Language Access Coordinator:

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I. Introduction, Agency name and agency language access coordinator

In order to comply with Local Law No. 30 (2017), the Department of City Planning ("DCP") has developed a Language Access Plan ("Plan") to detail how language access services would be provided to New Yorkers with limited English proficiency ("LEP New Yorkers"). The Plan proposes that the DCP provide meaningful access to information about New York City planning rules and policy as well as and the agency's direct public services, including processing land use applications (including DCP-initiated proposals) and managing the land use review process of the City Planning Commission ("CPC"). This is the second such plan pursuant to the Local Law, the previous one was published in 2018. Such language access services shall include (i). identifying and translating those documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of DCP services, (ii). providing interpretation and translation services to the public regarding the land use matters and to applicants for land use actions, (iii) helping LEP New Yorkers testify at CPC public hearings or at community meetings on the topic of land use proposals, and (iii) posting multilingual signage in certain locations regarding the availability of free interpretation services from DCP. The plan provides for this meaningful access in the DCP's service areas according to a needs assessment that balances: (i) the number or proportion of LEP New Yorkers in the eligible service population; (ii) the frequency with which LEP New Yorkers come into contact with the DCP; (iii) the importance of the benefit, service, information, or encounter to the LEP New Yorker; and (iv) the resources available to the DCP and the costs of providing various types of language services. Pursuant to City policy, this Plan was submitted to the Mayor's Office on May 26, 2021.

The Language Access Coordinator is Dominick Answini, Associate Counsel. Information and Language Access can be found on the DCP's website on Language Access can be found at

https://www1.nyc.gov/site/planning/about/language-access.page

II. Agency Mission and Background

The DCP is responsible for the City's physical and socioeconomic planning. The DCP oversees land use and environmental review, the preparation of plans, policies and zoning studies to promote strategic development in communities throughout the City, and the provision of technical assistance and planning information to government agencies and public officials. The DCP reports directly to the Deputy Mayor for Economic Development, and through this office to the Mayor. The DCP's motto is "To plan for the future of New York City" and our strategic objectives are (1). Neighborhood improvement (catalyze long-term neighborhood improvement through integrated planning); (2). Housing (encourage housing production, affordability and quality; (3). Economic development (promote economic development and job growth); (4). Resiliency and Sustainability (enhance resiliency and sustainability of neighborhoods); (5). Land Use Reviews (ensure integrity, timeliness, and responsiveness in land use reviews).

The Director of the DCP is charged with advising and assisting the Mayor in matters related to the development and improvement of the City and in issues with long-term implications for the City's built environment. In addition, the Director also serves as the Chair of the CPC. The CPC has 13 members, of which six (in addition to the Chair) are appointed by the Mayor. The other six members are appointed by the five Borough Presidents and the Public Advocate. The CPC holds public meetings and hearings and considers and votes on land use and related applications. The DCP is charged with ensuring that the CPC has the resources and expertise to comprehend land use matters in the City and make informed determinations. The DCP planners and other staff make presentations to the CPC for land use matters that come before the CPC for approval and also present studies and research performed by the DCP so that the CPC has a grasp of issues affecting the City from a land-use perspective.

The DCP has roughly 300 employees who work in the five borough offices, and among various planning, technical, environmental and land use divisions. The Information Technology Division ("ITD"), Counsel's Office, Environmental Assessment Review Division, and Operations provide support to the entire agency.

Direct Services

A. Land Use Review

The primary service provided by the DCP is the administration of the Uniform Land Use Review Procedure ("ULURP"). Pursuant to Section 197-c of the City Charter, land use decisions requiring discretionary action by the CPC are subject to a standardized process including public hearings and review by affected community boards, borough presidents, borough boards, the CPC, and the City Council. The DCP administers its portion of public review, including holding public hearings of the CPC and dissemination of related information to the public. When not meeting remotely (due to the COVID-19 pandemic), the CPC public hearings are generally held in the Lower-Level Concourse at 120 Broadway on alternating Wednesdays at 10:00am. Review

sessions, where the CPC is presented land use applications and other matters by DCP staff, are generally held in the same location on alternating Mondays at 1:00pm.

Other services of the DCP related to the Land Use Review process include:

- Providing opportunities to file applications for land use changes (including where the City is an applicant);
- Providing interested parties and the general public with information regarding applications entered into public review;
- Providing notice of and opportunities to testify at public hearings of the CPC or attend and listen to review session.

All three services entail DCP staff interacting with the service population, but last two are the most important, ensuring that all New Yorkers have the opportunity to learn and understand the complexities of land use matters and applications affecting land use, and ensuring that all New Yorkers have an opportunity to attend a public hearing or review session and make their voice heard.

B. Technical Assistance and Dissemination of Planning Information

The DCP also provides planning and land use information to the public by providing direct assistance through the borough offices and the Zoning Help Desk (see below). Additional information is provided to the public through the DCP website and publications such as press releases and planning reports. NYC Planning Labs, a division of the DCP, also provides mapping information and planning data via various websites such as zola.planning.nyc.gov.

Technical assistance services are available in the DCP's five borough offices, as well as the Zoning Help Desk and Central Intake (The final two are located at 120 Broadway, 31st Floor. For a complete list of addresses, see *Appendix A*). The borough offices are all equipped to answer general land use questions, while the Zoning Help Desk is designed to field questions pertaining to the Zoning Resolution. Central Intake answers questions regarding the land use application process and accepts applications. In addition, inquiries can be submitted electronically, through the DCP website.

The DCP also assists the public by making informational and instructional materials available online and in print. Press communications are also utilized to further the DCP's broader educational role.

C. On-line information sources

1. The DCP website:

The DCP website is a comprehensive data source which contains information on city planning in general, DCP initiatives in the field of city planning, an explanation of zoning, instructions of

how to make a land use application to the DCP, as well as pages expressing the CPC's upcoming public hearing and review session agendas. Also available on the DCP website is a wealth of data on demographics, land use data, and the geography of the City. The website includes a segment on Language Access.

2. Zoning Applications Portal

The DCP also has created the Zoning Applications Portal ("ZAP") which allows New Yorkers to review and download land use applications currently in public review, including all related environmental review filings. ZAP ensures that the public has easy access to land use applications, drawings and project descriptions that were previously only available on paper, and through local Community Board offices. It also gives the public the opportunity to easily see all the details of an application before a public hearing. There is also a separate webpage of ZAP which serves New Yorkers who wish to make their land use applications on-line rather that via paper copies and this applicant-focused portal allows applicants to see their application's submission status and timeline of previous and next steps.

