

**Testimony of Commissioner Minaya
New York City Department of Small Business Services**

Before the Committee on Small Business

June 8, 2026

Introduction

Good morning, Chair Thomas-Henry and members of the City Council Committee on Small Business. My name is Kenny Minaya, and I serve as the Commissioner of the New York City Department of Small Business Services (“SBS”). I am pleased to join today’s hearing with Assistant Commissioner Renaldo Hylton from the Department of Buildings (“DOB”).

The mission of SBS is to deliver economic security for all New Yorkers by connecting them to good jobs, supporting small businesses, and investing in our neighborhoods. There are over 126,000 storefronts in NYC and we are committed to ensuring small business owners are empowered to operate and grow their businesses as seamlessly as possible. Our support includes affordable capital connections, compliance consultations, and reform advocacy to make it easier to do business in NYC.

Just two weeks ago at our NYC Small Business Month Expo, we brought nearly 2,000 New Yorkers under one roof to connect with City agencies, industry experts and resource providers. Since becoming Commissioner, I have made it a priority to visit as many business corridors as possible and hear directly from small business owners, advocates, and community leaders about the evolving challenges facing our city and the urgent reforms needed to help small businesses across the five boroughs thrive.

The three bills and the resolution attached to this hearing seek to address some of these business challenges.

Intro 910

Intro 910 would repeal the requirement that all security grilles installed at businesses located in Group B or M buildings to have 70 percent visibility by July 1, 2026, or be subject to a fine. SBS fully supports the bill and believes it can go further by prioritizing business choice. In anticipation of City Council deliberation and action on this bill, on May 14th, the Administration announced a suspension of DOB’s enforcement of Local Law 75. This proactive step represents another measure we are taking to create regulatory relief for small businesses. We look forward to working with the Council to craft a version that provides business owners with the choice to install security grilles with visibility features that best meet their needs.

Intro 799

Intro 799 would require SBS to establish a program offering loans and grants, among other supports, to help small businesses offset expenses incurred due to city construction projects. SBS supports the intent of the bill, but we have some operational concerns with its implementation. However, SBS will continue to facilitate connections to affordable capital through our 7 Business Solutions Centers, the NYC Future Fund and the NYC Funds Finder marketplace.

Pre-considered Intro T-2026

This bill would require the mayor to establish a program that would plan and coordinate agency inspections for businesses to reduce the time needed to open. The administration supports the intent of the bill and does not want to inadvertently duplicate existing city services. Our team is proud of our efforts to reduce opening times in New York City. As part of Executive Order 11 (“EO11”), we conducted a “time-to-open” analysis to better understand the status-quo and generate insights for reform. SBS delivered those recommendations to the Deputy Mayor for Economic Justice earlier this year. The Administration has also demonstrated its commitment to cutting red tape through the expansion of SBS' NYC BEST team, which gets small businesses to opening day by liaising and advocating with regulatory agencies on behalf of small businesses. Since the start of the administration, our NYC BEST team has helped businesses save over \$6 million.

As such, we are supportive of the goals in Council Member Zhuang's bill and we look forward to partnering with the Council to advance reforms as part of Executive Order 11.

Conclusion

Thank you for this opportunity to testify about SBS’s work and how we can make it easier to start, operate, and grow a small business in New York City. I look forward to our continued partnership to empower our small businesses. I welcome any questions you may have.



TESTIMONY BEFORE NYC COUNCIL – COMMITTEE ON SMALL BUSINESS
Testimony in Support of Intro 910
June 8, 2026

Good afternoon, Chair Thomas-Henry and members of the Committee on Small Business.

My name is Matt Bauer and I'm testifying on behalf of the NYC BID Association, where I serve as co-chair of our Regulatory Reform Working Group. I'm also the President of the Madison Avenue BID in Manhattan.

As you may know the NYC BID Association represents all of the city's 78 Business Improvement Districts, serves nearly 300 miles of commercial corridors, including approximately 100,000 business, and invests more than a combined \$200M back into our communities in all five boroughs. We're very grateful that this committee is holding this hearing on important issues impacting small businesses, including the impending roll-down gate visibility requirements.

The NYC BID Association greatly appreciates the Council's efforts to support small business owners through Intro 910. So many businesses along our shopping districts do not have the resources to replace their gates, nor do all know of the requirements to do so with the new visibility requirements. We very much appreciate Intro 910's provisions to expand outreach to the small business community. However, we have significant concerns about how the bill is currently drafted.

After speaking with Council staff, we appreciate that Intro 910 aims to focus on replacement gates as opposed to forcing existing gates to be compliant, however that remains unclear in the legislation as is.

While Intro 910 removes the July 1, 2026 enforcement trigger date for the 70% transparency requirement for security grilles in both the Administrative and Building Codes, it does not establish a new effective or trigger date for compliance. As a result, upon enactment of Intro 910:

- All newly installed security grilles would be required to meet the 70% transparency standard; and
- All existing security grilles that do not meet the standard would be considered noncompliant (and would need to be replaced), with fines imposed unless the business corrects the grille within 90 days, or the owner can establish "an affirmative defense that the nonconforming security grille was installed prior to July 1, 2011."

The result is that potentially thousands of existing grilles may still be noncompliant, and the bill does not leave any time for additional education and outreach before the requirements take effect.

We are including specific language changes in our written submission, but we strongly encourage the Council to consider language changes to make clear that the visibility requirements will only apply to the replacement of security grilles moving forward, and to think about further delaying the effective date of that requirement to allow for education and outreach.

(over)

We also hope that any education around this mandate includes informing businesses of the requirement to file for a permit with the Department of Buildings to install a security grille.

We appreciate the opportunity to testify, and to serve as your partners in strengthening the City's small businesses and neighborhood retail corridors.

LANUGAGE RECCOMENDATIONS

Specifically, the core of the problem is that Item 3 of Section 1010.1.4.4 of the NYC Building Code remains in place as is. That section reads:

Except as to buildings or structures classified in occupancy Group S, buildings or structures that have been designated as a landmark by the landmarks preservation commission or located in a historic district designated by such commission, on or after July 1, 2011, no security grille may be installed or replaced, nor shall the owner of a structure classified as a Group B or M occupancy or the operator of the business occupying such structure allow to be installed or replaced, a security grille to secure such property where the grille abuts the sidewalk, unless the grille, when closed, permits visibility from the sidewalk of at least 70 percent of the area covered by such grille.

Therefore, the requirement that all roll down grilles be 70% clear goes into effect immediately upon enactment of Intro 910. We do not believe this outcome reflects the legislative intent of Intro 910, as it would impose significant hardship on small business owners throughout the city. We respectfully request that the Council's legislative team revisit amending Item 3 of Section 1010.1.4.4 of the NYC Building Code so that it fulfills aims of this Introduction.



Chair Thomas-Henry, and members of the Small Business Committee:

My name is Lisa Sorin, and I am the President of the Bronx Chamber of Commerce. The Bronx Chamber is dedicated to supporting and advocating for local businesses across the borough, especially New York's smallest businesses. Thank you to the Council for your continuous engagement and collaboration with the small business community on issues that impact affordability, stability, and economic growth.

I am submitting this testimony in support of Int 0910-2026 and the broader package of legislation being heard by this committee, including Int 0799-2026 which would require the Department of Small Business Services (SBS) to establish a program to provide loans, services, materials, or some combination, to support small businesses affected by city construction projects, and T2026-2025 which would require the mayor to establish a program that would coordinate inspections and plan reviews among agencies to cut down on the time for new businesses to open.

Regarding Int. 910, I first want to extend my thanks to Council Member Althea Stevens - after I brought this issue to her attention, she immediately took action, ultimately leading to the introduction of this important legislation.

For many small businesses in the Bronx, safety and security is a tangible and ongoing concern. Security grilles have long served as a basic and necessary form of protection from theft, unlawful entry, property damage, etc – losses that many small business owners cannot recover from without significant financial strain.

However, compliance with Local Law 75 presents significant cost burdens for small businesses, especially those in the Bronx. With the July 2026 deadline rapidly approaching, these extra costs arrive at a time where rising rent, utilities and operational cost and economic uncertainty gravely threaten the stability of small businesses, and the cost of repair or replacement may jeopardize these businesses' ability to keep their doors open. By rethinking the City's approach to implementing Local Law 75, Intro 910 removes one of the many financial burdens facing small businesses today.

In the same vein, business owners are required to comply with an increasingly complex, constantly changing regulatory environment whilst managing the day to day operational tasks of running a business. Unlike large corporations, many of these businesses cannot afford attorneys, or dedicated compliance staff, and so must keep track of these things themselves. Consequently, this means that many important updates and responsibilities can go overlooked, with owners completely unaware that they have failed to meet a requirement until they face fines and further disciplinary actions. This is



particularly substantial in the Bronx, where the bulk of business owners are immigrants, first generation entrepreneurs, etc that often serve multiple roles within their business.

Intro 910 addresses this by promoting compliance through communication rather than punishment, which is important for small businesses with limited administrative capacity. This bill ensures that chambers of commerce, business improvement districts, community organizations, and small businesses receive clear information about regulations, requirements, potential penalties, and available financial assistance programs.

More broadly, the Bronx Chamber would like to voice support on the full legislative package being heard today, which work together to reflect a foundational understanding that small businesses need clear communication, tangible support and consistent collaboration with elected officials. Every dollar wasted on unnecessary regulatory compliance issues caused by administrative confusion, is a detriment to small business owners trying to expand their livelihood.

Thank you for the opportunity to testify and for your ongoing commitment to supporting workers and small businesses across New York City.

Monday, June 8, 2026

Testimony Before the New York City Council Committee on Small Business

Good afternoon. My name is Mark Caserta, and I serve as Vice President of Small Business Support at the Brooklyn Chamber of Commerce. Thank you for the opportunity to testify in support of Intro 910.

I would like to begin by thanking the 34—and counting—Council Members who have sponsored this legislation. The Brooklyn Chamber of Commerce appreciates your leadership in protecting New York City's small businesses. We also thank the New York City Department of Buildings for postponing enforcement of Local Law 75, which had been scheduled to begin on July 1. Given the intent of Intro 910, this decision provides important breathing room and allows for a more thoughtful approach to addressing this issue.

As written, Local Law 75 would expose thousands of small businesses to fines for non-compliant roll gates and require many owners to spend thousands of dollars replacing existing gates. After years of recovering from the pandemic, coupled with ongoing inflation, rising operating costs, and economic uncertainty, many small businesses simply cannot absorb these expenses.

The Brooklyn Chamber of Commerce believes Local Law 75 should ultimately be repealed. However, we support Intro 910 because it removes the immediate threat of burdensome penalties while focusing on education.

As the Council and Administration move toward implementation, we offer the following recommendations:

1. Increase Education and Outreach

Through our Small Business Resource Network, we continue to see newly installed roll gates that do not comply with Local Law 75. This suggests that awareness of the law has not adequately reached property owners, business operators, installers, or real estate professionals. The Department of Buildings should prioritize education and outreach to ensure stakeholders clearly understand when and how compliance is required. They may actually need more time than Intro 910 is providing.

2. Improve Compliance Among Installers

Whether due to a lack of awareness or insufficient oversight, installers should not be placing non-compliant roll gates on storefronts 17 years after Local Law 75 was enacted. If the City intends to prohibit newly installed opaque roll gates, it

must ensure that installers are fully informed of the requirements and consider additional permitting or enforcement mechanisms to prevent future violations.

3. Clarify the Language of Intro 910

Several advocacy organizations, including the NYC BID Association, have raised concerns that portions of Intro 910 may not fully reflect the legislation's intent. As currently drafted, the bill could be interpreted to mean that all newly installed security grilles must meet the 70 percent transparency standard and that all existing non-compliant grilles remain subject to replacement unless an owner can establish an affirmative defense that the grille was installed before July 1, 2011.

This does not appear to be the intent of the bill's sponsors. We encourage the Council to review and clarify the language to ensure the legislation clearly removes penalties for existing non-compliant installations while establishing standards for future installations.

Thank you for the opportunity to testify today. We look forward to working with the Council and the Administration on the implementation of Intro 910 and would be happy to answer any questions.

