coordination, and any preemptory procurement actions such agencies can take to prepare for an increase in their contracted portfolio through normal procurement methods.

### Section 316. Intergovernmental procurement.

Notwithstanding any other requirement of this chapter,

a. any goods may be procured, ordered or awarded through the United States General Services Administration, or any other federal agency if the price is lower than the prevailing market price; any services or construction may be procured, ordered or awarded through the United States General Services Administration, or any other federal agency if the price is fair and reasonable, and

b. any goods may be procured, ordered or awarded through the New York State office of general services, or any other state agency, if the price is lower than the prevailing market price; any services or construction may be procured, ordered or awarded through the New York State office of general services, or any other state agency, if the price is fair and reasonable.

### Section 317. Alternatives to competitive sealed bidding.

a. If, in accordance with section three hundred twelve, an agency determines that the use of competitive sealed bidding is not practicable or not advantageous to the city, the agency shall select the most competitive alternative method of procurement provided for by sections three hundred eighteen through three hundred twenty-two which is appropriate under the circumstance. Each agency contract file shall contain documentation of such determination and of the basis upon which each contract is awarded, as is required by the procurement policy board.

b. Each contract for goods, services or construction in value of more than five million dollars proposed by an agency to be awarded which is let by other than (i) competitive sealed bidding, (ii) competitive sealed bids from prequalified vendors, or (iii) competitive sealed proposals, where the weight assigned to each of the factors or criteria to be considered in selecting the proposal most advantageous to the city was set forth in a writing filed in the agency contract file prior to the opening of proposals, shall require the approval of the mayor prior to its execution. Notwithstanding the preceding sentence, the mayor may, where the mayor has determined that it is appropriate, exclude an agency's contracts or a particular category of contracts from the approval requirement of this subdivision.

### Section 318. Competitive sealed bids from prequalified vendors.

In accordance with section three hundred seventeen, bids may be solicited from vendors who have been prequalified for the provision of a good, service or construction pursuant to section three hundred twenty-four by mailing notice to each prequalified vendor or, if special circumstances require, to a selected list of prequalified vendors. Award of the contract shall be made in accordance with the provisions of section three hundred thirteen of this chapter. A determination to employ selective solicitation for a particular procurement or for a particular category of

procurement shall be made in writing by the agency and approved by the mayor; unless the mayor, upon adequate assurances of an agency's capacity to comply with procedural requirements in relation to this section, has determined that such approval is not required for an agency's contracts or particular categories of contracts.

### Section 319. Competitive sealed proposals.

In accordance with section three hundred seventeen, proposals may be solicited through a request for proposals with award to the responsible offeror whose proposal is determined to be the most advantageous to the city, taking into consideration the price and such other factors or criteria as are set forth in the request for proposals. No other factors or criteria shall be used in the evaluation and award of the contract except those specified in the request for proposals. Discussions may be conducted with responsible offerors who submit proposals, provided that offerors shall be accorded fair treatment with respect to any opportunity for discussion and revision of the proposals.

### Section 320. Competitive sealed proposals from prequalified vendors.

In accordance with section three hundred seventeen, proposals may be solicited from vendors who have been prequalified for the provision of a good, service or construction pursuant to section three hundred twenty-four by mailing notice to each prequalified vendor or, if special circumstances require, to a selected list of prequalified vendors. Award of the contract shall be made in accordance with the provisions of section three hundred nineteen. A determination to employ selective solicitation for a particular procurement or for a particular category of procurement shall be made in writing by the agency by the mayor; unless the mayor, upon adequate assurance of an agency's capacity to comply with the procedural requirements in relation to this section, has determined that such approval is not required for an agency's contracts or particular categories of contracts.

### Section 321. Sole source.

a. In accordance with section three hundred seventeen, a contract may be awarded for a good, service or construction without competition when an agency determines, pursuant to rules promulgated by the procurement policy board, that there is only one source for the required good, service or construction. The agency contract file shall contain the agency's determination that only a single source is available for the required good, service or construction, including the process by which the agency made such determination. Copies of such notice shall be filed with the comptroller.

b. Whenever an agency determines that there is only a single source for a good, service or construction, an agency shall give immediate notice in the City Record of such determination and shall in such notice solicit the application of vendors qualified to provide such good, service or construction, or interested in providing such good service or construction in the future. The procurement policy board shall by rule define the timing and duration of such notification to ensure that vendors qualified to provide such good, service or construction have sufficient opportunity to express their interest to the agency prior to the initiation of any sole source negotiation; provided, however, that if the agency has determined that it should not reveal to the vendor with whom it is negotiating that it is doing so on a sole source basis under circumstances defined by rule of the procurement policy board, the notice required by this subdivision shall be made upon the

completion of such negotiations or the award of the contract. Vendors interested in providing such good, service or construction in the future shall be prequalified in accordance with section three hundred twenty-four, or shall be included for receipt of notice in accordance with subdivision a of section three hundred twenty-five.

### Section 322. Alternative procurement procedures.

In accordance with section three hundred seventeen, a contract may be awarded according to another procurement procedure established by rule of the procurement policy board, under circumstances, defined by rule of the procurement policy board, in which the use of such procedures is in the best interest of the city. An agency determination to utilize such an alternative procurement procedure for a particular procurement or for a particular type of procurement shall require the written approval of the mayor prior to seeking bids or proposals. The agency contract file shall contain the determination to use an alternative procurement procedure which shall state (1) which circumstances defined by the board to be in the best interest of the city apply to the procurement, including the basis upon which the agency made such determination, and (2) which procedure, as defined by the board pursuant to this section, was used in awarding the contract.

### Section 323. Multi-step sealed proposals.

A preliminary request for proposals may be issued requesting the submission of unpriced offers. Submissions in response to such a preliminary request for proposals may be relied upon by an agency (a) to solicit competitive sealed bids in accordance with section three hundred thirteen of this chapter; (b) to solicit competitive sealed bids from prequalified vendors in accordance with section three hundred eighteen; (c) to solicit competitive sealed proposals in accordance with section three hundred nineteen; or (d) to solicit proposals from prequalified vendors in accordance with section three hundred twenty.

### Section 324. Prequalification.

a. Agencies may maintain lists of prequalified vendors and entry into a prequalified group shall be continuously available. Prospective vendors may be prequalified as contractors for the provision of particular types of goods, services and construction, in accordance with general criteria established by rule of the procurement policy board which may include, but shall not be limited to, the experience, past performance, ability to undertake work, financial capability, responsibility, and reliability of prospective bidders, and their status as a certified minority and women owned business enterprise pursuant to section thirteen hundred four of the charter, and which may be supplemented by criteria established by rule of the agency for the prequalification of vendors for particular types of goods, services or construction or by criteria published in the City Record by the agency prior to the prequalification of vendors for a particular procurement. Such prequalification may be by categories designated by size and other factors.

b. Any vendor who is denied prequalification or whose prequalification is revoked by an agency may appeal such decision to the agency head. A determination of an agency head may be appealed to the office of administrative trials and hearings for a hearing and such office shall take final action regarding such matter. A decision by an agency to suspend a vendor's prequalification may be appealed to the agency head, provided that if such suspension extends for more than three months, it shall be deemed a revocation of the prequalification for the purposes of this section.

**Section 325. Planning and notification.**

a. Agencies shall produce a draft and final plan and schedule detailing anticipated contracting actions for the upcoming fiscal year, and shall hold at least one public hearing each year immediately following the release of the draft plan and schedule to receive testimony regarding the plan and schedule. The draft and final plan and schedule shall include, but not be limited to: the type of goods, services, or construction to be procured, the authorized maximum amount of funding associated with the program, the authorized number of contracts to be let for a particular program, the month and year of the next planned solicitation. Failure to include a contract in the plan and schedule issued pursuant to this section shall not be grounds for invalidating the contract. The procurement policy board shall promulgate rules governing the issuance of the draft and final plans and schedules, which shall ensure that the draft plan and schedule is issued promptly following the submission of the executive budget and that the final plan and schedule is issued no later than September thirtieth each year.

b. Pursuant to rules of the procurement policy board, each agency shall

1. for each category of goods, services or construction which is regularly procured by the agency, quarterly publish in the City Record a notice soliciting the names of vendors interested in being notified of future procurement opportunities in each such category,

2. for each category of goods, services or construction for which the agency prequalifies vendors for future procurement, quarterly publish in the City Record a notice soliciting the names and qualifications of vendors interested in being considered for prequalification for such category, and

3. publish in the City Record, and, where appropriate, in newspapers of city, state or national distribution and trade publications, notice of

(a) the solicitation of bids or proposals pursuant to section three hundred thirteen and three hundred seventeen through three hundred twenty-two, where the value of a contract is estimated to be above the small purchase limits, except where the agency has determined pursuant to section three hundred eighteen or three hundred twenty that solicitation should be limited to prequalified vendors,

(b) the award of a contract exceeding the small purchase limits in value. Each such notice of award shall indicate the name of the contractor, the dollar value of the contract, the procurement method by which the contract was let, and for contracts let by other than competitive sealed bidding, a citation of the clause of subdivision b of section three hundred twelve pursuant to which a procurement method other than competitive sealed bidding was utilized.

c. The procurement policy board, in consultation with the commissioner of citywide administrative services, shall promulgate rules providing for the publication and content of notices of contract actions required by this chapter. Such rules shall include provisions regarding,

i. the timing and frequency of notices,

ii. the required duration of solicitation periods,

iii. the form and content of notices, including the organization and presentation of such notices within standard categories of goods, services and construction which are sufficiently detailed to provide meaningful distinctions among categories.

d. The notice required by subparagraph a of paragraph three of subdivision a of this section shall not apply where the notice would disclose litigation strategy or otherwise impair the conduct of litigation by the city.

### Section 326. Public notice and comment on contract awards.

a. Prior to entering into any contract for goods, services or construction to be awarded by other than competitive sealed bidding or competitive sealed bids from prequalified vendors, the value of which exceeds an amount determined by the Procurement Policy Board, the agency shall give notice in the City Record that comments on the proposed contract may be submitted online for a period of time of not less than seven days, determined by the procurement policy board by rule, provided that such period of time shall commence no earlier than the date such notice is given. A description of the scope of work and key terms of the contract shall be included in such notice which shall at minimum include: (i) the agency name, (ii) the procurement identification number (PIN), (iii) a brief description of the goods, services, or construction to be procured, and method of source selection, (iv) the name and address of the proposed vendor and location of the proposed program, project, or worksite, and (v) the dollar amount of the proposed contract. The procurement policy board may by rule exempt from this public notice and comment requirement contracts to be let which do not differ materially in terms and conditions, as defined by the board, from contracts currently held by the city where the parties to such contracts are the same; provided, that under no circumstance may such exemption apply to any contract in value exceeding ten million dollars.

b. The requirements of this section shall not apply to any procurement (i) let pursuant to a finding of an emergency under section three hundred fifteen, (ii) required to be made on an accelerated basis due to markets which experience significant, short-term price fluctuations, as identified by rule of the board, or (iii) where public notice pursuant to this section would disclose litigation strategy or otherwise impair the conduct of litigation by the city.

### Section 327. Certification of legal authority and procedural requisites.

a. In the case of any contract which is let by other than competitive sealed bidding, the mayor shall certify, prior to the filing of the contract with the comptroller for registration in accordance with section three hundred twenty-eight of this chapter, that the procedural requisites for the solicitation and award of the contract have been met. The mayor may delegate such function to the agency proposing to award a contract only upon adequate assurance of an agency's capacity to comply with procedural requirements.

b. The corporation counsel shall certify prior to the filing of a contract with the comptroller for registration in accordance with section three hundred twenty-eight of this chapter, that each agency proposing to award a contract has legal authority to award each such contract.

### Section 328. Registration of contracts by the comptroller.

a. No contract or agreement executed pursuant to this charter or other law shall be implemented until (1) a complete contract file, pursuant to section three hundred thirty-four, has been filed with the comptroller and (2) either the comptroller has registered it or ten days have elapsed from the date of filing, whichever is sooner, unless an objection has been filed pursuant to subdivision c of this section, or the comptroller has grounds for not registering the contract under subdivision b of this section. b. Subject to the provisions of subdivision c of this section, the comptroller shall register a contract within ten days unless the comptroller has information indicating that:

i. there remains no unexpended and unapplied balance of the appropriation or fund applicable thereto, sufficient to pay the estimated expense of executing such contract, as certified by the officer making the same;

ii. that a certification required by section three hundred twenty-seven of this chapter has not been made; or

iii. the proposed vendor has been debarred by the city in accordance with the provisions of section three hundred thirty-five.

c. The comptroller may, within ten days of the date of filing of the contract with the comptroller's office, object in writing to the registration of the contract, if in the comptroller's judgment there is sufficient reason to believe that there is possible corruption in the letting of the contract or that the proposed contractor is involved in corrupt activity. Such objection shall be delivered within such ten day period to the mayor setting forth in detail the grounds for the comptroller's determination. After the mayor has responded to the comptroller's objections in writing, indicating (i) the corrective actions if any, that have been taken or will be taken in response to the comptroller's objections, or (ii) the reasons why the mayor disagrees with the comptroller's objections, the mayor may require registration of the contract despite the comptroller's objections. Such response by the mayor shall not serve as the basis for further objection by the comptroller, and the comptroller shall register the contract within ten days of receipt of the mayor's response.

d. The requirements of this section shall not apply to

(1) an emergency contract awarded pursuant to section three hundred fifteen or to an accelerated procurement as defined under section three hundred twenty-six, provided that the agency shall, within fifteen days of the execution of any such contract, submit such contract to the comptroller for an audit of the procedures and basis for the determination of the need for an emergency or accelerated procurement, and provided that failure by an agency to submit a contract within fifteen days of execution shall not affect the validity of such contract, or

(2) a contract awarded pursuant to this chapter for the provision of goods, services or construction that is not to be paid for out of the city treasury or out of moneys under the control of the city, provided that the board of the entity awarding such a contract shall within ten days of awarding contract, file a copy of such contract and any related materials specified by the mayor, with the mayor or the mayor's designee for purposes of section three hundred thirty-four of this charter.

**Section 329. By whom procured.**

a. All services to be performed by contract, including the furnishing of goods incident thereto, shall be obtained by the agency for whose use the appropriation therefor shall have been made, except as otherwise provided by law or by rule of the procurement policy board.

b. All other goods shall be purchased or procured by the department of citywide administrative services, except as otherwise provided pursuant to this chapter or other law.

c. Pursuant to rules of the procurement policy board and subject to other sections of this chapter, each agency may purchase directly goods in an amount not to exceed one thousand dollars for each transaction or, with the prior approval of the commissioner of citywide administrative services, in an amount not to exceed five thousand dollars for each transaction. The limitation of this subdivision shall not apply to purchases by an agency under a vendor contract entered into by the commissioner of general services.

d. The dollar limits for direct agency purchases without the prior approval of the commissioner of citywide administrative services pursuant to subdivision c of this section may be raised to five thousand dollars for each transaction for any or all agencies by the commissioner of citywide administrative services with the approval of the mayor. Any proposed increases in the limits for

such purchases above five thousand dollars shall be subject to the further approval of the comptroller. Any increase in dollar limits pursuant to this subdivision shall be published in the City Record and may be rescinded by the commissioner of citywide administrative services, the mayor, or the comptroller.

e. Subject to the approval of the comptroller, a specific procurement of a specific good may be delegated by the commissioner of citywide administrative services, in the best interest of the city, to any agency for direct purchase by such agency, and shall not be subject to the provisions of subdivisions b, c or d of this section; provided, however, that such delegation shall not be made for goods that are to be generally used by city agencies.

f. The mayor shall report annually on non-goods procurements, in particular shared services, where centralized procurement through the department of citywide administrative services may be in the best interests of the city. Such review shall include, but not be limited to, an analysis of instances where similar services are procured by multiple agencies and where agencies pay disparate prices for the same or similar services.

**Section 330. Inspection.**

Inspection and acceptance or rejection of all deliveries of goods shall be made by the agency that makes the direct purchase other than under a vendor contract. The commissioner of citywide administrative services may authorize an agency to which delivery is made to perform such functions on purchases made by the department of citywide administrative services subject to standards and policies of the commissioner. The comptroller may continue to perform such inspectional duties as are necessary for auditing purposes, including ascertainment of whether items purchased and paid for by the department of citywide administrative services or other agencies have been received and put to use by agencies.

**Section 331. Specifications.**

All purchases of goods shall be based upon specifications which are definite and certain, which permit of competition and which shall not be at variance with standard specifications for the various classes of goods approved by the commissioner of citywide administrative services. Before adopting standard specifications the commissioner shall obtain and consider the recommendations of agencies using the items to be standardized.

**Section 332. Payments procedure.**

Editor's note: this section has been amended by L.L. 2025/156, 11/8/2025, eff. 7/1/2026 and L.L. 2026/011, 1/3/2026, eff. 7/1/2027.

a. Electronic voucher processing. All city agencies and departments shall, to the extent practicable and consistent with operational and fiscal needs, develop and implement programs to accept vouchers by electronic means.

b. The procurement policy board shall promulgate rules for the expeditious processing of payment vouchers by city agencies and departments including (i) the maximum amount of time allowed for the processing and payment of such vouchers from the later of (a) the date such vouchers are received by the agency, or (b) the date on which the goods, services or construction to which the voucher relates have been received and accepted by the agency, (ii) a program for the payment of interest, at a uniform rate, to vendors on vouchers not paid within the maximum amount of time pursuant to clause i of this subdivision, (iii) a process for the allocation and charging of

any such interest payments to the budget of the agency responsible for the delay leading to the interest payments and (iv) agency reporting on the promptness of such payments in such form and containing such information as the board shall prescribe. The board shall coordinate and publish such agency prompt payment reports. Such rules shall facilitate the development and implementation of programs pursuant to subdivision a of this section.

**Section 333. Evaluation and monitoring of contractor performance.**

a. Each agency letting contracts shall monitor the performance of every contractor. Information with respect to contractor performance shall be maintained in a central place in accordance with subdivision c of section three hundred thirty-four.

b. 1. If a borough president determines there is reason to believe a term or condition of a contract providing for the delivery of services in the borough is not being complied with and that the contract should be terminated for noncompliance, modified, not renewed, modified at the time of renewal, or that the existing terms of the contract should be enforced, the borough president shall document in writing the reasons for that determination and present such determination, with a recommendation for appropriate action, to the agency head for review. In the case of a recommendation that a contract should not be renewed or should be modified at the time of renewal, such recommendation shall be made to the agency head at least one hundred and twenty days prior to the expiration of the contract.

2. The agency head shall respond to the borough president's findings within ten days from receipt of such findings, indicating what action, if any, shall be taken. If such action is not satisfactory to the borough president, the borough president shall, within thirty days of receipt of such responses, be authorized to require that a hearing be held in the borough by a contract performance panel consisting of the public advocate, the comptroller and the mayor, or their designees, to receive the testimony of the borough president and other interested persons on the borough president's recommendations. The hearing shall be held within twenty days from the borough president's request for the hearing. The head of the agency which procured the services in question, or designee of such agency head, and the contractor whose performance is being evaluated, shall have the right, and it shall be their duty when requested by the panel to appear and be heard.

3. The panel shall recommend, within thirty days of the date of such hearing, such action as it deems appropriate and shall promptly deliver its recommendations in writing to the agency head, borough president and contractor. Within thirty days of receipt of the panel's recommendation, the agency head shall respond in writing to the panel and the borough president, indicating which of the panel's recommendations shall be acted upon and what, if any, alternative action will be taken.

4. In the case of any contract regarding which more than one borough president has submitted a determination in accordance with paragraph one of this subdivision, the agency receiving such determinations shall notify each such borough president of the agency response submitted in accordance with paragraph two of this subdivision. A hearing, if any, held shall include the comments of all such borough presidents.

**Section 334. Information on city contracts.**

a. Agency contract files. Each agency shall maintain files containing information pertaining to the solicitation, award and management of each contract of the agency in accordance with standard record maintenance requirements established pursuant to section three thousand four of this

charter. The agency contract files shall contain copies of each determination, writing or filing required by this chapter pertaining to a contract and such information as is prescribed by rule of the procurement policy board, in such form as is prescribed by the procurement policy board. Agency contract files shall be open to the public inspection with adequate protection for information which is confidential.

b. Requests by elected officials for contract documentation. Whenever an elected official of the city requests documentation relating to the solicitation or award of any city contract, the mayor and city agencies shall promptly provide such documentation as is requested or shall promptly respond to the requesting official with reason why such documentation cannot be provided. If the mayor or agency is unable to provide the requested documentation within ten business days of the day the request is received, the mayor or agency shall within such time deliver to the requesting official a statement of the reasons the documentation can not be promptly provided and shall include in such statement a timetable within which the documentation will be provided, not to exceed thirty days from the date of the original request.

c. Centralized contract and contractor information. The mayor shall ensure that copies of city contracts and other standard information regarding city contracts and contractors are reasonably available for public inspection, including through remote digital access, with adequate protection for information which is confidential and in accordance with provisions of section one thousand sixty-four of this charter.

**Section 335. Centralized evaluation of contractor integrity, performance, and capability.**

a. The mayor shall evaluate the integrity, performance, and capability of entities that contract with the city, are seeking to contract with the city, or may seek to contract with the city. The mayor may designate one or more agencies to participate in such efforts. The evaluations of the mayor and any agency designated by the mayor may include conclusions regarding whether the entity should be considered a responsible contractor. The mayor and any agency designated by the mayor shall make such evaluations and conclusions available to agencies and the public through a centralized data base.

i. Each entity that seeks to contract with the city shall be determined by the procuring agency, prior to an individual contract award and in accordance with such rules as are promulgated by the Procurement Policy Board, that the entity has the integrity and capacity to perform the contracted services. This evaluation must include a review of centralized contractor information described in subdivision c of section three hundred thirty-four.

ii. Review of an entity's performance under a contract, in accordance with section three hundred thirty-three, shall take place no less than once for every twelve months of a contract's term and shall include, but not be limited to and in accordance with such rules as are promulgated by the Procurement Policy Board, a value-for-money analysis of contract delivery as compared to costs incurred and a review of subcontractors utilized for potential conflicts of interests or cost efficiencies.

b. Where evaluation pursuant to subdivision a of this section or other applicable rules and procedures includes a determination by the department of investigation of whether an entity that contracts with the city, seeks to contract with the city, or may seek to contract with the city, or any individual affiliated with such entity, is currently or has ever been, within a relevant timeframe the subject of an investigation by such department, such department shall, to the extent practicable,

submit such determination to the relevant agency at least 30 days prior to the anticipated commencement of the contract. However, such department may exercise its discretion with respect to the release of information that may affect the integrity of an ongoing investigation or may be subject to confidentiality requirements imposed by law or agreements with other law enforcement agencies. Such department shall provide an explanation to an agency if its review is not completed within thirty calendar days of the request. This subdivision shall not be construed to create a private right of action in relation to its provisions.