3. Zoning and Land Use Application (ZOLA) Website

Through the website Zoning and Land Use Application (ZOLA) one can find much information about City properties (including the zoning designation, ownership, building floor area and links to other agencies) as well as data such as street widths, locations of sidewalk cafes and the limits of special zoning districts.

4. Street Map Website

Through the website Street Map one can find information concerning the current NYC street map as well as a cataloguing of all past modifications to the official City map and information regarding street names and pierhead and bulkhead lines

III. Agency Language Access Policy and Goals

The DCP and the CPC place great importance on helping New Yorkers understand and participate in the City's planning process. The DCP's Language Access Plan seeks to further these goals by affording LEP New Yorkers improved access to DCP/CPC resources, and consistently providing improved access to opportunities to meaningfully participate in the land use review process. What follows is a summary of the DCP's overall goals for this Language Access Plan.

A. Access to Technical Assistance and Other Important Planning Information

Through frontline locations, public correspondence, and online and published materials the DCP seeks to make zoning and land use information available and intelligible to all New Yorkers, including, via the proposals described in this LAP, all LEP New Yorkers, and to provide consistent guidelines, training, and resources to DCP staff to ensure their ability to interact with LEP New Yorkers seeking assistance.

B. Public Participation in the Land Use Review Process, Including Applying for Land Use Actions

All members of the public should have the ability to participate in deliberations on land use issues affecting their neighborhoods and the City, generally. In order to effectively participate in a public hearing, the public must have access to written information regarding the applications and proposal affecting their neighborhood, advance notice of public hearings and review sessions, and the ability to give testimony to the CPC. This plan seeks to ensure that LEP New Yorkers have meaningful access to and can effectively participate in the land use review process. Given the COVID pandemic much of the space for participation has moved from community-based meetings/hearings or CPC meetings/hearings to on-line forums, and it is the DCP's goal as well as responsibility to ensure that all New Yorkers, including LEP New Yorkers, have as much of an opportunity to be heard on land use matters proposals and applications as prior to the pandemic.

All members of the public should also have the ability to make applications for land use actions so that they can use their land as they see fit within the confines of the land use law, rules and regulations of the City. It is the DCP's goal to ensure that such applications can be made more easily for LEP New Yorkers, with the caveat that nearly all land use applications are processed by service providers (e.g., attorneys, architects, environmental consultants) who are fluent in English.

The DCP has appointed Dominick Answini, who also holds the position of Associate Counsel, the Language Access Coordinator and he will be responsible for ensuring the DCP's implementation and ongoing compliance with this Plan. The DCP has also appointed him the Language Bank Liaison so that he will be responsible for the maintenance of a list of DCP employees with sufficient language skills to serve as translators for LEP New Yorkers ("Volunteer Language

Bank"). The Language Access Coordinator, working with the other agency divisions as appropriate, will work toward the continued operation and, as applicable, timely completion of each portion of this plan as outlined in *Section IX* as he has worked towards fulfilling the goals and responsibilities of the previous language access plan from 2018. As specified in *Section XII*, the Language Access Coordinator will be responsible for monitoring and overseeing the effectiveness of the DCP's policies towards meeting the City's needs.

On an annual basis, the Language Access Coordinator will report to the Executive Director of the DCP regarding the sufficiency and appropriateness of language services to ensure that the above goals are satisfied, as well as all of the complaints, responses, and outcomes of such responses and include this information in the annual report to the Executive Director noted in *Section III*.

IV. Agency Language Access Accomplishments and Progress on Goals from previous Language Access Plan

The DCP first drafted a Language Access Plan in 2009 in response to the Mayor's Executive Order No. 120 of July 22, 2008 and it was updated in 2018 as a response to Local Law 30 of 2017. The following explains the progress the DCP has made since 2018.

Starting in 2018, after the Language Access Plan was drafted and approved by the Mayor's Office of Immigrant Affairs, the DCP began to improve their accessibility to language access services.

1. Reconstituting of the Volunteer Language Bank:

The Volunteer Language Bank was in existence long before 2018 but the list of volunteers had not been updated for several years. A new initiative reconfirmed existing volunteers and brought in new volunteers, most of whom were planners. The number of volunteers and languages spoken were increased to the point where in early 2021 the Bank could boast of 25 volunteers speaking 11 languages. The volunteers have frequently been utilized not only as interpreters but also as translators of materials and proofers of professionally produced translations.

2. Improved signage:

There was essentially no multilingual signage at the DCP headquarters at 120 Broadway nor at the five borough offices or at the CPC hearing room in the Lower Concourse of 120 Broadway prior to 2018. The signage was immediately increased and by 2019 each location had wayfaring signage in each of the Top 10 Designated Citywide Languages, a supply of "I speak" cards available for LEP New Yorkers to express the language in which they were proficient, as well as signage expressing that translation was available in over 20 languages (via Language Line©)) and such services would be provided free of charge. In the hearing room of the CPC, cards which were to be filled out in order to testify at a hearing were also created in each of the Top 10 Designated Citywide Languages.

3. Website:

The language access information on the website was sparse in 2018. That year and into 2019 the Language Access Coordinator drafted summaries on such topic as: "When and why was zoning created?", "How is Zoning enforced?", "How is zoning amended?" As well as more practical information such as "How one can testify before the CPC?" and "How to make a land use application?". These summaries were drafted in plain English and then were translated by Geneva Worldwide, Inc ("Geneva") (and proofed by the Language Bank Volunteers) into each of the Top 10 Designated Citywide Languages. They were posted on a page of the DCP website entitled: "Language Access". This Language Access section also provided and continues to provide information regarding how one could make complaints about the provision of language

access services as well as a link to the Language Access Plan and demographic information about LEP New Yorkers. When the COVID pandemic occurred information about the suspension of the land use review procedure and its recommencement in September of 2020 was also translated by Geneva (and proofed by Language Bank Volunteers) and the links to such information were posted on the first page of the DCP website.

4. Training:

Staring in 2018 the Language Access Coordinator provided training classes for the frontline Divisions of the DCP (each borough office, Environmental Assessment and Review, the Zoning Help Desk) and has also provided training to new hires. The training consists of an explanation of Local Law 30, The Language Access Plan goals, the resources available and how they are to be provided, and record keeping. Over the course of this year (2021) the Language Access Coordinator shall determine, with the Senior Practices Manager, which staff has yet to be trained so that they can be trained before the end of the year. As the frontline employees were trained in late 2018 and new hires were trained since 2019 there are likely few that need to be trained. There is currently a training session scheduled for new hires on June 15, 2021. One for current employees who were never trained will be scheduled this summer.