From: [Pedro Suarez](#)
To: [Testimony](#)
Cc: [Leshaw, Savief](#); [Orlando, Anthony](#); [Herrera, Stephanie](#); [District8](#); [District17](#)
Subject: [EXTERNAL] Committee on Small Business 6/8/26 - Third Ave BID Testimony
Date: Monday, June 8, 2026 3:04:07 PM

Good Afternoon Chair Thomas-Henry and the Councilmembers of the Committee on Small Business,

My name is Pedro Suarez and I am the Executive Director of the Third Avenue Business Improvement District in the South Bronx neighborhoods of Melrose and Mott Haven, which fall primarily under Bronx Council Districts 17 and 8. The Third Avenue BID represents over 300 storefronts. It is also the oldest commercial district in the Bronx and one of the city's most heavily trafficked areas, serving as a major transportation hub.

I testify today in support of all bills being considered today, but more specifically to comment on Int 0910-2026 regarding Local Law 75 of 2009 concerning security grilles. While I support the original law's intention and goals, outreach to businesses over the past 15+ years has been insufficient to ensure compliance by July 1, 2026. Additionally, many of our local businesses simply lack the capital to install a security grille within the next month, as this equipment can cost between \$10,000 and \$20,000 or more, depending on the size of the storefront. I estimate that 30-50% of the businesses in my district are not currently compliant. While the original law is well-intentioned, we must ensure that small businesses continue to thrive in a post-COVID world, especially since concerns remain regarding storefront vacancy rates, as recently reported by the NYC Comptroller's Office. Additionally, I encourage the city to work closely with vendors that manufacture and install security grilles to ensure that any security grilles sold to NYC businesses comply with this law. I also urge transparency regarding how enforcement will determine compliance with the 70% visibility requirements. Additionally, as a former city employee, I know there are robust ways to notify businesses of new legislation. For example, when DSNY published new recycling rules several years ago, it used extensive data to send physical mailers to most commercial properties and DSNY met with the chambers of commerce and BIDs to disseminate the information to businesses with enough notice. Additionally, a very small team of 3-5 individuals conducted thousands of site visits over 12 months to educate businesses. I encourage DOB to implement similar strategies or partner with other agencies to ensure the information reaches businesses.

We have been working hard to strengthen the corridor, supported by the NYC Department of Small Business Services and the release of our recent Commercial District Needs Assessment. Thank you for considering my testimony today in support of our efforts. I look forward to continuing to work with the city on strengthening our commercial corridor in service of New Yorkers.

Respectfully,

Pedro Suarez

Executive Director

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NYC HOSPITALITY ALLIANCE

June 8, 2026

Testimony of the NYC Hospitality Alliance on Int. 0910-2026 Outreach on security grille visibility requirements, and to repeal item 4 of section 1010.1.4.4 of the New York city building code and section 28-315.7.1 of the administrative code; Int 0799-2026 Establishing a support fund for small businesses affected by roadway construction; Res. 0328-2026 Tax Credit for Businesses Affected by Infrastructure Construction; T2026-2025 Accelerating the opening of new businesses by coordinating required inspections; and Res. 0328-2026.

On behalf of the NYC Hospitality Alliance, a nonprofit trade association representing thousands of restaurants, bars, and nightlife venues across the five boroughs, we respectfully submit the following testimony in support of Introductions 0799-2026, 0910-2026, T2026-2025, and Res. 0328-2026 which would provide practical relief and flexibility to small businesses navigating significant operational and financial challenges.

Int. 0910-2026: Security Grille Visibility Requirements

The NYC law requiring small businesses to install security gates is unfair because the city did not properly inform business owners for many years of their new obligations, and then waited until the last minute to inform them of the rule. Many small businesses were blindsided and now face thousands of dollars in installation costs without enough time to prepare or budget. Instead of supporting local businesses, the city created unnecessary financial pressure through poor communication.

Repealing portions of the current requirements and eliminating retroactive compliance obligations would help reduce unnecessary financial burdens and avoid costly retrofits for existing businesses, while maintaining core safety and enforcement standards.

We also support the bill's emphasis on additional outreach and education to help improve awareness and compliance among business owners regarding permitting requirements, existing rules, penalties, and available financial assistance.

While this bill is a step in the right direction, the current enforcement structure does however remain problematic for small businesses. The July 1 enforcement date would require all newly installed gates to meet the 70% transparency standard immediately, without robust education or outreach to affected businesses.



NYC HOSPITALITY ALLIANCE

As written, businesses that install nonconforming gates, even today, could still face penalties without clear notice of the new requirements. The legislation should be amended to create a longer and mandated small businesses outreach campaign conducted before it could be enforced.

In addition, existing gates installed after July 1, 2011 would apparently remain subject to fines. A more practical solution that would help many more small businesses would be to grandfather all existing gates, and require that all gates installed on or after July 1, 2028 to comply with the standard. This would also provide a reasonable two-year transition period for city outreach and compliance and would avoid repeating past regulatory rollouts that disproportionately harmed small businesses.

Additionally, some small business owners say these new gates make stores less safe by allowing criminals to see inside and plan crimes.

This proposal amended as described would provide practical relief and flexibility for small businesses while recognizing the operational realities faced by neighborhood storefronts throughout New York City.

Int. 0799-2026: Roadway Construction Small Business Support Fund

The hospitality industry depends heavily on consistent pedestrian access, visibility, and customer convenience. Prolonged roadway and infrastructure construction projects can significantly disrupt surrounding businesses by limiting foot traffic, reducing visibility, complicating deliveries, creating noise and dust, and causing confusion for customers. Even necessary public infrastructure improvements can create substantial economic hardship for small businesses operating on thin margins, like restaurants and bars.

This legislation would create a meaningful mechanism to help independently owned businesses offset losses and adapt operations during lengthy construction projects. The proposed grants, low-interest loans, and support for operational modifications, signage, permits, and related expenses could provide important relief to neighborhood businesses facing prolonged disruptions outside of their control.

We also encourage additional clarification regarding the types of construction projects covered under the program, including whether certain utility or transit-related infrastructure work that significantly impacts storefront businesses may qualify for assistance.



NYC HOSPITALITY ALLIANCE

If such projects are not currently contemplated under the legislation, we encourage the Council to expand the program's scope to include those disruptions as well.

We appreciate the Council's recognition of the real-world impacts that extended construction activity can have on storefront businesses and support efforts to provide practical assistance and flexibility during these periods.

Res. 0328-2026: Tax Credit for Businesses Affected by Infrastructure Construction

The NYC Hospitality Alliance supports Resolution 0328, which calls on New York State to establish a tax credit for businesses negatively affected by infrastructure construction.

A targeted tax credit could provide meaningful relief to small businesses experiencing revenue losses due to prolonged construction activity and would complement local efforts to support businesses during periods of disruption. While Introduction 0799 would provide direct assistance through grants, loans, and other resources, a state tax credit could serve as an additional tool to help businesses recover losses and remain viable while major infrastructure projects are underway.

Together, Resolution 0328 and Introduction 0799 recognize that infrastructure improvements benefit the public at large, and that small businesses adversely affected by those projects deserve meaningful support while construction is underway.

T2026-2025: Accelerating the opening of new businesses by coordinating required inspections

The New York City Hospitality Alliance supports efforts to make it easier, faster, and more predictable to open and operate a small business. Restaurants, bars, and nightlife venues frequently navigate a lengthy and fragmented process involving multiple agencies, inspections, plan reviews, permits, and utility approvals before they can open their doors and begin generating revenue. Delays and inconsistent coordination can create significant financial strain for independent operators, who are often paying rent, utilities, insurance, and payroll for months before opening.

Based on feedback gathered from more than 60 hospitality operators earlier this year, 95% reported experiencing delays related to permits, licenses, or inspections, with many reporting delays lasting six months or longer.



NYC HOSPITALITY ALLIANCE

Businesses consistently identified challenges involving agency coordination, repeated resubmissions that restart review timelines, inconsistent guidance, inspection scheduling delays, and utility hook-ups. These delays increase costs, create uncertainty, and can discourage entrepreneurs from opening or expanding businesses in New York City.

We appreciate the Council's recognition that improving interagency coordination and streamlining inspections and approvals can help reduce unnecessary administrative burdens while maintaining important health and safety standards. Efforts to create a more transparent, coordinated, and predictable process could help support entrepreneurship, reduce pre-revenue carrying costs, and improve the overall small business climate in New York City. We urge that this proposal be amended to apply to all eating and drinking establishments. We also strongly recommend that the Council and Administration examine the New Business Acceleration Team established under the Bloomberg Administration, which successfully achieved many of the objectives underlying this proposed legislation. Unfortunately, the program has been gradually dismantled over the years despite its demonstrated effectiveness in streamlining business approvals and reducing bureaucratic barriers.

Thank you for your consideration. If you have comments or questions please contact our Executive Director, Andrew Rigie, at arigie@thenycalliance.org or 212-582-2506.





Testimony to the NYC City Council Committee on Small Business

My name is Urgen Sherpa, and I represent Chhaya CDC. Chhaya CDC is a non-profit that builds the power, housing stability, and economic well-being of South Asians and Indo-Caribbean communities in New York City. On behalf of my organization & the community I represent, I would like to thank the Committee for the opportunity to testify today.

I am here to ask you to vote YES on Intro 910 to repeal Local Law 75.

That law requires every commercial security grille to be replaced with one that is 70% see-through by July 1, 2026. A new gate costs between \$1,000 and \$10,000. For a small business already struggling to survive, that is a devastating expense.

And the business owners are struggling. Rent is out of control. There is no cap on commercial leases. Inflation has raised the cost of everything from electricity to eggs. Foot traffic in many neighborhoods has dropped sharply because people are afraid of federal ICE enforcement. More than 5,000¹ businesses closed in early 2025 alone. Storefront vacancies are at record highs.

Small business owners simply cannot afford to spend thousands of dollars on new gates right now.

The city says visible grilles are safer. But ask any business owner who has been broken into: a solid gate hides your inventory and equipment. A see-through gate lets criminals window-shop after hours. Business owners should be allowed to keep the gates that have worked for years.

Also, the deadline is just a week away. Most small business owners don't even know this law exists. Business owners cannot possibly replace thousands of gates across the city by July 1st. When they fail, they will face fines they cannot pay.

Please do not force them to choose between buying a new gate and keeping the doors open. Repeal Local Law 75. Pass Intro 910.

Thank you.

¹ Haag, M. (2026, January 15). Number of Businesses in New York City Plunged Last Spring, Report Says. *The New York Times*.
<https://www.nytimes.com/2026/01/15/nyregion/business-closures-nyc-economy.html>

[EDC Data Shows 8,400 NYC Businesses Closed Amid Congestion Pricing Tolls - NewsBreak](#)

From: [Lauren Collins](#)
To: [Testimony](#)
Subject: [EXTERNAL] Testimony regarding Intro 910 (commercial security grilles)
Date: Thursday, June 11, 2026 1:13:51 PM

Hello,

We are submitting testimony on Intro 910 (commercial security grilles). The Church-Flatbush Community Alliance is in support of Intro 910 but with an important caveat:

Despite our understanding of the stated intention of Intro 910 that it **not** require existing grilles be replaced, **Intro 910 as written will not protect property owners who installed solid grilles if they did so after 7/1/11**. We hope that the wording can be tweaked to make it clear that current solid security grilles will not need to be replaced with 70% open grilles unless they are being replaced at some future date and that this future date will allow for a reasonable, comprehensive outreach campaign by DOB directly to businesses. Simply removing the hard deadline of 7/1/26 is helpful but doesn't remedy what will be an enormous expense on businesses that are already struggling to keep up in a world of tariffs, high gas/shipping costs, and competition from online shopping.

What seems fair and probably aligns with our understanding of the intent of Intro 910:

- Determine a future deadline for all post-deadline grille installations and hold DOB responsible for direct, multi-language notification to all NYC businesses/property owners in the same way that DSNY does widespread notifications (notifying BIDs, CBs, etc. is not sufficient). This should include a large public/social media campaign.
- Grandfather in all grilles installed before that deadline. In our view, it's not unreasonable to impose a 70% requirement for newly installed grilles if everyone receives adequate notice before installing them. This also reduces the incentive for unscrupulous grille installers to submit complaints to drum up business (which would be a repeat of what happened when the store sign law changed years ago).
- Hold liable any grille installers who install noncompliant grilles.
- Task DOB with exploring ways to educate through the permitting system.

Please let me know if you have any questions.