Written Testimony – Charles T. Diamond
Proposal to the 2026 Charter Revision Commission – Chapters 1 and 13 (Procurement)
Detailed Proposed Amendments

# Chapter 1: Mayor

## Section 20-t. Office of contract services.*

a. Office of contract services. The mayor shall establish an office of contract services. Such office may, but need not be, established in the executive office of the mayor and may be established as a separate office or within any other office of the mayor or within any department the head of which is appointed by the mayor. Such office shall be headed by the director of contract services who shall be appointed by the mayor. The mayor may delegate to the director the powers conferred upon the mayor pursuant to chapters 13 and 14. For the purposes of this section, the term "director" means the director of the office of contract services.

b. City chief procurement officer. The director shall serve as the city chief procurement officer, provided that to the extent such officer exercises the powers delegated directly to the mayor pursuant to chapters 13 and 14, such powers may be otherwise delegated.

c. Powers and duties. The director shall have the power and duty to:

1. Perform all reviews, make all determinations, and give all approvals and certifications to be performed, as delegated by the mayor pursuant to chapters 13 and 14;

2. Coordinate and oversee the procurement activity of mayoral agency staff, including the agency chief contracting officers, and any offices that have oversight responsibility for procurement;

3. Designate persons to serve as a clerk of the franchise and concession review committee, as authorized by the mayor;

4. Review departmental and specialized contract guidelines and procedures for conformance with citywide contract guidelines and regulations;

5. Conduct pre-audit and post-audit reviews of selected contracts to ensure adherence to citywide contracting and procurement procedures;

6. Develop guidelines, as appropriate, for professional qualifications for mayoral agency chief contracting officers and procurement staff;

7. Establish rules, provide guidance, and issue directives to agencies regarding contracting, procurement, invoicing, payment, and auditing;

8. Establish, operate, and maintain computerized procurement and contracting systems and any other systems used by mayoral agencies to carry out procurement and contracting and related functions, and to provide technical and user support to agencies and the public in connection with the use of such systems;

9. Establish, operate, and maintain a computerized public database that includes data and information on city procurement and contracting, including disaggregated data regarding agency solicitations, contracting, and contract management;

10. Establish rules and fees to support the operation, maintenance, and usage of such computerized procurement and contracting systems;

11. Coordinate citywide information on contracts and contractors, coordinate with agency chief contracting officers, and provide technical assistance to agencies on contract and procurement related issues;

12. Conduct training programs and provide educational materials in relation to city procurement and contracting for agencies and for the public, and in collaboration with relevant agencies, promote awareness of city contracting opportunities and understanding of city procurement processes;

13. Provide guidelines and coordinate the activity of agencies in connection with the grant of a concession, franchise, or revocable consent; and

14. Perform such other functions and duties as may be delegated by the mayor.

d. Delegation and designation.

1. The director may delegate to the agency chief contracting officer of each agency the duties listed in this paragraph, provided that the mayor must authorize such delegation in the case of powers conferred upon the mayor by law:

(a) Certification pursuant to section 327 that the procedural requisites for the solicitation and award of contracts have been met upon adequate assurance that the agency possesses the capacity to comply with procedural requirements; and

(b) Any other approvals or functions required by law, rule, or regulation, except that the approval of the mayor required under subdivision b of section 317 shall not be delegated to an agency chief contracting officer.

2. The director shall periodically, and at least once annually, review each agency chief contracting officer's performance of the functions delegated, and if such performance is found unsatisfactory, the director shall revoke the agency chief contracting officer's authority to exercise such function and the director shall resume the exercise of such function.

3. The director may designate employees of the office to exercise any of the powers and duties set forth in this section upon the specific or general direction of the director. Any reference to the director or city chief procurement officer includes the persons who have received such designation.

e. Annual reporting. No later than October 1 of each year, the director shall submit to the speaker of the council and publish on the office's website an annual report including, but not limited to:

1. Procurement timelines, disaggregated by procurement method and agency, including late registration and timelines promulgated by the Procurement Policy Board;
2. Contract management timelines, disaggregated by agency, including the length of invoice review and payment processing times;
3. Compliance of each agency with the rules, directives, and applicable procedural requisites, including findings and corrective actions taken;

4. Compliance of each agency with procurement timelines, including findings and corrective actions taken; 5 A summary of pre-audit and post-audit reviews conducted, including findings and corrective actions taken;

. 6 Any active delegations made by the director to agency chief contracting officers and any revocations thereof, including those made under the authority of subdivision a of section three hundred twenty-seven;

7. A review of the competitiveness within applicable industries in which the city procures, including an analysis of the quantity of responses received by city agencies by industry, and strategies to improve competitiveness in the best interests of the city;

8. A review of instances in which agencies may be paying disparate costs for the same or similar contracted services and strategies where it would be appropriate to consolidate or standardize such purchasing in the best interests of the city; and,

9. All emergency procurements entered into pursuant to section three hundred fifteen, including, for any contracts active at the time of the report, the timeline to transition to normal procurement procedures.

f. Rules, guidelines, and procedures. The director is authorized to promulgate rules, guidelines, and procedures as may be necessary and appropriate to effectuate the purposes of this section.

g. Construction.

1. Any power of the director specified in this section that is conferred upon the mayor pursuant to law shall be exercised by such director only to the extent such exercise is consistent with a delegation by the mayor.

2. Nothing in this section shall be construed to alter or impede the authority of the procurement policy board or the franchise and concession review committee. Any rule, directive, or guideline issued pursuant to subdivision f of this section that does not implement a power conferred upon the mayor by law shall be superseded by any applicable rule of the procurement policy board and franchise and concession review committee.

*(Became effective 6/2/2026)*

## Chapter 13: Procurement

### Section 310. Scope.

Except as otherwise provided in this charter or by statute,

1. all goods, services or construction to be paid for out of the city treasury or out of moneys under the control of or assessed or collected by the city shall be procured as prescribed in this chapter; provided, however, that for (i) the office of an independently elected city official, or (ii) the council, where the provisions of this chapter require action by the mayor or an appointee of the mayor in regard to a particular procurement except for mayoral action pursuant to subdivision c of section three hundred thirty-four, such action shall not be taken by the mayor or such appointee of the mayor, but shall be taken respectively, by (i) by such elected official or (ii) the speaker of the council, or another member of the council designated by the speaker with the approval of a majority of the members of the council, and

2. all goods, services or construction to be procured by an entity, the majority of the members of whose board are city officials or are individuals appointed directly or indirectly by city officials shall be procured as prescribed in this chapter; provided, however, that where the provisions of this chapter require action by the mayor or an appointee of the mayor in regard to a particular procurement except for mayoral action pursuant to subdivision c of section three hundred thirty-four, such action shall not be taken by the mayor or such appointee of the mayor, but shall be taken by the governing board of such entity or by the chair of the board or chief executive officer of such entity pursuant to a resolution adopted by such board delegating such authority to such officer.

### Section 311. Procurement policy board.

a. There shall be a procurement policy board consisting of five members, three of whom shall be appointed by the mayor and two of whom shall be appointed by the comptroller. Each member shall serve at the pleasure of the appointing official. Members shall have demonstrated sufficient business or professional experience to discharge the functions of the board. At least one member appointed by the mayor and one member appointed by the comptroller shall not hold any other public office or public employment. The remaining members shall not be prohibited from holding any other public office or employment provided that no member may have substantial authority

for the procurement of goods, services or construction pursuant to this chapter. The mayor shall designate the chair.

b. The board shall promulgate rules as required by this chapter, including rules establishing:

1. the methods for soliciting bids or proposals and awarding contracts, consistent with the provisions of this chapter;

2. the manner in which agencies shall administer contracts and oversee the performance of contracts and contractors;

3. standards and procedures to be used in determining whether bidders are responsible;

4. the circumstances under which procurement may be used for the provision of technical, consultant or personal services, which shall include but not be limited to, circumstances where the use of procurement is (a) desirable to develop, maintain or strengthen the relationships between non-profit and charitable organizations and the communities where services are to be provided, (b) cost-effective, or (c) necessary to (i) obtain special expertise, (ii) obtain personnel or expertise not available in the agency, (iii) to provide a service not needed on a long-term basis, (iv) accomplish work within a limited amount of time, or (v) avoid a conflict of interest;

5. the form and content of the files which agencies are required to maintain pursuant to section three hundred thirty-four and such other contract records as the board deems necessary and appropriate;

6. the time schedules within which city officials shall be required to take the actions required by this chapter, sections thirteen hundred four and thirteen hundred five, or by any rule issued pursuant thereto, in order for contracts to be entered into, registered or otherwise approved, and time schedules within which city officials should take action pursuant to any other provision of law or rule regarding individual contracts, which rules shall specify the appropriate remedies, including monetary remedies, for failure to meet the terms of any applicable schedule for taking such actions. The board may set forth exceptions to these rules. The promulgation of rules defining time schedules for actions by the division of economic and financial opportunity of the department of small business services and the division of labor services of such department shall require the approval of each division, as such rules pertain to actions required of such divisions, prior to the adoption of such rules by the procurement policy board;

7. the time schedules within which agencies shall be required to complete distinct stages of the procurement process, as determined by the board, as well as standardized time schedules for contract management actions, such as payment procedures, which rules shall specify the appropriate remedies for failure to meet the terms of any applicable schedule. The board may set forth exceptions to these rules.

8. procedures for the fair and equitable resolution of contract disputes;

9. rules relating to the making of small purchases in a manner that will advance the purposes of the program for minority- and women-owned business enterprises and emerging business enterprises established pursuant to subdivision b of section thirteen hundred four;

10. rules authorizing the submission of a protest by a vendor or a vendor's designated representative of a determination of any procurement action by an agency, except for determinations related to accelerated procurements, emergency procurements, and small purchases; and

11. such other rules as are required by this chapter.

c. The board may promulgate such additional rules, policies and procedures consistent with and as may be necessary to implement the provisions of this chapter. The board shall annually review

all of its rules, policies and procedures and make such revisions as the board deems necessary and desirable. Nothing herein shall prevent the board from reviewing its rules, policies, and procedures, and making such revisions as the board deems necessary and desirable, more than once per year.

d. The board shall promulgate rules to facilitate the timely and efficient procurement of client services, and to ensure that such contracts are administered in the best interests of the city. Such rules shall include but not be limited to: (i) rules authorizing city agencies to meet annual financial audit requirements through the acceptance of consolidated audits across multiple contracts and multiple agencies; (ii) rules providing for expedited renewal or extension of existing client services contracts; (iii) rules mandating the promulgation of draft and final contract plans by all agencies procuring client services.

e. The board shall submit an annual report to the mayor, comptroller, and council setting forth the professional standards for agency contracting officers adopted by the mayor, including any applicable certification process.

f. In the promulgation of any rules pertaining to the procurement of construction or construction related services, the board shall consult with any office designated by the mayor to provide overall coordination to the city's capital construction activities.

g. The board shall make such recommendations as it deems necessary and proper to the mayor and the council regarding the organization, personnel structure and management of the agency procurement function including, where appropriate, recommendations for revision of this charter or local laws affecting procurement by the city. Such reports may include recommendations regarding agency use of advisory groups to assist in preparation of bids or proposals and selection of contractors. The board shall also review the form and content of city contract documents and shall submit to the law department recommendations for standardization and simplification of contract language.

h. The board shall not exercise authority with respect to the award or administration of any particular contract, or with respect to any dispute, claim or litigation pertaining thereto.

i. In addition to other rules authorized by this section, the board may provide by rule that:

1. agencies may make procurements of goods, services and construction for amounts not exceeding one million five hundred thousand dollars from businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter without a formal competitive process.

2. agencies may award contracts for goods and services on the basis of best value to the bidder or offerer which optimizes quality, cost and efficiency, among responsive and responsible bidders or offerers. Such basis shall reflect, wherever possible, objective and quantifiable analysis and may include the prospective bidder's record of complying with existing labor standards, maintaining harmonious labor relations, and protecting the health and safety of workers. Such basis may also identify a quantitative factor for awarding of contracts for bidders or offerers that are businesses certified as minority or women-owned business enterprises pursuant to article fifteen-a of the executive law and section thirteen hundred four of the charter. Where an agency identifies a quantitative factor pursuant to this paragraph, the agency must specify that businesses certified as minority or women-owned business enterprises pursuant to article fifteen-a of the executive law as well as those certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter are eligible to qualify for such factor. Nothing in this paragraph shall be construed as a requirement that such businesses be concurrently certified as minority or

women-owned business enterprises under both article fifteen-a of the executive law and section thirteen hundred four of the charter to qualify for such quantitative factor.

3. the rule or rules promulgated to implement paragraph one of this subdivision shall provide that the city shall, commencing on the first of October of the first full calendar year following the adoption of such rule or rules, submit an annual report to the governor and the state legislature of the total number and total dollar value of procurements of goods and services for amounts not exceeding the dollar amount threshold for making procurements without a formal competitive process as established by rule pursuant to paragraph one of this subdivision from:

(i) businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter;

(ii) all other businesses; and

(iii) information about the number of businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of this charter able to perform the specific type and scale of work involved in each procurement.

**Section 312. Procurement; general rule and exceptions.**

a. Prior to entering into, renewing, or amending a contract valued at more than one million dollars to provide standard or professional services, or prior to renewing or amending a contract to provide standard or professional services that, following such renewal or amendment, would have a value of more than one million dollars, including agency task orders pursuant to multi-agency task order contracts, but excluding emergency procurements, government-to-government purchases, required source procurements as described in paragraph (2) of subdivision (d) of section 1-02 of title 9 of the rules of the city of New York, contracts that have a total value of more than one million dollars but for which the value of standard or professional services included in such contract is one million dollars or less, small purchases from businesses certified as minority or women-owned business enterprises pursuant to section thirteen hundred four of the charter, and the procurement of legal services or consulting services in support of current or anticipated litigation, investigative or confidential services, an agency shall follow the procedure established herein and the mayor shall comply with the reporting requirements set forth in paragraph 8. A contract or agency task order shall not be artificially divided in order to reduce the value of such contract or agency task order to avoid the requirements of this section.

1. Prior to issuing an invitation for bids, request for proposals, or other solicitation, or renewing or amending an existing contract, the agency shall determine whether such contract is the result of or would result in the displacement of any city employee within the agency. For the purpose of this section, the term “displacement” shall mean a reduction in the number of funded positions, including but not limited to, that resulting from the attrition; layoff; demotion; bumping; involuntary transfer to a new class, title, or location; time-based reductions, or reductions in customary hours of work, wages, or benefits of any city employee.

(a) There shall be a presumptive determination that a proposed contract is the result of or would result in displacement if any of the following events occurred in the three year period preceding the date the agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract:

(1) the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose; or

(2) the announcement of spending reductions in connection with a budgetary program, including but not limited to a Program to Eliminate the Gap, that could result or has resulted in the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose; or

(3) any other statement by an agency or the mayor of a specific anticipated employment action that could result or has resulted in the displacement of a city employee within the agency who performs or has performed the services sought by the proposed contract or services of a substantially similar nature or purpose.

(b) If the agency determines that displacement would not occur, it shall include a certification to that effect, signed by the agency head, in any invitation for bids, request for proposals, or other solicitation, or with any contract renewal or amendment. Such certification shall detail the basis upon which the agency determined that displacement would not occur, construing broadly the nature of the services sought and providing information including but not limited to: (i) whether any civil service title or job title within the agency currently performs the services solicited or services of a substantially similar nature or purpose, the names of such titles, and the extent to which agency employees within such titles currently perform such services; (ii) whether the solicited services expand, supplement, or replace existing services, and a detailed description comparing the solicited services with such existing services; (iii) whether there is capacity within the agency to perform the services solicited and, if there is no such capacity, a detailed description specifying the ways in which the agency lacks such capacity; (iv) for the term of the proposed contract, the projected headcount of employees within such titles or employees who perform such services or services of a substantially similar nature or purpose; and (v) confirmation that none of the events set forth in subparagraph a of this paragraph occurred within the agency in the three year period preceding the date such agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract.

(c) If the agency determines that displacement would occur, the agency shall determine the costs incurred and the benefits derived in performing the service, consistent with the scope and specifications within the solicitation, renewal, or amendment, with city employees, and shall submit such analysis, with all supporting documentation, prior to issuance of any solicitation or entry into any contract renewal or amendment, to the comptroller.

2. Immediately upon receipt of bids, proposals, and other solicitation responses, or prior to the renewal or amendment of an existing contract, the agency shall submit such determination, analysis, and supporting documentation to the council and to the appropriate collective bargaining representatives representing employees who would be affected pursuant to paragraph 1 of subdivision a of this section.

3. Prior to award of a contract, a renewal, or an amendment, the agency shall perform a comparative analysis of the costs expected to be incurred and the benefits expected to be derived from entering into, renewing, or amending a contract with the proposed vendor, based on such vendor's best and final offer, and such agency's analysis of the costs incurred and the benefits derived from providing the service with city employees. If the agency head intends to award, renew, or amend the contract, he or she shall submit the reasons therefor, together with such analysis, and all supporting documentation, to the comptroller, the council, and the appropriate collective bargaining representatives representing employees who would be affected pursuant to paragraph 1 of subdivision a of this section.

4. The council may, within thirty days after receipt of such reasons, analysis, and supporting documentation hold a hearing on this matter. No contract award, renewal, or amendment shall be made prior to the expiration of this thirty-day period or a council hearing, whichever is sooner.

5. (a) All cost and comparative analyses required under this section shall be conducted in accordance with standard methodology of the office of management and budget, and consistent with the rules of the procurement policy board, as both are modified herein, subject to further modification by local law. Such analyses shall include all reasonable costs associated with performing the service using city employees and all reasonable costs associated with performing the service under the proposed contract or contract renewal or amendment.

(b) Such analyses shall further include the total number, qualifications, job descriptions, and titles of all personnel to be employed by the vendor under the proposed contract or contract renewal or amendment, as well as the nature and cost of salaries and benefits to be provided to such personnel.

(c) Such analyses shall further include, but not be limited to, the cost of employee supervision directly related to the provision of the service, vendor solicitation, contract preparation, contract administration, monitoring and evaluating the contractor, capitalization of equipment over the period such equipment shall be in use, supplies, the cost of providing the equivalent quantity and quality of service by city employees compared to the cost of providing such service by contract, based upon the best and final offer of the proposed vendor, and such other factors as will assist in arriving at full and accurate cost determinations and comparisons.

6. The reasons given to award, renew, or amend the contracts shall include all factors that have been considered in determining whether contracting for this service is in the best interest of the city, whether or not such reasons are contained within the cost or comparative analyses. Such factors shall include, but not be limited to, the potential for contractor default, the time required to perform the service, and the quality of the service to be delivered.

7. The mayor or his or her designee may prepare and implement a plan of assistance for displaced city employees, which may include, but need not be limited to, training to place such employees in comparable positions within the contracting agency or any other agency. The cost of such assistance plan may be included within the cost of contracting-out in the cost and comparative analyses.

8. (a) For the purposes of this paragraph, the term “agency” means a city, county, borough or other office, position, administration, department, division, bureau, board, commission, authority, corporation, advisory committee or other agency of government, the expenses of which are paid in whole or in part from the city treasury, and shall include but not be limited to, the department of education, the health and hospitals corporation, and the New York city housing authority, but shall not include any court, or any local development corporation or other not for profit corporation or institution, including such a corporation or institution maintaining or operating a public library, museum, botanical garden, arboretum, tomb, memorial building, aquarium, zoological garden or similar facility.

(b) The mayor shall, no later than July 31st of each year, produce and publish on the mayor's office of contract services website a plan and schedule for each agency detailing the anticipated contracting actions of each such agency for the upcoming fiscal year. The plan and schedule shall include: (i) information specific to each prospective invitation for bids, request for proposal, or other solicitation, including, but not limited to, the nature of services sought, the term of the proposed contract, the method of the solicitation the agency intends to utilize, the anticipated fiscal

year quarter of the planned solicitation, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services; and (ii) information specific to each proposed contract renewal or amendment, including, but not limited to, any modifications sought to the nature of the services performed under the contract, the term of the proposed renewed or amended contract, the reason(s) the agency intends to renew or amend such contract, the month and year of the expiration of the existing contract, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services.

(c) If an agency intends to issue an invitation for bids, request for proposal, or other solicitation, or to renew or amend an existing contract, but the mayor fails to include such prospective invitation, request, solicitation, renewal or amendment in the plan and schedule or such invitation, request, solicitation, renewal or amendment provides a longer contract term than the term provided in the plan and schedule or otherwise differs from the information included in the plan and schedule with respect to the nature of the services sought, the civil service or job titles within the agency that perform the services sought or services of a substantially similar nature or purpose, or the headcount of employees within such titles, the mayor shall provide public notice ten days before such agency issues such invitation, request, or solicitation, or enters into such renewal or amendment. Such notice, which shall be posted on the website of the mayor's office of contract services and in the city record, shall include: (i) information specific to the prospective invitation for bids, request for proposal, or other solicitation, including, but not limited to, the nature of services sought, the term of the proposed contract, the method of the solicitation the agency intends to utilize, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services; or (ii) information specific to the proposed contract renewal or amendment, including, but not limited to, any modifications sought to the nature of the services performed under the contract, the term of the proposed renewed or amended contract, the reason(s) the agency intends to renew or amend such contract, the civil service or job titles within the agency who perform the services sought or services of a substantially similar nature or purpose, if any, and the headcount of employees within such titles who perform such services.

b. 1. Except as provided for in sections three hundred fourteen, three hundred fifteen and three hundred sixteen, contracts shall be awarded by competitive sealed bidding under such rules as shall be made by the procurement policy board, except that, in a special case as defined in subdivision b of this section, the head of an agency proposing to award such contract may order otherwise in accordance with policies and procedures established by the procurement policy board.

2. A determination by the head of an agency to use other than competitive sealed bidding except as provided for by sections three hundred fourteen and three hundred sixteen shall be made in writing, stating the reasons why competitive sealed bidding is not practicable or not advantageous and why the method of procurement selected pursuant to section three hundred seventeen is the most competitive alternative that is appropriate under the circumstances. The head of the agency shall include the determination or a summary of the determination in the notice of solicitation, or for an emergency procurement in the notice of award, required to be published pursuant to section three hundred twenty-five of this chapter.

c. 1. For the purposes of this chapter, the term "special case" shall be defined as a situation in which it is either not practicable or not advantageous to the city to use competitive sealed bidding for one of the following reasons:

(a) specifications cannot be made sufficiently definite and certain to permit selection based on price alone;

(b) judgment is required in evaluating competing proposals, and it is in the best interest of the city to require a balancing of price, quality, and other factors;

(c) the good, service or construction to be procured is available only from a single source;

(d) testing or experimentation is required with a product or technology, or a new source for a product or technology, or to evaluate the service or reliability of such product or technology; or

(e) such other reasons as defined by rule of the procurement policy board.

2. The procurement policy board may provide by rule that it is either not practicable or not advantageous to the city, for one of the reasons set forth in paragraph one of this subdivision, to procure a specified type of good, service or construction by competitive sealed bidding.

**Section 313. Competitive sealed bidding.**

a. The term competitive sealed bidding shall mean a method of procurement where the award of a contract is made to the lowest responsible bidder whose bid meets the requirements and criteria set forth in the invitation for bids.

b. Procedures for competitive sealed bidding.