5. Provision of services in the last three years:

In the last three years language access services have been provided by each of the five borough offices and our Land Use Review division.

Over 50 separate summaries that were eventually posted on the DCP website (which were summaries [described in *Section IV.1*, above]) were translated by Geneva over the last three years. DCP Volunteers also translated materials related to applications, such as proposal summaries or translations of environmental studies, 22 times in the last three years, in the languages of Spanish, Korean, Mandarin, and Cantonese, for such proposals as the Gowanus Neighborhood Study (Brooklyn), Industry City Rezoning (Brooklyn), 215 Moore Street Rezoning (Brooklyn), the Southern Boulevard Neighborhood Study (Bronx), the Flushing Waterfront Rezoning (Brooklyn), the Soho/Noho Rezoning (Manhattan) and the Southern Boulevard Rezoning (Bronx). DCP volunteers also served as interpreters 9 times for public meetings (including for the Southern Boulevard Rezoning, Metro-North Neighborhood Study (Bronx), the Soho/Noho Rezoning) and walk-ins to the borough offices in the languages of Spanish, Korean, Mandarin, Cantonese and Urdu.

The DCP has been endeavoring to accomplish the set goals from the 2018 LAP for the last three years. To summarize our progress:

Goal	Update
Updating of the Volunteer Language Bank	accomplished

Free Telephonic translation at frontline	accomplished
locations	
Signage for Frontline locations in Top 10	accomplished
Designated Citywide Languages	
Automated translation of DCP webpages	partially accomplished
Update the Language Services Webpage	accomplished
on the DCP Website	
Continue to allow Non-English Language	accomplished
Testimony at All Public Hearings including	
additional time to testify for LEP New	
Yorkers	
Update the Emergency Response	accomplished
(Continuity of Operations Plan)	

V. LEP Population Assessment

Language access requirements for each service area are evaluated according to a needs assessment that balances: (i) the number or proportion of LEP New Yorkers in the eligible service population; (ii) the frequency with which LEP New Yorkers come into contact with the DCP; (iii) the importance of the benefit, service, information, or encounter to the LEP New Yorkers; and (iv) the resources available to the DCP and the costs of providing various types of language services. The following assessment addresses the four-factor analysis on a service-by-service basis.

As of 2018, according to the American Community Survey One Year Estimates, approximately 48% of New Yorkers spoke a language other than English at home and approximately 22% (nearly 1.8 million) of New Yorkers spoke English "less than very well". Surveys of DCP employees find that very few applicants and essentially no representatives of applicants speak English less than well (indicating a very low number of LEPs in the that service population). Surveys indicate that other aspects of services performed by DCP, including managing CPC hearings and giving generally advice on the topics of zoning and land use, as they are available to all New Yorkers, result in a higher number of interactions with LEPs. As all New Yorkers can avail themselves of these services (indeed, all New Yorkers should know that they have a stake in and can petition the CPC on land use matters) we consider the service population to be all New Yorkers.

A. Technical Assistance Areas

1. The number or proportion of LEP New Yorkers in the eligible service population

Technical assistance (e.g., aid provided to help understand the land use process, the Zoning Resolution, and other aspects of land use law and policy) is available to all members of the New York City public, and the service population is drawn from the full City population, containing nearly 1.8 million LEP New Yorkers. DCP acknowledges that children would probably not be accessing technical assistance but they might and without counting them the number would still be over 1.0 million.

2. The frequency with which LEP New Yorkers come into contact with the DCP

In interviews with the DCP technical staff, little direct contact with LEP New Yorkers was reported. This is not surprising as many of the persons who would be using technical DCP services would hire representatives to navigate the land use process.

3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:

The DCP places great importance on helping New Yorkers understand and participate in the City's planning process. The Language Access Plan seeks to further these goals by affording LEP

New Yorkers improved access to DCP services, including those of the dissemination of information about land use in the City and help in comprehending the aspects of land use law, procedure and policy. The rules and policy considerations that determine land use in New York City is complicated, especially to those not well-versed in the field. However, land use rules and policy can affect not only landowners in the City but anyone as all New Yorkers, by definition, live in the City and are impacted by land use law, procedure and policy. It would be a major loss for the LEP New Yorkers if technical assistance were not available to help them understand these matters.

4. The resources available to the DCP and the costs of providing various types of language services.

The DCP's current practice is to use the existing Volunteer Language Bank composed of bilingual staff to translate relatively simple materials as needed and to interpret and answer questions by LEP New Yorkers on an informal basis as well as bilingual staff who, while perhaps have not volunteered for the Bank, nevertheless, especially given their knowledge of the complexities of land use, make excellent interpreters for this service. The use of the Bank and other *ad hoc* volunteers has been very effective over the last three years (since the formalization of the Language Bank in 2018) and the perception of DCP staff who were interviewed is that the current availability of bilingual speakers, particularly in Spanish and Mandarin, is generally sufficient to meet the need.

If special circumstances arise, where, for example, a LEP New Yorker needs help interpreting an aspect of the Zoning Resolution, the DCP has the resources, provided by companies for which the DCP contracts (more on this later in the LAP) to provide interpretation services for the LEP New Yorker as well as translation of DCP forms, in the Top 10 Designated Citywide Languages as well as, on an *ad hoc* basis, other languages not included in the list of Designated Citywide Languages. DCP has access to LanguageLine and Geneva, companies which can interpret or translate beyond the Top 10 Designated Citywide Languages and while recent experience has shown that generally DCP staff is sufficient for helping LEP New Yorkers with interpretation or translation, DCP employees have been trained on the quick access and use of LanguageLine or to work in the Language Access Coordinator to have materials translated by Geneva.

B. Land Use Review Process

1. The number or proportion of LEP New Yorkers in the eligible service population:

Given that applications are subject to review by the general public, similar to the Technical Assistance Areas (see above), the service population participating in the review process is drawn from all persons in the City as land use decisions via the land use review process affect the neighborhoods where New Yorkers live, work and play. There can be no analysis of an individual's quality of life without this consideration. And this does not even consider the right of all New Yorkers to be heard at community board hearings/meeting and CPC hearings/meetings and the rights of New Yorkers to be provided the best quality information

regarding land use issues. Therefore, it is DCP's position that all New Yorkers must be included in the service population (while acknowledging that children would probably not be involved in the land use review process but they might and without counting them the number would still be over 1.0 million).