Best,

Lauren

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TESTIMONY

**NYC COUNCIL COMMITTEE ON EDUCATION
CHAIR, ERIC DINOWITZ**

Oversight Hearings on The Executive Budget for Fiscal Year 2027

**Presented on
Monday, June 8, 2026**



**The Council of School Supervisors and Administrators
Henry Rubio, President
Dale Kelly, Executive Vice President
Stamo Karalazarides, First Vice President**

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Thank you, Chair Dinowitz and members of the City Council, for the opportunity to offer written testimony on the Mayor's Fiscal Year 2027 Executive Budget. My name is Henry Rubio, and I am President of the Council of School Supervisors and Administrators. CSA represents more than 17,000 in-service and retired principals, assistant principals, educational administrators, supervisors, as well as directors and assistant directors of CBO-based early childhood centers across New York City.

The Executive Budget builds on several priorities raised during the Preliminary Budget process and includes meaningful investments in class size implementation, special education services, early childhood education, literacy and math supports, and citywide mental health and community safety initiatives.

At the same time, funding alone does not ensure successful implementation. School leaders are responsible for translating policy into practice, managing staffing, supervising instruction, maintaining safety, and supporting students and families every day. In each of the areas that follow, our goal is to ensure that investments made at City Hall translate into real improvements for students, educators, and families in every neighborhood.

Early Childhood Education

We strongly support the City's commitment to expanding access to early childhood education. Decades of research confirm what educators and families already know, that high quality early childhood programs improve school readiness, strengthen social and emotional development, increase long-term academic outcomes, and provide critical support to working families. Early childhood education sits at the center of any serious effort to support working families, and CSA supports the Administration's goal of expanding these programs.

The Executive Budget reflects further movement toward that goal. We appreciate the Administration's child care partnership with the State, including the State's \$1.2 billion investment to help make child care more affordable for working families. We also appreciate the Executive Budget's \$40 million investment in FY27 to increase provider rates, as well as funding for The Little Apple, the City's first municipal daycare. These investments are important acknowledgments that early childhood education is both education infrastructure and affordability infrastructure.

However, as school leaders well know, the long-term success of expansion depends on the stability of the workforce responsible for delivering these programs. Provider rate increases are an important step, but the City must ensure that public investments reach the educators, directors, assistant directors, and staff whose work makes early childhood education possible.

Today, New York City's early childhood sector is one of the largest in the nation, with nearly 37,000 educators working across more than 10,000 licensed childcare programs serving families in every borough. According to a comprehensive December 2025 workforce report released by the Day Care Council of New York and authored by Emmy Liss, who now serves as Executive Director of the Mayor's Office of Childcare, the workforce supporting these programs is overwhelmingly female and reflects the diversity of the communities it serves. Approximately 95 percent of childcare workers are women, about 75 percent are non-white or multiracial, more than 40 percent identify as Hispanic, and more than half were born outside the United States.

The same Day Care Council workforce analysis found that the median annual wage for childcare workers in New York City is approximately \$38,000, compared to a citywide median wage of roughly \$65,000, meaning childcare workers earn less than 95 percent of occupations in the city. As a result, they are twice as likely as other employed New Yorkers to live in poverty, and a significant number rely on public assistance programs such as Medicaid or SNAP.

Our members have lived through previous expansions which succeeded in increasing access, and many families benefited. However, expansion also scaled long-standing inequities. Two early childhood systems now exist side by side, one operated directly by the Department of Education and one operated by community-based organizations, and they remain fundamentally unequal.

CSA represents Directors and Assistant Directors in CBO programs who perform substantially the same work, under the same regulatory requirements, as their counterparts in DOE buildings. Yet they are paid less. Their staff are paid less. Their programs operate with fewer resources. This inequity has persisted for years despite repeated commitments to parity.

These compensation disparities have real consequences for workforce stability. Many educators leave community-based programs for DOE positions that offer higher salaries and stronger benefits. Recruitment becomes more difficult, leadership turnover increases, and classrooms become harder to staff. Across the early childhood sector, too many teachers leave the field within their first five years, and 57 percent of programs report being short staffed statewide. Even without further expansion, the system requires approximately 5,000 new educators each year simply to replace turnover, and workforce projections suggest that a universal birth-to-five system could require tens of thousands of additional childcare workers.

Leadership stability is particularly affected by compensation inequities. Directors and Assistant Directors in CBOs carry responsibilities that closely mirror those of DOE administrators. They supervise staff, evaluate teacher performance, guide curriculum implementation, manage attendance and payroll systems, oversee budgets, ensure regulatory compliance, and often respond to contracting and grant requirements associated with nonprofit governance.

Yet despite performing comparable supervisory roles, they are compensated on a lower scale. Analyses included in the Day Care Council workforce report estimate that directors who remain in community-based programs can lose more than \$2 million in earnings over the course of a 25-year career compared to similar leadership positions within the DOE system. No education system can sustain leadership stability when the professionals responsible for running programs face such a significant financial penalty for remaining where they are most needed.

In addition to compensation inequities, providers continue to face serious operational challenges related to delayed payments from the DOE. In recent years, community-based programs have experienced chronic payment delays that have made it difficult to meet payroll, pay rent, and maintain basic services. The City Council has already examined these failures through oversight hearings because centers have at times been forced to operate for months without reimbursement for services already delivered. These delays create financial instability, push programs into debt, and threaten closures even as demand for early childhood seats continues to grow.

Funding structures also contribute to instability. Many community-based providers operate under enrollment-driven funding models in which program budgets are tied directly to the number of students enrolled. Even small fluctuations in enrollment can create significant financial gaps for nonprofit providers operating on narrow margins. Unlike DOE schools, which operate within more stable institutional budgeting frameworks, community-based providers often absorb the financial risk created by shifting enrollment patterns.

CSA supports the Administration's vision for early childhood education and appreciates the new investments reflected in the Executive Budget. But we urge the City to address the full system, not just access. True success requires pay parity, workforce stability, operational reliability, timely payments, and respect for the professionals who lead these programs every day. If New York City is going to continue expanding early childhood education, it must fix the inequities that have defined it for too long.

Special Education Services and Due Process

CSA appreciates that the Executive Budget directly recognizes the long-standing challenges faced by special education students and their families. For decades, too many families have had to fight for services their children are legally entitled to receive. School leaders see the consequences when evaluations are delayed, providers are unavailable, placements are difficult to secure, or mandated services are not delivered with the consistency students need.

The Executive Budget states that NYC Public Schools has done important work in recent years to improve access to services and that the City is building on that work through additional investment. CSA supports that direction. The most effective way to reduce conflict, reduce

litigation, and support families is to provide students with the right services early, consistently, and close to home.

At the same time, the Executive Budget also identifies due process cases as a major cost driver and states that changes to program management are expected to reduce cases and generate annual savings. CSA understands the need for responsible fiscal management. But savings in special education must come from better service delivery, stronger administrative systems, clearer central support, and earlier resolution of family concerns, not from restricting access, delaying services, or shifting additional burdens onto individual schools.

Principals and assistant principals are often the people families turn to first when services are not in place. They work to coordinate IEP implementation, manage provider schedules, communicate with families, support teachers, and resolve conflicts before they escalate. But school leaders cannot solve systemwide capacity issues by themselves. They need adequate staffing, sufficient related service providers, timely evaluations, reliable transportation, clear placement options, and central systems that respond quickly when a student's services are at risk.

CSA urges the Administration and the Council to ensure that special education investments are measured not only by savings in due process spending, but by improved student outcomes, stronger family trust, and the ability of schools to deliver mandated services without forcing parents into adversarial processes. Reducing litigation should be the result of a better system for students, not a substitute for one.

School Safety

School safety remains one of the most urgent issues facing our schools. The Chancellor has rightly identified safety as a core pillar of his education strategy, and CSA strongly agrees. Children cannot learn when they are anxious or afraid. Families cannot fully trust the system if they do not feel confident sending their children into school buildings each morning. Educators cannot teach effectively when they are managing constant disruptions or responding to unresolved safety concerns.

In recent years, school leaders have seen a noticeable increase in anxiety among students and families. Parents consistently share heightened concern about social media-driven conflicts, mental health challenges, and incidents of violence both inside and outside school buildings. Students are carrying trauma into classrooms. School leaders are spending increasing amounts of time responding to behavioral crises, peer conflicts, and emotional distress.

New York City schools are currently supported by approximately 3,600 school safety agents, and the New York City Independent Budget Office reported in February 2025 that the number of school safety agents had declined by 28 percent, a loss of 1,413 positions, compared with July

2019 levels, reflecting a substantial reduction in the school safety workforce over the past several years.

Meanwhile, safety personnel continue to intercept dangerous items on a regular basis. Police reporting found that during the 2023-2024 school year NYPD school safety personnel confiscated approximately 3,700 dangerous instruments and 278 weapons in New York City public schools, representing thousands of situations in which trained personnel prevented potentially dangerous incidents from escalating.

School safety agents play a critical role in maintaining secure and welcoming school environments. They are often the first adults students see when they enter the building and the last when they leave. In many schools, safety agents are trusted figures who build relationships with families over years. They know the children by name. They recognize when something feels off. They de-escalate conflicts, support school staff during emergencies, and provide reassurance to parents. For many students, safety agents function as steady, familiar adults, often described by families as trusted uncles or aunts who help anchor the school community.

Despite their importance, the number of school safety agents has declined in recent years, leaving many buildings understaffed and school administrators overly burdened and concerned for the safety of their students and staff. For several years now, CSA has repeatedly raised concerns about this shortage and its impact on daily operations. While recruitment challenges are frequently cited, there has not yet been a comprehensive, systemwide strategy to address recruitment, retention, compensation, deployment, and working conditions.

The Executive Budget includes citywide investments in community safety, hate crime prevention, and access to mental health care. CSA supports these investments. They are important, and they reflect a broader understanding that safety includes prevention, intervention, and community stability. But citywide investments cannot substitute for the specific safety needs inside school buildings. Schools need enough trained safety agents, adequate mental health staffing, and leadership capacity to manage incidents in real time.

Recent incidents reported across New York City illustrate the kinds of situations school leaders and safety personnel are managing every day:

In September 2025, a 16-year-old student in Queens allegedly brought a loaded 9-millimeter handgun to school and posted threats on social media about shooting up the building.

In October of this school year, police recovered a loaded handgun from a student in Brooklyn, a school building that does not have permanent metal detectors.

In November, a 17-year-old student was slashed in the head and neck with a scalpel during a hallway fight inside a Bronx school and was transported to the hospital.

Right before the December holidays, a 12-year-old boy was charged with attempted murder after stabbing another 12-year-old in the chest at a Brooklyn school.

In January 2026, two separate students brought loaded firearms into two different New York City schools on the same day.

Even when violence occurs outside the building, the consequences immediately affect the school day: that same month, a Manhattan school building in Chelsea was placed on lockdown after gunfire erupted in a nearby park, forcing students and teachers to shelter in place.

In February, a school safety agent in Brooklyn was stabbed while attempting to break up a fight near a school during dismissal.

And earlier this month, an 11-year-old student stabbed another child inside a Bronx school, sending the victim to the hospital. Meanwhile, more than a dozen students were injured in a pepper spray incident at a Queens school.

These incidents represent only a fraction of the events school leaders manage each year. Even when situations are contained quickly, they leave lasting impacts on students, staff, and families. Each incident requires investigation, counseling, communication with families, and often weeks of follow-up to stabilize the school community. This is a growing strain on administrators who must quickly and appropriately address these incidents to support their students and families.

Safety also extends beyond physical security. Student well-being is deeply connected to mental health supports, restorative practices, and access to caring adults who can intervene early when problems arise. The New York City Department of Health reported in September 2025 that 35 percent of New York City public high school students reported feeling persistently sad or hopeless in 2023, up from 27 percent in 2013, while 18 percent reported seriously considering suicide and 14 percent reported a suicide attempt in 2023. These statistics are drawn from the NYC Youth Risk Behavior Survey, which is conducted every two years, making 2023 the most recent year of available citywide data.

At the same time, many schools lack adequate mental health staffing. A December 2025 report from New York City Comptroller Brad Lander found that 53 percent of New York City schools do not meet recommended guidance counselor ratios. Principals report that many conflicts stem from untreated anxiety, housing instability, social media pressures, and unresolved trauma. Without adequate counseling services, restorative programs, and school-based mental health professionals, schools are often left responding to crises rather than preventing them.

CSA continues to advocate for the restoration and expansion of restorative justice programs, school-based mental health supports, peer mediation, and guidance counseling services. These resources are not optional. When students have access to counseling, when conflicts are addressed through structured restorative practices, and when families are engaged as partners, schools become safer and more stable.