1. Bids shall be solicited through an invitation for bids, which shall include a purchase description and a notice of where vendors may obtain a copy of all contractual terms and conditions applicable to the procurement. A notice of the intention to solicit bids shall be publicly advertised in accordance with the provisions of section three hundred twenty-five of this chapter. The terms of such contracts shall be settled by the corporation counsel as an act of preliminary specification to an invitation for bids.

2. The agency letting the contract may reject all bids if it shall deem it for the interest of the city so to do; if not, it shall, without other consent or approval, award the contract to the lowest responsible bidder, unless the mayor shall determine in writing, justifying the reasons therefor, that it is the best interest of the city that a bid other than that of the lowest responsible bidder shall be accepted. Such determination shall be published in the City Record. Tie bids are to be decided by the agency letting the contract and the award made. Whenever a contract is awarded to other than the lowest bidder because the lowest bidder is determined by the agency not to be a responsible bidder or because the lowest bid is determined by the agency to not meet the requirements and criteria set forth in the invitation for bids, the agency making such determination and awarding such contract shall immediately notify the lowest bidder of such determination and shall file in the agency contract file a statement in detail of the reasons therefor.

3. Any bidder who is declared not responsible by an agency and any bidder whose bid is determined by an agency to not meet the requirements and criteria set forth in the invitation for bids may, within five days of receipt of notice of the agency decision, appeal such decision to the agency head. A determination of an agency head of an appeal of a decision of non-responsibility may be appealed to the mayor who shall take final action regarding such matter. A determination of an agency head of an appeal of a decision that a bid does not meet the requirements and criteria set forth in the invitation for bids shall be final.

c. No bid shall be valid unless accompanied by a deposit in the amount and manner set forth and specified in the proposal; provided, however, that the procurement policy board shall establish such requirements for bid deposits as are necessary and practicable, and, pursuant to rules and standards, may waive the bid deposit requirement for specific classes of purchase or types of transactions. Upon the award of the contract the deposits of unsuccessful bidders shall be returned to them, and the deposit of the successful bidder shall be returned upon execution of the contract and furnishing of the required security.

d. Every invitation for bids shall contain a provision that in the event of the failure of the bidder to execute the contract and furnish the required security within ten days after notice of the award of the contract, the deposit or so much thereof as shall be applicable to the amount of the award made shall be retained by the city, and the bidder shall be liable for and shall agree to pay on demand the difference between the price bid and the price for which such contract shall be subsequently relet, including the cost of such reletting and less the amount of such deposit. No plea of mistake in such accepted bid shall be available to the bidder for the recovery of the deposit or as a defense to any action based upon such accepted bid.

### Section 314. Small purchases.

a. Notwithstanding any other provision of this charter, the procurement policy board and the council may, by concurrent action, establish dollar limits for procurement of goods, services, construction, or construction-related services that may be made without competition or without public advertisement. Awards pursuant to this section shall be made in accordance with rules of the procurement policy board.

### Section 315. Emergency procurement.

a. Notwithstanding the provisions of section three hundred twelve of this chapter, in the case of unforeseen danger to life, safety, property or a necessary service, an emergency procurement may be made with the prior approval of the comptroller and corporation counsel, provided that such procurement shall be made with such competition as is practicable under the circumstances, consistent with the provisions of section three hundred seventeen of this chapter. The term of any emergency contract awarded pursuant to this section shall not exceed ninety days, except with the prior specific determination of the comptroller and the corporation counsel that a longer term is necessary to avoid or mitigate serious danger to life, safety, property, or a necessary service and that such danger cannot be successfully avoided or mitigated through normal procurement methods. A written determination memorializing the basis for the emergency, the level of competition that was actually used, the contractor ultimately selected, and the term of the contract, including a justification for any term exceeding ninety days and why such longer term meets the requirements of this section, shall be placed in the agency contract file, and shall further be submitted to the council no later than fifteen days following approval by the comptroller and corporation counsel of the contract award, and the determination or summary of such determination shall be included in the notice of the award of contract published pursuant to section three hundred twenty-five of this chapter.

b. Agencies shall produce a draft and final plan, the final version of which is to be published on their website no later than July 1 each year, detailing the contracting actions available to the agency in the case of an unforeseen increase in the need for the existing contracted

portfolio of goods, services, or construction. Such draft and final plan shall include, but is not limited to, planning for a 25%, 50%, and 100% increase in existing contractual needs, as well as any specific scenario applicable to the agency's contracted portfolio.

c. No later than October 1 each year, in accordance with section twenty-t, the Office for Contract Services shall issue a summary of such agency emergency contracting plans and include a citywide plan identifying areas of potential overlap, interagency coordination, and any preemptory procurement actions such agencies can take to prepare for an increase in their contracted portfolio through normal procurement methods.

### Section 316. Intergovernmental procurement.

Notwithstanding any other requirement of this chapter,

a. any goods may be procured, ordered or awarded through the United States General Services Administration, or any other federal agency if the price is lower than the prevailing market price; any services or construction may be procured, ordered or awarded through the United States General Services Administration, or any other federal agency if the price is fair and reasonable, and

b. any goods may be procured, ordered or awarded through the New York State office of general services, or any other state agency, if the price is lower than the prevailing market price; any services or construction may be procured, ordered or awarded through the New York State office of general services, or any other state agency, if the price is fair and reasonable.

### Section 317. Alternatives to competitive sealed bidding.

a. If, in accordance with section three hundred twelve, an agency determines that the use of competitive sealed bidding is not practicable or not advantageous to the city, the agency shall select the most competitive alternative method of procurement provided for by sections three hundred eighteen through three hundred twenty-two which is appropriate under the circumstance. Each agency contract file shall contain documentation of such determination and of the basis upon which each contract is awarded, as is required by the procurement policy board.

b. Each contract for goods, services or construction in value of more than five million dollars proposed by an agency to be awarded which is let by other than (i) competitive sealed bidding, (ii) competitive sealed bids from prequalified vendors, or (iii) competitive sealed proposals, where the weight assigned to each of the factors or criteria to be considered in selecting the proposal most advantageous to the city was set forth in a writing filed in the agency contract file prior to the opening of proposals, shall require the approval of the mayor prior to its execution. Notwithstanding the preceding sentence, the mayor may, where the mayor has determined that it is appropriate, exclude an agency's contracts or a particular category of contracts from the approval requirement of this subdivision.

### Section 318. Competitive sealed bids from prequalified vendors.

In accordance with section three hundred seventeen, bids may be solicited from vendors who have been prequalified for the provision of a good, service or construction pursuant to section three hundred twenty-four by mailing notice to each prequalified vendor or, if special circumstances require, to a selected list of prequalified vendors. Award of the contract shall be made in accordance with the provisions of section three hundred thirteen of this chapter. A determination to employ selective solicitation for a particular procurement or for a particular category of

procurement shall be made in writing by the agency and approved by the mayor; unless the mayor, upon adequate assurances of an agency's capacity to comply with procedural requirements in relation to this section, has determined that such approval is not required for an agency's contracts or particular categories of contracts.

### Section 319. Competitive sealed proposals.

In accordance with section three hundred seventeen, proposals may be solicited through a request for proposals with award to the responsible offeror whose proposal is determined to be the most advantageous to the city, taking into consideration the price and such other factors or criteria as are set forth in the request for proposals. No other factors or criteria shall be used in the evaluation and award of the contract except those specified in the request for proposals. Discussions may be conducted with responsible offerors who submit proposals, provided that offerors shall be accorded fair treatment with respect to any opportunity for discussion and revision of the proposals.

### Section 320. Competitive sealed proposals from prequalified vendors.

In accordance with section three hundred seventeen, proposals may be solicited from vendors who have been prequalified for the provision of a good, service or construction pursuant to section three hundred twenty-four by mailing notice to each prequalified vendor or, if special circumstances require, to a selected list of prequalified vendors. Award of the contract shall be made in accordance with the provisions of section three hundred nineteen. A determination to employ selective solicitation for a particular procurement or for a particular category of procurement shall be made in writing by the agency by the mayor; unless the mayor, upon adequate assurance of an agency's capacity to comply with the procedural requirements in relation to this section, has determined that such approval is not required for an agency's contracts or particular categories of contracts.

### Section 321. Sole source.

a. In accordance with section three hundred seventeen, a contract may be awarded for a good, service or construction without competition when an agency determines, pursuant to rules promulgated by the procurement policy board, that there is only one source for the required good, service or construction. The agency contract file shall contain the agency's determination that only a single source is available for the required good, service or construction, including the process by which the agency made such determination. Copies of such notice shall be filed with the comptroller.

b. Whenever an agency determines that there is only a single source for a good, service or construction, an agency shall give immediate notice in the City Record of such determination and shall in such notice solicit the application of vendors qualified to provide such good, service or construction, or interested in providing such good service or construction in the future. The procurement policy board shall by rule define the timing and duration of such notification to ensure that vendors qualified to provide such good, service or construction have sufficient opportunity to express their interest to the agency prior to the initiation of any sole source negotiation; provided, however, that if the agency has determined that it should not reveal to the vendor with whom it is negotiating that it is doing so on a sole source basis under circumstances defined by rule of the procurement policy board, the notice required by this subdivision shall be made upon the

completion of such negotiations or the award of the contract. Vendors interested in providing such good, service or construction in the future shall be prequalified in accordance with section three hundred twenty-four, or shall be included for receipt of notice in accordance with subdivision a of section three hundred twenty-five.

### Section 322. Alternative procurement procedures.

In accordance with section three hundred seventeen, a contract may be awarded according to another procurement procedure established by rule of the procurement policy board, under circumstances, defined by rule of the procurement policy board, in which the use of such procedures is in the best interest of the city. An agency determination to utilize such an alternative procurement procedure for a particular procurement or for a particular type of procurement shall require the written approval of the mayor prior to seeking bids or proposals. The agency contract file shall contain the determination to use an alternative procurement procedure which shall state (1) which circumstances defined by the board to be in the best interest of the city apply to the procurement, including the basis upon which the agency made such determination, and (2) which procedure, as defined by the board pursuant to this section, was used in awarding the contract.

### Section 323. Multi-step sealed proposals.

A preliminary request for proposals may be issued requesting the submission of unpriced offers. Submissions in response to such a preliminary request for proposals may be relied upon by an agency (a) to solicit competitive sealed bids in accordance with section three hundred thirteen of this chapter; (b) to solicit competitive sealed bids from prequalified vendors in accordance with section three hundred eighteen; (c) to solicit competitive sealed proposals in accordance with section three hundred nineteen; or (d) to solicit proposals from prequalified vendors in accordance with section three hundred twenty.

### Section 324. Prequalification.

a. Agencies may maintain lists of prequalified vendors and entry into a prequalified group shall be continuously available. Prospective vendors may be prequalified as contractors for the provision of particular types of goods, services and construction, in accordance with general criteria established by rule of the procurement policy board which may include, but shall not be limited to, the experience, past performance, ability to undertake work, financial capability, responsibility, and reliability of prospective bidders, and their status as a certified minority and women owned business enterprise pursuant to section thirteen hundred four of the charter, and which may be supplemented by criteria established by rule of the agency for the prequalification of vendors for particular types of goods, services or construction or by criteria published in the City Record by the agency prior to the prequalification of vendors for a particular procurement. Such prequalification may be by categories designated by size and other factors.

b. Any vendor who is denied prequalification or whose prequalification is revoked by an agency may appeal such decision to the agency head. A determination of an agency head may be appealed to the office of administrative trials and hearings for a hearing and such office shall take final action regarding such matter. A decision by an agency to suspend a vendor's prequalification may be appealed to the agency head, provided that if such suspension extends for more than three months, it shall be deemed a revocation of the prequalification for the purposes of this section.

**Section 325. Planning and notification.**

a. Agencies shall produce a draft and final plan and schedule detailing anticipated contracting actions for the upcoming fiscal year, and shall hold at least one public hearing each year immediately following the release of the draft plan and schedule to receive testimony regarding the plan and schedule. The draft and final plan and schedule shall include, but not be limited to: the type of goods, services, or construction to be procured, the authorized maximum amount of funding associated with the program, the authorized number of contracts to be let for a particular program, the month and year of the next planned solicitation. Failure to include a contract in the plan and schedule issued pursuant to this section shall not be grounds for invalidating the contract. The procurement policy board shall promulgate rules governing the issuance of the draft and final plans and schedules, which shall ensure that the draft plan and schedule is issued promptly following the submission of the executive budget and that the final plan and schedule is issued no later than September thirtieth each year.

b. Pursuant to rules of the procurement policy board, each agency shall

1. for each category of goods, services or construction which is regularly procured by the agency, quarterly publish in the City Record a notice soliciting the names of vendors interested in being notified of future procurement opportunities in each such category,

2. for each category of goods, services or construction for which the agency prequalifies vendors for future procurement, quarterly publish in the City Record a notice soliciting the names and qualifications of vendors interested in being considered for prequalification for such category, and

3. publish in the City Record, and, where appropriate, in newspapers of city, state or national distribution and trade publications, notice of

(a) the solicitation of bids or proposals pursuant to section three hundred thirteen and three hundred seventeen through three hundred twenty-two, where the value of a contract is estimated to be above the small purchase limits, except where the agency has determined pursuant to section three hundred eighteen or three hundred twenty that solicitation should be limited to prequalified vendors,

(b) the award of a contract exceeding the small purchase limits in value. Each such notice of award shall indicate the name of the contractor, the dollar value of the contract, the procurement method by which the contract was let, and for contracts let by other than competitive sealed bidding, a citation of the clause of subdivision b of section three hundred twelve pursuant to which a procurement method other than competitive sealed bidding was utilized.

c. The procurement policy board, in consultation with the commissioner of citywide administrative services, shall promulgate rules providing for the publication and content of notices of contract actions required by this chapter. Such rules shall include provisions regarding,

i. the timing and frequency of notices,

ii. the required duration of solicitation periods,

iii. the form and content of notices, including the organization and presentation of such notices within standard categories of goods, services and construction which are sufficiently detailed to provide meaningful distinctions among categories.

d. The notice required by subparagraph a of paragraph three of subdivision a of this section shall not apply where the notice would disclose litigation strategy or otherwise impair the conduct of litigation by the city.

### Section 326. Public notice and comment on contract awards.

a. Prior to entering into any contract for goods, services or construction to be awarded by other than competitive sealed bidding or competitive sealed bids from prequalified vendors, the value of which exceeds an amount determined by the Procurement Policy Board, the agency shall give notice in the City Record that comments on the proposed contract may be submitted online for a period of time of not less than seven days, determined by the procurement policy board by rule, provided that such period of time shall commence no earlier than the date such notice is given. A description of the scope of work and key terms of the contract shall be included in such notice which shall at minimum include: (i) the agency name, (ii) the procurement identification number (PIN), (iii) a brief description of the goods, services, or construction to be procured, and method of source selection, (iv) the name and address of the proposed vendor and location of the proposed program, project, or worksite, and (v) the dollar amount of the proposed contract. The procurement policy board may by rule exempt from this public notice and comment requirement contracts to be let which do not differ materially in terms and conditions, as defined by the board, from contracts currently held by the city where the parties to such contracts are the same; provided, that under no circumstance may such exemption apply to any contract in value exceeding ten million dollars.

b. The requirements of this section shall not apply to any procurement (i) let pursuant to a finding of an emergency under section three hundred fifteen, (ii) required to be made on an accelerated basis due to markets which experience significant, short-term price fluctuations, as identified by rule of the board, or (iii) where public notice pursuant to this section would disclose litigation strategy or otherwise impair the conduct of litigation by the city.

### Section 327. Certification of legal authority and procedural requisites.

a. In the case of any contract which is let by other than competitive sealed bidding, the mayor shall certify, prior to the filing of the contract with the comptroller for registration in accordance with section three hundred twenty-eight of this chapter, that the procedural requisites for the solicitation and award of the contract have been met. The mayor may delegate such function to the agency proposing to award a contract only upon adequate assurance of an agency's capacity to comply with procedural requirements.

b. The corporation counsel shall certify prior to the filing of a contract with the comptroller for registration in accordance with section three hundred twenty-eight of this chapter, that each agency proposing to award a contract has legal authority to award each such contract.

### Section 328. Registration of contracts by the comptroller.

a. No contract or agreement executed pursuant to this charter or other law shall be implemented until (1) a complete contract file, pursuant to section three hundred thirty-four, has been filed with the comptroller and (2) either the comptroller has registered it or ten days have elapsed from the date of filing, whichever is sooner, unless an objection has been filed pursuant to subdivision c of this section, or the comptroller has grounds for not registering the contract under subdivision b of this section. b. Subject to the provisions of subdivision c of this section, the comptroller shall register a contract within ten days unless the comptroller has information indicating that:

i. there remains no unexpended and unapplied balance of the appropriation or fund applicable thereto, sufficient to pay the estimated expense of executing such contract, as certified by the officer making the same;

ii. that a certification required by section three hundred twenty-seven of this chapter has not been made; or

iii. the proposed vendor has been debarred by the city in accordance with the provisions of section three hundred thirty-five.

c. The comptroller may, within ten days of the date of filing of the contract with the comptroller's office, object in writing to the registration of the contract, if in the comptroller's judgment there is sufficient reason to believe that there is possible corruption in the letting of the contract or that the proposed contractor is involved in corrupt activity. Such objection shall be delivered within such ten day period to the mayor setting forth in detail the grounds for the comptroller's determination. After the mayor has responded to the comptroller's objections in writing, indicating (i) the corrective actions if any, that have been taken or will be taken in response to the comptroller's objections, or (ii) the reasons why the mayor disagrees with the comptroller's objections, the mayor may require registration of the contract despite the comptroller's objections. Such response by the mayor shall not serve as the basis for further objection by the comptroller, and the comptroller shall register the contract within ten days of receipt of the mayor's response.

d. The requirements of this section shall not apply to

(1) an emergency contract awarded pursuant to section three hundred fifteen or to an accelerated procurement as defined under section three hundred twenty-six, provided that the agency shall, within fifteen days of the execution of any such contract, submit such contract to the comptroller for an audit of the procedures and basis for the determination of the need for an emergency or accelerated procurement, and provided that failure by an agency to submit a contract within fifteen days of execution shall not affect the validity of such contract, or

(2) a contract awarded pursuant to this chapter for the provision of goods, services or construction that is not to be paid for out of the city treasury or out of moneys under the control of the city, provided that the board of the entity awarding such a contract shall within ten days of awarding contract, file a copy of such contract and any related materials specified by the mayor, with the mayor or the mayor's designee for purposes of section three hundred thirty-four of this charter.

**Section 329. By whom procured.**

a. All services to be performed by contract, including the furnishing of goods incident thereto, shall be obtained by the agency for whose use the appropriation therefor shall have been made, except as otherwise provided by law or by rule of the procurement policy board.

b. All other goods shall be purchased or procured by the department of citywide administrative services, except as otherwise provided pursuant to this chapter or other law.

c. Pursuant to rules of the procurement policy board and subject to other sections of this chapter, each agency may purchase directly goods in an amount not to exceed one thousand dollars for each transaction or, with the prior approval of the commissioner of citywide administrative services, in an amount not to exceed five thousand dollars for each transaction. The limitation of this subdivision shall not apply to purchases by an agency under a vendor contract entered into by the commissioner of general services.

d. The dollar limits for direct agency purchases without the prior approval of the commissioner of citywide administrative services pursuant to subdivision c of this section may be raised to five thousand dollars for each transaction for any or all agencies by the commissioner of citywide administrative services with the approval of the mayor. Any proposed increases in the limits for

such purchases above five thousand dollars shall be subject to the further approval of the comptroller. Any increase in dollar limits pursuant to this subdivision shall be published in the City Record and may be rescinded by the commissioner of citywide administrative services, the mayor, or the comptroller.

e. Subject to the approval of the comptroller, a specific procurement of a specific good may be delegated by the commissioner of citywide administrative services, in the best interest of the city, to any agency for direct purchase by such agency, and shall not be subject to the provisions of subdivisions b, c or d of this section; provided, however, that such delegation shall not be made for goods that are to be generally used by city agencies.

f. The mayor shall report annually on non-goods procurements, in particular shared services, where centralized procurement through the department of citywide administrative services may be in the best interests of the city. Such review shall include, but not be limited to, an analysis of instances where similar services are procured by multiple agencies and where agencies pay disparate prices for the same or similar services.

### Section 330. Inspection.

Inspection and acceptance or rejection of all deliveries of goods shall be made by the agency that makes the direct purchase other than under a vendor contract. The commissioner of citywide administrative services may authorize an agency to which delivery is made to perform such functions on purchases made by the department of citywide administrative services subject to standards and policies of the commissioner. The comptroller may continue to perform such inspectional duties as are necessary for auditing purposes, including ascertainment of whether items purchased and paid for by the department of citywide administrative services or other agencies have been received and put to use by agencies.

### Section 331. Specifications.

All purchases of goods shall be based upon specifications which are definite and certain, which permit of competition and which shall not be at variance with standard specifications for the various classes of goods approved by the commissioner of citywide administrative services. Before adopting standard specifications the commissioner shall obtain and consider the recommendations of agencies using the items to be standardized.

### Section 332. Payments procedure.

Editor's note: this section has been amended by L.L. 2025/156, 11/8/2025, eff. 7/1/2026 and L.L. 2026/011, 1/3/2026, eff. 7/1/2027.

a. Electronic voucher processing. All city agencies and departments shall, to the extent practicable and consistent with operational and fiscal needs, develop and implement programs to accept vouchers by electronic means.

b. The procurement policy board shall promulgate rules for the expeditious processing of payment vouchers by city agencies and departments including (i) the maximum amount of time allowed for the processing and payment of such vouchers from the later of (a) the date such vouchers are received by the agency, or (b) the date on which the goods, services or construction to which the voucher relates have been received and accepted by the agency, (ii) a program for the payment of interest, at a uniform rate, to vendors on vouchers not paid within the maximum amount of time pursuant to clause i of this subdivision, (iii) a process for the allocation and charging of

any such interest payments to the budget of the agency responsible for the delay leading to the interest payments and (iv) agency reporting on the promptness of such payments in such form and containing such information as the board shall prescribe. The board shall coordinate and publish such agency prompt payment reports. Such rules shall facilitate the development and implementation of programs pursuant to subdivision a of this section.

**Section 333. Evaluation and monitoring of contractor performance.**

a. Each agency letting contracts shall monitor the performance of every contractor. Information with respect to contractor performance shall be maintained in a central place in accordance with subdivision c of section three hundred thirty-four.

b. 1. If a borough president determines there is reason to believe a term or condition of a contract providing for the delivery of services in the borough is not being complied with and that the contract should be terminated for noncompliance, modified, not renewed, modified at the time of renewal, or that the existing terms of the contract should be enforced, the borough president shall document in writing the reasons for that determination and present such determination, with a recommendation for appropriate action, to the agency head for review. In the case of a recommendation that a contract should not be renewed or should be modified at the time of renewal, such recommendation shall be made to the agency head at least one hundred and twenty days prior to the expiration of the contract.

2. The agency head shall respond to the borough president's findings within ten days from receipt of such findings, indicating what action, if any, shall be taken. If such action is not satisfactory to the borough president, the borough president shall, within thirty days of receipt of such responses, be authorized to require that a hearing be held in the borough by a contract performance panel consisting of the public advocate, the comptroller and the mayor, or their designees, to receive the testimony of the borough president and other interested persons on the borough president's recommendations. The hearing shall be held within twenty days from the borough president's request for the hearing. The head of the agency which procured the services in question, or designee of such agency head, and the contractor whose performance is being evaluated, shall have the right, and it shall be their duty when requested by the panel to appear and be heard.