All New Yorkers, including LEP New Yorkers, also may bring land use actions before the CPC to use their land in some way that is not as-of-right. The language access services should also ensure that these LEP landowners can also avail themselves of the land use process for this purpose.

2. The frequency with which LEP New Yorkers come into contact with the DCP:

While interviews with staff do not indicate a historically high level of LEP participation in CPC public hearings, the likelihood of participation by LEP New Yorkers has been greatly increased when property subject to an application is located in a community district with a high percentage of LEP New Yorkers, and there is a high level of publicity or perceived impact by members of the community. Staff reports that LEP New Yorkers wishing to testify at past public hearings have generally provided their own interpreters, or submitted written testimony. If a land use matter is located in an area of the city where there are many LEP New Yorkers, DCP may require the applicant (if it is a private application) to provide translation and interpretation services for outreach meetings in the community or for CPC hearings. If the applicant is DCP or another City agency DCP would help arrange, provide or pay for the translation or interpretation services.

Regarding LEP New Yorkers bringing land use applications before the CPC, it has been the DCP's experience that all of the land use applications brough before the CPC are administered by hired representatives who can navigate the land use process in English.

3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:

The CPC places great importance on receiving input, either in oral or written testimony, from members of the public in the land use deliberations affecting their neighborhoods. Consistent with these goals, the DCP seeks to ensure that all members of the public have access to and the means with which to provide testimony at CPC public hearings, whether that participation is inperson or remotely, as has been required during the COVID-19 pandemic. If a segment of the service population, specifically LEP New Yorkers, were not able to communicate effectively with the DCP to express their opinions on land use matters, an important factor in the consideration in the decisions of the CPC would be lost, not to mention that the LEP New Yorkers would have lost their voice to influence decisions made by the DCP and CPC regarding land use in their neighborhoods and indeed for the whole of the City.

4. The resources available to the DCP and the costs of providing various types of language services:

The DCP has historically relied on community boards, City Council members, local civic groups and the press to disseminate information to non-English speaking communities regarding important applications, and in a few instances has translated materials and provided interpretation services. As noted above in Paragraph 2, often the DCP requires private developers to provide interpretation and translation services for community outreach. Based on current DCP contracts with Geneva, providing on-site interpretation services at public hearings, be they CPC hearings or community outreach meetings implemented by DCP staff (common for DCP-initiated land use proposals), is estimated to cost approximately \$100 per hour per language provided, based on the length of hearing and the language requested. Because any member of the public may choose to participate in a hearing without advance notice, it is difficult to gauge the demand for such services in advance of a hearing. For translating written testimony, the cost is approximately 20 cents a word.

Accordingly, the Service Provision Plan (see Section VI) provides a framework for analyzing applications on a case-by-case basis to anticipate the demand and volume of appropriate LEP services. (See Section VI).

If special circumstances arise, where, for example, a DCP-initiative in a neighborhood where many speakers of certain languages reside, the DCP has the resources to provide translation services for the community with regard to any DCP-presentations to the community or to receive inquiries from residents.

C. Agency Press Communications:

1. The number or proportion of LEP New Yorkers in the eligible service population:

Media communication is available to all members of the public, and the service population is drawn from the full city population, containing some 1.8 million LEP New Yorkers, although DCP acknowledges that children would probably not be the target audience for DCP press communications, but they might and without counting them the number would still be over 1.0 million.

2. The frequency with which LEP New Yorkers come into contact with the DCP:

The DCP Press Office reports that non-English language media outlets regularly communicate with the Press Office in English (although non-English materials from community groups may be included in the communications), and that English language press releases do not limit access by, or dissemination to, the non-English language media. The Press Office, working with the Borough Offices, determines the demographic makeup of the area affected by the project and shapes DCP's communications to reach LEP New Yorkers in pertinent languages in the affected area.

3. The importance of the benefit, service, information, or encounter to the LEP New Yorkers:

The DCP recognizes the importance of communication with the public, especially with regard to proposals (whether DCP-initiated or initiated by another agency or a private entity) that would directly affect neighborhoods' quality of life. Consistent with this, the DCP seeks to ensure that all LEP New Yorkers have access to the information, whether from DCP-communications or from other sources of information, that would allow LEP New Yorkers to understand what is being proposed for sites in their neighborhood, in their borough or in the City generally. If LEP New Yorkers did not have access to the information that is published by the DCP, especially on matters of land use affecting their neighborhoods, a major function of the DCP, to inform and give notice of land use actions and proposals, would not be effective for a large portion of the NYC community. That community, the LEP New Yorkers, would need to find other methods of discovering information and data expressed by the DCP which would put them at a disadvantage to understanding where when and how upcoming land use actions would occur.

The resources available to the DCP and the costs of providing various types of language services.

The DCP has historically engaged local and city-wide press outlets, some of which publish in the Top 10 Designated Citywide Languages but accept information from the DCP in English, to disseminate information to communities with a high-proportion of LEP New Yorkers. The Press Office has access to DCP Volunteers for translations of press releases before they are released.

VI. Provision of Language Access Services

The DCP employs policies to ensure that staff at frontline service centers consistently assists LEP New Yorkers by ensuring availability of interpreters, training of frontline staff, and adequate signage.

