



**NEW YORK CITY DEPARTMENT OF BUILDINGS
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING AND BUILDINGS
APRIL 25, 2024**

Good morning Chair Sanchez and members of the Committee on Housing and Buildings. I am Jimmy Oddo, Commissioner for the New York City Department of Buildings (“the Department”). I am joined today by Yegal Shamash, Chief Structural Engineer and Assistant Commissioner of Structural Engineering Compliance, Guillermo Patino, Deputy Commissioner of Policy and Legal Affairs, and several members of the Department’s leadership team. We thank you for holding this important hearing and look forward to discussing the Department’s efforts to keep buildings and the public safe, as well as the legislation before the Committee.

Last year, there were two major building incidents, including the collapse of a parking structure at 57 Ann Street in Lower Manhattan in April, which tragically resulted in a fatality, and the partial collapse of a building at 1915 Billingsley Terrace in the Bronx in December. While I will address these incidents in further detail, I will first discuss the regulations that are in place to keep buildings and the public safe, which include the requirement that the façades of certain buildings be inspected periodically and a more recent requirement that parking structures be inspected periodically. While these requirements obligate building owners to conduct periodic inspections, it should be noted that building owners are always under an ongoing obligation to maintain their buildings in a safe condition. This is an obligation the Department takes extremely seriously as regular building maintenance is key to keeping buildings in a safe condition in order to avoid incidents.

Local Law 10 of 1980, which was subsequently amended by Local Law 11 of 1998, established a requirement that the owners of buildings greater than six stories in height have the exterior walls of their buildings inspected every five years. This requirement resulted in the Façade Inspection and Safety Program (“FISP”). These inspections are conducted by registered design professionals with relevant experience, who are approved by the Department and hired by building owners.

Following such inspections, technical reports describing the results of the inspection must be submitted to the Department. Further, the report must make recommendations for maintaining the building's façade and for repairing any unsafe conditions. When an unsafe condition is discovered, steps to protect the public must immediately be taken and such unsafe condition must be promptly repaired. Building owners who do not comply with the inspection requirement, who submit late filings, or who fail to repair unsafe conditions, face penalties that accrue until compliance is achieved. While the Department has strengthened its rules pertaining to FISP, a comprehensive review of the program has not been undertaken since the program was originally implemented. As such, the Department is in the process of retaining an engineering consulting firm to conduct a comprehensive review of FISP to determine whether any modifications to the program are needed to align the program with today's building stock and typology. We look forward to keeping this Committee updated on this work and partnering to strengthen the regulations that exist to keep building façades in a safe condition.

Similar to FISP, Local Law 126 of 2021, which resulted in the most recent comprehensive update to the New York City Construction Codes, established a new requirement that all parking structures be inspected every six years. This new inspection program was closely modeled after FISP, which has a track record of success as it relates to building façade safety. As such, the framework that exists for this program is very similar to the framework that exists for FISP. The inspections under this program are conducted by professional engineers with relevant experience, who are also approved by the Department and hired by building owners. This inspection requirement began in 2022 and applied to parking structures in Lower, Mid and the Upper West Side of Manhattan. Parking structures in the rest of Manhattan and Brooklyn must comply with the inspection requirement by 2025 and structures in Queens, the Bronx, and Staten Island must comply with the inspection requirement by 2027. So far, we are seeing promising compliance with the first sub-cycle of the requirement to conduct parking structure inspections.

We have taken steps to strengthen our regulations and hold bad actors accountable in the aftermath of the major building incidents that occurred last year. In addition, we are thinking through how we approach enforcement, with an eye towards performing inspections based on our wealth of data in order to identify potential issues before they arise. We are also using every tool in our

enforcement toolbox to hold bad actors accountable in the interest of keeping buildings and the public safe. However, it has become increasingly clear that issuing OATH summonses are not always the answer when dealing with bad actor building owners. As such, we are taking enhanced enforcement action where appropriate, which includes working with the New York City Department of Finance to place liens and pursuing legal action against building owners.

Following the parking structure collapse in Lower Manhattan in April 2023, we revised our regulations to require that every parking structure be inspected by a professional engineer by August of this year, which significantly sped up the timeline for certain parking structures, some of which would not have been inspected until 2027. Additionally, we revised our regulations to require that an engineer be responsible for performing annual observations of such parking structures. Of note, the Department has retained a consultant to investigate the cause of this collapse and that work is still underway. However, preliminarily, the investigation has found that the parking structure did not collapse because it was overloaded. We look forward to keeping this Committee updated regarding their findings.

Following the partial building collapse in the Bronx in December 2023, we conducted a sweep of all the properties owned by the owner of the building to determine whether any violating conditions existed at such buildings. Further, we moved to swiftly suspend inspection privileges for the professional engineer who conducted the latest façade inspection at the building. We have entered into a settlement agreement with the professional engineer, which resulted in a two-year suspension of their privileges to conduct façade inspections and have referred them to the New York State Education Department for further potential discipline. We are currently reviewing the existing regulations related to the qualifications of industry professionals who perform such façade inspections to determine if there are any opportunities to strengthen registration requirements for such private façade inspectors in the interest of public safety. While the professional engineer who conducted the most recent façade inspection at the building has been held accountable, we continue to investigate the cause of this collapse to determine if any additional factors contributed to the collapse and will keep this Committee updated on our findings.

Turning now to the legislation before the Committee today, the majority of which relate to parking structures.

Intro. 135 would require the Department to perform a study and prepare a report on the structural loadbearing capacity of parking structures for the purpose of evaluating the efficacy of existing loadbearing capacity limits. The New York City Construction Codes prescribe design loads for all structures, including parking structures, which must be used in the design of such structures. The Construction Codes have kept pace with national standards for vehicle design loads. Special inspections by, or under the direct supervision of, a registered design professionals must be conducted during the construction of such structures to ensure that construction is in accordance with approved designs. Additionally, during the periodic inspections of existing parking structures, where the load capacity of a structure is in doubt, professional engineers may be required to perform load tests to confirm the load carrying systems in order to properly evaluate the parking structure. While the Department is supportive of the intent of this legislation, it does not have the capacity to perform the comprehensive study being proposed in-house given the various factors that must be taken into consideration in order to complete the study. However, it should be noted that there is an ongoing effort to study the impact of electrical vehicle weights on current design loads for parking structures, which the Department is very supportive of.