3. The panel shall recommend, within thirty days of the date of such hearing, such action as it deems appropriate and shall promptly deliver its recommendations in writing to the agency head, borough president and contractor. Within thirty days of receipt of the panel's recommendation, the agency head shall respond in writing to the panel and the borough president, indicating which of the panel's recommendations shall be acted upon and what, if any, alternative action will be taken.

4. In the case of any contract regarding which more than one borough president has submitted a determination in accordance with paragraph one of this subdivision, the agency receiving such determinations shall notify each such borough president of the agency response submitted in accordance with paragraph two of this subdivision. A hearing, if any, held shall include the comments of all such borough presidents.

**Section 334. Information on city contracts.**

a. Agency contract files. Each agency shall maintain files containing information pertaining to the solicitation, award and management of each contract of the agency in accordance with standard record maintenance requirements established pursuant to section three thousand four of this

charter. The agency contract files shall contain copies of each determination, writing or filing required by this chapter pertaining to a contract and such information as is prescribed by rule of the procurement policy board, in such form as is prescribed by the procurement policy board. Agency contract files shall be open to the public inspection with adequate protection for information which is confidential.

b. Requests by elected officials for contract documentation. Whenever an elected official of the city requests documentation relating to the solicitation or award of any city contract, the mayor and city agencies shall promptly provide such documentation as is requested or shall promptly respond to the requesting official with reason why such documentation cannot be provided. If the mayor or agency is unable to provide the requested documentation within ten business days of the day the request is received, the mayor or agency shall within such time deliver to the requesting official a statement of the reasons the documentation can not be promptly provided and shall include in such statement a timetable within which the documentation will be provided, not to exceed thirty days from the date of the original request.

c. Centralized contract and contractor information. The mayor shall ensure that copies of city contracts and other standard information regarding city contracts and contractors are reasonably available for public inspection, including through remote digital access, with adequate protection for information which is confidential and in accordance with provisions of section one thousand sixty-four of this charter.

**Section 335. Centralized evaluation of contractor integrity, performance, and capability.**

a. The mayor shall evaluate the integrity, performance, and capability of entities that contract with the city, are seeking to contract with the city, or may seek to contract with the city. The mayor may designate one or more agencies to participate in such efforts. The evaluations of the mayor and any agency designated by the mayor may include conclusions regarding whether the entity should be considered a responsible contractor. The mayor and any agency designated by the mayor shall make such evaluations and conclusions available to agencies and the public through a centralized data base.

i. Each entity that seeks to contract with the city shall be determined by the procuring agency, prior to an individual contract award and in accordance with such rules as are promulgated by the Procurement Policy Board, that the entity has the integrity and capacity to perform the contracted services. This evaluation must include a review of centralized contractor information described in subdivision c of section three hundred thirty-four.

ii. Review of an entity's performance under a contract, in accordance with section three hundred thirty-three, shall take place no less than once for every twelve months of a contract's term and shall include, but not be limited to and in accordance with such rules as are promulgated by the Procurement Policy Board, a value-for-money analysis of contract delivery as compared to costs incurred and a review of subcontractors utilized for potential conflicts of interests or cost efficiencies.

b. Where evaluation pursuant to subdivision a of this section or other applicable rules and procedures includes a determination by the department of investigation of whether an entity that contracts with the city, seeks to contract with the city, or may seek to contract with the city, or any individual affiliated with such entity, is currently or has ever been, within a relevant timeframe the subject of an investigation by such department, such department shall, to the extent practicable,

submit such determination to the relevant agency at least 30 days prior to the anticipated commencement of the contract. However, such department may exercise its discretion with respect to the release of information that may affect the integrity of an ongoing investigation or may be subject to confidentiality requirements imposed by law or agreements with other law enforcement agencies. Such department shall provide an explanation to an agency if its review is not completed within thirty calendar days of the request. This subdivision shall not be construed to create a private right of action in relation to its provisions.

Written Testimony – Charles T. Diamond
Proposal to the 2026 Charter Revision Commission – Chapters 1 and 13 (Procurement)

**Date:** June 16, 2026

**Re:** Proposal for amendments to Chapters 1 and 13 of the City Charter (Procurement)

## Executive Summary

To reform the City's byzantine procurement system and fulfil the ideals of the 1989 Charter, the Commission for Government Efficiency should consider the included changes to ten sections of the New York City Charter, including Section 20-t (Office of Contract Services) of Chapter 1 and nine sections of Chapter 13 (Procurement).

While comprehensive reform will require action at various levels of government, different budget decisions, and cultural change amongst procurement actors, the proposed Chater amendments will reduce costs and improve the quality of the goods, services, and construction received. Procurement reform serves as a value multiplier for all other efficiency efforts and allows the City to truly do more with less.

This unique opportunity to focus on government efficiency through a Charter Revision Commission must address the 'third rail' of procurement to fulfill its stated objectives.

## Background

As the largest municipality in the United States, New York City procures significant quantities of goods, services, and construction through thousands of individual contract actions per year. From July 2024 to June 2025, City agencies awarded $42.3 billion in contracts for goods, services, and construction, surpassing the entire budgets of many state governments. Despite the crucial role procurement plays in delivering City action, those familiar with the process have long criticized it as complex, slow-moving, and repetitive.

Notable achievements over the past 15 years, including the digitization of the prior paper-based system, are overshadowed by an outdated legal structure that seeks to avoid fraud, waste, and corruption through hundreds of prophylactic rules that regulate every step of the procurement process without seeking to quantify the risk prevented, the administrative cost incurred, or the benefits gained. Despite this recognized compliance burden, bad contracting outcomes continue to occur through high profile instances of exactly that: fraud, waste, and corruption.

The way the City buys is rooted in its Charter reform of 1989, prior to which the Board of Estimate would gather in marathon sessions lasting into the early morning approving rounds of contracts – a model distinctly disfavored under the 1989 reforms. As noted at the time, the importance of having a singular, accountable actor for procurement decisions was crucial to encouraging both better business decisions and the prevention of favoritism. However, the ideal of the 1989 Charter reforms, which resulted in the creation of the Mayor's Office of Contract Services ('MOCS') to serve as that singular, accountable actor on behalf of the Mayor, has not been fulfilled. MOCS has only sporadically serviced a strategic sourcing role and DCAS central procurement is limited in remit to goods and maintains only a smattering of shared services. Agency compliance and business processes are decentralized and the City's unified purchasing power is underutilized.

Thirty-seven years of the 1989 Charter procurement process has made evident that we need stronger central actor driving procurement efficiency – from sourcing to invoicing.

**Proposed Amendments to City Charter**

Chapter 1 (Mayor)

Section 20-t (Office of Contract Services):

Requiring explicit review and additional reporting requirements to the annual citywide procurement indicators report, regarding:

- agency procurement timelines;
- agency contract management timelines;
- delegated authority and agency compliance with procedural requisites;
- competitiveness within distinct industries;
- value-for-money across agency portfolios; and,
- emergency procurements and the transition to normal procurement procedures.

Requiring a public database based on the current transparency portal, PASSPort Public, launched in 2022.

Chapter 13 (Procurement)

Section 311: Empowering the Procurement Policy Board to set timelines for stages of the procurement process, including non-procurement approvals.

Section 315: Requiring emergency procurement planning and reporting, both citywide and by agency.

Section 325: Requiring annual agency procurement plans for contracts beyond client services contracts.

Section 326: Allowing the Procurement Policy Board to set the dollar threshold for online notice and comment for contract awards.

Section 328: Reduce registration window to ten days while requiring a complete contract file for Comptroller review.

Section 329: Include shared services in the remit of the Department of Citywide Services and require analysis of where centralized purchasing of services may be in the best interests of the City.

Section 331: Clarify that the use of 'definite and certain' specifications in purchasing applies to goods, not to request for proposal criteria.

Section 334: Requiring digitized and remote access to the centralized contract and contractor information database for public inspection.

Section 335: Requiring evaluation of contractor integrity, performance, and capacity prior to contract award and inclusion of that analysis in the contract file. Add specificity to contract performance monitoring requirements.

Detailed proposed amendments are enclosed for consideration.

**Potential Impact**

Some of these proposed changes elevate best practice, policy, or Procurement Policy Board rule to a Charter command, whereas others represent drastic change from past practice and are intended to spur cultural change. The benefits of these proposed amendments fall within the three inter-related buckets below.

Improving Accountability & Transparency: With the Mayor's Office of Contract Services now being included in the Charter as the Office of Contract Services, the opportunity exists to formalize current reporting practices and extend them to include a focus on data transparency, identifying inefficiencies, and holding agencies accountable for lack of compliance or planning. Elevating current transparency systems and accountability practices to Charter level will ensure they will not vary by administration and are more likely to be fully funded. Open contracting principles, proven to drive competition, must be elevated above risk-averse decisions to limit procurement information from the public.

Driving Efficiency: Through right-sizing the risks and the burdens of aspects of the procurement process we can reduce administrative drag while better meeting the goals of the existing law, including through setting procurement timelines. Reducing the Comptroller registration window to 10 days while clearly mandating a complete contract file for such window to begin will reduce the constant back-and-forth of registration while ensuring the Comptroller can better fulfill their mandated duties. Advance, published planning for an agency's entire contracting portfolio, including emergency specific planning, will provide potential vendors with the time to compete and force agencies to improve their procurement planning.

Refocusing on Strategic Sourcing: The current law, rules, and policy put primary responsibility for ensuring value for money in City contracting on an Agency Chief Contracting Officer's determination that an individual contract be "fair and reasonable"[1], an often-perfunctory task completed without question. While the 1989 Charter may have assumed that the incentives of City budgeting would naturally encourage ACCOs to be as thrifty as possible, past practice has shown that that incentive structure is not enough. By elevating value-for-money to the same level of importance as procedural compliance we can reset our basic approach to contracting to improve business outcomes. Specific consideration and reporting on value-for-money of City contracts, highlighting disparate prices for similar line-items, and requiring advanced plans for an agency's entire contracting portfolio will fill the known gaps in our attempts to be strategic in how we buy.

**Non-Charter Reforms**

Irrespective of the benefits described above, many of the most painful aspects of our procurement process are not rooted in the Charter.

[1] Procurement Policy Board Rule 2-06 (9 RCNY 2-06)

Long standing issues with invoicing and payment procedures – while addressed in the above through improved reporting – are primarily an operational issue rather than a gap in the law. Consistent underbudgeting of central and agency procurement infrastructure cannot be fixed through a Charter amendment. While many stakeholders have bemoaned the lack of substance in City contracting notices, the law is strong in that regard and Charter Section 325(c)(iii) specifically directs the PPB and DCAS to ensure such notices are "sufficiently detailed to provide meaningful distinctions among categories".

Thus, the culture and incentive structure of government is perhaps most impactful on procurement outcomes, with procurement so painful that it is ignored as unsolvable and short-term fixes are prioritized over system building. The current executive proposal to reduce MOCS' budget by 18.8% for Fiscal Year 2027 and the recently reported discussion to delay billions of dollars of payments to non-profits due July 1 emphasize that the lesson has not been learned – we must care about procurement.

This Commission is an unmissable opportunity to elevate procurement as the efficiency issue of our time and spur the necessary reforms at the State, Council, City Hall, Procurement Policy Board, and agency level.

**Conclusion**

No amendments to the City Charter can holistically address the issues that plague how governments buy things. Procurement inefficiency is not unique to New York City, either within the United States or internationally. However, these amendments to the City Charter will fulfill the intent of the 1989 Charter reforms and represent a structural reset. Perhaps most importantly, putting procurement reform front-and-center of government efficiency is the best chance we have to catalyze the process, policy, and cultural changes necessary to drive better business outcomes.

Regardless of whether the Commission seeks to consider the specific amendments I have proposed, at a minimum this must be the beginning of a robust debate regarding procurement reform and must result in a proposal for such from this Commission. No serious attempt to address efficiency within City government can afford to not do so and avoid this 'third rail' of modern government.

Name

## Bria Donohue

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | American Institute of Architects New York Chapter (AIANY) |
| Zip Code | [redacted] |

Public Comment

American Institute of Architects New York Chapter Testimony to New York City Charter Commission on Government Efficiency

Public Hearing on Streamlining Government for Infrastructure Projects and the Public Realm

June 9, 2026

Thank you, Chair Gaspard and members of the Commission on Government Efficiency, for holding today's hearing. I am Bria Donohue, Director of Government Affairs at the American Institute of Architects New York Chapter. AIANY is the leading design non-profit representing 5,000 architects and design professionals committed to positively impacting the physical and social qualities of our city.

AIANY commends Mayor Mamdani on his demonstrated leadership and commitment to responsible use of public dollars, ensuring our city is effectively delivering public goods and building a quality, resilient public realm. As needs grow and capital budgets tighten, every project must do more: strengthen the public realm, advance the clean-energy transition, and increase resilience to climate threats. Much can be done through reforms to the City Charter to help the city more effectively deliver capital projects.

The 700+ pages of the City Charter are meant to reflect the city's priorities and rules for operation; however, layers of bureaucracy have stifled the city's ability to deliver critical projects in an efficient and cost effective manner. The restrictive and overly cautious nature of our current system makes it challenging to operate and deliver projects both for agencies and design professionals. When we burden projects with so many boxes to check and hoops to jump through, how can we expect to deliver high quality public goods in a way that taxpayers can trust that the city is getting the most bang for its buck. AIANY recommends the Commission evaluate the following reforms to the City Charter:

Launch a Coordinated, Citywide Capital Planning Process
Agencies often plan and budget projects independently, with limited shared data, leading to missed opportunities to coordinate and difficulty advancing citywide priorities like climate resilience and affordable housing. The Commission should explore empowering DDC's Advanced Capital Planning program to support agencies with technical planning support to develop realistic, comprehensive long term capital plans that balance state of good repair, program needs, and environmental justice target projects. By coordinating capital priorities and conducting more front end planning, the city can identify opportunities to maximize co-benefits, such as utility/infrastructure coordination, permit approvals, and minimize construction disruptions. Smart comprehensive planning enables the city to deliver quality projects with the mentality of "do it once, do it right."

Prioritize Qualifications Based Selection (QBS)

Provide flexibility to capital agencies to select design and construction partners based on their qualifications, experience and quality of their proposal. The Commission should explore reforms to the Procurement section of the City Charter to enable agencies to move away from a low-bid environment and determine which partner is right for a project based on a holistic evaluation of their submission. To deliver quality public goods, a highly qualified team with demonstrated experience on projects of similar scope and budget is required, so being able to assess expertise and innovation in addition to price sets projects up for success from the start.

Expand Authorization of Alternative Project Delivery Tools
Legacy delivery models do not meet today's project needs, with traditional the design bid build model slowing implementation and limiting collaboration and innovation, particularly for high performance building and infrastructure projects. The current piecemeal authorization of alternative project delivery tools like Progressive Design-Build and CM-Build limits the city's ability to effectively deliver projects. Design build, CM build, progressive design build, and other alternative delivery tools have been proven to unlock meaningful efficiencies, foster collaboration, and deliver quality projects faster. With reauthorization of New York's design-build authority approaching, the Commission should support legislative action to permanently authorize design build and expand the range of delivery tools available to public owners. There is no one size fits all approach for project delivery, so broad authorization of alternative delivery tools is crucial to enable the public owner to make strategic decisions on which delivery method is best for which project based on the specific scope and project needs. The Commission should also evaluate reforms to the City Charter to add flexibility for capital agencies to utilize alternative delivery methods.

Modernize and Streamline Oversight Processes
Outdated oversight processes add years to delivery timelines. Sequential reviews across budgeting, procurement, and permitting - combined with duplicative requirements and limited use of modern technology or risk based approaches mean City projects routinely take longer and cost more than comparable private-sector work. The Commission must evaluate reforms to budgeting, procurement, and permitting to eliminate unnecessary steps, reduce duplication, and enable parallel review.

Invest in the Public Realm as Infrastructure
Our public space makes up roughly 40% of our city's land mass and yet it is funded as if it was much smaller and less critical. Meaningful funding is key to ensure that our parks, natural areas, streets, sidewalks, and public plaza can be designed, constructed, activated, and maintained to best serve New Yorkers. We must invest in every aspect of our shared space, including an increased baseline allotment in the city budget, and unlocking innovative ways to access additional funds for maintenance, stewardship, and activation. The city must fund public spaces like the city funds public infrastructure to ensure that these spaces can be designed and activated to be both functional and resilient. The Commission should evaluate mechanisms to fund public realm maintenance, such as dedicating a percentage of capital project

budgets for maintenance rather than limiting agencies to expense dollars to ensure agencies have the capacity to maintain projects that are delivered. Currently, the lack of maintenance capacity is a roadblock, and unlocking a specified portion of capital funding for maintenance would enable agencies to integrate more innovative design into our built environment while also ensuring that these spaces last and are usable.

Expand Green Building Standards
Under the umbrella of delivering quality public goods are the types of building practices and materials used in projects. When delivering public projects, we should be serving New Yorkers by utilizing healthy materials. Buildings are the largest contributor of greenhouse gases in the city, and of that a significant portion of emissions come from embodied carbon, which is the emissions generated by the manufacturing, transportation, installation, maintenance, and disposal of construction materials - approximately 17% of global greenhouse gas emissions. To better serve the public, the city must prioritize utilizing low carbon construction materials. The City Charter includes a number of provisions on energy efficient buildings, addressing operational carbon emissions, but fails to tackle embodied carbon. The Charter should reflect our priorities as a city to build a quality, resilient, low-carbon built environment. The Commission should explore reforms to expand green building standards in Chapter 9, Section 224.1.

Thank you for the opportunity to testify, and we look forward to working closely with the Commission to execute meaningful reforms to improve how the city delivers quality capital projects.

Attachment(s)



AIANY Testimony to Charter Commissio...

Date Submitted

June 16, 2026

| | |
|---|---|
| Topic | Unnecessary Bureaucracy, Procurement Reform, Real Estate and Development, Budget Issues, Department of Buildings (DOB) Issues, Technology |
| Method Received | Airtable Form |
| Is it charter related? | Yes |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Citywide capital planning, investing in public realm infrastructure, expand green building standards |

AIA New York

**American Institute of Architects New York Chapter Testimony to New York City Charter Commission on Government Efficiency**

*Public Hearing on Streamlining Government for Infrastructure Projects and the Public Realm*

**June 9, 2026**

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The 700+ pages of the City Charter are meant to reflect the city's priorities and rules for operation; however, layers of bureaucracy have stifled the city's ability to deliver critical projects in an efficient and cost-effective manner. The restrictive and overly cautious nature of our current system makes it challenging to operate and deliver projects both for agencies and design professionals. When we burden projects with so many boxes to check and hoops to jump through, how can we expect to deliver high quality public goods in a way that taxpayers can trust that the city is getting the most bang for its buck. AIANY recommends the Commission evaluate the following reforms to the City Charter:

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New York, NY 10012`

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Provide flexibility to capital agencies to select design and construction partners based on their qualifications, experience and quality of their proposal. The Commission should explore reforms to the Procurement section of the City Charter to enable agencies to move away from a low-bid environment and determine which partner is right for a project based on a holistic evaluation of their submission. To deliver quality public goods, a highly qualified team with demonstrated experience on projects of similar scope and budget is required, so being able to assess expertise and innovation in addition to price sets projects up for success from the start.

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New York, NY 10012`

AIA New York

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Thank you for the opportunity to testify, and we look forward to working closely with the Commission to execute meaningful reforms to improve how the city delivers quality capital projects.

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New York, NY 10012`

Name

# Erin Starr

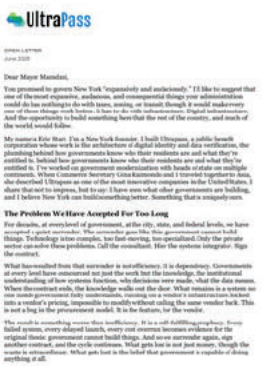
Email [redacted]

Professional Affiliation: UltraPass

Zip Code:

Public Comment: See attached

Attachment(s)


UltraPass

Dear Mayor Mamdani,

You promised to govern New York "expansively and audaciously." I'd like to suggest that one of the most expansive, audacious, and consequential things your administration could do has nothing to do with taxes, zoning, or transit, though it would make every one of those things work better. It has to do with infrastructure. Digital infrastructure. And the opportunity to build something here that the rest of the country, and much of the world would follow.

My name is Eric Starr. I'm a New York founder. I built Ultrapass, a public benefit corporation whose work is the architecture of digital identity and data verification, the plumbing behind how governments know who their residents are and what they're entitled to. Behind how governments know who their residents are and what they're entitled to. I've worked on government modernization with heads of state on multiple continents. When Commerce Secretary Lutnick and I traveled together to Asia, she described Ultrapass as one of the most innovative companies in the United States. I share that not to impress, but to say: I have seen what other governments are building, and I believe New York can build something better. Something that is uniquely ours.

**The Problem We Have Accepted For Too Long**

For decades, at every level of government, at the city, state, and federal levels, we have accepted a quiet surrender. The surrender goes like this: government cannot build things. Technology is too complex, too fast-moving, too specialized. Only the private sector can solve these problems. Call the consultant. Hire the systems integrator. Sign the contract.

What has resulted from that surrender is not efficiency. It is dependency. Governments at every level have outsourced not just the work but the knowledge, the institutional understanding of how systems function, why decisions were made, what the data means. When the contract ends, the knowledge walks out the door. What remains is a system no one inside government truly understands, running on a vendor's infrastructure, locked into a vendor's pricing, impossible to modify without calling the same vendor back. This is not a bug in the procurement model. It is the feature, for the vendor.

The result is something worse than inefficiency. It is a self-fulfilling prophecy. Every failed system, every delayed launch, every cost overrun becomes evidence for the original thesis: government cannot build things. And so we surrender again, sign another contract, and the cycle continues. What gets lost is not just money, though the waste is extraordinary. What gets lost is the belief that government is capable of doing anything at all.

Ultrapass x NYC Open Letter.pdf

Date Submitted: June 16, 2026

Topic: Miscellaneous

Method Received: Airtable Form

Is it charter related? Yes

1

| | |
|---|---|
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Make NYC the first local government with Digital Public Ingfrastructure |

UltraPass

OPEN LETTER

June 2026

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UltraPass

I am not arguing that government should stop working with the private sector. That would be absurd. The private sector is the engine of American innovation, and innovation is what has built this city and this country to the heights we have reached. What I am arguing is different and more precise: government must stop outsourcing its judgment. Stop outsourcing its institutional knowledge. Stop treating systems integrators and consultants as a substitute for capability rather than a complement to it. The private sector should build on government infrastructure, not be the infrastructure itself.

## What the World Has Already Figured Out

The concept is called Digital Public Infrastructure, DPI. It is not a product. It is not an app. It is the foundational layer on which everything else runs: shared, open, interoperable systems for identity, data exchange, and consent that allow government and the private sector to build services on top of a common base.