An AP in Every School

Leadership capacity is another critical factor. As anyone who has spent time in a school building knows, assistant principals are central to the daily operation of safe and effective schools. They work at the intersection of instruction, operations, and school culture. They supervise and support teachers, coordinate professional learning, manage compliance responsibilities, reinforce expectations across the building, and address the countless day-to-day issues that determine whether a school runs smoothly. In many buildings, assistant principals are among the most visible and consistently present members of the leadership team, maintaining steady relationships with students, staff, and families throughout the school day.

That presence is especially important when it comes to safety. Assistant principals are often the first administrators to respond to student crises, medical emergencies, behavioral incidents, and safety concerns. They coordinate with school safety agents, direct staff, communicate with families, support teachers, and stabilize school operations in real time. These moments require judgment, composure, and experience.

But safety is not only about crisis response. It is also about prevention. Assistant principals help build the school culture that allows adults to identify problems early, intervene before conflicts escalate, and maintain clear expectations in classrooms, hallways, cafeterias, and common spaces.

When schools do not have sufficient assistant principal coverage, these responsibilities do not disappear. They fall entirely on the principal or are distributed in ways that create gaps in supervision, communication, and follow-through. That is not sustainable, particularly in large schools where the number of students, staff, programs, and daily incidents requires a distributed leadership structure.

As class size implementation brings thousands of new teachers into the system, ensuring sufficient supervisory staffing becomes even more important. Schools need enough assistant principals to mentor new educators, support instruction, maintain consistent operations, and respond quickly and effectively to safety concerns. For these reasons, CSA continues to advocate for at least one assistant principal in every school and for the supervisory capacity necessary to keep schools safe, stable, and well led.

Professional Development

CSA supports school leaders not only through advocacy but through sustained professional development delivered by our Executive Leadership Institute. For more than two decades, ELI

has provided CSA members with training designed by school leaders for school leaders, grounded in the realities of New York City schools.

ELI offers many single-topic workshops each year on timely and practical subjects, including instructional leadership, restorative practices, mental health supports, science of reading implementation, chronic absenteeism, family engagement, and crisis management. In addition, ELI provides structured, year-long programs for new and experienced administrators who want to reinvest in their professional growth. These programs focus on instructional supervision, school culture, staff development, operational management, and equity-centered leadership.

The centerpiece of ELI's work is ALPAP, CSA's Advanced Leadership Program for Assistant Principals, which serves as a principal preparation program. ALPAP is a year-long experience that pairs aspiring principals with veteran mentors who are currently leading schools. Participants engage in seminars, field-based learning, action research, and direct coaching. They build practical leadership skills while developing professional networks that continue long after the program ends. ALPAP has helped prepare hundreds of school leaders for principalship and remains one of the most effective leadership pipelines in the City.

The Executive Budget includes \$17.3 million in FY27 to expand NYC Reads and Solves. CSA supports investments that strengthen literacy and math instruction. But the success of these instructional initiatives depends heavily on school leaders. Principals and assistant principals must understand the instructional models, support teachers, use data effectively, monitor implementation, and communicate with families. That requires targeted professional development aligned to the real work of school leadership.

For many years, professional development relied heavily on in-person workshops. While those remain valuable, the pandemic accelerated a shift toward virtual learning, and school leaders have embraced it. Virtual sessions allow administrators to participate from their buildings, reduce travel time, and balance professional learning with demanding schedules. Attendance has increased, and engagement has broadened across boroughs.

At the same time, school leaders are increasingly asking for asynchronous learning. Principals and assistant principals work long days and often cannot attend live sessions at fixed times. They are requesting high-quality online courses that can be completed at their own pace, while still earning required certifications and professional learning credits. This flexibility is essential for leaders who are managing staffing shortages, student needs, and operational challenges throughout the school day.

CSA is preparing to transform its offerings by converting much of our existing content into asynchronous formats while continuing to offer live workshops and mentoring. This will allow us to reach more school leaders, provide consistent learning across the system, and support

administrators in ways that fit the realities of their schedules. This transition requires significant investment in curriculum development, digital platforms, instructional design, and staffing.

A critical component of this expansion is artificial intelligence literacy. AI is already reshaping education. Yet many school leaders have not received structured training on how to responsibly integrate AI into instruction, operations, and school culture. CSA believes that systemwide transformation begins with principals.

We are developing professional learning specifically focused on AI, created by New York City administrators for New York City administrators, covering best practices for instructional use, staff support, student safety, data privacy, and ethical implementation. Increasing AI literacy among school leaders and administrators will produce dividends across the system. It will strengthen instructional leadership. It will support teachers as they adapt their practice. It will help schools operate more efficiently. It will ensure that students benefit from emerging technologies in thoughtful and equitable ways.

CSA is trusted with professional development because our programs are created by New York City school leaders who understand New York City schools. Our facilitators are practitioners. Our content reflects the instructional frameworks, compliance requirements, staffing realities, and community dynamics that principals face every day. This credibility matters. School leaders engage deeply with ELI because the learning is relevant, practical, and immediately applicable.

We are asking the Council for increased investment of \$1.2 million in ELI, bringing the total to \$2.2 million, because this moment represents a critical turning point.

Class Size Law Implementation

CSA has always supported smaller class sizes. Educators understand that when teachers have fewer students, they are better able to provide differentiated instruction, build relationships, identify learning gaps, and spend meaningful time with each child. Smaller classes create stronger classroom communities and improve academic outcomes. For these reasons, CSA supported the class size legislation at the state level.

From the beginning, however, we have been clear that reducing class size must be done responsibly. We warned early that successful implementation would require sufficient staffing, adequate funding, and available space. Without all three, schools would be placed in impossible positions and students would ultimately bear the consequences.

The Executive Budget makes significant new commitments toward class size compliance. We appreciate the additional \$122 million investment to hire 1,000 more teachers. We also appreciate the addition of \$1.5 billion to the School Construction Authority's Five-Year Capital

Plan, bringing the total identified in the Executive Budget summary to \$7.6 billion. These investments reflect the reality that class size implementation cannot succeed without both staff and space.

Over the past two years, CSA has worked closely with the DOE and UFT to move implementation forward in a practical way. Principals were asked to analyze their buildings, assess staffing needs, evaluate space constraints, and report back on what their schools would require to meet the mandates. We appreciate that the City used this information to guide funding decisions and to direct additional resources to schools that demonstrated need.

We appreciate the Executive Budget's additional \$122 million investment to hire more teachers, and we continue to urge the city to pair teacher hiring with sufficient supervisory staffing. CSA has consistently emphasized that hiring teachers alone will not be enough. If thousands of new educators enter the system, schools also need supervisors who can provide instructional coaching, professional development, and operational stability. APs play a central role in mentoring new teachers, maintaining consistency across classrooms, and responding to daily challenges in school buildings. We were pleased that the City recognized this reality, and we continue to advocate for further supervisory support as implementation continues toward the compliance thresholds.

Another one major challenge has become increasingly clear. Many schools simply do not have the physical capacity to add classrooms. New construction has not kept pace with enrollment growth, and there has not been sufficient progress in identifying where additions to existing buildings are feasible or where entirely new schools are required. Without a comprehensive facilities strategy tied directly to class size implementation, principals are left trying to solve structural problems at the building level with limited options. Space constraints remain one of the most significant barriers to full compliance. We must prioritize the facility retrofit requests that principals have already submitted to increase the number of available classrooms, and the City must begin to identify locations for new school buildings.

Lastly, CSA remains concerned about the financial structure supporting implementation. Fair Student Funding was designed around class sizes that will no longer exist. When schools reduce enrollment to meet new caps, they lose per-pupil funding even as they are required to staff additional classrooms. Without adjustments to Fair Student Funding, schools may be forced to cut programs or support services to cover basic instructional costs. The funding formula must eventually be updated to reflect the realities created by the law.

Additional Priorities

In addition to the areas already discussed, CSA urges the Council to continue supporting several programs and operational needs that are essential to school stability and student success.

CSA strongly supports expanded investment in Career and Technical Education. CTE programs provide students with industry-aligned instruction, hands-on experience, and pathways to meaningful careers. School leaders see firsthand how these programs engage students who may otherwise feel disconnected from traditional academic models. Yet access remains uneven across boroughs and communities. CSA urges increased funding to expand CTE and career pathway offerings so that every student has access to career-connected learning, including apprenticeships and internships, particularly in high schools serving high-need populations.

Equally important is early exposure to digital literacy and computer science in elementary and middle schools. Students must develop foundational skills in computational thinking and responsible technology use at an early age. CSA continues to advocate for dedicated funding for computer science instruction, professional development for educators, and equitable access to devices and curriculum resources so that students across all neighborhoods are prepared for high school, college, and an evolving workforce.

CSA also supports expanded investment in STEAM Centers that provide students with opportunities in science, technology, engineering, arts, and mathematics. These centers expose young people to robotics, design, and emerging fields while building creativity and problem-solving skills. School leaders urge that these opportunities be made available in every borough, not concentrated in a limited number of communities.

Community Schools remain another critical support structure. These schools provide wraparound services that address food insecurity, health care access, housing instability, and family engagement. When paired with strong instructional programming, Community Schools help stabilize neighborhoods and improve attendance, behavior, and academic outcomes. CSA encourages continued investment in community schools.

Access to functioning technology remains essential. Schools continue to rely on student devices for instruction, assessment, and communication with families. CSA urges the City to continue funding the purchase, maintenance, and repair of devices so that technology does not become an unfunded mandate placed on individual schools.

CSA also appreciates the Executive Budget's investment in expanding NYC Reads and Solves. Literacy and math investments are important, but they must be accompanied by sufficient staffing, coaching, professional learning, scheduling support, and high-quality materials. Principals and assistant principals will be responsible for making these initiatives work in classrooms, and they need the tools and time to do that work well.

Finally, CSA also urges the City to sustain funding for New Visions. New Visions provides critical support to schools through technology solutions specifically designed for the unique realities of public education. The New Visions Portal was created in partnership with educators

and school communities to reflect the day-to-day workflow of schools. By thoughtfully consolidating student, academic, attendance, program, and intervention data into one accessible system, the Portal empowers school leaders and staff to make informed decisions, identify student needs early, and coordinate timely supports that improve student outcomes.

The Portal is not simply a reporting dashboard. It is a planning, case-management, and student-support tool that allows school teams to monitor progress, document interventions, coordinate services, and act on real-time information before challenges become crises. Its widespread voluntary use across the system demonstrates the meaningful value administrators and school-based staff find in the platform.

Continued investment in New Visions funding is essential to ensuring that schools have access to tools that foster collaboration, efficiency, and student success. The Portal fills a critical gap by connecting schools, districts, and community-based service providers through a shared platform that supports coordinated care and communication. It also helps connect school teams with district offices, CUNY, DHS shelters, community-based organizations, and citywide initiatives through shared, permission-based access to timely and actionable information. Its flexibility allows schools to customize processes to meet local needs while maintaining consistency in data use and intervention strategies.

Sustaining this funding for the platform will help schools strengthen support systems, improve operational effectiveness, and ensure that every student has access to the resources they need to thrive. CSA urges the Council and Administration to maintain stable funding for the New Visions Portal so that school leaders and their teams can continue using coordinated, real-time data to support students and families effectively.

Conclusion

CSA appreciates the Administration's recognition that New York City's education system requires sustained investment in early childhood education, class size implementation, special education services, school safety, instructional supports, mental health, and leadership development.

The Executive Budget includes important new investments, including support for class size staffing and capital needs, special education services, childcare provider rates, NYC Reads and Solves, citywide mental health access, and early childhood expansion. These are meaningful steps. But the success of these investments will depend on implementation, staffing, space, central support, and the ability of school leaders to turn budget commitments into daily practice.

At the same time, school leaders see every day that funding decisions made at City Hall translate directly into classroom conditions, staffing stability, and student well-being. Expanding early childhood education requires resolving long-standing inequities in compensation and payment systems. Improving special education requires early access to mandated services and a system that supports families before disputes escalate. Implementing class size mandates requires

adequate staffing, space planning, and funding structures that reflect current realities. Ensuring school safety requires investments in people, mental health supports, and leadership capacity, not just infrastructure. Strengthening professional development requires preparing current and future leaders for the evolving demands of their roles, including responsible integration of emerging technologies.