Intro. 136 amends the New York City Construction Codes to require that a special inspection agency determine maximum permissible weights for each level of a parking structure and that sensors be installed for the purposes of enforcing such weight limits. While the Department does not have concerns with parking structure owners or operators calculating the maximum permissible weight for each level of their structure according to design loads established by the New York City Construction Codes or as informed by the Certificate of Occupancy for their structure, we would defer to parking structure owners or operators on the feasibility of enforcing such limits by installing weight sensors at their structures.

Intro. 170 would double the penalties associated with certain summonses issued by the Department when such summonses are issued in connection with parking structures. The Department regularly reviews and revises its penalty schedule in order to ensure that penalties are

appropriate for the severity of violating conditions and that they have a deterrent effect. Generally, penalty amounts are consistent for the same violating condition and are not varied based on where that violating condition has been discovered. Where the Department finds repeated noncompliance or egregious conduct, our penalty schedule is designed so that summonses with increased aggravated penalties may be issued. As such, the Department already has a mechanism in place to escalate penalties where appropriate. For these reasons, the Department is not supportive of this proposal.

Intro. 176 would require the Department to publish a boilerplate annual observation checklist to be used by parking structure owners or their authorized agents prior to their initial annual inspection. Such parking structure owners or their authorized agents would be required to use such checklist to perform an annual observation by January 1, 2025. As mentioned earlier on in my testimony, following the collapse of the parking structure in Lower Manhattan last year, the Department updated its parking structure inspection rules to require that all parking structures perform an annual observation, which must be performed by a professional engineer, by August 1, 2024. Further, professional engineers will now be required to perform annual observations of parking structures moving forward. Given the recent strengthening of parking structure inspection regulations, this proposal is no longer needed.

Intro. 231 would require that parking structure inspections be conducted once every four years beginning in 2028 after the completion of the initial six-year inspection cycle, which began in 2022. Given that the parking structure inspection requirement is relatively new and that a full cycle has not yet been completed, the Department would urge the Committee to defer considering this proposal until after the first cycle has been completed to determine whether any modifications to the program are needed, including how often inspections must be conducted.

Intro. 313 would require the survey and abatement of asbestos-containing materials by a building owner following the occurrence of a catastrophic event that disturbs the structure of a building. The New York City Construction Codes require that applicants who intend to fully demolish or remove one or more stories of certain buildings certify that the building or part thereof is free from asbestos containing material before the Department issues such permits. In the event an emergency

demolition is required, which may be the case when a building is structurally unsafe, New York State regulations provide that a building may be demolished with asbestos-containing materials in place, provided that air monitoring be conducted, and that the demolition is controlled per State regulations. In light of such existing regulations, it would be helpful to discuss this proposal further with the Committee to better understand the issue it intends to address in light of existing regulations.

The **Preconsidered Intro.** would require the Department to create a risk-based inspection program to identify potentially hazardous buildings, which would be subject to proactive inspections. As I mentioned earlier on in my testimony, the Department is supportive of performing inspections based on its data in order to identify potential issues before they arise. As such, the Department is supportive of the goals of this proposal and would welcome the opportunity to discuss it further with this Committee to ensure that our goals are aligned. However, we are concerned that being mandated to perform proactive inspections without additional resources will strain our existing inspectorial resources.

Thank you for the opportunity to testify before you today. We welcome any questions you may have.

HPD Testimony for the 4/25 City Council Hearing on Building Stability

Good morning, Chair Sanchez and members of the Housing and Buildings Committee. My name is AnnMarie Santiago, and I am the Deputy Commissioner of the Office of Enforcement and Neighborhood Services (ENS) at the New York City Department of Housing Preservation and Development (HPD). I am accompanied by Assistant Commissioner of Property Management and Client Services, Yong Ju Kim.

HPD's primary enforcement goal each and every day is to ensure that tenants live in safe housing that complies with New York City and New York State housing codes. Our Housing Inspectors respond to hundreds of thousands of complaints, proactively looking for health and safety issues. We dedicate resources to housing court actions both with and on behalf of tenants, emergency repairs when landlords fail to fulfill their responsibilities, and landlord and tenant education. We invest heavily in enhanced enforcement against landlords whose buildings grossly fail to meet the standards our city has set for safe and healthy housing.

As part of our inspection work, HPD may find conditions which are so unsafe that we are required to issue an Order to Repair/Vacate Order ("vacate order"). This Order requires households to relocate from their home and for property owners to conduct repairs, if feasible, to restore a building or unit to habitability. Having to be relocated from one's home because of a fire or unsafe conditions is a traumatic experience, and HPD assesses every situation to ensure that there is no other safe and feasible option for tenants to remain in place. For many years, unlike any other city in the country, New York City has been committed to assisting households who face these hardships by providing financial support, temporary housing, and aid in returning to their original home.

In FY23, HPD issued 329 fire-related vacates, 243 illegal occupancy vacates and 39 habitability-related vacates. Habitability vacates are generally issued when there are maintenance conditions beyond the scope of the emergency repair program to address in short order to protect the lives

of the occupants. The majority of illegal occupancy vacates are for egress or fire safety issues in cellars or other illegally occupied spaces.

HPD Code Enforcement responds to fires where a significant number of rental units are affected or in cases where the American Red Cross (ARC) provides services to rental households that might require Emergency Housing Services assistance but no vacate has already been issued by a city agency. In 2001, the agency first created the Special Enforcement Unit (SEU) to assist with the enforcement of all types of vacate orders, but primarily for fire response and fire vacate monitoring.