Estonia built X-Road in 2001. It is an open-source data exchange layer that connects over 900 government and private organizations. A citizen's verified identity, once established, travels across every system that needs it. Taxes, healthcare, benefits, voting: one layer, one truth, no redundancy. The result is a government that costs less to run and works better for everyone who uses it.

India built its DPI stack, Aadhaar for identity, UPI for payments, DigiLocker for credentials, and in less than a decade enrolled 1.3 billion people in services that previously excluded hundreds of millions. The economic impact has been measured in the hundreds of billions of dollars. The social impact is harder to measure but more important: people who had never before accessed a formal financial system or a government benefit now can.

The European Union is building interoperability frameworks across 27 member states. Singapore has built Singpass, a national digital identity used by 97% of citizens. Uruguay, Rwanda, Ukraine: governments across the income spectrum are making the same bet: that shared digital infrastructure is as foundational as roads and water, and that governments who build it will be better governments.

New York City has not made that bet. Not yet.

## What New York Can Build, and Why It Would Be Different

Here is what I believe, and why I am writing to you specifically. Every DPI system built so far has been built by a national government, for a nation. Estonia has 1.4 million people. India has 1.4 billion but built its stack under centralized federal authority. What no government has yet demonstrated is that a city, dense and diverse and rights-conscious, that can build DPI from the ground up, on its own terms, and make it work.

New York City is the most plausible place on earth to prove that it can.

UltraPass

We have 8 million residents. We have a $100 billion budget. We have more diverse civic institutions, advocacy organizations, and community stakeholders than most countries. We have a tradition of being first: the subway, the public library system, the public housing model, the idea that a city owes its residents something more than the market will provide. We have, right now, an administration that has declared its intention to govern boldly.

What New York should build is a Digital Public Infrastructure layer that is distinctly ours. Rooted not in efficiency alone, but in the values this city has always claimed: freedom, privacy, and the radical idea that government exists to serve people, not the other way around. Specifically:

> *A consent-based data exchange standard, modeled on Estonia's X-Road but built for a pluralistic city, that allows verified data to travel with the New Yorker who owns it, across agencies and programs, without redundant re-collection. Not a new database. Not a centralized repository. A protocol.*
>
> *A privacy architecture that is not an afterthought. Decentralized data storage. Explicit citizen consent at every exchange. Audit trails that belong to the resident, not the agency. The right to see, correct, and revoke.*
>
> *An open standard, published and freely available, that other cities and states can adopt. Not a proprietary system that creates the same vendor dependency we are trying to escape. New York builds it. New York owns it. And then New York gives it away, because that is what infrastructure does.*

The immediate impact would be measurable. Up to 85% of the eligibility data required by SNAP is identical to what Fair Fares, NYCHA, Medicaid, and Cash Assistance require. Every program re-collects it independently. A New Yorker who qualifies for three programs runs the same gauntlet three times. Many give up. Half a million eligible Fair Fares recipients are not enrolled today, representing roughly $700 million a year in benefits the city has already authorized but cannot deliver. That is the cost, in one program, of not having this infrastructure. The cost across all programs, and the cost in caseworker time, and the cost in erosion of trust, is much larger.

But the larger impact is harder to quantify and more important. When New York City builds this, and it works, other cities will adopt it. Other states will build on it. The federal government, which has failed repeatedly to modernize its own infrastructure, will have a model that actually functions. We will have demonstrated something the country has stopped believing: that government can build something that lasts, that serves people, and that other people want to copy.

## What I Am Asking

UltraPass

I am asking for two things, both modest in themselves and significant in combination.

First: direct OTI, through the authority granted under Chapter 48 of the City Charter, to design and publish a blueprint for a New York City Digital Public Infrastructure layer. Not a procurement. Not a vendor selection. A blueprint, an open technical standard, developed with public input, that defines how verified data can move between agencies and programs with citizen consent. The private sector will compete to build on top of it. The city will own the protocol.

Second: establish, through the procurement authority of Chapter 13, a structured pathway for small companies and civic-tech organizations to pilot solutions against that standard without navigating a multi-year RFP process designed for a different era. New York has the most concentrated collection of technology talent in the country. Make it possible for that talent to work with the city instead of around it.

These two things together do not require new legislation. They do not require a tax increase. They require a decision, a declaration that this city will build its own infrastructure, on its own terms, and that the era of reflexive outsourcing is over.

## Why Now

The federal government is in retreat on the question of what it owes its residents. Institutions that New Yorkers have relied on are being dismantled or defunded. In that environment, cities are not just local governments anymore. They are the last line of democratic governance that most Americans will actually feel. What New York does in the next four years will matter far beyond these five boroughs.

You have the mandate. You have the authority. You have, right now, a Commission on Government Efficiency that is holding hearings specifically on this question. The moment is available. The only question is whether we reach for it.

New York built the subway when no one believed a city could move that way. It built the public library when knowledge was a luxury. It built public housing when the market had failed the people who built this city with their labor. Those were not small bets. They were declarations about what kind of city we intended to be.

A New York City Digital Public Infrastructure layer is the same bet, for this century. I believe you are the mayor who can make it. I would be honored to help.

---

Respectfully,

**Eric Starr**

Founder & CEO, Ultrapass Identity Corporation (PBC)

[redacted]

Name

# Barbara Blair

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Non-Profit |
| Zip Code | [redacted] |

Public Comment

PUBLIC REALM TESTIMONY
My name is Barbara Blair, President of the Garment District Alliance. I am testifying today to advocate for a better and more efficient system for public realm management. The current back-and-forth between the Department of Transportation (DOT) and the city's many BIDs, merchant associations, community boards, and block associations is lengthy, laborious, and unclear. Rules regulating materials, siting, and safety are seemingly arbitrary, leading to confusion and frustration. As public space managers, we want to improve our city, but we need a partner who helps us get to yes rather than one that creates barriers.

The city charter must construct a clearer relationship between public realm managers and the city, one which codifies interventions that can be implemented as of right.

The 2013 Street Design Manual was intended to fill this gap by outlining design elements, placement, and other considerations for the public realm. Unfortunately, what began as a toolkit to enable swift public realm improvements has increasingly become a tool to deny those same interventions. Currently, proposed streetscape interventions, even ones that are already used in other parts of the city or other world class cities, are subject to lengthy reviews that frequently lead to denials.

Likewise, the charter should codify indemnification for neighborhood nonprofits that have been asked to manage the city's public realm. This management comes at a real financial cost and risk that non profits and other small organizations should not be asked to bear.

We want to be good stewards, but we need adequate support. The current system does not work. The city charter needs revision to establish clearer relationships, guidelines, responsibilities, and indemnification related to the public realm.

311 TESTIMONY
Also, I am testifying today to advocate for a more actionable, accountable, and efficient 311 system that swiftly addresses complaints and provides transparency for resolutions.

Our current 311 system used to be one of the best civic engagement tools in the world. When it started, 311 complaints were considered, tracked, and resolved with seriousness. However, 311 has devolved into a system where most complaints are dismissed almost immediately after being filed or irrational responses are given such as "we will respond to your complaint within 38 days".

In Manhattan, from May 2023 to May 2026, almost 20% of all 311 complaints were closed within 30 minutes, primarily because the city regards these complaints as not actionable. This leaves the citizenry frustrated and with the clear message that government does not work.

In the Garment District, we work to address illegal vending and peddling, yet 86% of vendor complaints went unresolved with no note. The 14% that had a note were simply stock responses stating that there was no resolution. This is despite 93% of vendor complaints coming from locations that received complaints previously. Illegal vendors should not be tolerated if the city expects citizens to believe that elected officials can manage well.

311 needs to be an actionable system that carries out enforcement against bad actors across the city rather than parroting these same non responses. Claiming a "condition was not found during follow-up" while the issue persists for weeks on end does not create trust or confidence in the city's ability to address real problems. Responses should include photos and notes from the inspectors would increase transparency.

The current use of 311 reports is also insufficient. The 311 system is a finger on the pulse of the city, drawing attention to the key issues across our communities. Simply sharing monthly reports is insufficient. A review body should examine 311 data more closely to understand why issues go unresolved to understand the policy, operations, or training gaps that exist.

I urge you to use your legislative prerogative to pursue bad actors, and if existing policy is insufficient to address these complaints, use 311 cases to identify where legislation is needed to take action.

Equally important, be transparent with the public, throughout the process and follow-up for complaints.

Thank you.

Attachment(s)

Drop files here or click to browse

Date Submitted: June 16, 2026

Topic: Unnecessary Bureaucracy ✕ | Enforcement ✕ | Reporting Requirements ✕ | Street Redesigns ✕ | Support Oversight Agencies ✕

Method Received: Airtable Form

| | |
|---|---|
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Reform the DOT Street Design Manual and 311 system |

Name

# Barbara Blair

Email [redacted]

Professional Affiliation non-profit/BID

Zip Code [redacted]

Public Comment

Fix 311, it is completely broken. Used to represent an engaged government. If the city council passes a law they must be required to enforce it, provide funding for robust enforcement. It makes a mockery of government if you pass laws you don't enforce.

Attachment(s)



Citycharter2026.docx

Date Submitted June 16, 2026

Topic Enforcement ✕ Unnecessary Bureaucracy ✕ Technology ✕

Method Received Airtable Form

Is it charter related? Yes

1

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Government Operations |
| Subtopic | Improve 311 |

**Barbara Blair, Garment District Alliance**
**Date: Tuesday, June 9th**
**5:00 pm – 8:00 pm**
[redacted]

**Good evening members of the commission. I am testifying on two topics.**

**PUBLIC REALM TESTIMONY**

**My name is Barbara Blair, President of the Garment District Alliance. I am testifying today to advocate for a better and more efficient system for public realm management. The current back-and-forth between the Department of Transportation (DOT) and the city's many BIDs, merchant associations, community boards, and block associations is lengthy, laborious, and unclear. Rules regulating materials, siting, and safety are seemingly arbitrary, leading to confusion and frustration. As public space managers, we want to improve our city, but we need a partner who helps us get to yes rather than one that creates barriers.**

**The city charter must construct a clearer relationship between public realm managers and the city, one which codifies interventions that can be implemented as-of-right.**

**The 2013 Street Design Manual was intended to fill this gap by outlining design elements, placement, and other considerations for the public realm. Unfortunately, what began as a toolkit to enable swift public realm improvements has increasingly become a tool to deny those same interventions. Currently, proposed streetscape interventions, even ones that are already used in other parts of the city or other world class cities, are subject to lengthy reviews that frequently lead to denials.**

**Likewise, the charter should codify indemnification for neighborhood nonprofits that have been asked to manage the city's public realm. This management comes at a real financial cost and risk that non-profits and other small organizations should not be asked to bear.**

**We want to be good stewards, but we need adequate support. The current system does not work. The city charter needs revision to establish clearer relationships, guidelines, responsibilities, and indemnification related to the public realm.**

**311 TESTIMONY**

**Also, I am testifying today to advocate for a more actionable, accountable, and efficient 311 system that swiftly addresses complaints and provides transparency for resolutions.**

**Our current 311 system used to be one of the best civic engagement tools in the world. When it started, 311 complaints were considered, tracked, and resolved with seriousness. However, 311 has devolved into a system where most complaints are dismissed almost immediately after being filed or irrational responses are given such as "we will respond to your complaint within 38 days".**

**In Manhattan, from May 2023 to May 2026, almost 20% of all 311 complaints were closed within 30 minutes, primarily because the city regards these complaints as not actionable. This leaves the citizenry frustrated and with the clear message that government does not work.**

**In the Garment District, we work to address illegal vending and peddling, yet 86% of vendor complaints went unresolved with no note. The 14% that had a note were simply stock responses stating that there was no resolution. This is despite 93% of vendor complaints coming from locations that received complaints previously. Illegal vendors should not be tolerated if the city expects citizens to believe that elected officials can manage well.**

**311 needs to be an actionable system that carries out enforcement against bad actors across the city rather than parroting these same non-responses. Claiming a "condition was not found during follow-up" while the issue persists for weeks on end does not create trust or confidence in the city's ability to address real problems. Responses should include photos and notes from the inspectors would increase transparency.**

**The current use of 311 reports is also insufficient. The 311 system is a finger on the pulse of the city, drawing attention to the key issues across our communities. Simply sharing monthly reports is insufficient. A review body should examine 311 data more closely to understand *why* issues go unresolved to understand the policy, operations, or training gaps that exist.**

**I urge you to use your legislative prerogative to pursue bad actors, and if existing policy is insufficient to address these complaints, use 311 cases to identify where legislation is needed to take action.**

**Equally important, be transparent with the public, throughout the process and follow-up for complaints.**

**Thank you.**

Name

## Saida Cabrera

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |

Public Comment

Department of Aging Need to streamline services instead of giving people the run around. Many times when you call them they direct you to another agency for information and referrals. When you call the other agency (usually NY Connects) they give you number to other organizations for assistance. When you call to complain about agencies they (Depart. Of Aging) over see as a caseworker, they do not validate your request. Also the new system (VIVE) makes work more difficult instead of more effective. Even when concerns are presented and NYC Aging say they are going to make upgrades to new system, nothing happens. The added times used to navigate and use this new system takes away from actually serving the community. Very counter productive.

NYPD I am still waiting to be contacted by the detective assigned to my case from last year October 2024. I was assaulted in my building and have video and pictures of the incident. I went 2 times to the 44th precent and was told that the detective wasn't there or that he was off. I called various time and left messages and nothing. No calls, no viocemail nothing. Responding officers said that they couldn't do anything and said 'I'm sorry you live in the Bronx'.

I report issues through 311 about noise in the neighborhood. It takes NYPD hours to respond and then nothing is done. Since 2023, I've reported hundreds of noise complaints for the building across the street. The same people who assaulted me, hang out everyday across the street. When I went to a community board meeting and spoke to the commanding officer (Anthony Mascia) he said he would work with me to help the quality of life in this neighborhood. He took down my name and contact information. After that my complaints are just ignored and dismissed.

HPD HPD issues violations for repairs needed in the apartments but they do not follow up to see if work was done. It feels like HPD is working together with landlords to keep new yorkers living in horrible conditions. HPD are not enforcing landlords to make repairs. It is counter productive to have to go to court for a judge to order landlord to do repairs. It's like everyone has given up. Or they are being paid to look the other way.

APS Many mentally ill people are being denied services through APS. APS case workers are under qualified to deal with individuals that suffer from mental health. Seniors are neglecting themselves and being abused by family members. APS is not doing enough to intervene.

If you need further clarification or more examples, please don't hesitate to contact me at [redacted].

Attachment(s)

Drop files here or click to browse

| | |
|---|---|
| Date Submitted | June 16, 2026 |
| Topic | Tenant Protection × Policing × |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Feedback |
| Subtopic | |

Name

# Rihanna Kola

Email [redacted]

Professional Affiliation Retired executive

Zip Code [redacted]

Public Comment

It is shameful that NYC has such a dirty city, especially our subway. The street often smells like faeces, urine, and dirt. I have lived in and traveled to London and Tokyo, cities similar in size and density to NYC, and these cities are not as dirty. What hygiene practices that can create jobs and help New Yorkers take pride in the state of their city can you implement? Why don't we have the latest in street cleaning tech? I know that you are introducing better trash management, but how can NYC clean its streets frequently and efficiently? It may be prudent to learn from Japan how to clean and maintain the best city in the world.
Thanks for your support and consideration.
Best Wishes
Rihanna Kola

Attachment(s) Drop files here or click to browse

Date Submitted June 16, 2026

Topic Unnecessary Bureaucracy × Technology × Miscellaneous ×

Method Received Airtable Form

Is it charter related?

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Quality of life |
| Subtopic | |

Name

# Ajit Thomas

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Co-op Board President [redacted] |
| Zip Code | [redacted] |
| Public Comment | Our co-op building has 80+ units which consists of mostly of studios and one bedrooms. We are in a Landmark district.<br><br>As you know, the city requires building to put up sidewalk shed to address unsafe conditions. To complete any work on our building facade that addresses unsafe conditions, we are required to get approval from Landmark. While this process is ongoing, this building with mostly elderly and/or lower middle class residents has to pay for the scaffolding/side walk shed even before any work can happen.<br><br>I have been the President of this co op [redacted] since 2011. Every Local Law 11 project since then (three of them) has faced inordinate delays in Landmark where no work is done and yet expenses accrue for the sidewalk sheds.<br><br>Can the city make the process of Landmark process efficient especially for any building projects where sidewalk sheds are installed around the building?<br><br>Ajit Thomas<br>[redacted] |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 17, 2026 |

| | |
|---|---|
| Topic | Department of Buildings (DOB) Issues ×<br>Unnecessary Bureaucracy ×<br>Real Estate and Development × |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Housing |
| Subtopic | Sidewalk sheds |

Name

# James Maule

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | The Civic Stoop |
| Zip Code | [redacted] |

Public Comment

My name is James Maule. I'm a New York City resident and the founder of The Civic Stoop (civicstoop.org), a free tool I built to help ordinary New Yorkers understand their city government. I'm submitting this comment because I believe access to public information is a government efficiency issue, and one this Commission is well positioned to address.

Right now, a New Yorker who simply wants to know who represents them, what their Council is voting on, how to testify, who is lobbying on a bill, or where the city spends its money has to navigate a dozen separate and disconnected systems: Council Legistar, the State Senate site, Congress.gov, Checkbook NYC, the lobbying database, and the scattered pages of NYC Open Data. Each is built differently. None talk to each other. For most people, the information might as well not be public at all, because the effort required to assemble it is its own barrier. That friction quietly discourages participation and erodes trust, which is the opposite of what an efficient, responsive government should do.

I built The Civic Stoop to close that gap. It pulls these previously disparate sources into one place: a ZIP-code and map lookup for your representatives, a daily plain-language tracker of meetings and legislation, guidance on how to testify, and an Explore page that maps city government as a connected graph, so a resident can start with a single council member and follow the real connections to the committees, bills, lobbying clients, and spending tied to them, each traced back to its public record.

I want to dwell on one fact, because I think it is the most important point I can offer this Commission. I built and maintain all of this myself, as one individual with a goal, and it updates every night. If one person, working alone and using only publicly available data, can unify these sources into something searchable and understandable that refreshes nightly, then the barrier inside city government is not technical. It is organizational. What I have done externally is exactly what needs to be done internally. Across all NYC agencies, information should be databased, searchable, and understandable, both for the public and for the agencies themselves. Siloed information is not a neutral fact of government. It is a direct cause of inefficiency. It duplicates work, hides waste, slows services, and keeps both residents and city employees from seeing the full picture.

This is also where AI can do real good. Modern AI can turn dense, jargon-heavy legislation into plain language. It can answer the question a resident actually has, such as what a bill does and how it affects their block, and it can connect records that today only an insider knows how to cross reference. Used well, it makes government understandable to the people it serves.

My recommendation to the Commission is concrete: treat unified, open, machine readable, and externally searchable public information as a modernization priority, and pursue the same standard internally across agencies. When the city's information is interoperable rather than siloed, it spends less effort answering repetitive requests, residents can actually find

what they're entitled to, agencies can coordinate, and independent tools, including the city's own, can serve the public far better. That kind of efficiency adds up.

Finally, I want to offer one experience as a small case study in the kind of process inefficiency I hope this Commission will examine. After losing my job in April 2025, I applied to numerous positions across New York City government, roles directly aligned with my background and with the civic-technology skills I've used to build the tool described above. I did not receive a single interview, and in all but one case, no response at all. I raise this not as a personal complaint but because a city working to modernize and deliver should be able to identify and engage local talent already trying to serve it. A hiring process that cannot do that is worth a hard look from a Commission charged with making government work.

Thank you for your time and for the opportunity to be heard.

James Maule
Founder, The Civic Stoop
[redacted]

Attachment(s)

Drop files here or click to browse

Date Submitted: June 17, 2026

Topic: Technology ✕ Unnecessary Bureaucracy ✕ Procurement Reform ✕

Method Received: Airtable Form

Is it charter related?:

Charter Related: No

Topic Simplified: Technology

Subtopic: Centralized civic data and the power of AI

Name

# Open Plans

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Open Plans |
| Zip Code | |

Public Comment

Open Plans' Testimony to the Charter Revision Commission
(Commission on Government Efficiency)

Open Plans writes in regard to the Charter Revision Commission. Open Plans is a New York City based organization that advocates for more functional, people centered streets and public spaces. We believe that the Commission on Government Efficiency has a unique opportunity to ease the burdens on local businesses and groups that steward public space. Our recommendations are below:

Amend the Charter to allow the City to administer roadway dining through Department of Transportation (DOT) permits and licenses rather than through revocable consent, unifying it with the sidewalk dining process. The current approval process for roadway dining, through the City's revocable consent process, results in needless red tape and delays. Sidewalk cafes are not subject to revocable consent, resulting in two separate pathways for similar uses of public space. We recommend unifying these processes and exempting roadway dining from the revocable consent process, instead using DOT permits and licenses. This would result in relief for local businesses that would like to operate roadway dining but have to wade through the rigid administrative revocable consent process. The Commission should also review whether other routine public right of way uses could use this framework. The prior Commission identified these issues as warranting further consideration, and we believe this Commission should take them up.

Amend the Charter to eliminate or lower the financial burden on restaurants to pay for Charter-mandated public hearing requirements for outdoor dining applications. The Charter requires DOT to provide public notice for outdoor dining applications. However, DOT passes the cost of publication on to restaurants, with its website stating that costs range from $100 to $800 per application. This cost would be nominal for the DOT, but, along with other start-up costs associated with outdoor dining, could add up to a level that is prohibitive for small, local restaurants (particularly in disadvantaged communities where there is already less outdoor dining). We urge the Commission to consider disallowing the costs from being placed on restaurants, or limiting them to a modest fee — 10% of the publication cost, for example. We should be making it easier, not harder, for all neighborhoods to reap the financial and livability benefits of outdoor dining.

Amend the Charter to better accommodate public space stewardship. With respect to facilitating public space stewardship, the Charter is limited. Organizations seeking formal approval to operate in a public space are limited to concessions, franchises, and/or revocable consent. None of these processes are conducive to regular stewardship of a public space. We raise up the testimony of M. Blaise Backer which contains a number of novel and effective ideas on how we can amend the Charter to resolve this issue including:
- Creating a fourth instrument in Chapter 14: the public realm stewardship agreement

Rightsizing the Franchise and Concession Review Committee for small and community scale agreements
- Letting a defined share of locally generated revenue stay with the space that generates it
Providing bounded term security for partners that finance public improvements

With these revisions, we can continue making New York City affordable and livable. We look forward to further collaboration with the Commission.

Respectfully,
Open Plans

Sara Lind
Co-Executive Director
[redacted]

Jackson Chabot
Director of Advocacy and Organizing
[redacted]

Michael Sutherland
Senior Policy & Legislative Analyst
[redacted]

Attachment(s)


OpenPlans

Open Plans' Testimony to the Charter Revision Commission
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3. **Amend the Charter to better accommodate public space stewardship.** With respect to facilitating public space stewardship, the Charter is limited. Organizations

Open Plans COGE Testimony.pdf

Date Submitted: June 17, 2026

Topic: Revocable Consent ✕ | Franchises & Concessions ✕ | Unnecessary Bureaucracy ✕ | Reporting Requirements ✕

Method Received: Airtable Form

| | |
|---|---|
| Is it charter related? | Yes |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Public Realm |
| Subtopic | Reform revocable consent |

OpenPlans

**Open Plans' Testimony to the Charter Revision Commission**
**(Commission on Government Efficiency)**

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a. Creating a fourth instrument in Chapter 14: the public realm stewardship agreement
b. Rightsizing the Franchise and Concession Review Committee for small and community-scale agreements
c. Letting a defined share of locally generated revenue stay with the space that generates it
d. Providing bounded term security for partners that finance public improvements

With these revisions, we can continue making New York City affordable and livable. We look forward to further collaboration with the Commission.