CSA's members are responsible for turning policy into practice. They manage complex organizations, support educators, partner with families, and care for students under increasingly challenging conditions. They are committed to delivering on the City's goals, but they cannot do so without stable systems, equitable funding, and sustained support.

CSA looks forward to continuing to work with the Administration and the City Council throughout the budget process to ensure that these investments lead to meaningful improvements in school communities across all five boroughs. We thank you for your continued partnership and for your commitment to New York City's students, families, and educators.

Thank you for the opportunity to testify.

FROM: Nargis Baseel – Senior Lawyer England & Wales

DATE: June 8, 2026

SUBJECT: Modernizing 22 NYCRR s 521.1 to remove barriers on UK legal talent and alleviate administrative delays. To introduce a pilot scheme to make English Legal advice accessible for NY residents.

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

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

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

Strategic Alignment with the Mayor's Platform

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

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

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

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

Best Regards

Nargis Baseel

Senior Lawyer England & Wales

Email: [REDACTED]

Contact: [REDACTED]



Testimony of Leah Archibald

Executive Director, Evergreen: Your North Brooklyn Business Exchange
NYC Council Committee on Economic Development May 29, 2026

Thank you to the Chair and members of the Committee for the opportunity to testify.

New York City is proposing to dismantle the only program dedicated to supporting small manufacturers and industrial businesses, many of which keep this city functioning. Eliminating funding for the Industrial Business Service Provider (IBSP) program would end more than forty years of partnership between the City and the organizations that help industrial firms survive and grow in New York.

Evergreen has partnered with the City of New York for more than 40 years to support industrial businesses in North Brooklyn—manufacturers, fabricators, food producers, and logistics firms that anchor the city’s working economy. For more than 40 years, Evergreen: Your North Brooklyn Business Exchange has worked directly with these businesses that anchor the working economy of North Brooklyn. **I have included letters and testimonials from a sample of them highlighting the many ways Evergreen has assisted their businesses, allowing them to grow working class jobs in our community.**

What We Do

Since our founding in 1982, Evergreen has evolved alongside the City. We began by improving public safety in industrial areas, then became experts in incentive programs, helping hundreds of businesses grow. When the City created the IBZ program, we were selected to serve North Brooklyn. During the 2008 recession, we partnered with the City to acquire industrial property, and today we operate five buildings—32,000 square feet—leased below market to small manufacturers to preserve jobs.

In 2025 Evergreen staff served 192 individual businesses. Business clients looked to Evergreen for a wide variety of services; the most frequently requested services by far and away was assistance navigating government. Evergreen assisted 42 businesses with government navigation on 64 different issues. Evergreen was able to help eight local firms apply for 19 different incentives. One hundred thirteen firms received one-on-one assistance from Evergreen staff on more than 203 issues. Seventy-six firms sent 87 attendees to our informational workshops and multi-week seminars.

The businesses we assist are not small in their impact. A recent economic analysis found that **the businesses Evergreen served in 2025 support approximately 5,300 jobs across New York City and generate roughly \$1.5 billion in economic activity annually.**



EVERGREEN

Your North Brooklyn Business Exchange

IBSP organizations also serve as the City's most effective pipeline connecting industrial businesses to critical public programs. Because we maintain long-term relationships with hundreds of firms in Industrial Business Zones, IBSPs are often the primary source of referrals for companies accessing city incentives such as the Commercial Expansion Program (CEP) and the Relocation and Employment Assistance Program (REAP). Without IBSP organizations actively identifying and assisting eligible businesses, many small manufacturers simply do not know these programs exist or lack the capacity to apply successfully.

At the same time, Evergreen is actively helping industrial businesses participate in the emerging green economy. Through our Growing Green initiative, we are working with partners to connect Brooklyn's small manufacturers and industrial service firms to opportunities in clean energy, infrastructure resilience, and environmental restoration. These programs are designed to ensure that the transition to a green economy creates opportunities for local businesses and working-class New Yorkers rather than leaving them behind.

This is a true public-private partnership. **City funding enables us to leverage philanthropy, private capital, and earned revenue to deliver far greater impact.** The City's investment allows organizations like ours to mobilize far greater resources on behalf of small industrial businesses, providing better bang for the buck with taxpayer dollars. Just as importantly, we are a trusted messenger—able to reach businesses and connect them to City programs more effectively than the government alone.

Why This Matters

In North Brooklyn alone, industrial businesses support nearly 48,000 jobs and generate approximately \$15 billion in economic activity annually across New York City. These jobs pay average wages of approximately \$107,000, significantly higher than the Brooklyn average. These are accessible, living-wage jobs—often held by immigrants, workers of color, and workers without college degrees—and they remain one of the most reliable pathways to economic mobility in this city, where cost of living continues to rise in many neighborhoods.

The IBSP program is not optional—it is core infrastructure that allows this sector to function. Organizations like Evergreen are a critical part of the infrastructure that allows this sector to survive in one of the most expensive cities in the world.

The work IBSP organizations do already aligns directly with many of the Mamdani administration's priorities: expanding access to good jobs, ensuring that growth is equitably distributed throughout all communities in NYC, and ensuring that the benefits of the green economy reach historically underinvested communities.

What's At Stake



EVERGREEN

Your North Brooklyn Business Exchange

Eliminating the IBSP program and its funding weakens the entire ecosystem of nonprofit economic development organizations that extend and amplify the City's investment in working-class job creation. The replacement model currently proposed in the Business Solutions Center RFP would assign a single rotating staff member to serve industrial businesses across multiple neighborhoods in each borough.

Industrial firms require help navigating zoning and permitting, securing industrial space, accessing specialized financing, complying with environmental regulations, and building workforce pipelines. This work requires deep sector knowledge and sustained relationships built over years. A rotating generalist cannot replace the trusted expertise that IBSP organizations provide, and a single employee cannot possibly serve the hundreds of businesses that IBSPs serve each year throughout NYC.

Further, this proposal is also inconsistent with the City's own industrial policy. The recently released Industrial Plan recognizes the need to strengthen the industrial sector and support businesses located in Industrial Business Zones. Eliminating the organizations that actually deliver those services and replacing them with a single employee in each borough undermines that strategy.

If IBSP is eliminated, the City loses that infrastructure. **If this program is eliminated, the City will lose more than a contract line. It will lose an entire ecosystem. This will undermine the effectiveness of NYC's own programming.**

You lose the front door to industrial businesses—and decades of trust and sector expertise built over time.

You lose the pipeline to your own programs. IBSPs are the primary way industrial businesses access City incentives like CEP and REAP. Without us, businesses don't know these programs exist—and even when they do, they lack the capacity to apply successfully.

You lose your emergency response network. After Hurricane Sandy, when SBS needed to meet impacted businesses, we brought the Mayor directly to flooded firms. During COVID, we connected manufacturers to produce hospital gowns for NYC Health + Hospitals, distributed PPE to essential businesses, and served as a real-time conduit between government and industry.

You lose capacity when the City needs it most. During COVID, SBS sent us hundreds of businesses from across the city seeking help accessing disaster funding. We worked around the clock to assist them. When DCP needed 300 surveys completed over the holidays, we delivered—because we have the relationships. When DOT asked us to collect feedback from our industrial businesses about the BQE and Grand Street Bridge redesign we were able to say yes because we had the relationships and at present, we still have the capacity.



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Your North Brooklyn Business Exchange

You lose deep, sector-specific expertise that cannot be replicated by a rotating generalist and cannot be replaced by a rotating generalist.

If we lose this funding, we are not going to have the capacity—the staffing—to do these things for the city in the future.

And you'll lose decades of expertise—for what? A model that replaces trusted, sector-specific support from multiple staffers and organizations with a single rotating BSC staff member in each borough? Doing office hours once a week in a library? It is not humanly possible for a single BSC staffer in each borough to serve the 400+ businesses our IBSPs serve in each borough each year. How will businesses even know how to find them?

Let me be blunt: this is not efficiency. It feels more like **DOGE-style cuts or private equity stripping a company for short-term gains** while undermining its long-term viability.

The IBSP program costs the City roughly \$1.2 million annually—a negligible investment relative to the billions of dollars in economic activity and tens of thousands of jobs supported by the industrial sector. For approximately \$1.2 million annually—a rounding error—the City sustains a system that supports thousands of jobs and billions in economic activity.

Eliminating it does not save money. It dismantles infrastructure the City relies on.

What We Recommend

We are not asking the City to preserve the status quo. We are asking the City not to dismantle the industrial support ecosystem and to partner with us to create a system that works better and helps your administration achieve its goal of a more equitable city.

Specifically, we urge the City to:

- **Remove industrial business support from the Business Solutions Center RFP**
- **Use the one year extension for existing IBSP contracts to ensure continuity of services and as runway to work with industrial organizations to design a modernized program that addresses industrial real estate pressures, business education needs, and emerging opportunities in the green economy**

Industrial businesses make New York a city where working people can still build a future. The IBSP network helps keep those businesses here. The Industrial Service Providers are the infrastructure that supports them. **Don't squander it. Strengthen it.**



Mayor Zohran Mamdani
City Hall
New York, NY 10007

Eric Ottaway
CEO

Dear Mayor Mamdani:

My name is Eric Ottaway, and I am the CEO and owner of The Brooklyn Brewery, an industrial business located in Williamsburg, Brooklyn. Brooklyn Brewery has been operating in Brooklyn since 1988, and was the first company to bring brewing back to Brooklyn when we opened our doors in Williamsburg in 1996. We currently employ over 40 people in Williamsburg and are putting the finishing touches on our new brewery which will require us to expand to over 60 employees.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

Organizations like **Evergreen: Your North Brooklyn Business Exchange** provide critical support to small manufacturers and industrial businesses like mine. Evergreen has helped our company with zoning issues, grant applications, building and operating permits, available properties for lease, community relations, and much more. Evergreen regularly connects us with resources that allow us to operate and grow in New York City.

We love Brooklyn and NYC, and have staked our name (literally) to our beloved Borough. However, as you well know, doing business in NYC is challenging on a good day. Without the assistance of Evergreen, it would be far more difficult for small businesses like ours to thrive in NYC.

Programs like IBSP ensure that small companies like mine have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that helps industrial businesses survive in an increasingly difficult business environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of my business and that of my employees depends on it.

Sincerely,

Oppose eliminating the IBSP program

Arthur Wei <arthur@brooklyncampervans.com>

Thu, Apr 9, 2026 at 3:18 PM

To: Leah Archibald <larchibald@evergreenexchange.org>, "knieves@evergreenexchange.org"
<knieves@evergreenexchange.org>, district34@council.nyc.gov

Dear Council Member Jennifer Gutiérrez,

My name is **Arthur Wei**, and I am the owner of **Brooklyn Campervans**, an industrial business located in **East Williamsburg**. Our company **builds mobile homes and mobile offices from cargo vans and employs 5 New Yorkers**.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

Organizations like **Evergreen: Your North Brooklyn Business Exchange** provide critical support to small manufacturers and industrial businesses like mine. Evergreen has helped our company with workshops, consulting, advice, and the right connections. Evergreen regularly connects us with resources that allow us to operate and grow in New York City. Without their assistance, it would be far more difficult for small businesses like ours to thrive in NYC.

Industrial businesses like mine provide stable, good-paying jobs and produce essential goods and services for New York City. Industrial businesses provide accessible, well-paying jobs to New Yorkers who are too often left out of the city's prosperity—immigrants, people of color, and workers without college degrees. Programs like IBSP ensure that small companies like mine have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that helps industrial businesses survive in an increasingly difficult business environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of my business and that of my employees depends on it.

Sincerely,

Arthur Wei

Co-Founder of Brooklyn Campervans

344A Maujer St. Brooklyn, NY 11206

--



Arthur Wei

Co-Founder at Brooklyn Campervans

<https://www.brooklyncampervans.com/>

arthur@brooklyncampervans.com





Karen Nieves <knieves@evergreenexchange.org>

Fwd: Preserve Funding for IBSP Program

1 message

Caroline Bell <caroline@cafegrumpy.com>
To: Karen Nieves <knieves@evergreenexchange.org>

Sun, Mar 29, 2026 at 8:56 PM

----- Forwarded message -----

From: **Caroline Bell** <caroline@cafegrumpy.com>
Date: Sun, Mar 29, 2026 at 8:56 PM
Subject: Preserve Funding for IBSP Program
To: <District33@council.nyc.gov>

Dear Council Member Restler,

My name is Caroline, and I am the owner of Cafe Grumpy. Our coffee roastery is an industrial business based in Greenpoint, where we roast coffee for our retail locations as well as for grocery and wholesale partners.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

Organizations like Evergreen: Your North Brooklyn Business Exchange, provide essential support to small manufacturers and industrial businesses like ours. Throughout our growth, Evergreen has helped us navigate challenges by connecting us with critical resources that make it possible to operate in New York City. Without this kind of support, it would be significantly more difficult for small businesses like ours to survive and grow.