When Housing Inspectors conduct an inspection in response to a fire, their role is to assess if essential services are being provided and whether the building is safe from a habitability standpoint, including whether the apartment is secure and safe from either direct fire damage or damage from extinguishing the fire (water damage, broken windows or doors). Some fires result in only minor or limited damage and tenants can safely reoccupy with only the issuance of violations. On the other end of the spectrum, some fires cause extensive damage that require significant repairs. For example, when roofs sustain major damage or structural elements are affected, significant time will be required to make appropriate repairs. In many buildings, there is a mix of extremely damaged apartments and apartments that need minor repairs, such as fixing broken windows.

It is important to recognize that a significant number of fires are not directly caused by the owner's negligence. Working in this space for over 20 years, HPD has experience with property owners facing challenges when addressing major repairs, including but not limited to: obtaining insurance company assessments and payments; coordinating access for tenants to retrieve belongings; hiring appropriate professionals such as architects, engineers or specialized contractors; scheduling work sequentially among multiple trades and contractors; obtaining materials; and ensuring that various agency filings or utility company requirements are met.

HPD intervention has assisted and encouraged many owners to continue to move forward expeditiously with repairs. If we determine that the owner is not making appropriate progress on

a reasonable timeline and multiple households receiving housing services are affected, we may initiate legal action. In CY22, HPD conducted post-vacate building visits in response to more than 80% of the fire vacates issued and 74% of those vacates have been rescinded. We also initiated litigation seeking an Order to Correct on 27 buildings which were not moving forward with repairs in a timely manner and 80% of those vacates were rescinded. Having the flexibility to respond to different building situations is key to the effectiveness of our process.

HPD is also committed to providing immediate assistance to families affected by vacate orders. Under a contract with HPD, the American Red Cross (ARC) responds to vacates, offering immediate emergency housing assistance and a direct referral into HPD's emergency housing process. In FY23, ARC responded to 885 fire incidents that resulted in HPD providing services. This includes providing immediate housing services for almost 3,000 families. This fiscal year through March, ARC has responded to more than 646 fire incidents, providing immediate emergency housing services for over 2,100 families.

For families requiring longer term housing assistance, households register through Emergency Housing Services (EHS) and are assigned a placement at one of our family living centers located in Manhattan, Brooklyn and the Bronx. Singles and adult household placements are made at single room occupancy buildings in Manhattan, the Bronx, Brooklyn, and Queens. Over the years, EHS has become increasingly flexible with the requirements to obtain assistance and works with tenants to obtain documents needed to prove identity and residency at the affected building, which are the only requirements for assistance. The EHS case management team works with client households to develop and update rehousing plans and provides direct support and guidance around all aspects of returning home and/or finding new housing.

I will now take a moment to speak to the HPD-related bills being considered today.

Intro 608 details certain actions the city must take following the issuance of vacate orders by the Department of Health and Mental Hygiene (DOHMH), the Fire Department (FDNY) and HPD. As discussed, HPD is committed to supporting displaced residents and working to ensure that their units are repaired to facilitate their return home. While we are happy to discuss how to improve on our processes, we have concerns about some provisions in this bill. For one, the bill requires

that we initiate 7A proceedings when corrections are not made within a short timeframe. As has been our practice, we believe that executing focused and flexible enforcement, where we work collaboratively with owners and consider all of our available tools, is the most effective way to achieve our goals for both the city and the residents of the buildings. The 7A Program is only one tool, and that program is focused on negligent property owners who allow tenants to live in the most distressed conditions and who fail to be responsive to other enforcement efforts. We also have concerns about the requirement in this introduction that HPD facilitate access to apartments for resident while vacates are in place, from both health and safety and legal perspectives.

Intro 607 would require HPD to make best efforts to provide relocation services as close to a household's vacated home as possible. Many of you have worked with HPD on tragic occasions when people were displaced, and we all understand the hardship that tenants experience when having to relocate far from their homes. Although our network of temporary housing for both families with children and adult families or single adults is limited, we do our best to accommodate the needs of our families. Those needs include not only the location of the temporary housing that is available, but household size and any other special needs that the family may have. Finding new locations willing to provide temporary space to families or individuals on an as needed basis, or keeping units available specifically for these displaced households without knowing what that need will be, when we know so many New Yorkers' need for permanent housing is challenging, is a tremendous struggle. As you all know, the vacancy rate for the lowest income New Yorkers is 1%, and many of the families we serve through EHS would fall into that cohort of renters. Our resources are better directed to helping these families find new housing. To that end, HPD is exploring additional strategies to assist families with their housing search.

Intro 609 requires that HPD report on funds collected and dispersed through the Special Repair Fund. Through research and consultation with the Law Department, we have determined that this Code section was never implemented and is not legally enforceable. We are happy to work with the Council to remove this statute.

Thank you for the opportunity to testify today about HPD's current work to support New Yorkers affected by the issuance of a vacate order. Over the past few months, the Council has introduced multiple pieces of legislation which would support tenants affected by vacate orders, and we remain committed to working with you to improve what we do to better serve New Yorkers in need. We are happy to answer any questions you might have.

REBNY Testimony | April 25, 2024

The Real Estate Board of New York to The City Council Committees on Housing and Buildings and on Parking Structure Safety Bills

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association. Founded in 1896, REBNY represents commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople and other organizations and individuals active in New York City real estate. We appreciate the opportunity to testify on several proposed laws that address parking structure safety and inspections.

Bill: Intro 136-2024

Subject: This legislation would require garage owners or employees to not park vehicles where the collective weight of vehicles on any level would cross that level's weight limit. To do so, the owner or operator would need to install a motor vehicle scale or weight station at each entrance to the garage and post relevant signage. The bill would further disallow any additional vehicles from being parked in the structure if the weight limit of the structure, as measured by the number of vehicles allowed, has been reached.

Sponsors: Councilmembers Selvena N. Brooks-Powers, Gale A. Brewer, Shahana K. Hanif, Crystal Hudson, Farah N. Louis

REBNY appreciates the intent of this legislation, especially considering the tragic garage collapses that have occurred recently. Certainly, those collapses warrant the Council taking a hard look at strategies for ensuring that parking structures are well maintained.

Weight limits in garages are already tightly regulated. Many garages have a weight limit, based on the number of total cars allowed in the garage, which is established in the Certificate of Occupancy (C of O) based on the strength of the concrete in the garage. In other garages, the C of O establishes limits to the number of cars on a level-by-level basis. In both cases, the Department of Consumer and Worker Protection enforces the limitations on the number of cars that can park in a garage or on a level, issuing significant fines for violations.