A. Interpretation Services:

- 1. The basic resource for interpretation is existing DCP staff. Staff is trained (including those who only speak English) to recognize an LEP New Yorker and to use non-verbal cues (such as signage and "I speak" cards") to determine which language is needed as well as where to get interpretation help (i.e., LanguageLine (see below) or Volunteer Language Bank) Staff at DCP is often bi- or tri- lingual and each office is staffed by planners who can help at a moment's notice, especially in the more common languages spoked in their office catchment areas (e.g., the Bronx for the Bronx Office, etc.). However, this is only a quick fix and while it is often enough for certain technical or even land use services, it is generally inadequate for the many languages spoken by LEP New Yorkers.
- A further way the DCP provides language access services is via the agency "Volunteer Language Bank". The Bank is a list of volunteer staff who have generally been vetted and trained by the Language Access Coordinator to ensure that there is a supply of qualified translators and interpreters who also a very familiar with the knowledge base of the agency. Although the Volunteers are not specifically trained as translators or interpreters, they are generally able to navigate the intricacies of land use rules and policy as well as the procedure of the public review land use process better than a professional translator unfamiliar with the field. Also useful is that many of the Volunteers who have emigrated to the United States have studied planning in their countries of origin and so have that language's vocabulary of planning at their disposal to help with interpretation and translation. The DCP does not determine whether a Volunteer is qualified to translate or interpret in a particular language nor are there instances where the Volunteer is prohibited from translating. We have not had any complaints about the provision of services provided by Volunteers in the last three years. If a DCP volunteer is inadequate, for example if the LEP New Yorker is having trouble communicating with the volunteer, DCP has alternative means or providing services (see next paragraph).
- 3. A secondary resource contract ("LanguageLine©") has been established with the city's Department of Information Technology and Telecommunications ("DoITT") providing interpretation via telephone when the DCP staff is unavailable or there is no staff member who can translate the needed language. This contract's resource allocation is regularly monitored and reevaluated based on demand for service. The contract provides that the DCP will be able to provide via LanguageLine interpretation in at least 100 languages, both common and esoteric. The wide scope

of LanguageLine's list of languages can help when the Language Bank Volunteers do not know the required languages (although that rarely happens). Requests to use LanguageLine do not need to go through the Language Access Coordinator as often the need for such services are immediate.

B. Translation Services

For written correspondence, and in-person translation for example, translation for spoken testimony at a public hearing, the DCP contracts with Geneva. Before staff can use Geneva the Language Access Coordinator and the Procurement Department must be consulted to determine if the use of Geneva is appropriate and also to understand and consider the cost of the services provided. An important step taking when translating materials by Geneva is quality control by DCP staff. As noted above the technical aspects of land use law, zoning and land use review procedure are complicated and DCP's staff's skills in the field allow them to ensure that the Geneva-translated materials explain the planning aspects correctly.

C. Language Access in Agency Communications

Section V.C. expresses how the DCP Press Office provides agency communications. Other communications, for example, materials produced for CPC meetings as well as community meetings, are generally translated on an ad hoc basis (depending on the languages needed for the specific service population for a project¹. As it is DCP's charge to understand communities, before communications are expressed, we determine with the local DCP planner which languages are needed and translate, generally with Geneva, accordingly. The planner can look to materials produced or organized by DCP's Population Division that can give insight as to the language demographics in certain areas.

In accordance with the Mayor's Office, citywide policy and protocol, the DCP will continue to provide automated translation of all website material, through a third-party translation tool (e.g., "Google Translate"). However, as Google no longer supports this tool, and is available only to older sites (e.g., the main DCP website but not the new ZAP website), it may stop working at some point. Fortunately, the major browsers (such as Chrome, Safari and Edge) all have an automatic translation tool. This function significantly enhances access to reference information regarding the work of the agency, basic zoning concepts, regulations, and the public review processes. Given how much more effective the DCP has become in the last five years of providing information via web-access tools (see above) translation of the website is important. However, DCP has translated important portions of the website and located this information in a section of the website entitled "Language Access".

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¹ For example, if a rezoning is to occur is an area of the city where there is a large number of Spanish and Cantonese speakers, DCP will have translated hand outs explaining the proposal and how to testify at CPC or community hearings. If it would be a private application, DCP requires the private applicant to provide, at their cost (but proofed by DCP staff) materials explaining the proposal in the required languages.

The Language Access portion of the DCP website is dedicated to non-English language material where the DCP has drafted basic summaries about the agency, including the services provided as well as a summary of zoning and land use procedure in New York City which is translated into the Top 10 Designated Citywide languages. These materials were translated by Geneva and then proofed, to the extent that our Language Bank had the resources (i.e., a volunteer who could translate the language) to ensure accuracy not only to the language fidelity of the translation but also to the accuracy of the translation from a planning standpoint. The materials can be found here on the Language Access portion of the website:

http://www1.nyc.gov/site/planning/about/language-access.page

In the last calendar year, the DCP has also created translations of information regarding how the land use process has been halted and later resumed remotely as a result of the COVID-19 pandemic. This information has been translated into the Top 10 Designated Citywide Languages and has been modified as needed as the pandemic has proceeded.

D. Plain Language

Materials that are created for the DCP website or for use in CPC hearings or community hearings, as well as materials created by the press office, are generally provided according to plain language principles as identified by the Mayor's Office. Before the materials are translated the English versions are reviewed by the Language Access Coordinator or the press office (if specifically for agency press communications) to determine if they are easily understandable and use a minimum of technical words and phrases. This can be difficult as often aspects of zoning and land use regulation are quite technical, but we recognize that a correct translation that is nevertheless too difficult to understand is not a good provision of services. The translated materials are then generally reviewed, to the extent that our Language Bank has the resources, to ensure that there is fidelity between the original plain language English version and the translated version.

E. Policies and Procedures for Helping to be More Welcoming, Signage and Languages Beyond the Top 10 Designated Citywide Languages

The borough offices as well as the main DCP office at 120 Broadway and the CPC hearing room has been outfitted with new directional and welcome signage in the top ten "designated citywide languages" as defined by the Mayor's Office in 2017 (which are Spanish, Chinese (including Traditional and Simplified), Russian, Bengali, Haitian Creole, Korean, Arabic, Urdu, French, & Polish), and DCP staff in these locations shall have Mayor's Office of Operations "I Speak" language identification cards available to inquiring LEP New Yorkers to assist in language identification. Training provided to frontline staff ensures that upon greeting visitors, staff can assist in identifying LEP New Yorkers using the Mayor's Office of Operations identification posters, and can identify the appropriate interpretation resource. DCP also at each of the offices has signage explaining that if an LEP New Yorker needs interpretation services that those services would be provided free of charge. The DCP has implemented these policies to provide

access in top ten designated citywide languages defined by the Mayor's Office in 2017. Regarding languages beyond the Top 10 Designated Citywide languages, at least over the last three years there as been very little demand for services in those languages. However, DCP has capabilities, pursuant to our contracts with Language Line and Geneva, to provide for services if need be as our resources allow. Recently (early 2021) for a public (remote) meeting on the Soho/Noho rezoning, which is a DCP-led initiative, DCP was able to hire Geneva to provide a Cantonese interpreter even though Cantonese is not one of the Top 10 languages, evidencing that when needed DCP can respond to needs beyond the most widespread non-English languages.