Respectfully,
Open Plans

Sara Lind
Co-Executive Director
[redacted]

Jackson Chabot
Director of Advocacy and Organizing
[redacted]

Michael Sutherland
Senior Policy & Legislative Analyst
[redacted]

[redacted]

Name

# Lauren Upadhyay

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | |
| Zip Code | [redacted] |
| Public Comment | Please fund spay/neuter programs and pet food pantries for low-income and struggling New Yorkers. Please also freeze the rent! Thank you for all you are already doing to make New York better for all. |
| Attachment(s) | Drop files here or click to browse |
| Date Submitted | June 17, 2026 |
| Topic | Budget Issues ✕ Tenant Protection ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |
| Topic Simplified | Animal welfare |

| | |
|---|---|
| Subtopic | Fund spay/neuter and pet food pantries |

Name

# Nicola Zanghi

Email [redacted]

Professional Affiliation Specialty Coffee Association of America

Zip Code [redacted]

Public Comment

I live in Crown Heights, which has a higher rat population than other neighborhoods and hasn't been able to get back to its pre-covid levels (which were still pretty bad). On Franklin Ave, there are two cafes (Cordelia and Little Zelda) owned by the same people, and I've seen numerous notices of DOH violations, ratings hidden, and even illegal operation after being shut down by DOH. I walk past these places every day, they simply choose not to display their rating, and it is tremendously frustrating. I've seen them disguise it under a "special menu", a "spring cleaning" sign, and frilly little curtains. I've worked over a decade in New York's Food and Beverage industry and hiding your rating isn't just deceitful, it's evident that the hygeine grade is terrible or failing. For tourists and newcomers to the city, that's not something they're aware of, and these businesses take advantage of that. Places like this make me sick (and occasionally their customers too.)

I don't think I need to spell out the correlation between the restaurants like this on the tourist stretch of Franklin Ave and the multiple rat warrens surrounding my apartment. Any exterminator (or New Yorker) will tell you that proper pest management begins with eliminating the food source. A side-note to all dog owners: more rats means more poisonings, which means more people who lose a beloved pet to a split second lapse in vigilance (I've sat next to these people at the Emergency Vet. It's real.)

I imagine across the rat heatmap, there are similar correlations with local establishments slacking on sanitation. I don't want to tolerate them any more. New York has historically been known as dirty throughout the country and the world, and it's unfortunately accurate. Changing that can show the world who we are and what we can do. I want to see our government take smart and decisive actions against restaurants that flagrantly ignore public health standards.

Attachment(s)




Little Zelda closed_! _ r_crownheights.pdf

Date Submitted: June 18, 2026

Topic: Enforcement, Department of Buildings (DOB) Issues, Tenant Protection, Unnecessary Bureaucracy

Method Received: Airtable Form

Is it charter related? No

1

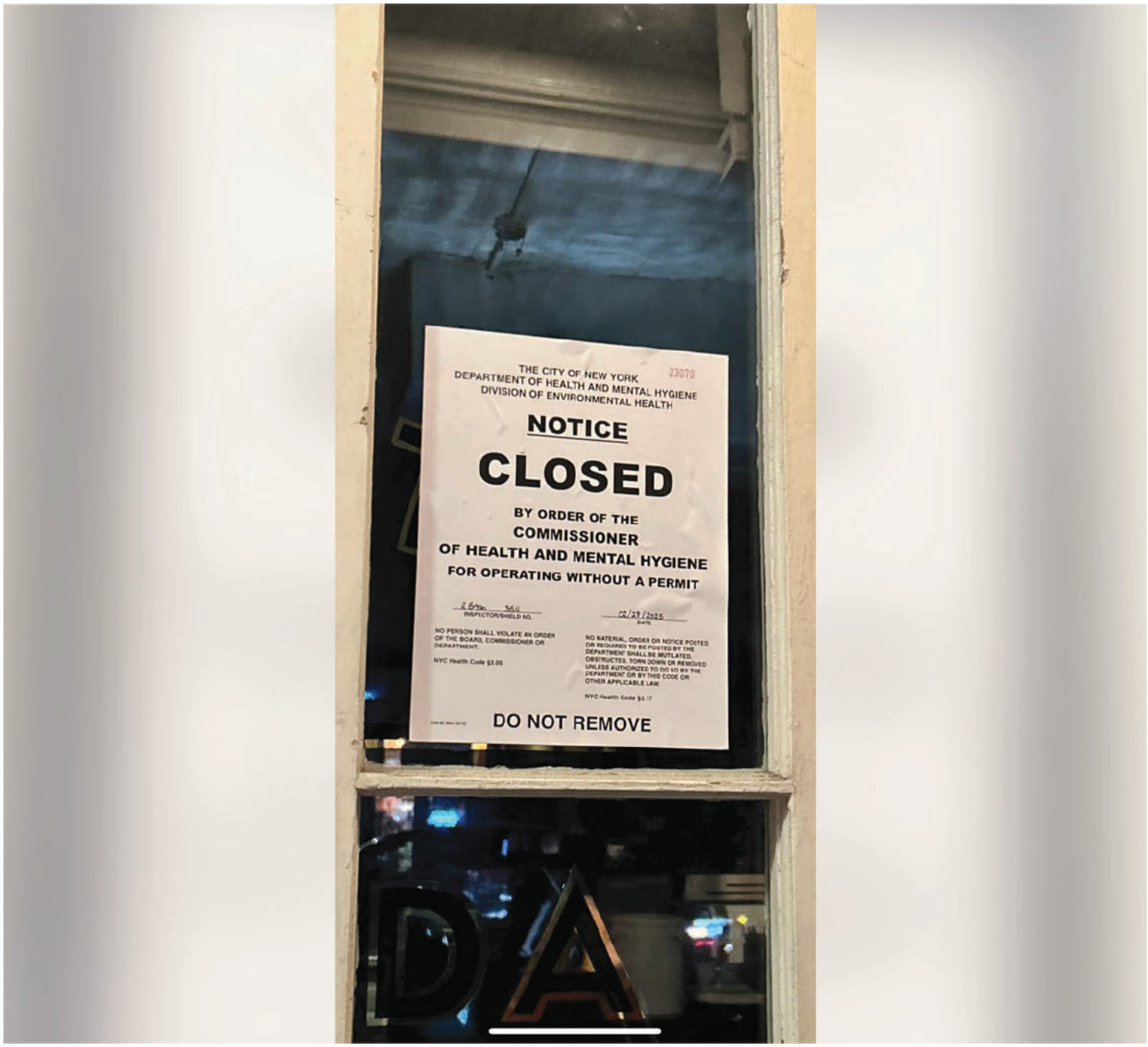
Charter Related: No

Topic Simplified: Quality of life

Subtopic: Too many rats

r/crownheights • 1y ago [redacted]

# Little Zelda closed?!




It sure what the violation is or if is permanent?? Anyone know details?

90 · 92

studycom • Promoted



[redacted] • 1y ago

the NY Health website has the violations listed. the violations include not having a Food Protection Certificate, Evidence of rats or live rats in establishment's food or non-food areas and Food contact surface not properly washed, rinsed and sanitized after each use. yuck!

57

8 more replies

[redacted] • 1y ago

I am once again asking people to reminisce over Breuklyn and their breakfast cup.

29

3 more replies

[redacted] • 1y ago

This doesn't surprise me. The owner has a long history of stuff like this among his many failed ventures in the area. He even tried to get people to protest bagel pub opening because it completed with his garbage bagel shop that barely lasted a year.

46

[redacted] • 1y ago

isn't this the guy who made his fortune founding "Neighborhoodies", that early 00s hipster clothing line where you could buy a 50 dollar sweatshirt that said "Williamsburg" on it? That bagel shop sucked lol

20

[redacted] • 1y ago

The place is small as hell and barely had food , to fail for these reasons is gross incompetence.

20

[redacted] • 1y ago

Are the owner the same as Word of Mouth?

12

10 more replies

22

6 more replies

[redacted]

A friendly game is a great way to remember to save $700 on insurance.

Get a Quote

libertymutual.com

Liberty Mutual customizes car insurance so you only pay for what you need.




[redacted] • 1y ago

Just walked by and they're open with cardboard covering the health department signs!!!!

10

[redacted] 1y ago

Ewwww

4

1 more reply

[redacted] • 1y ago

i've always avoided this place bc they had a C healthgrade for at LEAST the last year. same with franklin park.

8

[redacted] • 1y ago

It's so disappointing about Franklin Park especially because that's such a prime location. feels like they were way better pre-covid

6

[redacted] 1y ago

They have a C health grade (significant violations the could lead to food borne illnesses)

https://a816-health.nyc.gov/ABCEatsRestaurants/#!/Search

47 points on Feb 4th

7

[redacted] • 1y ago

[redacted] • 1y ago

When is this from? I was just there earlier today

6

[redacted] • 1y ago

Oh....oh dear

4

[redacted]

Have you been saying Foundayo (orforglipron) like this?

Learn More

foundayo.lilly.com

See Indication & Safety Summary with Warnings on foundayo.lilly.com/risk




[redacted] • 1y ago

I knew I was right to Stan Bien cuit only

11

[redacted] • 1y ago

When every restaurant had their letter rating (a lot more B's than normal), Zelda's still had a "pending" which I found odd since no other food service establishment had that designation at the time. Either it was a fake to hide the low rating or the health dept doing actual further review. Personally, I hated how they took up half the sidewalk and the patrons would let their dogs sit and occupy the other half of it.

In any case, the owner would usually post to this channel pretending to be a random concerned resident rallying support/to shop there. His staff in years past all hated him, the community also doesn't have the warmest words for the guy. Don't feel bad though, he still has a few businesses on Franklin Ave. I never met him IRL tho and would love to pick his brain, whatever he is, he's an entrepreneur.

11

[redacted] • 1y ago

I take this back about him being an entrepreneur, the coffee shop is open with the health dept signs covered with cardboard

4

[redacted] • 1y ago

Barboncino and now Zelda???? This is ass

3

I had a friend who said they went there this morning and it was business as usual...so its back open already?

3

[redacted] • 1y ago

They opened with their closure signs covered with cardboard and no letter grading

8

[redacted] • 1y ago

I think a few things should be made clear after reading these comments:

1. The NYC Health Department does have very strict but also cryptic qualifications for restaurants and cafes and NYC inspectors are notoriously arbitrary in grading against these qualifications. For example, one of the violations listed on the website for Little Zelda in previous years has been "Hot TCS food item not held at or above 140 °F." Little Zelda does not offer hot prepared food and hasn't in the last 7 years I've lived in this neighborhood. They offer pastries that you can have heated in a toaster oven. But they do not keep hot prepared food on site. The difference between an A or a B in some instances could literally hinge on the inspector's poor knowledge of the qualifications or even just their mood. Not the true cleanliness of the restaurant.
2. One violation outside of these guidelines can get your grade knocked down by a whole letter. You could have the cleanest restaurant in Brooklyn and lose a letter grade because your towels weren't in a red bucket the day the inspector showed up. That's not to say you should ignore the inspection grade of a restaurant, but it is to say that if they are open and they have a grade posted, the department did not deem the situation serious enough to close down the restaurant. Of course, use your own judgement, but until you run a restaurant in the city and realize how hard it is to get an A, don't wag your finger at a B. And use your eyes. You can tell if things are off and choose somewhere else to go.
3. There are mice in every. single. restaurant. in this city. You should not expect to live in a city like New York and not be surrounded by mice. Should they be running across your toes while you eat? No. But you should not be surprised by the mention of mice in any public space. Once I was dining outside at a very popular Brooklyn spot and a giant rat ran across my feet and onto the premises of the restaurant. Did I scream "rat" and get the place shut down? No. I went about my business and had a great time.
4. I go to Little Zelda on an almost daily basis and I would die for these baristas. So instead of dogging them for not being able to keep the place clean, maybe let's focus on supporting them while they were likely forced to go to work to pay their bills even though the owners of their place of employment were hiding the closure status from the public in order to make more money. Hold the owners accountable by asking about the cleanliness at their open locations (there is an exhaustive list in the comments) but don't turn this on the minimum wage workers who are just trying to make a living. Again, use your best judgement but it looks like it's kind hard to go out in Brooklyn without running into a place these people might own so remember their employees are just trying to get by.

All this said. If you don't want to go, you don't have to. You can literally roll a boulder down Franklin Avenue and hit a coffee shop. You have plenty of options. Except Starbucks. Don't go to Starbucks.

7

Name

# Danielle Mindess

Email [redacted]

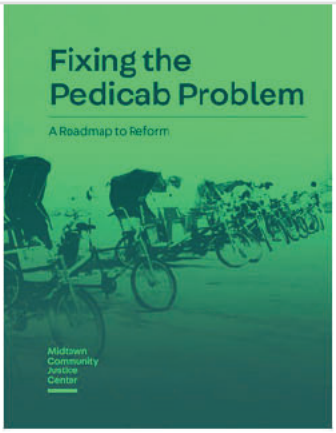
Professional Affiliation Center for Justice Innovation

Zip Code [redacted]

Public Comment

Over the past 18 months, the Midtown Community Justice Center has experienced a consistent cycle of pedicab drivers coming to our courtroom on summons matters. We have come learn about the industry challenges that lead to both bad business practices that impact consumers and the Midtown business community, as well as over criminalization of a low wage, primarily immigrant workforce. In response, the Justice Center underwent a process to develop solutions to the issue in partnership with our local elected officials, the Times Square Alliance, Central Park Conservancy, DCWP, MOCJ, the New York Pedicab Alliance, and more. The group's recommendations are described in the attached report. The primary recommendation is to move the industry from the under equipped DCWP to TLC, an agency with expertise and capacity to regulate for hire vehicles.
For more information: https://www.innovatingjustice.org/resources/fixing-pedicab-problem-roadmap-to-reform/

Attachment(s)




MCJC_AP-Guide-Pedicab-Reform_0504...

Date Submitted June 18, 2026

| | |
|---|---|
| Topic | Enforcement ✕ Unnecessary Bureaucracy ✕ Department of Buildings (DOB) Issues ✕ Miscellaneous ✕ |
| Method Received | Airtable Form |
| Is it charter related? | No |
| | 1 |
| Charter Related | Yes |
| Topic Simplified | Streets |
| Subtopic | License and regulate pedicabs under TLC |

# Fixing the Pedicab Problem

## A Roadmap to Reform



Midtown
Community
Justice
Center

A report by the Midtown Community Justice Center in collaboration with the Office of Council Member Gale Brewer, the Central Park Conservancy, and the Times Square Alliance.

**May 2026**

## Acknowledgements

The Midtown Community Justice Center wishes to thank Tom Harris and Michael Duggan from the Times Square Alliance, David Saltonstall from the Central Park Conservancy, and Council Member Gale Brewer and staffers Sam Goldsmith (former) and Shulamit Puder for their leadership and advocacy for reforming the pedicab industry and their many contributions to the roundtable and this report.

Danielle Mindess, Jordan Otis, Emma Embleton, and Joshua Farrell from the Midtown Community Justice Center steered this project. Harriet Holder and Emely Castillo Arias staffed the roundtable. Thanks to our Center for Justice Innovation colleagues Elizabeth Brantl and Hailey Nolasco from Government Relations and Emma Dayton, Daniel Logozzo, Rob Wolf, Samiha A. Meah, Michaiyla Carmichael, and Catriona Ting-Morton from Communications for their editing and design support.

Council Member Harvey Epstein and staffer Jackson Fischer-Ward, City Council Speaker Julie Menin and staffer Israel Martinez, former Council Members Erik Bottcher and Keith Powers and their staffers Carl Wilson, Franklin Richards, Hayley Brundige, and Ben Jacobs provided support and guidance. George Ntim from the Marriott Marquis hosted our roundtable. Bennett Stein and Aliza Saunders from Bennett Midland adeptly designed and moderated the roundtable discussion, and Maggie Wolk coordinated the engagement. Jessica Cruz, former Project Manager at the Mayor's Office of Public Safety, spearheaded the original pedicab reform efforts and generously allowed us to build upon her work. Jill Starishevsky and Inessa Abayev at the Mayor's Office of Criminal Justice prioritized this issue and worked with us to elevate it. Carlos Ortiz and Hali Radecker from the Department of Consumer and Worker Protection, Rachel Amar from the Office of Administrative Trials and Hearings, and Julia Chowdhury from the Office of Court Administration dedicated time and effort to getting the details right.

The Honorable John Zhuo Wang and his Court Attorney Rebecca Basescu Schwartz have dedicated considerable effort to ensuring fair and just outcomes for pedicab drivers and the Midtown community. Assigned Counsel Plan Attorneys Gideon Oliver and Dru Carey have provided consistent advocacy for pedicab drivers, and they shared extensive industry knowledge with us.

Special thanks to Makan Camara, Kenneth Winters, and Ibrahim Donmez from the New York Pedicab Alliance who offered their personal experiences and the experiences of their members—the legal pedicab drivers who are most directly impacted by the state of the industry, and whose relentless pursuit of reform got us here.

## For More Information

Danielle Mindess
Email: [redacted]

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# Executive Summary: The Case for Comprehensive Pedicab Reform in New York City

New York City's pedicab industry is fundamentally broken. In its current form, it works for no one.

It does not work for consumers, particularly out-of-town tourists, who are routinely targeted and exposed to opaque pricing and extreme overcharging by operators. It does not work for pedicab drivers, many of whom are exploited by pedicab fleet owners who operate underground rental businesses while shifting legal and financial risk onto drivers. It does not work for Broadway theatergoers, who increasingly face congested sidewalks and streets, blaring music, and aggressive solicitation in Midtown's already crowded Theater District. And it does not work for Central Park visitors, who must often run the gauntlet of pedicabs encircling the Park, competing aggressively for customers and undermining the visitor experience in one of the City's most treasured public spaces.

The consequences of this failure are well documented. Reputable news outlets have repeatedly reported on tourists being charged hundreds of dollars for short pedicab rides spanning only a few blocks, often after being misled about pricing or told a per-minute rate was a flat fee. These incidents are not isolated; they are symptoms of a regulatory system that has failed to keep pace with the realities of the industry.

Complaints to the City's 311 helpline also underscore the degree to which consumers are routinely taken advantage of in ways that leave them feeling angry and abused, with little recourse for corrective action.[1]

For years, the City has relied primarily on police enforcement—ticketing individual drivers, issuing summonses, and conducting episodic crackdowns. This approach has not had a meaningful impact. Enforcement is inconsistent, resource-intensive, and often misdirected at drivers rather than the business owners who control vehicles, pricing practices, and working conditions. High dismissal rates in court further undermine deterrence.

What is needed is not more of the same enforcement, but structural regulatory reform—a modernized framework that promotes safety, transparency, accountability, and fairness, while bringing the industry into the daylight in a manner that is good both for consumers and law-abiding drivers. The reforms below—developed by the Midtown Community Justice Center in close collaboration with the Office of Council Member Gale Brewer, and in consultation with a range of key stakeholders including the Central Park Conservancy, the Times Square Alliance, and the New York Pedicab Alliance—are designed to accomplish that.

## Core Reforms Needed

1. **Move Industry Oversight from Department of Consumer and Worker Protection (DCWP) to Taxi and Limousine Commission (TLC)**
   The pedicab industry requires the regulatory structure used by the Taxi and Limousine Commission for other for-hire vehicles, which includes low barriers to legal entry, clear accountability, and strong safety standards.
2. **Standardize Rates and Mandate Meters**
   Uniform pricing and mandatory meters are essential to protect consumers, reduce fraud, and legitimize the industry.
3. **Hold Vehicle Owners Accountable**
   Many pedicabs are owned by individuals who rent vehicles to drivers daily while evading responsibility for compliance.
4. **Legalize Safe Electric Motors and Ban Unsafe Ones**
   Electric motors are already deeply embedded in the industry and are a practical necessity for long shifts. Making all motors illegal has only empowered arbitrary enforcement.
5. **Create a Consistent Civil Enforcement Structure**
   Pedicab enforcement is fragmented and overly reliant on criminal summonses issued by the NYPD.
6. **Reform Court Processes**
   High dismissal rates for criminal summonses based on a lack of discovery compliance undermine enforcement and accountability.
7. **Create Basic Driver Support Infrastructure**
   Even compliant drivers are forced to break rules due to the absence of basic facilities.
8. **Ensure Accessible Insurance Premiums to Encourage Legal Operation**
   High insurance costs are a major barrier to legal pedicab operation. Currently, four insurance providers meet the insurance coverage requirements outlined in the Administrative Code. These providers charge annual premiums that are widely viewed as unsustainably high.

## Conclusion

The current pedicab system undermines consumer trust, exploits workers, degrades public spaces, and strains enforcement resources—while delivering none of the transparency or accountability New Yorkers deserve.

Comprehensive regulatory reform, modeled on proven frameworks already in use elsewhere in the City, offers a clear path forward. Done correctly, it will protect visitors, support a largely immigrant workforce, and restore order to Midtown and Central Park.


$4 PER
MINUTE PER
RIDE

## Background and History

Pedicabs, which combine a bicycle and carriage for passengers, are for-hire vehicles offering short-distance and scenic rides, primarily to tourists in Times Square and Central Park, and occasionally local commuters.

New York's pedicab industry traces back to 1994, when an environmentalist named George Bliss began assembling human-powered rickshaws in SoHo. Through the late 1990s and early 2000s, the fleet grew quietly around Midtown and Central Park—becoming a genuine commercial business with no licensing requirements, no mandatory insurance, no safety standards, and no enforceable rate rules.

By 2005, the industry's growth had alarmed the yellow cab and horse-carriage industries enough that they began lobbying the City Council aggressively. Council Member Christine Quinn—later Council Speaker—became the central legislative figure. Several bills were debated across the years, including one that would have capped licenses at 325, but ultimately the industry sued and won. A state court struck down the cap in 2008 as legally defective, leaving the industry in a practical enforcement vacuum while litigation wound through the courts.

The deadlock broke in June 2009, four days after a pedicab accident on the Williamsburg Bridge. Mayor Bloomberg and Speaker Quinn announced a compromise. The resulting law—Intro 1031-A—established the framework still nominally in place today: Department of Consumer and Worker Protection (DCWP) licensing for businesses and drivers, mandatory insurance, safety inspections, an 850-plate cap, and per-minute pricing displayed on exterior signage. Subsequent amendments in 2011 and 2012 refined seizure procedures and clarified fare rules. On paper, it looked like a workable structure.[2]

## The Long Failure of Enforcement

In hindsight, the 2009 framework has failed on nearly every front. Pricing fraud became endemic. A 2018 ABC7 investigation found more pedicab operators breaking laws than following them near Times Square on a single evening, with fares billed at $200, $400, or even $600 for short rides. DCWP at the time acknowledged it had no authority or operational capacity to conduct random on-street stops. By the early 2020s, individual passengers were being charged $500 to nearly $1,000 for 15 to 20-minute trips. Unlicensed operators multiplied unchecked. The city issued approximately 850 plates, but by 2024 an estimated 1,200 to 1,500 pedicabs were operating, many with forged credentials.