To implement changes to the City's Construction Codes, the Department of Buildings (DOB) promulgated rules, which went into effect on January 1, 2022, requiring parking structure inspections at least once every six years. Inspections were staggered into three cycles, based on Borough and Community District, with Sub-

Cycle 1A inspections due by December 31 of 2023, and Sub-Cycles 1B and 1C due by the end of 2025 and 2027 respectively. The rule also specified the qualifications of inspectors and required an annual observation of parking structures. Finally, the rule requires unsafe conditions to be remedied in a timely and safe manner.

In response to the two garage collapses, the City then modified the rule to require all garages to receive an original observation by a qualified professional sooner than many garages would have had their first inspection in order to make sure of the integrity of the structures. Specifically, all parking structures require an initial observation by August 1, 2024, except those who filed an inspection report due December 31, 2023 (Sub-Cycle 1A), or those whose inspection report is due by December 31, 2025 (Sub-Cycle 1B), but who filed the report before August 1, 2024. We believe that this inspection system, which, as noted above, includes an annual observation, as well as current limits on the number of vehicles that can park in a garage and active enforcement of those limits, are sufficient to ensure that parking structures are properly maintained.

Furthermore, installing a vehicle weighing station in all entrances of existing garages would be costly and create operational challenges for the garage and the public for several reasons. First, many parking structures in the city operate on a 24/7 schedule and the installation of a weigh station would require disruptive construction work that would necessitate the closure of the garage. Second, in peak parking times, cars being weighed would result in blocked entrances causing cars to line up in the street, disrupting traffic.

Taken together, all the above information indicates that Intro 136 is not necessary to ensure that garages are structurally safe and well operated.

Bill: Intro 170-2024

Subject: This bill would increase penalties for certain violations related to parking structures. First, it would double the standard civil penalty for DOB violations issued to the owner of a parking structure. Second, it would allow for daily penalties for violations for failure to maintain a parking structure. These new violations vary from \$1,600 to \$20,000.

Sponsors: Councilmembers Amanda Farías, Shaun Abreu, Farah N. Louis

REBNY appreciates that fines related to failing to maintain a parking structure need to be stringent enough to help make sure that public safety is at the forefront of management priorities, and that matters such as immediately hazardous conditions are resolved in an expedited fashion.

That said, owners who are making a good faith effort to resolve issues with parking structures, such as taking measures to remove any threats to public safety while preparing to undertake repairs, should not continue to receive fines. In addition, where reasonable, there should be a cure period for certain violations.

Bill: Intro 176-2024

Subject: This bill would require DOB to create a boilerplate checklist of essential baseline items to be inspected prior to the required initial condition assessment already required to be completed and filed by August 1, 2024.

Sponsors: Councilmembers Oswald Feliz, Christopher Marte, Sandy Nurse, Shaun Abreu, Gale A. Brewer, Shahana K. Hanif, Crystal Hudson, Farah N. Louis

As previously stated, existing DOB rules and City law require owners to conduct either a full inspection or an initial observation by August 1, 2024. This work must be completed by a qualified parking structure inspector who is trained to analyze the parking structure's condition and the individual building systems that comprise the parking structure. Current rules also require an annual observation of parking structures to further ensure that they are in a safe condition.

While a boilerplate checklist could be useful to help guide the work of that qualified parking structure inspector, it is not necessary to require the owner to complete additional inspections beyond those already required by law.

Bill: Intro 231-2024

Subject: This bill would require parking structure assessments after January 1, 2028, to be conducted every four years, instead of every six years. It would also require garages that are safe with repairs or with engineering monitoring to be subsequently assessed after two, rather than three, years.

Sponsors: Crystal Hudson, Shahana K. Hanif, Farah N. Louis

REBNY believes that the current schedule for parking structure inspections should be sufficient to ensure that they are structurally safe and well-maintained. This includes the recent addition of an initial observation by August 1, 2024 for those garages whose first inspection falls at a later date. The current regulatory scheme also requires an annual observation of garage conditions by a qualified professional to ensure structural integrity.

If inspections are to be more frequent, the law should align with Local Law 11 inspections, so that the same qualified inspector could assess a garage at the same time as a building façade, where garages are a part of or associated with a building.

Finally, REBNY could support follow-up inspections every two, rather than three, years.

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Testimony Before the New York City Committee on Housing and Buildings

April 25th, 2024

Thank you to Committee Chair Sanchez and members of the Committee on Housing and Buildings for hosting this hearing,, and for the opportunity to testify.

About the Association for Neighborhood and Housing Development (ANHD)

ANHD is one of the City's leading policy, advocacy, technical assistance, and capacity-building organizations. We maintain a membership of 80+ neighborhood-based and city-wide nonprofit organizations that have affordable housing and/or equitable economic development as a central component of their mission. We bridge the power and impact of our member groups to build community power and ensure the right to affordable housing and thriving, equitable neighborhoods for all New Yorkers. We value justice, equity and opportunity, and we believe in the importance of movement building that centers marginalized communities in our work. We believe housing justice is economic justice is racial justice.

Intro 0607- A Local Law to amend the administrative code of the city of New York, in relation to requiring tenant relocation services to the same community district, a nearby community district, or the same borough

As we all know, New York City residents have to navigate a complicated and lengthy system whenever they are victims of fire. We have seen as recently as a couple of years ago the kind of conditions tenants are constantly at risk of in buildings that are not up to code. Twin Parks was a reminder of just how vulnerable our neighbors are when tragedy strikes. This law would help maintain as much stability as possible for tenants who lose their homes as a result of fire. Ensuring tenants remain in their community districts will keep as much constancy as possible. This will allow tenants affected by fire to still access the same schools, hospitals, family networks, and local services in their neighborhoods that will help them as they navigate the aftermath of the fire. This small change can help make the lives of displaced tenants just a bit easier and will allow tenants to remain close to the resources they are used to accessing. Along with other help, this can help tenants more easily start to rebuild their lives. We strongly support passage of this bill.