F. Land Use Review Process and the Public's Participation

General policies as noted earlier in *Section V.B* have been implemented to improve access to application information and public hearing notices, and to facilitate the submission of non-English language testimony. Given the high cost and widely varying need for language services during the public review process, the DCP Executive Director determines, on a case-by-case basis, whether and to what extent additional measures should be taken to ensure access. Such determinations will be made in consultation with the DCP borough office director and through consideration of the following factors: (i) the percentage of LEP New Yorkers in the affected community district; (ii) whether the application will have impacts on the community generally or a limited number of properties; (iii) the interest demonstrated by LEP New Yorkers, their community groups, and the non-English language press; and (iv) the cost of supplemental services.

General policies to be implemented are described below, followed by additional measures which are recommended for instances which are deemed to warrant additional measures to ensure access.

1. Information Regarding Current Applications to Come Before the CPC

Application information may be obtained from a variety of sources including: official application files, docket language from the CPC calendar (a brief expression of the propped land use proposal), CPC Reports, oral presentations (by DCP staff or applicants and their representatives) at CPC review sessions and public hearings, community board meetings, presentations and summaries. Nearly all of these materials (including during the COVID-19 pandemic the oral presentation in real time) are available on the DCP and community boards' websites.

- For all applications, automated translation of most of the website makes application information more widely accessible, particularly for DCP-initiated applications for which a significant amount of plain language description is provided.
- For DCP initiated applications (e.g., for a rezoning of an area of the City) which warrant
 additional measures to ensure access by LEP New Yorkers, additional project
 information may be professionally translated (and proofed by Language Bank

Volunteers to the extent feasible) and made available on the DCP website or distributed at an in-person community meeting.

2. Notice of Public Hearings

- Automated translation of the website makes public hearing schedules able to be found by LEP New Yorkers.
- For applications deemed to warrant additional measures to ensure access by LEP New Yorkers, professionally translated notice (which has been proofed by DCP Volunteers to the extent feasible) would be posted on the website and disseminated through interested community boards.

3. Testimony at Public Hearings

- For all applications, the CPC accepts testimony from LEP New Yorkers in the Top 10 Designated Citywide Languages defined by the Mayor's Office. If requested the DCP can arrange to have an interpreter available and will allow for additional time to testify if simultaneous interpretation is being used. Non-English written testimony or non-simultaneous oral testimony in a language that is not English (which will be transcribed from the CPC video recording), would be translated professionally by Geneva, and provided to the CPC members for consideration to ensure that the testimony is clearly transmitted to and understood by the CPC members.
- Directional signage at public hearing venues has been posted in the Top 10 Designated
 Citywide Languages, and instructional information has been made available in these ten
 languages for LEP New Yorkers wishing to testify. Generally, all CPC public hearings,
 when the public hearings are not remote as during the COVID-19 pandemic, occur at
 120 Broadway where the requisite directional signage has been posted.
- For applications which are anticipated to elicit testimony from a large number of LEP New Yorkers, on-site interpreters may be retained by the DCP. If the proposal is expected to elicit testimony in specific languages the DCP can provide interpreters for those languages in anticipation of their need, but for more esoteric languages the DCP will need to be informed, ideally two weeks in advance, to have interpreters available. It may not be cost-effective to have interpreters (especially from a private company) to be on call for the entire hearing but the Executive Director will make that determination on a case-by-case basis. If the application is a private application the DCP will likely require the applicant to pay for the interpretation or translation, as needed.

4. Land Use Applications Made by LEP New Yorkers

Interviews with Land Use Review Division staff indicate that there are essentially no applications made where the applicant or applicant's representative require translation

services. Applications brought before the CPC are generally managed by representatives who are all fluent in English. There is no plan to create land use forms in the Top 10 Designated Citywide Languages but if required by specific circumstances DCP's Executive Director can direct Geneva to translate land use application forms into the required language.

G. Licenses permits and Registrations

Although the DCP and the CPC analyze land use applications the agency does not issue licenses or permits. An approved action by the CPC is generally referred to the City Council for further review or, in the specific instance of applications which can be approved by the CPC Chair or the CPC without further City Council approved, the approvals are forwarded to the Department of Buildings who would then issue any permits based on those approvals as per the requirements of the Zoning Resolution or other New York City land use rules and regulations.

H. Emergency Preparedness and Response

While DCP is not an agency that has an immediate vital role in an emergency (such as the FDNY or NYPD) we are called on to provide geographic information for the City to aid agencies in responding to emergencies. That is not the kind of emergency response that would likely require the provision of language access services as the DCP communications to fellow agencies are always expressed in English. The DCP also is not specifically involved in the distribution of vaccinees or other materials to help combat the COVID-19 pandemic. However, the DCP must be capable of immediately expressing to our service populations when our services will be interrupted or modified in any way due to an emergency.

In the event of an emergency DCP is able to respond via its emergency preparedness and response plan (the "Continuity of Operations Plan" or "COOP"). The COOP includes a provision for the Information and Technology Division and the Human Capital Division to update the agency voicemail and website and these updates will be made in each of the Top 10 Designated Citywide languages by the either Geneva or Language Line or DCP Volunteers. The DCP also has a contract with a marketing firm that can post our multilingual messages in ethnic media sources. We would not use graphics as the information is relatively simple. In the event that the service providers cannot provide translation of messages quickly enough for posting or expression in the media then the Language Access Coordinator will call on the Volunteer Language Bank for in-house translations (which, given the simplicity of potential messages, should be more than adequate for the required task). The DCP Emergency Response Liaison (Yvonne Williams) works with the Language Access Coordinator to ensure that translations of DCP communications can be translated by the service providers as soon as is practicable. (see Section IX).

VII. Training

Certain divisions (those who tend to work more closely with the public such as borough planners, often referred to in this Plan as "frontline") of the DCP staff have been trained by the Language Access Coordinator in the resources available for language access and how to administer such services. New staff, as part of their orientation are similarly trained on a rolling basis (i.e., every few months when the DCP holds general orientation). Staff is generally educated on topics such as the rationale for language access, the agency's polices procedures and resources as well as identifying and providing language access services for LEP New Yorkers. The DCP may in the future modify its methods and procedures of training DCP staff. The COVID-19 pandemic has caused a slowdown of training of front-line workers although 11 new hires were trained in the early spring.