Residents near the Broadway theater district have faced amplified music audible inside performances. Licensed pedicab operators have been systematically undercut by more recent operators with no licenses and no insurance. A small number of pedicab fleet owners take advantage of drivers, often recent immigrants with very limited options for earning a living, renting vehicles by the day that are uninsured, display improper signage, and have broken seatbelts, and leaving drivers to bear the cost of criminal summonses.

Since November 2024, when the Office of Court Administration reopened the Midtown Community Justice Center's ("Justice Center") summons calendar, the Justice Center has adjudicated well over 2,000 cases related to pedicabs. The drivers who appear in the Justice Center's courtroom have shared a host of frustrations about the industry, including working conditions, tensions with NYPD, frequent ticketing (sometimes for minor infractions), and an inability to obtain accurate information about their open cases. Drivers who are licensed, insured, and driving registered vehicles are distressed by the proliferation of drivers operating illegally who give their industry a bad reputation and take their customers. In August of 2025, a pedicab driver named Musa Cetin took his own life while in police custody after getting arrested on an open summons warrant related to pedicab driving. Mr. Cetin's tragic death further underscored a dysfunctional industry that impacts lives and livelihoods.

The Justice Center has likewise fielded complaints about pedicabs from multiple stakeholders, including the Times Square Alliance, the Central Park Conservancy, Midtown businesses, community members, elected officials, and the New York Pedicab Alliance, which represents licensed pedicab drivers. These groups expressed frustration with the current system's inability to address challenges posed by pedicabs, including blocked entrances to hotels and theaters, loud music, tourists' complaints about excessive charges, and more. Council Members Brewer, Powers,[3] and Bottcher,[4] whose districts all include pedicab traffic, similarly receive complaints and requests for intervention from the same stakeholders. In 2025, the City's 311 system received 172 complaints related to pedicabs. Of those, 86 reported overcharging and another 35 reported an unlicensed pedicab operator.

What has emerged over time is a framework with enough restrictions to burden legal operators but not enough enforcement to deter problematic ones, much less the fleet owners who rent pedicabs to unscrupulous drivers. That imbalance has persisted for fifteen years.

## Pedicab Roundtable

As part of the Midtown Community Justice Center's mission-driven goal to improve public safety and community conditions, we sought first to understand the issue from all perspectives and then to convene key stakeholders to seek solutions.

In partnership with Council Members Brewer, Powers, and Bottcher, the Justice Center hosted a roundtable meeting about the pedicab industry on Thursday, November 13, 2025, at the Marriott Marquis in Times Square. The goal of the meeting was to develop a blueprint for a healthy pedicab industry. The meeting was facilitated by the civic sector consulting firm Bennett Midland.

### Participants

*Assigned Counsel Plan*

- Dru Carey, Defense Attorney
- Gideon Oliver, Defense Attorney

*Broadway Association*

- George Lence, Board of Directors

*Center for Justice Innovation*

- Danielle Mindess, Project Director, Midtown Community Justice Center
- Jordan Otis, Deputy Project Director, Midtown Community Justice Center
- Emma Embleton, Community Partnerships Coordinator, Midtown Community Justice Center
- Elizabeth Brantl, Government Relations Coordinator, Center for Justice Innovation

*Central Park Conservancy*

- David Saltonstall, Vice President for Government Relations, Policy and Community Affairs

*City Council*

- Council Member Brewer
- Sam Goldsmith, Policy and Communications Director, Council Member Brewer
- James Lu, Legislative Fellow, Council Member Brewer
- Carl Wilson, Chief of Staff, Council Member Bottcher
- Hayley Brundige, Legislative and Budget Director, Council Member Powers
- Franklin Richards, Director of Operations, Council Member Powers
- Katie Sinise, City Council Oversight and Investigations Division

*Department of Consumer and Worker Protection*

- Carlos Ortiz, Deputy Commissioner, External Affairs
- Karline Jung, Senior Legislative Analyst

*Department of Transportation*

- Colleen Chattergoon, Senior Borough Planner

*Driver Representative*

- Kerem Nuhoğlu, Times Square Pedicab Driver Representative

*Manhattan District Attorney's Office*

- Kofi Sansculotte, Financial Frauds Bureau Chief
- Estelle Strykers-Santiago, Executive Director, Community Partnerships Unit
- Alex Garcia, Community Engagement Coordinator, Community Partnerships Unit

*Marriott Marquis*

- George Ntim, Market Director of Diplomatic and Community Relations
- Zoe Pepper, Hotel Manager
- Teddy Mihaliadis, Director of Event Management
- Tom Schultz, Director of Security and Safety

*Mayor's Office of Criminal Justice*

- Inessa Abayev, Senior Counsel, Policy and Justice Operations

- Christian Klossner, Executive Director, Office of Special Enforcement

*Mayor's Office of Public Safety*

- Jessica Cruz, Project Manager
- Horace Norville, Chief Agency Liaison

*Midtown Community Justice Center's Presiding Judge and Staff*

- Hon. John Zhuo Wang
- Rebecca Basescu Schwartz, Court Attorney to Judge Wang

*New York Pedicab Alliance*

- Makan Camara, President
- Kenneth Winter, Public Affairs

*New York Police Department*

- Matthew Russo, Agency Attorney

*Office of Administrative Trials and Hearings*

- Rachel Amar, Senior Advisor to the Commissioner

*Times Square Alliance*

- Tom Harris, President
- Regina Fojas, Chief of Staff
- Ellen Goldstein, Senior Vice President, Policy, Planning and Research
- Michael Duggan, Vice President of Public Safety
- Caitlin Falk, Director, Policy and Research
- Riley Guggenhime, Coordinator, Policy and Research

**Key Questions**

Prior to the meeting, a planning committee consisting of Midtown Community Justice Center and City Council member staff met with stakeholders to collect and analyze answers to the following questions:

- If you could build the pedicab industry from scratch, what would it look like?
- What are the main barriers to achieving the vision you'd like to see? What or who will be required to make your vision a reality?

What are we (or could we be) doing today to reduce harm to all stakeholders? Could we be doing something in the immediate term to start to solve some of the identified challenges?

In the answers to these questions, the planning team heard broad agreement on the components of a healthy industry, including a regulatory framework and enforcement strategy that ensures all pedicabs operating in the city are registered and all drivers are licensed and insured. DCWP currently licenses pedicab businesses and pedicab drivers in New York City, with NYPD and Parks responsible for conducting all on-street enforcement. Stakeholders agreed that the Taxi and Limousine Commission (TLC) has the right infrastructure in place to license, regulate, and conduct enforcement for the pedicab industry. Therefore, the industry should be moved under the authority of TLC.

# Recommendations

**The roundtable generated robust conversation that produced the following goals and recommendations for how to achieve them.**[5]

## 1

## Move oversight of the industry to TLC and apply a regulatory framework similar to the City's other for-hire vehicle industries.

The pedicab industry must reduce barriers to licensing for drivers and modify the regulatory framework to promote safety and accountability. This will require:

- Streamlining the license application process and expediting license renewals, including by allowing drivers to pick up renewed licenses in person.
- Requiring training in industry rules and safe driving practices when issuing licenses and license renewals.
- Creating barcodes for license plates to connect vehicle registrations to owners.

## 2

## Ensure accessible insurance premiums to encourage legal driving.

High insurance costs are a barrier to legal pedicab operation. Lowering premiums and making insurance more accessible is necessary for industry legitimacy. This will involve the following considerations:

- Currently there are four insurance providers that meet the legal requirement for the amount and policy coverage set by the law. Unsustainably high annual premiums prevent many pedicab businesses from operating legally.
- Upon assuming responsibility for the industry, TLC must consider other insurers to create a competitive market and bring down costs to an amount that drivers can reasonably afford.

## 3

## Standardize rates and mandate meters.

Stakeholders support uniform pricing and mandatory, visible meters to protect tourists from overcharging, reduce fraud, and legitimize operators. This will require:

- Standardizing the per-minute price for pedicab rides and requiring the use of GPS-enabled meters similar to those used in other for-hire vehicles. Pricing may include variance based on ride duration (e.g. the price per minute is higher for rides under 20 minutes to account for quick trips versus scenic tours).

- Establishing a maximum rate per minute with a sunset provision for a higher standardized rate increase every two years.
- Requiring standard pricing signage for all pedicabs that is easily recognizable to potential customers. The New York City Administrative Code currently requires signs on both exterior sides and the rear of the pedicab, but drivers and vehicle owners create and hang the signs inconsistently. The signage package should include three signs, two for the exterior of the cab and one for inside the vehicle in a location visible to passengers. Standard signage issued with the seal of the oversight agency will not only ensure pricing transparency, but signal to riders which drivers are legitimate and operating legally.
- Developing app-based reservations, haling, and payment.

## 4

## Hold vehicle owners, not just individual drivers, responsible for operating legally.

Drivers often lack control over the condition of the pedicab, including working seat belts and proper signage. Regulation and enforcement should focus on business owners, not just individual drivers. This will require:

- Metal plates for front and back of the pedicab similar to license plates for cars.
- Barcodes on license plates tied to vehicles' owners allowing enforcement agencies to hold pedicab business owners accountable for fake plates, renting to unlicensed drivers, pedicabs operating without registration or insurance, improperly displayed rate signs, broken seat belts, and/or illegal motors.
- Pedicab owners maintaining logs of insurance and maintenance requirements for TLC's monitoring of compliance.

## 5

## Legalize safe electric motors and enforce proper motor use.

Electric motors are a practical and reasonable necessity for a 10-hour shift and already deeply integrated into the industry. All motors on pedicabs are currently illegal, which gives the NYPD cause to stop nearly any pedicab for a violation, even if the driver is otherwise operating legally. Legislation passed by the City Council is needed to permit proper motors and ban unsafe ones. This will require:

- Amending the Administrative Code to allow safe motors on pedicabs.
- Providing battery charging infrastructure in Midtown Manhattan to ensure safe charging to prevent battery fires.
- Training in lithium-ion battery safety.

## 6

## Create a consistent enforcement structure that favors administrative penalties versus criminal penalties.

Enforcement of relevant laws is inconsistent, with different priorities and interpretations depending on the officer or area (e.g., Times Square vs. Central Park). Enforcement is tied to individual drivers, not to pedicab operator licenses and business owners. The current system overly relies on the NYPD using criminal summonses to enforce rules related to licensing and proper vehicle maintenance. Compliance with the law will require logical and consistent enforcement by TLC to investigate and enforce industry regulations. This will require:

- Moving oversight of the pedicab industry to TLC.
- More consistent regulation of the industry by creating tiered consequences for driving infractions, including fines, vehicle seizure, and loss of license.
- Amending the law to allow enforcement by TLC.
- Training for the NYPD on new enforcement procedures and updated laws, how to correctly write summonses, and interacting professionally with drivers.
- TLC and NYPD working with the Manhattan District Attorney's Office to support investigative efforts in instances where drivers are suspected of overcharging.

## 7

## Improve court processes related to criminal summonses.

High summons dismissal rates undermine enforcement and limit effective deterrence. Infractions that land in court often get dismissed due to discovery requirements. Summons proceedings in New York City do not involve prosecutors and so rely on police officers to directly produce discovery—which is not typically a police officer function and can be very resource intensive—resulting in a nearly 100 percent dismissal rate on cases that go to trial. Non-criminal summonses are returnable to the Office of Administrative Trials and Hearings (OATH), while criminal summonses are returnable to the Midtown Community Justice Center. Court bifurcation creates inconsistency in the application of the law. Neither court tracks repeat behavior or reports summonses to DCWP, so there is no escalation of consequences or shared driving record between responsible agencies. This type of reporting would be challenging because infractions are tied to people who often have similar names and incorrectly documented birthdates rather than pedicab licenses. Comprehensive regulatory and enforcement reforms would alleviate much of the strain on the criminal court system, OATH, and the NYPD, which currently regulates the industry through a high volume of summonses.[6] This will require:

- Police officers recording vehicle VIN numbers or other identifying serial numbers on summonses.

- A tiered system of enforcement escalation tied to licenses and pedicab ownership, rather than as criminal matters.
- Removing jail as an option for pedicab-related offenses under the NYC Administrative Code. Although municipal code violations are exempt from the discovery requirements under Article 245 of the New York State Criminal Procedure Law, such violations are not exempt when the sentence includes a sentence of jail (CPL 245.10[a][iii]), which includes pedicab-related offenses. The failure to certify discovery compliance leads to dismissal of the majority of these cases at trial in criminal court.
- Sharing information about criminal summonses and driving records between the courts and TLC once a summons has been resolved with a guilty finding or plea and appeal time has expired. A final adjudication is needed to provide sufficient link to a violation against a licensed driver and business.

## 8

## Create infrastructure to support fair working conditions for drivers.

With no legal locations to stop for breaks or to use the bathroom, even drivers who otherwise operate legally must break the rules and risk receiving tickets for illegal stopping during a 10-hour shift. Remedying this will require:

- Working with the Department of Transportation to utilize existing infrastructure for taxi drivers to identify safe and legal places for drivers to stop, rest, and use the bathroom.
- Providing battery charging stations where drivers can safely charge legal batteries for electric motors.

# Next Steps

Reforming the pedicab industry will save city law enforcement and court system resources, reduce frustration among Midtown-area businesses and residents, protect tourists from exploitation, and allow legal drivers to avoid unnecessary legal system involvement and unfair competition with those operating illegally. By implementing achievable changes in legislation, policy, oversight, enforcement, and infrastructure, the pedicab industry could thrive. Pedicabs could offer a greener alternative mode of transportation, as originally envisioned by the founders of the industry, and provide tourists with a memorable and safe experience in the heart of New York City.

**For More Information** Danielle Mindess, Email: [redacted]

# Endnotes

[1] In 2025, the City's 311 system received 172 complaints related to pedicabs. Of those, 86 reported overcharging and another 35 reported an unlicensed pedicab operator.

[2] Sources include: *Time's Up! Environmental Organization*; *amNew York (2008)*; *ABC7/7 On Your Side (2018)*; *New York Post (2024)*; *Gothamist* (*2023*, *2025*); *NYC Council hearing transcripts (March 2025)*; *NYC Administrative Code §20-249 et seq.*; *Arizona Law Review (pedicab regulation study)*; *NYC Mayor's Office press releases (2025)*; *New York Pedicab Alliance; NYC Council Intros 0077-2026 and 0673-2026*.

[3] Council Member Powers' term ended on December 31, 2025. Council Member Virginia Maloney currently represents Manhattan Council District 4.

[4] Council Member Bottcher resigned from the City Council on February 4, 2026. The special election to fill his seat will be held on April 28, 2026.

[5] Many of the recommendations listed in this report will require changes to the New York City Administrative Code through legislation in the City Council.

[6] In 2025, 2,059 pedicab summonses were docketed at the Midtown Community Justice Center, the vast majority of which were dismissed. At least 697 pedicab summonses were returned to OATH; however, that figure is likely an undercount. As an impartial tribunal, OATH does not track or analyze its case data by respondent type (i.e. individual or business, etc.). Cases that come before OATH are decided on a case-by-case basis. Unless the type of respondent is a necessary element of the allegations on a summons, respondent type is not a factor considered at a hearing.

# Photo Credit

Original photos courtesy of the Central Park Conservancy. Edited by Samiha A. Meah.



midtownjustice.org

Name

# MANZU MD SELIM

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Makkah |
| Zip Code | [redacted] |
| Public Comment | MANZU MD SELIM<br>Afroza Neha |
| Attachment(s) |  <br>inbound8340935665526822455.jpg |
| Date Submitted | June 19, 2026 |
| Topic | Miscellaneous |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | No |

| | |
|---|---|
| Topic Simplified | Feedback |
| Subtopic | |



PERSONAL DATA AND EMERGENCY CONTACT

Name: MANZU
Father's Name: MD SELIM
Mother's Name: MAYA BEGUM
Legal Guardian's Name:
Permanent Address: [redacted]

Emergency Contact:
Name: MD SELIM
Relationship: FATHER
Address: [redacted]

Telephone No: [redacted]

A19903937

PASSPORT
পাসপোর্ট

গণপ্রজাতন্ত্রী বাংলাদেশ PEOPLE'S REPUBLIC OF BANGLADESH

Type: P
Country Code: BGD
Passport Number: [redacted]
Surname: MANZU
Given Name:
Nationality: BANGLADESHI
Personal No.: [redacted]
Date of Birth: [redacted]
Previous Passport No.: [redacted]
Sex: M
Place of Birth: [redacted]
Date of Issue: 23 AUG 2025
Issuing Authority: DIP/DHAKA
Date of Expiry: 22 AUG 2035
Holder's Signature: [redacted]

05.06.88

A19903937 05 JUN 1988

[redacted]

Name

# Tony Alfieri

Email [redacted]

Professional Affiliation

Zip Code [redacted]

Public Comment

Please observe in the attached video demonstrating how flex posts installed by DOT to protect bike lanes are repeatedly crushed by DSNY trucks. I can't believe that we're paying one agency to install public infrastructure only to pay another city agency to destroy it.

Attachment(s)



BollardDestruction.mp4

Date Submitted June 19, 2026

Topic Street Redesigns ✕ Unnecessary Bureaucracy ✕ Enforcement ✕

Method Received Airtable Form

Is it charter related?

| | |
|---|---|
| Charter Related | No |
| Topic Simplified | Streets |
| Subtopic | DSNY destroying flex posts installed by DOT to protect bike lanes |


25DY-606
M9
NYC

Name

## Cordell Schachter

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | former CTO NYC DOT, former CIO US DOT |
| Zip Code | [redacted] |

Public Comment

New York City Needs a New Operating System: Recommended Charter Reforms to Make Government Work Better for New Yorkers

By Cordell Schachter, former CIO, U.S. Department of Transportation, and former CTO, NYC Department of Transportation; Manny Innamorato, former CIO, NYC School Construction Authority, and former CIO, MTA Bus; and Cecil McMaster, former CIO, NYC Department of Environmental Protection.

New York City's services run on software. They now depend on software as much as they depend on roads, buildings, equipment, and people, but the City Charter has not kept pace with that reality.

Every day, residents, businesses, workers, and visitors rely on city technology for emergency response, water monitoring, construction planning, street work coordination, permitting, inspections, benefits access, 311 services, and countless other public functions. These systems are rightly operated by agencies with deep subject matter expertise, but the city lacks a sufficiently strong enterprise framework to prioritize investments, reduce duplication, modernize obsolete systems, secure critical infrastructure, and hire the talent required to deliver reliable digital government.

The Charter should be updated to create a modern operating system for city technology: one that treats IT investment, cybersecurity, procurement, hiring, automation, and system modernization as core government infrastructure rather than back office support.

We recommend six Charter changes to help build that new operating system for New York City government.

1. Create a City Hall IT Chief Investment Officer and Project Review Organization

The Charter should require a City Hall IT Chief Investment Officer to oversee major technology spending and chair an OMB based IT Project Review Organization responsible for approving, monitoring, and publicly reporting on major IT investments. The Project Review Organization should include permanent representation from OMB and relevant oversight agencies, rotating representation from operating agencies, and a clear mandate to prevent duplicative software development, encourage reuse, and support common platforms for functions such as permitting and inspections. The common platforms could be customized for use by agencies with different missions and hosted by the department that developed them. That would create provider customer relationships between peer departments as done in the federal government to achieve efficiencies without sacrificing effectiveness.

This reform would give the city a consistent mechanism to prioritize scarce technology dollars, identify high risk projects early, and create economies of scale without removing agencies' responsibility for mission delivery.

2. Require a Separate NYC Cybersecurity Agency

The Charter should establish a dedicated New York City cybersecurity agency with cybersecurity as its primary mission.
Cyber threats to local governments have grown more frequent and consequential, while federal support has become less certain and the Office of Technology and Innovation carries a broad portfolio that includes shared services, IT policy, 311, and cybersecurity. A standalone cybersecurity agency would sharpen accountability, improve incident response, and ensure that protection of city systems, data, and critical services receives sustained executive focus. The federal government has multiple agencies with responsibility for cyber defense and response. NYC needs at least one.

3. Streamline IT Hiring and Workforce Development
The Charter should require a multidisciplinary commission to modernize IT and related hiring, working with New York State authorities, labor, academia, agency leadership, and the private sector to make city hiring faster, fairer, and more responsive to changing needs, especially in technology.
The commission should support modern job descriptions, on demand civil service testing where appropriate, rolling application processes, and training programs that help current staff build new skills in their fields. Without faster access to skilled talent, even well-funded technology initiatives will remain difficult to deliver and sustain.

4. Require Agencies to Pilot First and Procure Second
The Charter should direct agencies to use challenge-based acquisitions and pilot programs before committing to major purchases.
New York City's procurement rules already allow greater use of challenge based procurement and demonstration projects, but the Charter should make pilot-first delivery the expected path for major technology initiatives so agencies can test real solutions before making large taxpayer commitments. The current acquisition process already allows for much of this. The Procurement Policy Board adopted an amendment on 9/19/24 titled "Challenge-Based Procurement." https://www.nyc.gov/assets/mocs/downloads/Regulations/PPB/PPBAgenda2_20240919.pdf It clarified earlier changes allowing wider use of demonstration projects, removed language requiring competitive contracts to acquire more of the good or service tested, extended the demonstration project maximum contract term to 3 years, and emphasized the ability of agencies to use challenge based solicitations. This approach would reduce reliance on high stakes, high risk, and slow-moving RFPs that can result in awards after requirements or technologies have already become outdated. The city should also be required to post on line an official, current version of the PPB rules. Currently, the city's PPB webpages states: "This copy of the Rules, while not official, is, to the best of our knowledge, complete and accurate at the time of its printing."

5. Mandate a Modernization Roadmap for Obsolete Systems
The Charter should require the Project Review Organization to create and update every two years a citywide modernization roadmap for obsolete technology systems that still support critical public services. The roadmap should identify high risk systems, required resources, sequencing priorities,

and opportunities to replace legacy tools through Agile delivery and pilot based procurement rather than lengthy specification driven projects. Agile project implementations can deliver working software before traditionally-scoped software projects even get started. A formal modernization timeline would help the city move from reactive maintenance to planned replacement of systems that are costly, fragile, difficult to secure, and increasingly unable to meet public expectations.

6. Use Automation and Artificial Intelligence Strategically and Safely
The Charter should require the city to use automation, including artificial intelligence, to improve government work processes where these tools can safely support staff, improve service delivery, reduce administrative burden, and increase the safety of staff working in potentially hazardous conditions. The city should pair this mandate with clear guardrails for labor fairness, privacy, equity, cybersecurity, transparency, procurement competition, and avoidance of vendor lock-in.
Used responsibly, automation and AI can help city employees focus on higher value work while improving the speed, consistency, and accessibility of public services.

Conclusion
New York City cannot deliver twenty first century government with twentieth century technology governance.
By updating the Charter to strengthen IT investment oversight, cybersecurity, hiring, procurement, modernization, and responsible automation, the Commission can help create a city government that is more secure, efficient, accountable, and responsive to New Yorkers.