Intro 0608 A Local Law to amend the administrative code of the city of New York, in relation to requiring the department of housing preservation and development to increase tenant relocation services in the event of a vacate order

Tenants who lose their homes as a result of fires need all the support they can get to help get them through the relocation process. The tenant relocation specialists proposed by this bill will offer much needed support when fire victims have to start looking for temporary relocation. This small change will make it easier for tenants to know the steps they can take to find

temporary housing, and connect them to more organizations that can offer help. Empowering HPD by creating administrators to oversee repairs will make it easier to point out when landlords are not adequately making repairs. A simple change in a rule requiring tenants are notified when they can reoccupy their apartments will also make it easier to hold landlords accountable for when they are falling short. A big part of making sure that this is a successful change is to give administrators the proper training and tools they need to push for corrections. We would like this bill to give administrators real power to incentivize landlords to fix violations by the time indicated in the vacate order. Tenants currently have little to no recourse they can take to push for timelier repairs. It is important that we clearly state what power these administrators will have and what kind of accountability they will have when appointed.

Intro 0609 A Local Law to amend the administrative code of the city of New York, in relation to requiring the department of housing preservation and development to report on the special repair fund

We support this bill's proposal to add reporting requirements for the Special Repair Fund. The report is necessary for accountability and to ensure that we better understand how the money from the special repair fund is helping New Yorkers. It will give the public access to data that we can use to ensure that the funds are being used adequately to help repair buildings that are especially in disrepair, and help clarify whether resources are adequate for addressing the conditions they are meant to solve. We hope that the data from this report can be used by our members to better inform their advocacy and organizing efforts. **T2024- 1867 Establishing a risk-based structural inspection system for buildings**

This bill is an important first step in ensuring that tenants are not subject to the worst conditions possible in the buildings they reside in, to the point of structural failure. We have seen instances of buildings falling apart due to a lack of oversight and correction. Mandating the Department of Buildings be proactive in identifying buildings that are at risk of serious structural damage will help prevent further tragedies. Issuing clear timelines for both corrective action plans and fixing violations is a necessary requirement to push landlords to address the issues. We expect that the Department of Buildings will be provided with the adequate resources to conduct all necessary inspections and issue fines that truly incentivize landlords. It is important that the city start being more proactive in identifying buildings that are in serious disrepair to prevent any serious structural damage that could harm tenants. We want to have this be a tool that empowers the people our members are fighting for. We support quick passage of this bill, and urge the city to adequately resource the Department of Buildings to hire, train, and deploy the necessary inspectors and legal staff to properly enforce building safety and prevent future tragedies.

Thank you for the opportunity to testify. If you have any questions or for more information, please contact Israel Sanchez at israel.s@andh.org .



April 25, 2024

CHIP Testimony on Tenant Relocation

Thank you for holding this hearing today. I am Adam Roberts, Policy Director for the Community Housing Improvement Program (CHIP). We represent New York's housing providers, including apartment building owners and managers.

We are here to testify on Int 607 and Int 608, as well as tenant relocations more generally. These bills would place limitations on relocating tenants after a vacate order due to an emergency. While we do not have any objection to these bills, we wanted to note that these bills would be redundant for the one million units of rent-stabilized housing in the city. This is because NYS Housing and Community Renewal (HCR) already places strict limits on relocating rent-stabilized tenants.

Looking more broadly at tenant relocations, we hope the council will use this as an opportunity to reform tenant relocations in all situations, not only in emergencies. As previously mentioned, HCR makes relocating rent-stabilized tenants effectively impossible.

The inability to relocate rent-stabilized tenants is perhaps the greatest obstacle to building new housing in the city. As we have seen in countless failed affordable housing projects, a single rent-stabilized tenant can block the construction of new affordable housing by refusing to relocate temporarily during demolition.

No amount of tax credits or zoning reforms will change this. The passage of 485x and the City of Yes will not lead to new housing if existing buildings with rent-stabilized tenants cannot be rebuilt. Over 40% of rental housing is rent-stabilized, meaning huge portions of the city will not produce new affordable housing because tenants cannot be relocated.

This is not only to the detriment of future tenants, but also to existing tenants. If offered a brand new apartment in exchange for relocating during construction, the vast majority of tenants would likely accept. Most rent-stabilized buildings are over 100 years old. They do not have basic necessities like elevators and functional HVAC systems. Furthermore, they are filled with lead and asbestos, which are dangerous to abate in occupied apartments.

Yet, a single tenant refusing to relocate can prevent all of their neighbors from having a new home with an elevator and heat pump, not to mention other features like a new kitchen and bathroom.

If the council actually wants to build new housing and improve living conditions for rent-stabilized tenants, restrictions on relocating tenants must be removed. Again, thank you for holding this hearing today.

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Dear Chair Sanchez and Members of the Housing & Buildings Committee,

My name is Vincent Petraro. I represent the Metropolitan Parking Association (“MPA”), a trade association of most of the parking garage and parking lot operators in the City of New York. We are happy to have been invited to today’s hearing.

The hearing notice mentions Building Integrity and then cites two addresses, one of which is a parking garage and one of which is not a parking garage. The five proposals we will comment on all deal with parking garage buildings.

1. Intro 135: A Local Law in relation to a study on structural load bearing capacity of parking garages. The MPA has no issues with a study being performed, though would like to be a part of setting up the study’s parameters and can be helpful with scheduling inspections, and with sharing our engineers’ expertise.
2. Intro 136: A Local Law to amend the administrative code of the city of New York, in relation to weight limits for parking structures. The MPA engineer is Anthony Stasio, PE, of EDG Architecture and Engineering who is here to testify also. This proposal is not necessary as the Building Code and Regulations already cover the basics of what is contemplated here.

As described by Anthony Stasio, PE, the Building Code mandates that the load-bearing capacity for each garage must be determined and specified during the initial design phase. This information is publicly available and can be found on the Certificate of Occupancy (C of O) for each floor.