Industrial businesses play a vital role in New York City's economy. We create stable, good-paying jobs and produce essential goods and services. Just as importantly, we offer accessible employment opportunities to New Yorkers who are often excluded from the city's economic prosperity. Programs like IBSP ensure that companies like ours have the support needed to remain in the city and continue employing local residents.

Eliminating the IBSP program would remove one of the few systems specifically designed to help industrial businesses endure in an increasingly challenging economic environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide critical services to the industrial business community.

Sincerely,
Caroline

Caroline Bell (*she/her*)
Owner, Café Grumpy
199 Diamond St. Brooklyn NY 11222 US
(718) 383-0748

EMPIRE METAL TRADING LLC.



SCRAP METAL RECYCLING

1301 GRAND STREET, BROOKLYN, NEW YORK 11211

TELEPHONE (718) 497-1950 FAX (718) 456-7274

March 18, 2026

Council Member Jennifer Gutierrez
244 Union Avenue
Brooklyn, NY 11211
District34@council.nyc.gov

Dear Council Member Gutierrez:

My name is Wayne King, and I am a managing member of Empire Metal Trading LLC, an industrial business located in East Williamsburg, Brooklyn. Our company receives, processes and ships scrap metal for recycling into new finished metal products. It is the oldest form of recycling. We currently employ 25 New Yorkers.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

Organizations like **Evergreen: Your North Brooklyn Business Exchange** provide critical support to small manufacturers and industrial businesses such as ours. Evergreen has helped our company with a great number of resources and guidance pertaining to our operations, from networking with other local businesses, hiring, real estate advice, and assisting us in enhancing our operations in the borough.

Evergreen regularly connects us with resources that allow us to operate and grow in New York City. Without their assistance, it would be far more difficult for small businesses like ours to thrive in NYC.

Industrial businesses like ours provide stable, good-paying jobs and provide essential services for New York City. Industrial businesses provide accessible, well-paying jobs to New Yorkers who are too often left out of the city's prosperity—immigrants, people of color, and workers without college degrees. Programs like IBSP ensure that small companies like ours have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that assist industrial businesses to survive in an increasingly difficult business environment.

● Page 2

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of my business and that of my employees depends on it.

Sincerely,

Wayne D. King

Empire Metal Trading, LLC

Email: wayne@empiremetaltrading.com

Written Testimony: City Council Small Business Committee Hearing Re: Industrial Business Service Provider (IBSP) Program Submitted by: Daniel Sklaar, CEO, Fine & Raw Chocolate LLC & The Chocolate Factory 70 Scott Ave, Brooklyn, NY 11237 March 23, 2026

My name is Daniel Sklaar. I am the founder and CEO of Fine & Raw Chocolate, a Brooklyn-based bean-to-bar chocolate company, and The Chocolate Factory, a 1,000-person event and production venue at 70 Scott Ave in Bushwick. I am writing to urge the Council to oppose the elimination of the Industrial Business Service Provider program and to restore funding to organizations like Evergreen that are essential to the survival of industrial businesses in New York City.

Fine & Raw has been making chocolate in Brooklyn for over fifteen years. We source cacao directly from cooperatives in Ecuador and the Dominican Republic, manufacture in-house, and sell across the country and internationally. The Chocolate Factory employs local workers and serves as an anchor in our neighborhood. We are exactly the kind of business the IBSP program was designed to support—and we have relied on it.

Through Evergreen, we have navigated regulatory processes with city agencies that would have been extraordinarily difficult and costly to handle on our own. We have accessed financing and incentive programs that helped us invest in equipment and grow our workforce. When regulatory issues arose—whether related to building compliance, fire safety, or manufacturing permits—Evergreen helped us understand our obligations and resolve them without losing momentum. And when we needed to find and secure industrial space appropriate for food production, Evergreen's knowledge of the local industrial real estate market was invaluable.

These are not abstract services. They are the difference between a business surviving and thriving in New York City, or relocating—or closing. The cost and complexity of operating as an industrial business in this city is immense. The IBSP program exists precisely because the city recognizes that small manufacturers and industrial employers cannot navigate it alone.

Dismantling the IBSP program under the guise of reform, after 40 years of investment, would be a serious mistake. It would weaken the support infrastructure that allows businesses like mine to stay and grow here. It would ultimately accelerate the displacement of industrial businesses from the five boroughs—businesses that employ working New Yorkers, anchor neighborhoods, and generate economic activity that cannot simply be replaced by retail or office use.

I urge this Council to protect the IBSP program and ensure that organizations like Evergreen continue to have the stable funding they need to serve our community.

Thank you.

Daniel Sklaar CEO, Fine & Raw Chocolate LLC / The Chocolate Factory
chocolate@fineandraw.com 70 Scott Ave, Brooklyn, NY 11237

HANGMAN

FINE ART STORAGE AND SERVICES

106 Gardner Ave
Brooklyn, NY 11237
(212) 974-7669
hangmannyc.com

April 8, 2026

Dear Mayor,

I am writing as the CEO of Hangman NYC LLC, a fine art logistics and storage company based in East Williamsburg, Brooklyn. We employ approximately 73 people and serve major institutional art galleries across New York, Los Angeles, and Miami.

I urge you to restore funding for the Industrial Business Service Provider (IBSP) program and reverse the proposed cuts that would cripple organizations like Evergreen Exchange.

Evergreen has directly supported my company's growth and continued investment in New York City. They have helped us navigate complex regulatory issues, identify energy incentive programs, and connect with resources that made it possible for us to commit to a major new facility buildout in Brooklyn — a significant capital investment that keeps jobs and economic activity in the five boroughs.

Industrial businesses like mine face unique challenges operating in New York City. The cost of space, the complexity of city agencies, and the regulatory environment make it difficult to compete with markets in other states. Evergreen bridges that gap. Without them, many small and mid-sized industrial companies will lose the only lifeline they have to navigate city government and access the programs designed to keep us here.

Cutting IBSP funding would undermine 40 years of investment in New York's industrial economy and send a clear signal that the city does not value the businesses and workers who build, make, and move things.

I urge you to reconsider.

Respectfully,



David Hurwitz

Founder & CEO

Hangman NYC LLC

106 Gardner Ave, Brooklyn, NY 11237

(212) 974-7669

david@hangmannyc.com



LEERFORM

Dear,

I am writing to express my strong support for Evergreen and to urge you to reconsider any proposed cuts to the IBSP program administered through the Department of Small Business Services.

As a New York City small business owner, I can say without hesitation that Evergreen has been instrumental to the growth and sustainability of our company, Leerform. Their support has allowed us to manage cash flow, take on larger and more complex projects, and operate with a level of stability that would not have otherwise been possible.

Quite simply, we would not be in a position to grow or create jobs without Evergreen.

The proposed cuts to the IBSP program are deeply concerning. This program is not abstract policy—it is a direct pipeline of support that enables organizations like Evergreen to provide critical financial tools to small businesses that are often underserved by traditional lenders. Removing or reducing this funding would have immediate, real-world consequences: fewer businesses able to grow, fewer jobs created, and more companies forced to operate at the edge of instability.

In our case, Evergreen's support has translated directly into job creation. We have been able to hire, train, and retain employees because we had access to resources that allowed us to plan beyond the short term. Without that support, our trajectory—and our ability to contribute to New York City's economy—would look very different.

At a time when small businesses are still navigating economic uncertainty, this is precisely the kind of program that should be strengthened, not reduced. Investing in Evergreen and the IBSP program is an investment in job creation, economic resilience, and the long-term health of the city's small business ecosystem.

I strongly urge you to preserve funding for the IBSP program and continue supporting organizations like Evergreen that are proven to deliver real impact for New York City businesses.

Thank you for your consideration and for your continued commitment to supporting the small business community.

Sincerely,
Doug Young

Managing Partner
Leerform Fabrication | Design

182 Stewart Ave Brooklyn NY 11237 347 300-9946

Martin Greenfield Clothiers, Ltd.

HAND TAILORED CLOTHING

239 Varet Street · Brooklyn · NY 11206 · Telephone: (718) 497-5480 · Fax: (718) 456-3365

Testimony of Tod Greenfield of Martin Greenfield Clothiers LTD NYC Council Small Business Committee Hearing March 23, 2026

My name is Tod Greenfield, and I am an owner of Martin Greenfield Clothiers LTD, an industrial business located in East Williamsburg. Our company manufactures hand tailored custom suits, and we currently employ 50 New Yorkers.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

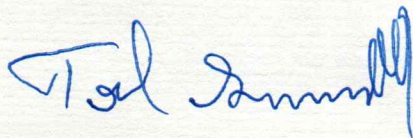
Organizations like **Evergreen: Your North Brooklyn Business Exchange** provide critical support to small manufacturers and industrial businesses like mine. Evergreen has helped our company Apply for our PPP loan, provided us with HR classes, and advocated on our behalf when we were issued unjust violations because of conflicting requirements of different city agencies. Evergreen regularly connects us with resources that allow us to operate and grow in New York City. Without their assistance, it would be far more difficult for small businesses like ours to thrive in NYC.

Our business provides stable, good-paying Union jobs to a mostly immigrant workforce. During Covid we produced desperately needed masks and hospital gowns for City Agencies, Hospitals, and front-line workers. My father Martin Greenfield got his first job in NYC at what is now our factory. He worked for the predecessor company for 30 years, starting as a non-English speaking refugee with only grade school education. His factory job enabled him to put down roots here and provided our family with the means to educate my brother and I. Today our employees can do the same for their families.

After the blackout of 1977 our neighborhood was decimated and business that survived the fires and looting were fleeing. Martin Greenfield worked with St. Nicks Alliance to establish Evergreen in 1982. This helped to stabilize and improve our neighborhood. Programs like IBSP ensure that small companies like mine have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that help industrial businesses survive in an increasingly difficult business environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of my business and that of my employees depends on it.

Sincerely,
Tod Greenfield, VP



Martin Greenfield Clothiers LTD
239 Varet Street, Brooklyn, NY 11206
(718) 497 5480 tod@greenfieldclothiers.com

Email: suit@greenfieldclothiers.com

April 6, 2026

Mayor Zohran Mamdani
City Hall
New York, NY 10007

Dear Mayor Mamdani:

My name is Ezra N. Goodman, and I am a member of Norris McLaughlin, a law firm in Manhattan. We are proud to work with Evergreen: Your North Brooklyn Business Exchange, a non-profit organization which provides essential support and resources to small businesses in New York City.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

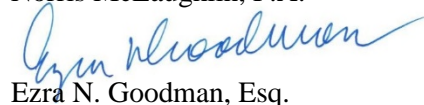
Organizations like Evergreen provide critical support to small manufacturers and industrial businesses. Evergreen regularly connects those businesses with resources that allow them to operate and grow in New York City. Without Evergreen's assistance, it would be far more difficult for small businesses to survive and thrive in NYC.

Industrial businesses of the kind supported by Evergreen provide stable, good-paying jobs and produce essential goods and services for New York City. Industrial businesses provide accessible, well-paying jobs to New Yorkers who are too often left out of the city's prosperity—immigrants, people of color, and workers without college degrees. Programs like IBSP ensure that small companies have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that helps industrial businesses survive in an increasingly difficult business environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of their businesses and that of their employees depends on it.

Sincerely,

Norris McLaughlin, P.A.



Ezra N. Goodman, Esq.



MECHANISM

March 18, 2026

Nepal Asatthawasi

Co-Executive Director, Mechanism

1216 Broadway

New York, NY 10001

Attention: City Council Small Business Committee Hearing, March 23 2026

We have watched with hope as the Mamdani administration has taken the question of who NYC's economy is actually working for seriously. We write now because the proposed elimination of the Industrial Business Service Provider (IBSP) program would move that project in exactly the wrong direction. Eliminating IBSPs would be a mistake that would deepen NYC's inequality, undermine its economic resilience, and abandon the workers and small businesses that need the City's support most. We urge the administration and SBS to reverse this decision.