VIII. Record Keeping and Evaluation

A. Record Keeping

1. Frontline Interpretation

For all interpretation services by DCP volunteers, staff has been told to log the encounter via email to the Language Access Coordinator. The log will include the date, time, duration and nature of the encounter, the language used, and any other relevant comments. All divisions in the DCP who employ language access services will be asked on an annual basis if there had been any issues or complaints with the provision of services. In this way the Language Access Coordinator can monitor the efficacy of the plan and whether such services are performing their assigned job adequately. The DCP will especially examine language access in light of DCP initiated proposals, where the onus is more on the City versus a private applicant to ensure that the public, including LEP New Yorkers, understand the land use proposal and the issues involved with such proposal.

For all interpretation provided using LanguageLine or Geneva interpreters, the DCP relies on reports from the DCP Procurement division to monitor usage.

On an annual basis, or if a significant increase in usage is noted, the Language Access Coordinator will consult with Procurement Division and the Budgeting Office to reevaluate allocated resources.

2. Online Documents

On an annual basis, ITD will report the number of page views in the LEP portion of the DCP website and which languages are accessed.

3. LEP Testimony

The Land Use Review Division will track LEP testimony and report annually to the Language Access Coordinator. In addition, DCP borough staff will be advised to monitor and convey any possible LEP interest in DCP-projects to the Land Use Review Division in anticipation of CPC Public Hearings.

4. Overall Assessment

On an annual basis, the Language Access Coordinator evaluates the above data, reach out to frontline and Land Use Review Division staff for feedback, and report to the Executive Director regarding the sufficiency and appropriateness of language services in light of the requirements of Local Law 30. Every three years this Plan and the Language Services will be updated as need be based on changes to the agency's service population or services.

IX. Resource Analysis and Planning

As explained in Section VI, the DCP has many available resources with which the agency is able to fulfil its goals and policies regarding language access. In the current DCP budget for the fiscal year 2021 (as well as for 2022) allocates \$38,628 each year to language access. It is anticipated that the amount spent on language access will not increase as a percentage of the DCP budget and in an absolute sense the amount spent on language access services will probably be influenced by the City's budget allotment for DCP and CPC.

A. Language Bank

Given the education and varied backgrounds of DCP staff the DCP has been able to compose a Volunteer Language Bank to assist in translation services. A form for self-identification allows volunteers to assess their expertise and comfort level in participating in each of the following LEP services:

- in-person/telephonically interpretation for frontline service operators;
- providing translation and quality assurance for professional translation of technical assistance public documents and public hearing notifications and other material antecedent to public hearings;
- providing on-site (or, for as long as public hearing continue to the remote as result of the COVID-19 pandemic) interpretation at public hearings and/or providing interpretation of testimony at public hearings.

Requests are made to the volunteers on an as-needed basis, with copies of the request sent to the Language Bank Coordinator for record keeping. In calendar 2020 language bank volunteer were used frequently to proof materials added to the website for disclosure about the DCP's response to the COVID-19 pandemic, but otherwise the Bank was used an estimated 6 times for translation and interpretation services.

B. Telephonic and Document Translation

The DCP's contract with LanguageLine will continue to be used generally by the frontline desks (each borough office's main line, Zoning Help Desk, Central Intake), and accessible to all DCP employees with public contact positions. Staff has been and will be instructed to use LanguageLine services only in cases where DCP language volunteers are not readily available.

The DCP will also maintain preliminary translation services through LanguageLine for essential documents and non-English language correspondence.

C. Signage for Frontline Locations

Signage approved by the Mayor's Office will be implemented where it is not already implemented for all frontline locations to ensure that service locations are accessible, and that

LEP New Yorkers and frontline staff are able to identify the need for language services and that such services can be provided free of charge. As noted in *Section VI* the signage will include directional signage at public hearing venues in the Top 10 Designated Citywide Languages including instructional information in these ten languages to help LEP New Yorkers who wish to testify at CPC public hearings.

D. Automated Translation of DCP and CPC Websites

The DCP website currently employs Google Translate to translate nearly all text on each page of the website. As standards are made available by Mayor's Office and DoITT, DCP's ITD has and will continue to implement standards for automated translation of web materials.

E. Language Services Webpage on the DCP Website

As noted previously, the DCP Language Access Coordinator drafted, revised and submitted for professional translation in the Top 10 Designated Citywide Languages materials that explain:

- 1. Basic information about land use review process
- 2. Basic Information about Zoning
- 3. Instructions on how to give non-English language testimony (following implementation of Supplemental LEP Services, as described below)
- 4. Fact Sheet of available Language Services
- An explanation of the agency's response to the COVID-19 pandemic and how the pandemic has affected and continues to affect the land use review process and how COVID-19 has changed how the public can testify at public hearings.

Prior to posting, Language Bank volunteers provided quality review of documents translated into the Top 10 Designated Citywide Languages to the extent of their capacity to do so to improve the readability and comprehensibility of the materials. The Language Access Coordinator also ensured, via his careful review, that the underlying English version which the translations were based upon meets the principles of plan language.

The number of page views in this section has been and will continue to be tracked and used to determine whether the cost of translation of additional materials is warranted.

F. Non-English Language Testimony at All Public Hearings

For all public hearings, including those remote hearings during the COVID pandemic, testimony from LEP New Yorkers in languages that are not English currently is and will continue to be accepted by the CPC, and additional time will be allowed for the simultaneous interpretations of such testimony before the CPC.

When testifying at a public hearing at 120 Broadway, or expressing that they want to heard at a remote hearing, speakers will continue to be asked to indicate whether they are a LEP New

Yorker requesting assistance providing testimony in a non-English language. If so, the DCP will use its Language Bank to attempt to identify an available interpreter. If none are readily available, testimony will be recorded, and then transcribed and translated by Geneva for distribution to the CPC. Because transcription and translation is relatively expensive, the DCP will continue to include a proviso on its website encouraging LEP New Yorkers to provide "advance notice of a request for interpretation services at an upcoming hearing", so that appropriate interpretive services can be identified but if simultaneous translation of testimony is requested and a Language Bank Volunteer is not available the DCP has a contract with Geneva for the live translation of this testimony if needed.