Live load, in the context of structural engineering and design, refers to the dynamic or moving loads that a structure is expected to support during its intended use. These loads are not constant and can vary in magnitude and location. Engineers consider live loads when designing structures to ensure they can safely support the anticipated loads without experiencing excessive deflection or failure.

Live loads for a parking garage are specified by Building Codes or standards based on its intended use. Engineers use these loads, along with other factors such as dead loads (the weight of the structure itself) and environmental conditions, to design structures that are safe, efficient, and durable.

Capacity of a structure is designed on a Per Square Foot basis as per the Building Code, not on a total load for the entire level. The Building Code bases the live load of vehicles spread out over the area the vehicle takes up. The current Building Code live load requirement is based on the maximum number of closely spaced vehicles on a floor of a garage. It is not the total load that the entire floor can support, so we do not count vehicles until a certain number is met. Live Load has nothing to do with a total load on a level.

An easy example, a typical parking space in a garage is 8.5' by 18' or 153 Square feet. If we look at the heaviest Tesla, it is 5,390 pounds, that is 5,390 pounds spread over 153 square feet, or 35.23 pounds of pressure per square foot. Typically approved Live Loads for garage floors range from 40 up to 200, higher than the 35 pounds of pressure per square foot in this example. Even if a garage had a live load of 40, it would be able to handle wall to wall 5,390 pound vehicles. Also, remember that not every car is 5,390 pounds, many are 3,000 to 4,000 pounds or so, thereby providing even less pounds per square foot on the garage level.

All of this is already a part of the existing law. Therefore, scales are not only not necessary, but would create negative issues, such as location of the scale on already busy sidewalks and the delay that weighing would cause to cars queuing to enter the facility.

3. Intro 170: A Local law to amend the Administrative Code of the city of New York, in relation to increased penalties for the department of

buildings violations issued to parking structures. This seems to be in response to the collapse at 57 Ann Street. However, it is important to point out that the collapse is still under investigation (by the District Attorney) and any such changes should await his report. There is no proof of anything structural causing the collapse. Additionally, while the hearing mentions Building Integrity and cites a non-garage building, the fines all relate to garage structures. This disparate treatment of garage structures would be unprecedented and singles out parking garages with a new fine structure.

4. Intro 176: A Local law to amend the administrative code of the City of New York, in relation to the creation of a boilerplate annual checklist for parking garage inspections prior to initial annual condition inspections. Anthony Stasio, PE, advises us that the requirements & template is already in place under LL-126 for inspection requirements. It has to be inputted into DOB NOW and approved by the DOB Parking Enforcement division.
5. Intro 231: A Local Law to amend the Administrative Code of the city of New York, in relation to increasing the frequency of parking structure inspections. It is important to note that in addition to the required inspections already in the law, that an annual inspection is required with an annual observation checklist to be on-site showing each years inspection.

We are hopeful that you take all of this information into consideration and we would be happy to meet again to discuss this and any issue relating to parking.



Alan Levine
President

Twyla Carter
Attorney-in-Chief
Chief Executive Officer

Adriene L. Holder
Chief Attorney
Civil Practice

Testimony of

THE LEGAL AID SOCIETY

on

Building Integrity Hearing

The New York City Council Committee on

Housing and Buildings

April 29, 2024

The Legal Aid Society appreciates the opportunity to present testimony on proposed legislation aimed at fortifying New York City’s tools to prevent future building collapses and protect tenants when a vacate order has been issued for their building or unit due to full or partial building collapse or other dangerous conditions. We thank the Committee on Housing and Buildings for convening this hearing and Chair Sanchez for her leadership.

WHO WE ARE

The Legal Aid Society is the oldest and largest not-for-profit public interest law firm in the United States, working on more than 300,000 individual legal matters annually for low-income New Yorkers with civil, criminal, and juvenile rights problems. The Legal Aid Society also provides law reform representation that benefits all two million low-income children and adults in New York City. The Legal Aid Society delivers a full range of comprehensive legal services to low-income families and individuals in the City. Our Civil Practice has local neighborhood offices in all five boroughs, along with centralized city-wide law reform, employment law, immigration law, health law, and homeless rights practices.

INTRODUCTION

The purpose of the housing standards in New York City is to ensure that minimum health and safety guidelines are met, and safe and decent housing is preserved and maintained. As demonstrated by events such as the collapse of parking structures and the partial building collapse at 1915 Billingsley in the Bronx, the consequences of noncompliance with these health and safety standards are devastating to tenants and the public at large.¹ Moreover, noncompliance with housing standards is also a common form of harassment designed to drive tenants from their homes.

¹ E.g., Claudia Irizarry Aponte and Greg B. Smith, *Collapsed Bronx Building Was Deemed Unsafe in 2020, The City*, <https://www.thecity.nyc/>, Dec. 11, 2023, <https://www.thecity.nyc/2023/12/11/collapsed-bronx-building-fined-cited-billingsley-terrace/>

The Legal Aid Society plays a critical role in enforcing New York City’s housing standards, especially through the City’s Anti-Harassment Tenant Protection (“AHTP”) program. Without these efforts, many tenants would continue living in unsafe and unhealthy conditions. In this fiscal year alone, we have worked or are working with tenants in more than 15 buildings across the five boroughs that have been abruptly forced to leave their homes due to a vacate order due to unsafe conditions. We are working with the tenants at Billingsley Terrace and the tenants at 150 Bay 22nd Street whose circumstances were discussed at the hearing and our testimony is informed by our experience working with tenants who are subject to vacate orders.

We work with City agencies and attorneys toward our mutual goal of health and safe living conditions every day. As such, we have some comments and suggestions regarding the proposed legislation about vacate orders.

OVERALL RECOMMENDATIONS

The various city agencies tasked with the issuance and oversight of vacate orders should take a more service oriented, customer friendly and transparent approach when dealing with issues surrounding vacate orders and subject to those orders. Knowing what is wrong with a building, what needs to be done to fix it, and what inspections are needed and have been done to lift a vacate order would give tenants confidence that the city is looking out for them and the condition of NYC’s housing stock. This needs to include monitoring construction, lead, mold, and asbestos dust in these buildings. approach to enforcing those standards so that building collapses are prevented or minimized and vacated tenants are informed of their rights and available resources and their tenancies are protected.