For our first decade, we operated as the Urban Manufacturing Alliance, founded in NYC, where we helped launch the Made in NYC initiative and built the national case for urban manufacturing as a core economic development strategy. Now as Mechanism, we partner with communities, municipalities, and economic development agencies to plan and develop production ecosystems that increase local resilience and well-being. We work to fix the systems that have allowed manufacturing to erode, and with it, the economic security and stability of working-class communities. NYC is where this work began. What happens here still matters to us, and matters nationally too.

NYC is one of the most unequal cities in the world, and that did not happen by accident. It is the direct outcome of decades of shortsighted policy choices that prioritized the knowledge economy, finance, and tech industries while allowing the industrial sector to erode. The businesses and jobs that have sustained immigrants, New Yorkers of color, and workers without college degrees - the very people systematically excluded from the high-wage economy - have been allowed to shrink, squeezed by rising rents, speculative real estate, and the absence of dedicated policy. The IBSP program is one of the few remaining mechanisms the City has left to counteract this trajectory. Eliminating it tells the immigrant business owner in Maspeth, the garment worker in Sunset Park, and the food manufacturer in the South Bronx that the city has decided their economy is not worth saving or even having.

for

Community &
Connection in
Manufacturing

mechanism.community

MECHANISM

The numbers demonstrate the stakes:

- The **industrial sector provides over 500,000 jobs** (nearly 15% of the city's workforce) and generates over **\$1.7 billion annually in tax revenue.**
- **32% of NYC jobs that pay over \$50,000 and don't require a college degree are industrial jobs,** more than any other sector.
- Industrial businesses offer real mobility to a **workforce that is 67% people of color and 70% of whom do not possess a degree.**

These jobs are the primary remaining pathway to the middle class for New Yorkers most often left behind. Without doubt, they depend on the specialized support that only IBSPs provide.

We are entering an era of what many recognize as a polycrisis: accelerating climate shocks, geopolitical instability, fractured global supply chains, and economic volatility that no single policy can predict or prevent. When global supply chains collapsed during the pandemic, the city's remaining industrial sector - composed of its garment workers, food manufacturers, medical supply producers - became an emergency resource. As NYC pursues a Green New Deal transition, it will depend on its industrial sector to design, manufacture, install, and maintain green technologies. IBZs contain freight logistics, cold storage, waste processing, electricity distribution, energy storage, advanced manufacturing capacity, and other capabilities that the city cannot afford to lose. The businesses that can flex to meet changing needs are small manufacturers, who also are the most agile, community-rooted producers in the ecosystem. IBSPs keep them viable and connected.

There is one more disruption that demands attention: AI is already transforming the knowledge economy that New York has spent decades building. No one knows exactly how this will unfold, but manufacturing jobs — that require physical skill, spatial judgment, and craft — have proven far more resistant to automation than the office economy New York has bet everything on. Protecting and growing the industrial sector now is a hedge against the workforce displacement that is coming. A city that preserves its manufacturing base will be far better positioned to absorb shock than one that lets it disappear.

We understand the city is facing a serious budget deficit. We do not dismiss this difficult reality. But the IBSP program costs just \$1.2 million citywide, a figure so modest it amounts to a rounding error in municipal finance. For that investment, the city

for

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Manufacturing

mechanism.community

MECHANISM

sustains the backbone organizations that keep hundreds of industrial businesses alive, growing, and employing marginalized New Yorkers. These are businesses that generate tax revenue, anchor neighborhoods, and provide the kind of stable employment that reduces long-term demand on city social services.

The proposed alternative of a single rotating generalist staffer per borough through the Business Solutions Center is an insufficient substitute for what currently exists. Industrial firms require specialized support from organizations embedded in their sector and communities. That is what IBSPs provide, built over decades of institutional knowledge and relationships based on trust and it cannot be replicated by drop-in services.

We ask the City to take three steps:

1. Remove industrial businesses from the Business Solutions Center RFP;
2. Extend existing IBSP contracts by at least one year to ensure continuity; and
3. Work *with* the industrial community to co-design a modernized program that addresses rising real estate pressures, connects manufacturers to green economy opportunities, strengthens workforce pipelines, and reinvests in the Industrial Developer Fund.

A more equitable NYC is not possible without a strong industrial sector. The IBSP program is one of the most important tools the city has for building the economy this administration claims it wants. We urge you to protect it.

Sincerely,

Nepal Asatthawasi
Co-Executive Director
Mechanism

for

Community &
Connection in
Manufacturing

mechanism.community



SIGHTLINEFABRICATION

**810 Humboldt St, Ste 1D
Brooklyn, NY 11222
Phone: 718-383-8333
www.sightlinemade.com**

Mayor Zohran Mamdani
City Hall
New York, NY 10007

May 11th, 2026

Dear Mayor Mamdani:

My name is Jessica Kaplan, and I am the co-owner of Sightline Fabrication LLC, an industrial business located in Greenpoint, Brooklyn. Our company manufactures custom scenery for off-Broadway theater. We mainly work with not-for-profit theaters and currently have a list of about 10 employees who freelance for us on different projects based on their availability.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program as they provide vital funding for organizations like Evergreen: Your North Brooklyn Business Exchange. In turn, Evergreen provides critical support to small manufacturers and industrial businesses like mine.

Evergreen was instrumental in our ability for our business to survive through the pandemic. We had no work for over 10 months because all of the theaters in NYC were closed, but we still had to pay \$12,000 a month in rent for our 5,000 sqft shop space. Without their help we would not have received a PPP loan which along with other guidance allowed us to find a way to keep our business open.

In 2024, after the building where we had been renting a space for 13 years was sold, the new landlord used a buyout clause we were forced to accept by our old landlord to end our lease in order to rent the space. We had to find a new space in about 3 months. We found it very difficult to find a manufacturing space that was the size we needed at a price we could afford, and also near public transportation. Without Evergreen's help we never would have found a new space manufacturing space with GMDC and we would have been forced to close our business.

In addition, Evergreen regularly connects us with resources that allow us to operate in New York City. They also provide in person meeting about different topics that are very helpful for small business such as bookkeeping, marketing, accounting, utility savings, real estate, and financing info. They help connect us with other businesses in our area. And they provide information about our area that might affect us, like subway changes, road closures, or hazards like superfund clean ups.

Owning a small business has become more unaffordable as we are also struggling with the rising costs of living in NYC as well. It feels like a losing battle against increasing utilities, rent, fees, taxes, and insurance. We had been in business for over 18 years and we have never felt like we have been able to get far enough ahead of the rising costs of doing business in NYC to feel comfortable. But in the past few years it has begun to feel unsustainable and we worry that we may not have help navigating any future challenges.

Industrial businesses like mine provide stable, good-paying jobs and produce essential goods and services for New York City. We work in an industry that is part of the fabric of NYC and the jobs we provided pay almost double the minimum. Programs like IBSP ensure that small companies like mine have the support they need to remain in the city and continue employing local residents. Eliminating this program would remove one of the few systems that helps industrial businesses survive in an increasingly difficult business environment.

I strongly urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen that provide essential services to the industrial business community. The livelihood of my business and that of my employees depends on it.

Sincerely,

Jessica Kaplan
Sightline Fabrication LLC
810 Humboldt St, Ste 1D
Brooklyn, NY 11222
718-383-8333
bids@ sightlinenyc.com

March 26, 2026

To: NYC Committee on Small Business
Via upload to Hearing Testimony Registration

From: Elli Papadopoulos
Founder, Skopos Collective LLC
504 Halsey Street, Brooklyn, NY
elli@skoposcollective.com

Re: Written Testimony in Opposition to the Proposed Elimination of the Industrial Business Service Provider (IBSP) Program

My name is Elli Papadopoulos and I am the Founder of Skopos Collective LLC. I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

I have worked in small business, community, and economic development since 2005. During the 2008 recession, when banks turned their backs on small businesses, organizations like Evergreen and SBIDC showed up. At the time I was working for a Community Development lender — Grow America Fund — and these IBSPs were our eyes and ears on the ground. When an industrial business needed financing and no one else was willing to help, they were the lifeline that made it happen.

I say this not only from memory, but from current experience — I work with these organizations today, providing small business finance education to their members. They engage real businesses on real issues and deliver real answers from real professionals. That is rare and valuable.

Generalist organizations simply do not understand the specific needs of manufacturers. IBSPs do. A manufacturer navigating flood-proofing, industrial leases, or environmental permitting has fundamentally different needs than a restaurant or retailer. Folding them into a one-size-fits-all program with the same budget and a rotating staff member covering an entire borough is not a reform — it is a funding cut in disguise.

Industrial businesses pay better wages, generate significant economic and social value, and are woven into the fabric of our neighborhoods. They deserve more investment, not less. Eliminating the IBSP program would further disenfranchise this community at precisely the moment they need support most.

I urge you to reject this proposal.

Respectfully submitted,



Elli Papadopoulos

STITCH NYC INC

March 23, 2026

Dear City Council Small Business Committee:

My name is Kelly Ault. My husband and I have a small custom furnishings business in the Brooklyn Navy Yard.

Like my husband and me, most small business owners are everyday people with a passion, but without MBAs or knowledge about the ins and outs of starting, running, and growing a business. We don't know what we don't know, so we rely on the expertise of Evergreen to educate us and connect us to the right people and organizations for important aspects of owning and running a business, such as attaining and maintaining compliance, simplifying the complexities of business finance, finding funding sources, and helping with solutions for day-to-day and even long-term challenges.

We count on their assistance to help us navigate aspects of running a business that are often confusing and time-consuming.

Additionally, since many small businesses, including our own, are self-funded, and the owners wear many hats, this leaves little time or financial resources for researching and affording business development classes. We rely on Evergreen to alert us to low- or no-cost classes and events.

All these services are invaluable to small businesses. Without IBSP funding, this vital lifeline will be cut. Evergreen and other similar organizations eliminate a large amount of stress from small business owners. They are a trusted resource that we can lean on.

NYC is nothing without its small businesses. They are the backbone of our city, and we need all the support we can get!!

Please continue to fund the IBSP program so we can continue to rely on Evergreen for years to come!

Thank you for your time.

Kelly Ault

*Please NOTE our new address (same physical space, new address), effective April 1st 2026:

Kelly Ault
Stitch NYC Inc
1 Brooklyn Navy Yard
Bldg 88 / Suite 1003
Brooklyn NY 11205

BROOKLYN NAVY YARD

63 FLUSHING AVE, UNIT 172 BUILDING 3, SUITE 1012
BROOKLYN NEW YORK 11205

T/ 718.875.6763 F/ 718.875.6911

TWOSEVEN INC.

221 MCKIBBIN STREET BROOKLYN NY 11206
TEL 718 389 4876 FAX 718 389 5304
TWOSEVEN.NET INFO@TWOSEVEN.NET

Council Member Jennifer Gutiérrez
District 34 — New York City Council
244 Union Avenue, Brooklyn, NY 11211

23 March 2026

Dear Council Member Gutiérrez,

My name is Franco Götte and I am the CEO of TwoSeven Inc., a design and fabrication studio located at 221 McKibbin Street in East Williamsburg — in your district. Together with my partner Martina Salisbury, I employ over fifty New Yorkers who design and build custom window displays, retail environments, and installations for fashion brands, luxury retailers, museums, and cultural institutions. Everything we make is proudly Made in New York City.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program, and to ask for your support in preserving it.

Organizations like Evergreen: Your North Brooklyn Business Exchange are exactly what this program is meant to create. Evergreen serves over 200 businesses annually in the Greenpoint/Williamsburg and North Brooklyn Industrial Business Zones, offering networking, workshops, and technical assistance; helping businesses navigate grants and financing; and advocating directly for the preservation of industrial space. For businesses like ours, this support is not a luxury — it is a lifeline.

TwoSeven's story is a familiar one in this neighborhood. When rezoning in Williamsburg-Greenpoint allowed residential development to push into our neighborhood, our landlord refused to renew our lease and rents more than doubled. I seriously considered closing the business. It was Evergreen who made us aware of a city grant to help cover our moving expenses — and without that grant, during the depths of the 2008 financial crisis, we would not have survived. Evergreen also helped us become a Qualified Empire Zone Enterprise, and those tax credits allowed us to grow from 15 employees to over 50 in the years that followed — fabricators, artisans, and artists who live and work in this neighborhood.

Industrial businesses like ours provide stable, accessible, good-paying jobs to New Yorkers who are too often left out of the city's prosperity. The IBSP program is one of the few systems that gives small industrial businesses the support they need to stay in New York City and keep employing local residents. Eliminating it would be a serious blow to the businesses, workers, and neighborhoods — like East Williamsburg — that depend on it.