G. Supplemental LEP Services

For applications where additional measures are deemed necessary by the Executive Director to ensure access (see *Section VI.D*), the following actions may be taken:

- 1. For certain applications/projects, based on a needs assessment, basic plain language information regarding the application/project may be posted on the DCP website, with professional translation provided in languages most appropriate for the affected community district(s), as determined by the Executive Director (See Section VI). Language Bank Volunteers, if available in the necessary languages, will be asked to provide quality assurance of documents prior to posting. If such application/project is a private application the DCP will require the applicant to provide such translated materials with DCP employing the Language Bank Volunteers to proof the resulting translation prior to distribution.
- 2. To supplement the legally required notice of hearings, notice will be translated into those languages deemed appropriate, posted on the website, and circulated to affected community boards
- 3. Where significant numbers of LEP New Yorkers are expected to provide testimony, the DCP may seek to provide interpretation by utilizing the Language Bank, Community Boards, or retaining professional interpreters (such as Geneva). On occasion, volunteer civic groups may continue to provide interpretation services.

X. Outreach and Public Awareness of Language Access Services

The DCP, mostly through borough staff, will continue to reach out through local community boards to promote the existence of the available Language Access Resources. This outreach had been done when the previous plan was implemented three years ago but recently the COVID-19 pandemic has made this more difficult as DCP borough liaisons no longer attend in-person community board hearings where they may speak to inform the boards of such services. The plan is to try other methods of outreach so that the public knows of what services are available and for the borough liaisons to reengage with the community board even if it is remotely.

This Plan shall be updated on the DCP website in its own section of the DCP website (Language Access) and access to that portion of the website is easily found. The information provided on the website regarding the DCP's response to the COVID-19 pandemic has been translated into the Top 10 Designated Citywide Languages and is available at the top of the opening page of the website.

XI. Language Access Complaints

The Language Access Coordinator is able to receive complaints and respond to them and members of the public can contact him at the address noted on page [] (Appendix A). His email and phone number are prominently displayed at the bottom of the Language Access Page of the DCP website with this statement:

If you have any questions or would like to deliver a compliant at any time, please contact DCP's Language Access Coordinator Dominick Answini, Assistant Counsel, at (212) 720-3676, danswin@planning.nyc.gov or dial 311.

Additionally, any complaints with regards to language access or the Languages Access Plan that are received via the 311 system (including TTY 212-504-4115, 311ONLINE, or 311MOBILE) that would normally be forwarded to the DCP Executive Office in the normal course of business will be forwarded by DoITT to the Language Access Coordinator. Finally, any language access complaints that are received by DCP-front line staff (such as borough planners or Land Use Review Division planners) will be forwarded directly to the Language Access Coordinator.

The Language Access Coordinator shall respond to all complaints within 14 days of the DCP receiving the complaint and copy the Executive Office and the frontline planner (if applicable) on the response to the complaint.

XII. Implementation Plan Logistics

The Language Access Plan has been implemented and coordinated over the last three years by Language Access Coordinator, Dominick Answini of the DCP's Counsel's Office. The Plan shall be updated every three years and posted on the DCP website on the Language Services Webpage.

A. Improving the Language Bank

The DCP Language Bank Liaison updated the DCP's volunteer Language Bank in late 2018 and since then has endeavored to increase the number of volunteers, languages spoken, and the scope of their responsibilities Currently the Bank has 25 volunteers who can speak a total of 11, languages and 5 of the Top 10 Designated Citywide Languages.

On an annual basis, the Language Bank Liaison has engaged in recruiting new volunteers and update the bank as necessary. Generally yearly, in September, The LBL sends an email to the entire agency asking for volunteers. Currently there are some of the Top 10 Citywide Languages which are not covered by the Language Bank. It is our goal to have at least one volunteer for each of the 10 languages.

B. Telephonic Translation

The DCP Language Access Coordinator will maintain the contract for telephonic interpretation that has been in existence since 2009. A way to improve this, and something that we would like to satisfy this year, is to obtain dual headsets so that Language Line could be used more efficiently.

C. Signage for Frontline Locations

Signage has been posted at the CPC hearing room at 120 Broadway as well as at each of the five borough offices of the DCP in the Top 10 Designated Citywide Languages instructing the public that a translation services are available. Prior to September 2021 we will reexamine the signage, especially in anticipation of the reopening of the offices and the hearing room at 120 Broadway.

D. Automated Translation of DCP/CPC Website

The website is currently translated automatically and will continue to be translated for the foreseeable future via the browsers. It is a goal, although not something that DCP can solve on its own, for the City to purchase a widget for the translation of City website after the Google Translate widget is terminated (see *Section V.C.*). If the widget issue is something that DCP can solve within its power then it will.

E. Language Services Webpage on the DCP Website

This page of the DCP website was extensively updated 2018 with materials that summarize in great detail many aspects of what the DCP does including a history of zoning and the DCP, how to make an application, how to testify before the CPC and the basics of NYC planning. This portion of the website will continue to be updated as needed (especially in light of the COVID-19 pandemic) by the Language Access Coordinator in consideration of the importance of the information and the cost of professional translation of the materials. The Language Coordinator, by September 2021, will review the DCP website and determine if there are other aspects of the website that should be translated into the Top 10 Designated Citywide Languages, and if so, whether the cost of translation will be justified by the additional benefit.

F. Non-English Language Testimony at All Public Hearings

For all public hearings, LEP testimony currently is and will continue to be accepted by the CPC, and additional time will be allowed for such testimony in order to accommodate the interpretation. The Language Access Coordinator and the DCP's Land Use Review Division staff will coordinate the provision of these services.

Appendix: Locations of Department of City Planning Service Centers

LANGUAGE ACCESS COORDINATOR

Dominick Answini, Associate Counsel 120 Broadway, 31st Floor New York, NY 10007 (212) 720- 3676 danswin@planning.nyc.gov

CENTRAL INTAKE

120 Broadway, 30th Floor New York, NY 10271 (212) 720-3382

ZONING HELP DESK

120 Broadway, 31st Floor New York, NY 10007 (212) 720- 3291

BRONX BOROUGH OFFICE

1775 Grand Concourse, Suite 503 Bronx, NY 10453 718-220-8500

BROOKLYN BOROUGH OFFICE

16 Court Street, 7th Fl., Room 705 Brooklyn, NY 11241 718-643-7550

MANHATTAN BOROUGH OFFICE

120 Broadway 31st Floor New York, NY 10271 212-720-3276

QUEENS BOROUGH OFFICE

120-55 Queens Blvd., Room 201 Kew Gardens, NY 11424 718-286-3170

STATEN ISLAND BOROUGH OFFICE

130 Stuyvesant Place, 6th Fl. Staten Island, NY 10301-2511 718-556-7240