Equally important is keeping track of tenants and their whereabouts once they leave the vacated premises and until they are restored to permanent housing. Currently, tenants

scatter to various locations after issuance of a vacate order, leaving them connected to the information and resources afforded by city agencies and legal services providers, and causing too many to lose affordable apartments they could otherwise recover.

SPECIFIC RECOMMENDATIONS

- Emergency Response teams that meet tenants at times of crisis and provide tenants with information and resources across time should be created by HPD. Team members would explain what happens next, what tenants need to do, what the city agencies can and will do, what owners are responsible for, and would also facilitate access to services. They should continue to be a resource for tenants until tenants are able to return to their apartments or are permanently relocated.
- Require landlords to prioritize displaced tenants for relocation into vacant or next available units. The current proposal shifts some of the onus to repair or relocate from the landlord to HPD. Landlords should be required to relocate at the option of the tenant and for tenants to have the ongoing option to be restored to their original units once they are habitable.
- Require the landlord and/or HPD to relocate tenants into actual apartments or as close thereto as possible while they wait to be restored to their vacated units.
- Require that insurance proceeds for a building to be set aside for the repair of the building to limit HPD's responsibility to fund and manage repairs and the depletion of funds for the 7A program. HPD should prioritize repair of rent regulated buildings for the 7A program (not every vacated building).
- Require all vacate orders to specify the conditions giving rise to the order and a realistic time in which the conditions must be corrected. Require owners to pay for a professional assessment of the work to be done and a time estimate to complete the work.
- Explore the purchase of distressed buildings by preservation purchasers, land trusts, HDFCs etc. with the financial support to restore the buildings.
- Pass legislation prohibiting DOB from issuing demolition permits in rent regulated buildings without permission from NYS Housing and Community Renewal
- Permanently fund the Anti-Harassment Tenant Protection ("AHTP"), crucial component of the city's strategy for safe, decent housing. Through the AHTP program, The Legal Aid Society and other service providers provide free, affirmative, holistic legal help to low-income tenants facing unsafe living conditions and landlord harassment.

COMMENTS ON SPECIFIC BILLS

1. *Int. No. 607, Relocation of Tenants After Vacate to Nearby Area*

- Clarify that relocation services are to be provided to tenants subject to vacate orders issued by any governmental agency or department (HPD, DOB, FDNY, etc.)
- Requests for relocation services shall not be time restricted (tenants may apply at any time even if the services are initially refused).
- Clearly define ‘suitable accommodations,’ (as close to the accommodations tenants had in their vacated units.)
- The burden and responsibility for relocation services must first be on the landlord, then the department if the landlord is unable or unwilling to provide the services.
- Reiterate that landlord is required to reimburse the department all relocation costs incurred by the department.

2. Int. No. 608, HPD Relocation and 7A After Vacate Order

- Notices of vacate orders should be given to relevant parties including HPD within 24 hours and should be readily available to public through things such as city web and social media sites, in wording and languages they can understand.
- Vacate orders must specify the reasons for the order and the time in which the conditions that gave rise to the order must be corrected. They should also be in the city’s designated languages.
- Agency representatives and/or the landlord) should have a duty to reach out to vacated tenants through Red Cross, city shelters, outreach to elected officials, direct contact to formerly occupied units, notice at the building, obtaining information from the landlord about contact information for tenants.
- The city should have an emergency response/support team that provides ongoing support and services to vacated tenants to ensure that they are accessing the available benefits and supports to which they are entitled and eligible for, including legal services. This support obligation of the emergency response team shall continue until the vacate order has been lifted.
- Agency representatives and/or the emergency response team shall work with owners to identify owner owned or managed units suitable and available for relocation and shall provide the vacated tenants with that information. Representatives shall also provide ongoing support and services to vacated tenants to ensure that they are accessing the available benefits and support to which they are entitled or for which they are eligible, including legal services. The ongoing support obligation ends after the vacate order has been lifted

- Agency representative and/or the emergency response team should meet tenants at times of crisis to explain next steps, what tenants need to do, what the city agencies can and will do, what the owner needs to do etc.
- Agency representative and/or the emergency response team should facilitate access to all services available to vacated tenants.
- Landlords must be required to immediately stabilize vacated units/buildings, providing security and protection from the elements and provide tenants temporary access to retrieve personal belongings. HPD's Emergency Repair Program should do so where the owner refuses or is unable to do so.
- Landlord and agency representative must notify vacated tenants that they have a right to return to their apartments and the time for said return.
- The size and configuration of units vacated pursuant to a vacate order cannot be substantially altered absent first, prior approval from DHCR and then the required permits from DOB.
- Likewise, buildings subject to vacate orders cannot be demolished without prior authorization from HCR and then the proper permits from DOB.
- The requirement for mandatory 7A proceedings is overly broad and costly. Prioritizing buildings such as those with the most rent regulated units and the most returning tenants could be more manageable.

OTHER COMMENTS

Pre-Considered Int. No., Risk based inspection program

- When assigning a risk score for predicting structurally hazardous buildings, the risk-based inspection program just consider the history of housing standards violations including but not limited to violations of HMC, Building Code, Construction Code, Health Code, Electrical Code as well as violations issued by government agencies including but not limited to HPD, DOB, ECB, FDNY, DOHMH.
- The program should also consider the type as well as the number of all 311 complaints.
- Clarify that the time for owners to submit a corrective action plan after receiving notification of unsafe conditions is 10 working days.
- Follow-up inspections by the Department to verify the progress of corrective measures should take place every 30 days after issuance of the violation for unsafe conditions.
- Work to correct hazardous conditions should commence immediately after issuance of the violation and be completed within in no more than 45 days.
- The inability to obtain non-emergency work permits shall not absolve owners from the responsibility of correcting such conditions as required by law nor prevent the issuance of any attendant penalties or fines.