Attachment(s)



COGE Testimony Cordell Schachter New...

Date Submitted

June 19, 2026

| | |
|---|---|
| Topic | Technology ✕ Procurement Reform ✕ Unnecessary Bureaucracy ✕ Support Oversight Agencies ✕ |
| Method Received | Airtable Form |
| Is it charter related? | |
| Charter Related | Yes |
| Topic Simplified | Technology |
| Subtopic | Update the charter to create a modern operating system for city technology |

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The common platforms could be customized for use by agencies with different missions and hosted by the department that developed them. That would create provider-customer relationships between peer departments as done in the federal government to achieve efficiencies without sacrificing effectiveness.

This reform would give the city a consistent mechanism to prioritize scarce technology dollars, identify high-risk projects early, and create economies of scale without removing agencies' responsibility for mission delivery.

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**4. Require Agencies to Pilot First and Procure Second**

The Charter should direct agencies to use challenge-based acquisitions and pilot programs before committing to major purchases.

New York City's procurement rules already allow greater use of challenge-based procurement and demonstration projects, but the Charter should make pilot-first delivery the expected path for major technology initiatives so agencies can test real solutions before making large taxpayer commitments.

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Used responsibly, automation and AI can help city employees focus on higher-value work while improving the speed, consistency, and accessibility of public services.

**Conclusion**

New York City cannot deliver twenty-first-century government with twentieth-century technology governance.

By updating the Charter to strengthen IT investment oversight, cybersecurity, hiring, procurement, modernization, and responsible automation, the Commission can help create a city government that is more secure, efficient, accountable, and responsive to New Yorkers.

Name

# A NYC Parent Coordinator

| | |
|---|---|
| Email | [redacted] |
| Professional Affiliation | Parent Coordinator, NYC Public Schools [redacted] |
| Zip Code | |

Public Comment

Written Testimony to the New York City Commission on Government Efficiency (COGE)

I have served New York City's public schools for nearly thirty years, and I work today as a Parent Coordinator. I offer this testimony to identify a structural inefficiency in how this city defines, classifies, and plans for one of its most essential frontline workforces. Modernizing that structure is squarely within your mandate to make government work better.

Parent Coordinators have become one of the most relied upon workforces within New York City Public Schools, yet the systems governing the position remain largely unchanged from a role designed more than two decades ago. The result is a growing gap between what the City expects Parent Coordinators to do and how the position is officially classified, supported, and planned for.

The Parent Coordinator role was created in 2003 under the Children First reforms, the same year mayoral control took effect. The original charge was narrow and clear: serve as a liaison between families and the principal, welcome parents, and support the Parent Association. Today there is a Parent Coordinator in nearly every one of the city's 1,597 public schools, and the job bears little resemblance to that 2003 description. We are now communications managers, enrollment specialists, attendance partners, translators and interpreters for limited-English families, technology support for parents navigating online systems, community resource navigators, event coordinators, and the implementation partners who carry new city and state initiatives into the building. During COVID-19, we were the human infrastructure that kept families connected to schools, distributing devices, explaining remote learning, and guiding families to food and benefits. When the City needs a policy delivered to the families of its roughly 906,000 public school students, it runs through us.

The problem is one of government modernization. The duties expanded; the classification did not.

Parent Coordinators are paid on the Community Associate civil service line, a title whose specifications were never written for the scope of work we now perform. I raise compensation here not as a request, which I understand sits outside your authority, but as the clearest available measure of how far the City's classification system has drifted from operational reality. When a title's pay and specifications no longer match the work being performed, that gap is not merely a labor concern. It is evidence that the system used to define, value, and plan for the position has fallen out of date. Compensation is the diagnostic, not the demand.

The salary range runs from roughly $44,000 for new hires to just under $74,000 at top step, and there is no built-in advancement pathway that reflects the specialized, year-round, family-facing work we do. There is a higher community title, Community Coordinator, whose job description often

aligns more closely with the day to day responsibilities of many Parent Coordinators than the title under which they currently serve. Yet no formal pathway exists between the two positions, creating a persistent disconnect between operational reality and the City's classification, advancement, and compensation structures. A workforce whose responsibilities have grown for two decades while its classification and compensation structure stood still is, by definition, a workforce the City's planning systems have stopped tracking accurately.

The result is a classic efficiency failure. The City invests little in retaining institutional knowledge, experiences turnover and vacancies in a role that depends heavily on trust built over years, and loses the very continuity that makes family engagement work. When a job title no longer describes the job, the City cannot effectively plan, budget, recruit, retain, or staff it. That is precisely the kind of outdated constraint this Commission was created to identify.

Government inefficiency occurs when workforce structures fail to reflect operational reality. When agencies depend on employees to perform responsibilities that exceed the design of their official title, government loses the ability to accurately plan staffing needs, measure workloads, evaluate performance expectations, and retain experienced personnel. Persistent misalignment between what a title pays and what its holders actually do is one of the most reliable warning signs that planning and classification systems have stopped functioning effectively. Over time, this creates avoidable turnover, institutional knowledge loss, reduced continuity, and service disruption.

Many of us have given decades to this system. Yet because our duties grew without our classification keeping pace, long serving Parent Coordinators approach retirement on salaries that never caught up to the work. The recent Parent Coordinator allowance, while welcome, does nothing to strengthen retirement security because it is not pensionable. People who have spent a working lifetime serving New York City's families should not reach the end of their careers unable to adequately prepare for retirement because the systems governing their position failed to evolve alongside the work itself.

A modern workforce structure should also provide a realistic pathway to economic security. While compensation itself falls outside the Commission's authority, workforce structures that fail to keep pace with evolving responsibilities inevitably produce compensation outcomes that lag behind operational reality. A modern government should be able to offer employees performing essential public services a pathway to both career advancement and a living wage.

This issue extends beyond retirement. Parent Coordinators have become one of the most relied upon workforces within the Department of Education, yet compensation continues to lag far behind the value, responsibility, expertise, and institutional knowledge the position now demands. Over the years, the role has expanded far beyond family engagement. Parent Coordinators have

become the frontline implementation team for school, district, and citywide initiatives. With every new initiative, expectation, and mandate, more responsibilities are added to the position while the structures governing compensation, advancement, and workforce planning remain largely unchanged.

The City has transformed Parent Coordinators into indispensable employees while maintaining systems that continue to treat the position as though it were operating within its original scope. The work has evolved. The expectations have evolved. The demands have evolved. The systems governing the position have not.

I am encouraged that District Council 37, whose Local 372 represents Parent Coordinators alongside Community Associates, Community Coordinators, and School Neighborhood Workers, is represented on this Commission through Executive Director Henry Garrido. That presence underscores that workforce modernization is not a side issue but central to government effectiveness.

The Charter already recognizes this principle. Section 813 gives the Civil Service Commission authority to review title classification and personnel administration. The opportunity before you is to make that review regular, transparent, data driven, and accountable rather than occasional and largely invisible.

I respectfully urge the Commission to consider charter amendments that would:

- Establish a regular, mandatory cycle for reviewing civil service classifications so that job titles are periodically evaluated against the actual duties employees perform.

- Require the City to publish workforce planning data, including vacancy rates, turnover rates, years of service data, and compensation information by title, so policymakers and the public can identify where workforce structures are no longer aligned with operational realities.

Create transparency and accountability mechanisms requiring agencies to report when a title's actual duties have substantially diverged from its official specification.

Establish expectations that classification systems, advancement pathways, and workforce planning practices evolve alongside the work itself.

- Require agencies to identify positions where significant responsibility growth has occurred without corresponding review of classification structures, allowing policymakers to proactively address workforce misalignment before it becomes a service delivery problem.

None of these recommendations require the Commission to set salaries or rewrite collective bargaining agreements. They simply ask the Charter to

require that government regularly evaluate whether its workforce structures still reflect reality.

New York City cannot modernize government if its workforce structures remain frozen in the past. Parent Coordinators represent one example of a broader challenge facing City government: jobs evolve, responsibilities expand, and public expectations change, yet the systems used to classify and plan for those jobs often remain static.

Building mechanisms that ensure workforce structures evolve alongside the work itself would strengthen accountability, improve retention, preserve institutional knowledge, and make government more effective for the New Yorkers it serves.

Thank you for your time and for the opportunity to be heard.

Attachment(s)



COGE_Parent_Coordinator_Testimony.d...

Date Submitted: June 19, 2026

Topic: Unnecessary Bureaucracy ✕ | Reporting Requirements ✕ | Procurement Reform ✕

Method Received: Airtable Form

Is it charter related?:

Charter Related: Yes

Topic Simplified: Government Operations

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New York City Independent Budget Office

TESTIMONY

[redacted]

June 11, 2026

Testimony of Louisa Chafee, Director, New York City Independent Budget Office

Before the Commission on Government Efficiency (COGE)

Good evening, Chair Gaspard, Vice Chair Wolfe, Executive Director Cheng, and members of the Commission. I am Louisa Chafee, Director of the City's Independent Budget Office (IBO). IBO is a nonpartisan, independent government agency that owes its existence to the decision by NYC City's voters to adopt the proposals of the 1989 Charter Revision Commission, and in the case of IBO, that decision was due in no small measure to the vision and tenacity of Commissioner Messinger. Thank you. IBO was seen at the time by many advocates as a key component of the goal to promote greater equity by enhancing access to information, and specifically, transparency of the City's budget.

My testimony today will cover three areas:

- First, the critical need to reform the City's procurement process to ensure both fundamental fairness and efficiency in spending;
- Next, the importance of improving budget transparency by finally mandating the use of meaningful units of appropriation; and
- Finally, to strengthen the City's budget framework, particularly to ensure the preservation of adequate reserves.

**Procurement Reform: Ensuring Cost-Effective and Efficient Services to New Yorkers and Fairness to City Service Providers and Vendors**

As any household knows, paying bills on time is important, and when one fails to do so the results can be costly. Yet, the City's track record is terrible. This problem affects many areas, including major construction projects on which the City pays a premium as vendors build into their bids the expectation of slow payment. But nowhere is the situation more critical than for human services programs such as pre-K, senior centers and services for the unhoused.

IBO has previously made two proposals in this area: one, ensuring timely registration and timely invoice payment for nonprofits; and two, broadening the membership of the Procurement Policy Board (PPB). IBO also urges this Commission to continue to work on this topic, with a focus on other parts of the City's contract portfolio such as construction and technology, beyond the currently calendared schedule.

***Paying Nonprofits Fairly and On-Time***

While advances may provide relief to providers *after* they have already endured having their contracts registered far too late, the use of advances will not fully remedy the problem of late payment. By not registering contracts on time, the City forces human services vendors to provide services for weeks or months during which there is no contract in place, a time during

which the City is legally *barred* from paying them. It cannot pay invoices nor issue advances. Hundreds of human services providers will see their contracts end on June 30th and will not have new contracts in place for several months, during which time they cannot be paid.

This is an issue for IBO as it brings financial risk to NYC, stresses a critical service provision sector and risks delivery of services, including services the City is legally required to provide.

IBO recommends a Charter amendment to require agencies to process contract extensions for active human services contracts that would otherwise expire, in any case where continued payment would be at risk. The data is irrefutable that City agencies get contract "extensions" registered on time at far higher rates than other types of contracts, particularly new RFP awards, which are registered especially late. There are many ways the Charter could direct the PPB to force agencies to use a contract type they can get done on time. Agencies should be mandated in the Charter to process extensions for contracts that would otherwise expire, in any case where continued payment is otherwise at risk. Virtually all City contracts can be canceled by the City at any time, so an extended contract can be terminated and the parties can transition to the new contract once it is registered.

The second problem is late payment on invoices. Why aren't the City's bills paid? Sometimes it is because a contract ends and the agency fails to complete the process of registering a new contract early enough. Sometimes, even for contracts that are registered, invoices languish at City agencies for long periods of time as the agency holds up the entire payment while it disputes a tiny percentage of claimed costs. IBO supports a Charter mandate to require agencies to pay 80% of every invoice submitted by a human services contractor in good standing, within a reasonable time frame from its receipt (such as 30 or 45 days).

Why does the human services portfolio need this relief? The private sector business model offers options that are not available to nonprofits. If the City is too slow to pay bills, private sector vendors (like construction or IT) stop providing services – or they raise bid prices to compensate for this risk. Services for vulnerable New Yorkers (generally human services and some professional service contracts), are provided overwhelming by nonprofit entities, and are usually structured on a fixed-price basis, based on the budget the City allocates to the program, with little to no variation based on individual provider costs. Providers have no other customers to whom they can sell services when the City stops paying. Most importantly, these are mission-driven organizations committed to serving New Yorkers. They just keep trying to function, even when the City's payment track record is unconscionable.

A partial payment process can easily be automated to ensure that funds are paid to the vendor initially, while also allowing the City to continue its vetting process before releasing the remainder. Any risks of overpayment are minimal, for three reasons: 1) the majority of every invoice is usually for rent and payroll, two cost items that are negotiated as part of the contract budget approval; 2) the City has the power to recoup from future invoices; and 3) contracts are audited and amounts paid in error are recovered in that process as well.

Requiring the City to pay interest on late payments is not a viable solution to this problem for most providers. The vendors most likely to be harmed by the City's slow payments are small,

community-based organizations that are also unlikely to be able to access commercial credit, at any price, making this type of relief fairly useless to them.

### *Improved Procurement Governance*

IBO also supports changes to the Procurement Policy Board's (PPB) structure and duties. First, the PPB should be required to meet at least four times per year. It should be a forum where procurement performance can be regularly reviewed and improved.

Second, its membership should be doubled in size, with strict limits on the number of members who are current City employees and a requirement for some members to come from the vendor arena. Section 259(d) of the Charter, defining the composition of the IBO Advisory Committee, could serve as a model for how to specify a broad cohort of members. Finally, the PPB should have its own director and staff and budget, with a requirement to produce an annual report evaluating the effectiveness of its rulemaking actions. At its inception, the PPB had a staff, which was eliminated administratively some years later, as it was not Charter-required. One key reason to restore this capability is that if the PPB is seen to have a separate structure from the Mayoralty, it could invite and facilitate potential rulemaking petitions by the public. Under Chapter 45 of the Charter, the City Administrative Procedure Act provisions (§ 1043-g) enable members of the public, including for example, the human services vendor community, to petition the PPB for a specific rulemaking, and to require that body to act on the petition within sixty (60) days.

## Enhancing the City Budget's Structure to Promote Transparency

Massive federal policy changes and budget cuts now threaten our City—and in particular, our most vulnerable residents who depend on City services that either directly flow from federal funds or could be hit with cuts as the City absorbs the loss of federal dollar in other areas. As City decision-makers wrestle with how to address this challenge, it is crucial for the public to be able to clearly track the budgets for all programs that serve New Yorkers.

One of the important reforms from the 1989 Charter that was never really implemented is the requirement for the budget to be comprised of understandable "units of appropriation." The City's budget is larger than all but a handful of state budgets. Crafting a process that ensures both transparency and fiscally soundness is a critical undertaking, with significant consequences for all New Yorkers. Each year, when the City Council adopts the budget, it authorizes spending in a series of categories, which the Charter refers to as units of appropriation--commonly known as U/As. Under section 100 c of the Charter, a unit of appropriation was supposed to reflect the budget "for a particular program, purpose, activity or institution." In practice over the years, units of appropriation have become extremely broad, to the point where they do not promote transparency at all. The goal of providing clear, understandable information to the public remains unmet.

Many agencies lump unrelated programs, with unrelated funding streams, into a single U/A. This process conveys little useful information to the public or the Council. For example, the Department of Youth and Community Development (DYCD) combines after-school, adult literacy, and assistance to immigrants in a single U/A. The Police Department has a single U/A that totals a quarter of the entire NYPD $6.9 billion budget.

While new U/As can be added in budget negotiations, this has not occurred in a systematic way. IBO suggests that the Charter require U/As to be studied and updated on a regular basis, jointly by the Mayor and the Council. IBO also suggests that the Charter proscribe a minimum number of U/As for each agency, on the order of at least four or five U/As per agency. The Charter should also set a maximum, in terms of a percentage of the overall budget, for the size of any single U/A. No single U/A ought to exceed one percent of the budget, unless the Mayor and the Council agree that a specific item is, in fact, indivisible. Based on such a standard, for example, the NYPD's U/A lumping together all police precincts, boroughwide offices, and various specialty units, would be required to be divided, but a U/A covering the City's debt service costs or employee health insurance, may be permitted to exceed the 1% threshold.

**Protecting the Framework for Sound Budgeting**

These past several years, the challenges presented by federal policy and budgetary changes have grown exponentially. Recognizing that the decision to set aside funds that are otherwise available for new or enhanced programs to address the very significant unmet needs of New Yorkers is a difficult one, the Charter should provide greater guidance concerning the importance of investing in reserves, particularly the Revenue Stabilization Fund (RSF), commonly called the Rainy Day Fund.

IBO urges this Commission to consider adding language to Section 258 b, which defines the contents of the four-year plan. That section already references the RSF in connection with deficits at the close of a fiscal year, as well as a mandate for a minimum of $100 million in general reserves, but it offers no standards for the treatment of any potential year-end surplus. Language could be added to establish a minimum target for investment in the RSF for any fiscal year that closes in surplus. The minimum target could perhaps be set as a percentage of such surplus. This new requirement could be applied unless the Mayor includes within the four-year plan a statement of reasons why adding funds to the RSF is either unnecessary or infeasible.

I welcome any questions you may have this evening, or in the days to come. Thank you.

To see more of IBO's work and to follow IBO on socials scan here: SCAN ME

THE CITY OF NEW YORK
**OFFICE OF THE COMPTROLLER**
MARK D. LEVINE

**Testimony of New York City Comptroller Mark Levine Before the Charter Revision Commission on Government Efficiency (COGE)**

**Submitted on June 17, 2026**

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Thank you, Chair Gaspard and members of the Charter Revision Commission, for the opportunity to testify before you today.

New York City's Charter is not only a governing document. It is also a fiscal and operational framework. It shapes how the City plans, budgets, saves, procures, contracts, and prepares for risks that extend far beyond any single budget cycle or mayoral administration. Though Charter Revision processes have seemingly become routine in recent years, they are anything but. This Charter Revision comes at a pivotal moment in our City's history, and we must seize this moment to make New York City more resilient and effective in the face of an uncertain future.

New York City is facing one of the most difficult fiscal and budget outlooks in recent memory. Technological change is accelerating, the risks posed by the federal government are growing, and the costs of housing, services, infrastructure, and climate change continue to rise. The City's tax receipts are fueled by a few highly volatile sectors and high-income individuals. These pressures demand a City government that can plan for long-term risk, protect essential services, and deliver public dollars with greater speed, integrity, and accountability. The reforms that I will share today will vastly improve New York City's ability to manage long-term fiscal risk.

**Complete the governance framework for the rainy-day fund**

*Amend Chapter 58, Section 1528 to set a target size for the rainy-day fund, to require the adoption of a formula-based deposit mechanism, and to set conditions and size of withdrawals. The Mayor, the City Comptroller, and the City Council would jointly determine a policy with the parameters and features of the deposit mechanism, withdrawal triggers, and procedures necessary to*

[redacted]

*implement the Charter mandate. Reporting on implementation should be required annually to the City Comptroller, the State Comptroller, the* Financial Control Board*, the City's Independent Budget Office, and the public. Further, the current language in Section 1528 stating that, "The city may maintain a revenue stabilization fund to serve as a year-to-year reserve account" should be changed to "The city shall maintain a revenue stabilization fund…"*

The City should adopt clear rules for the Revenue Stabilization Fund, commonly known as the Rainy Day Fund.

Let me explain why.

New York City faces the most difficult fiscal outlooks since the 2008 financial crisis, with federal uncertainty, economic volatility, rising long-term risks from AI, and over-reliance on volatile economic sectors that could quickly strain the City's budget. Yet the City does not currently have enough in reserves to protect against a serious recession, major federal funding cuts, extreme weather, or other fiscal shocks.

We have a Rainy Day fund for exactly these moments. It is meant to protect New Yorkers from economic shocks and fiscal emergencies before they force sudden cuts to essential services, layoffs, or tax increases.

The Rainy Day Fund was not created overnight. New Yorkers voted via referendum in 2019 to give the City the ability to save money for future years. The State Legislature passed enabling legislation in 2020, and then-Mayor Bill de Blasio signed an executive order establishing the Revenue Stabilization Fund in 2021. For the first time, New York City had a dedicated mechanism to set aside resources for economic downturns and other major fiscal shocks.

But years after creating the fund, that framework remains incomplete. The fund has no binding target size, no formula for regular deposits, and insufficient guardrails for withdrawals. Deposits remain dependent on annual budget negotiations between the Mayor and the City Council, while withdrawals can be proposed without a sufficiently rigorous framework for determining whether the City is truly facing the kind of downturn or catastrophic event that warrants tapping emergency reserves to address temporary shocks.

The recent Preliminary Budget showed why stronger rules are needed. The Administration proposed drawing on the Rainy Day Fund to help balance the financial plan, even though the City was not facing a recession, catastrophic

event, or major revenue collapse. While that withdrawal is no longer reflected in the current budget, the episode made clear how vulnerable the fund remains without stronger guardrails.

The Charter should be amended to require the adoption of a formal Rainy Day Fund policy with four core elements.

First, there must be a target balance. My Office has proposed a target of 16% of the City's tax revenues. This is the revenue shortfall experienced, on average, during previous recessions. Currently, the City holds about 2% of tax revenues in the rainy-day fund and it should find the most expeditious path to bring it to at least 10% to provide meaningful support at the beginning of a recession, if not for its entire duration. The higher 16% target would put the City in a stronger position to withstand a serious recession without resorting immediately to deep service cuts, layoffs, or tax increases.

Second, the Charter should require and a policy should establish formula-driven deposits. When the fund is below its target level, the City should be required to make regular contributions based on revenue growth. My Office proposed a formula that takes a portion of tax revenue growth above a defined threshold, as well as a portion of non-property tax revenue growth above its trailing average. This would allow the City to save more during strong revenue years, when it is most prudent and least painful to do so.

Third, there should be clear withdrawal rules. The Rainy Day Fund should be available when the City faces a genuine fiscal emergency, such as a recession, major revenue decline, natural disaster, or other catastrophic event. But withdrawals should not be used as a routine tool to balance the budget during periods of revenue strength. The Charter should establish and a policy should fully articulate objective triggers, such as sustained employment losses or a catastrophic event, and should limit the amount that may be withdrawn in a single year.

Fourth, the adopted policy and its implementation should be subject to regular public reporting. The Mayor's Office of Management and Budget should be required to include a Rainy Day Fund section in each financial plan. That section should disclose 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. Reporting should be provided to the

City Council, the City Comptroller, the Independent Budget Office, the State Comptroller, the Financial Control Board, and the public.

This reform is not about locking away money for its own sake. It is about protecting New Yorkers when the economy turns. A strong Rainy Day Fund is what allows the City to preserve essential services, avoid sudden layoffs, maintain market confidence, and respond to families and communities in moments of disruption.

The Charter should make clear that New York City will save in good times so that it can protect New Yorkers in hard times.

Thank you for the opportunity to testify.



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