Int. No 313, Asbestos Report After Catastrophic Occurrence

- All buildings subject to vacate orders should be inspected for lead and mold in addition to asbestos, by investigators certified in each field and owners shall be required to correct any conditions found to exist as required by law.
- On-going oversight and enforcement by DEP, DOHMH, DOB, and/or HPD must be required.
- Tenants must be informed of the risks of exposure to these elements.

CONCLUSION

Thank you for the opportunity to testify at this oversight hearing. We welcome the opportunity to further share our ideas on effective enforcement of the HMC, including the proposed legislation.

Please contact the undersigned with any questions.

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Testimony Statement

To Whom It May Concern,

I am writing to urgently address a critical issue regarding the scheduling of inspections through 311 for tenants in Bushwick, Brooklyn. As a tenant and tenant organizer, I have encountered significant challenges with the current system that require immediate attention and change.

The inability to schedule inspections through 311 has created numerous obstacles for tenants like myself and tenants I've worked with in the past 8 years. Without the option to choose a suitable time for inspections, we are often left in a state of uncertainty, resulting in missed inspections due to conflicting work schedules or other commitments. This not only wastes valuable time and resources but also prolongs the resolution of essential services.

Moreover, the lack of a scheduling system contributes to a pervasive sense of distrust among tenants towards city agencies. Many of us fear that inspections may occur unannounced or without proper identification, leading to apprehension about granting access to our homes.

It is crucial that a scheduling system be implemented immediately to address these pressing concerns. Allowing tenants to schedule inspections through 311 would streamline the process, minimize disruptions to our daily lives, and ensure that inspections are conducted in a timely and efficient manner. Additionally, it would demonstrate a genuine commitment to serving the needs of tenants and fostering trust in the system.

In conclusion, I urge you to take swift action to implement a scheduling system for inspections through 311. By prioritizing the convenience and trust of tenants, we can create a more equitable and effective system for addressing issues within rental properties.

Thank you for your attention to this urgent matter.

Sincerely,

Amy Collado

Tenant organizer at Bushwick Housing Independence Project - BHIP

Email: bhiporganize@gmail.com

My name is Ibrahim Xavier Johnson. I personally thank this committee for your interest in public housing. I was born and raised in public housing. This is affordable housing, and I am currently on the wait list for an apartment in Manhattan or the Bronx. I am a veteran of the US Army and graduate of CUNY and I credit my success to the stability that public housing provided my family in the 1970's and 1980s. New York City likes RAD/PACT conversions, and we have the NYCHA Trust Fund, at the State level.

For me, public housing is a federal commitment backed by the US Department of Housing and Urban Development (HUD). HUD has emphasized the importance of NYCHA tenant leadership. Consequently, the City Council must include the City-Wide Council of Presidents (CCOP), the official voice of NYCHA tenants, in any discussion regarding NYCHA's commitment to affordability. I am asking the City Council to consult with CCOP when considering any legislation regarding NYCHA.

The previous City Council representative, from District 9, met with the Tenant Presidents in the past. I encourage the City Council to continue this process of consultation. Remember, CCOP is a product of **CFR 964.18**, a federal law which empowers CCOP. I am asking this council to publicly acknowledge CCOP and give honour and tribute to the NYCHA Tenant Presidents. I am also asking the City Council to create a permanent liaison between CCOP and the City Council. I am currently the unofficial consigliere for at least one NYCHA Tenant President. I would like my volunteer work to become official and eventually paid.

Sincerely,

Ibrahim Xavier Johnson

President and Harlem resident

Black Star Housing, Inc

409 TimeLine/Roulette

- 1) The Unit advertising the rental of 12G was a Public Listing on Street Easy
- 2) Reputable Realty Company (Oxford)
- 3) Submitted checking and savings documents as well as paystubs
- 4) Submitted to a credit check
- 5) Paid First month, Last month and Security Deposit as well as five additional months in cashiers payment to the shareholder, Patricia Miller
- 6) Was told that Simply Moving and ABC Realty were forwarded Certificate of Insurance prior to taking possession of the apt. on Tuesday June 1st, 2021
- 7) On Saturday Morning June 5th, 2021 Mr. Roulette was sent a text from Ralph Davies telling him he was an illegal tenant and to immediately vacate
- 8) Mr. Roulette forwarded the text to both Ms. Patricia Miller (shareholder) and Ms. McLaurin of Oxford Realty, Ms. Miller did not respond to Mr. Roulette
- 9) Tuesday June 15th, 2021-I texted Eric the super at 409 at 11:34AM to access the freight elevator and was told I cannot do so unless I contacted ABC Realty (specifically Jason or Ralph)
- 10) As a result of this misrepresentation and miscommunication between Ms. Miller, Oxford realty representative and the HDFC coop board Mr. Roulette is being denied 'Quality of Life' by not being able to move items into his unit from his storage nor does he have the simple comfort of having food or guest contact him through the building intercom system.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Southwest 8 Res. No. _____

in favor in opposition

Date: 4-25-24

(PLEASE PRINT)

Name: Lina Renuque-Roble

Address: _____

I represent: Southwest United HHC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Guillermo Patino

Address: Deputy Commissioner, Policy and Legal Affairs

I represent: DOB

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Anmarie Santiago

Address: _____

I represent: NYC HPD

Address: 100 60th Street

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/25/74

(PLEASE PRINT)

Name: Yung Joo Kim

Address: 100 Gold St, New York N.Y.

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jimmy Oddo

Address: _____

I represent: DOB

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Yegal Shamash

Address: 280 Bway

I represent: DOB

Address: 280 Bway

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 607-608-609 Res. No. _____
 in favor in opposition

Date: 4/25/24

(PLEASE PRINT)

Name: Maribel Lopez

Address: 434 South 5th St

I represent: Los Sure

Address: 434 South 5th St

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 4.25.24

(PLEASE PRINT)

Name: Judith Goldines

Address: 49 Thomas St NY NY

I represent: The Legal Aid Society

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Emiliano Herrera

Address: 434 South 5th St

I represent: Las Suras

Address: 434 South 5th St

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 4/25/29

(PLEASE PRINT)

Name: Christopher Leon Johnson

Address: _____

I represent: Seiv

Address: _____

Please complete this card and return to the Sergeant-at-Arms