I strongly urge you to support the preservation of funding for the IBSP program. The livelihood of our business and the fifty New Yorkers who work here depends on it.

Respectfully,

Franco Götte, CEO
Martina Salisbury, Creative Director
TwoSeven Inc.
221 McKibbin Street, Brooklyn, NY 11206



March 17, 2026

Dear Council Member Gutiérrez,

My name is Alice Mok, and I serve as Assistant Vice President of Marketing & Public Affairs at Wonton Food Inc., a family-owned food manufacturing company headquartered in Brooklyn. Founded in 1973 in Chinatown, Wonton Food has been producing noodles, wrappers, and fortune cookies for over 50 years. Today, we employ more than 400 New Yorkers and supply restaurants, grocery stores, and food service providers nationwide.

I am writing to express my strong opposition to the proposed elimination of the Industrial Business Service Provider (IBSP) program.

Organizations like Evergreen: Your North Brooklyn Business Exchange have been a vital partner to industrial businesses like ours. Evergreen provides meaningful support by connecting us with city resources, advocating for the needs of manufacturers, and helping ensure that companies like Wonton Food can continue to operate and grow in New York City. Their role as a bridge between government and industry is especially critical as manufacturers navigate rising costs, regulatory complexity, and ongoing space constraints.

Industrial businesses like Wonton Food play an essential role in New York City's economy. We provide stable, well-paying jobs that are accessible to immigrants, working families, and individuals without advanced degrees—jobs that support local communities and create real pathways for upward mobility.

At the same time, operating an industrial business in New York City has become increasingly challenging. Programs like IBSP are among the few dedicated resources that actively support manufacturers and help us remain competitive. Eliminating this program would significantly weaken the support system that small and mid-sized industrial businesses depend on to survive and grow.

I respectfully urge the City of New York to preserve funding for the IBSP program and continue supporting organizations like Evergreen. The long-term sustainability of companies like Wonton Food—and the livelihoods of the hundreds of New Yorkers we employ—depend on it.

Thank you for your time and consideration.

Sincerely,

Alice Mok

Alice Mok

Assistant Vice President, Marketing & Public Affairs



New York City Council Committee on Small Business

Public Testimony: NYC Council Committee on Small Business Hearing

Date: June 8, 2026

Thank you to the City Council, the Committee on Small Business, and Council Member Zhuang for the opportunity to submit written testimony on behalf of LS 21413.

I am writing on behalf of **Hot Bread Kitchen**, a nonprofit organization that promotes economic mobility for New Yorkers who face barriers to economic opportunity through training and job placement, food entrepreneurship programs, and a wraparound ecosystem of individualized support. We use the food industry as our opportunity catalyst because it is uniquely powerful - offering broad economic opportunity while celebrating the diversity that defines New York City. I am the Chief Executive Officer, and oversee all of our mission-driven operations.

Central to Hot Bread Kitchen's work is our small business incubation program, HBKi. HBKi supports food business entrepreneurs through three programs:

- A. **Seed:** Our pre-incubation program that supports aspiring and early-stage entrepreneurs as they commit and lay a foundation to launch a food business.
- B. **Start:** Our incubator, connecting early stage founders with subsidized shared commercial kitchen space, market opportunities to grow sales, and technical assistance, with the goal of reaching breakeven and building a strong foundation for success.
- C. **Scale:** Our accelerator, which supports growth-ready businesses in accessing capital across lending, equity, and grants to fuel their continued growth.

In 2026, Hot Bread Kitchen will reach over 190 small business owners across New York City through HBKi.

After 18 years of hearing from food industry entrepreneurs, we can confidently say - **we strongly support LS 21413 and urge the Council to advance this legislation.** HBKi members are predominantly women, immigrants, and people of color, and most are first-time business owners navigating the City's regulatory landscape without legal or financial support systems. Time and again we hear from our entrepreneurs that the New York City permitting and inspection process, especially around shared commercial kitchen space, is **one of the single greatest barriers** to opening or expanding their business. Standard Department of Buildings plan reviews alone can take anywhere from 4-12 weeks, with total permitting timelines often stretching six months or more. Our entrepreneurs often have no safety net - delays translate directly into lost revenue, wasted rent payments, and in too many cases, abandoned business dreams.

LS 21413 would restore and codify a program with a proven track record of cutting opening timelines by 2-3 months and generating millions in owner profit and tax revenue. For the entrepreneurs that HBKi serves, this kind of coordinated support could be transformative. The food industry historically operates on extremely tight margins, with it taking anywhere from 6-24 months for a business to break even. Cutting down this time even by 2 months

can offer a lifeline to business owners. LS 21413's requirement for public reporting on time-to-open metrics is also a commonsense accountability measure that will help entrepreneurs manage their expectations, and plan their ordering and finances accordingly.

On behalf of Hot Bread Kitchen and the entrepreneurs that we serve, I respectfully urge the Committee on Small Business to advance LS 21413. New York City is a unique place where small businesses represent a dream on every corner. This legislation can ensure this remains true for the next generation of small business owners, helping them open their doors faster, with less burden, and with the support of a city government that is on their side. Thank you for your attention to this important matter.

Leslie Abbey, Chief Executive Officer, Hot Bread Kitchen



FIFTH AVENUE
PARK SLOPE
BUSINESS IMPROVEMENT DISTRICT

Park Slope Fifth Avenue BID | 157 13th Street | Brooklyn NY 11215 | 718 551 5545

Monday June 8th, 2026

Testimony Before the New York City Council Committee on Small Business

Good afternoon, Chair and members of the Committee on Small Business,

My name is Joanna Tallantire, and I am the Executive Director of the Park Slope Fifth Avenue Business Improvement District (BID). Thank you for the opportunity to testify today in strong support of Intro 910.

First, I want to extend our deep thanks to the committee, the 34 council members who have sponsored this legislation, and particularly Council Members Hanif and Avilés, who represent our district. Choosing to educate rather than penalize our 520 small businesses is a massive step in the right direction.

As a BID director for many years, I see firsthand that our micro-businesses are hurting. Between shifting economic pressures, rising operational costs, and one of the worst winters I have seen in my 20 years in New York City, these merchants are operating on incredibly thin margins. They are our neighbors, not big corporations.

For them, replacing a perfectly functional security gate isn't a routine upgrade—it's an unexpected, major capital expense. And it *is* unexpected, because as the original Local Law 75 showed, there was virtually zero city outreach over the 17 years of the law's existence.

When a gate replacement costs anywhere from \$2,000 to \$15,000 just to avoid city fines, you are asking micro-businesses to do the impossible. For many merchants, this is a make-or-break expense. If enforced rigidly, we are looking at a wave of avoidable storefront vacancies and turnover.

While the Park Slope Fifth Avenue BID would ultimately like to see Local Law 75 repealed entirely, we firmly support Intro 910 because it removes the looming July 1st penalties and pivots to an education-first model.

However, to ensure this legislation actually achieves its goal, we urge the Council to address three critical issues:

1. **Hold Gate Installers Accountable:** Because of a lack of education and accountability, roll-down gate companies have continued to install non-compliant gates on Fifth Avenue as recently as six months ago. The Department of Buildings must educate these installers and consider a permitting or enforcement mechanism so the burden doesn't fall solely on the business owner.
2. **Extend the Education Timeline:** A six-month window is simply not enough time to reach and educate all the micro-businesses. We have 138 non-compliant gates in our district alone; scaling that citywide requires a longer timeline.
3. **Clarify the Bill's Language:** As the NYC BID Association has raised in our collective analysis, the current draft of Intro 910 may not fully reflect its intended purpose. The text can still be interpreted to mean that any newly installed security grilles must meet the 70% transparency standard unless the owner can prove it was installed before July 1, 2011. We encourage the Council to review and tighten this language so there is zero ambiguity.

Thank you again for the opportunity to testify today. The Park Slope Fifth Avenue BID stands ready to partner with the City to lead the educational outreach our merchants need.

Joanna Tallantire, Executive Director

Park Slope Fifth Avenue BID



Testimony on Behalf of the Retail Council of New York State

**New York City Council
Committees on Small Business
June 8, 2026**

**Testimony Submitted by:
Kelsey Dorado Bobersky
Director of State and Local Government Relations
Retail Council of New York State
kelseydorado@rcnys.com**

Good afternoon, Chair Thomas-Henry and honorable Committee members:

My name is Kelsey Dorado Bobersky; I am the Director of State and Local Government Relations for the Retail Council of New York State. Our organization is the state's leading trade group for the retail industry, representing member stores in New York City and across the state, ranging from the smallest independent merchants to national and international brands. Thank you for the opportunity to testify today on Introduction 910-2026.

The security and viability of New York City's retail storefronts remain our top priority on behalf of the brands we represent. Small and independent retailers rely on affordable, functional security infrastructure to protect their inventory, their employees and property during non-business hours. For many of our member stores, especially those in neighborhoods where retail theft remains elevated, a solid security grille is not an aesthetic choice, it is a practical one.

Introduction 910-2026 addresses a significant and time-sensitive concern facing those businesses. Local Law 75 of 2009 established a 70% visibility requirement for security grilles, with a compliance deadline of July 1, 2026. As that deadline approaches, thousands of retailers across the five boroughs face the prospect of mandatory grille replacement with no meaningful financial assistance and limited awareness of this requirement.

The Retail Council of New York State supports Introduction 910-2026, which will provide essential guidance and relief to small businesses ahead of the July 1st deadline. However, as currently drafted, the bill raises two specific concerns that must be addressed before it is approved and signed into law.

First, while the bill removes the July 1, 2026 enforcement date, it does not strengthen the education and outreach requirements in the immediate future. For example, a retailer that installs a new grille this summer may not be in compliance, as the store owner may not be aware of the existing law and related requirements. We respectfully urge the City Council to ensure that the bill's outreach provisions are meaningfully resourced and implemented before enforcement begins.

Second, the bill states that existing non-conforming security grilles would remain subject to fines, with an affirmative defense available only to those businesses that installed the grilles prior to July 1, 2011. In effect, any retailer that installed a non-conforming grille on or after that date would have no defense and would remain liable. We respectfully ask that the affirmative defense period be extended or restructured.

The Retail Council of New York State will continue to work constructively with the sponsor, the Committee and relevant city agencies as you consider the bill. As always, we appreciate the City Council's understanding and appreciation for the challenges facing small retailers across New York City.



June 8, 2026

Re: Support for Int. 0910 - New York City Council Committee on Small Business

Dear Speaker Menin, Chair Thomas-Henry, and Members of the New York City Council:

The [Five Borough Jobs Campaign](#) is a citywide coalition of local economic development corporations, business improvement districts, and businesses fighting to create jobs and build a more sustainable economic future across New York City. **On behalf of our member organizations, we write to urge swift passage of [Int. 0910](#), with one key amendment, to address the unintended consequences of Local Law 75 before the July 1, 2026 enforcement deadline.**

Under Local Law 75, businesses must replace traditional solid roll-down gates with versions that are at least 70% transparent, despite some neighborhoods estimating current compliance rates [as low as 12%](#). As a result, many longstanding small businesses are now facing thousands of dollars in unexpected replacement costs simply to avoid fines or violations. For many storefronts, replacement costs are expected to range [anywhere from \\$2,000](#) to \$10,000 depending on the gate's size and condition – a major expense for small businesses already operating on thin margins.

There has been little to no communication from the City regarding the existence, requirements, or enforcement of this regulation, leaving many business owners unaware until they are already facing potential violations or significant compliance costs. This lack of outreach undermines the intent of the policy and places an unfair burden on businesses that have made good-faith investments in existing security measures.

We appreciate Councilmember Stevens introducing Int. 0910, which takes steps to protect small businesses from the significant costs associated with the approaching deadline. However, as currently drafted, it could still leave some small businesses vulnerable to penalties. Without additional outreach, businesses may continue installing noncompliant gates, and certain existing gates could remain subject to fines. Requiring compliance only for gates replaced on or after July 1, 2028 would provide time for education and implementation while avoiding unnecessary burdens.

With this modification, the proposal would offer a thoughtful and practical approach that protects current businesses from immediate financial hardship while establishing a clear and reasonable path forward for future installations.

Many small business owners have also raised concerns that replacing existing solid gates with more transparent models could leave storefronts [more vulnerable](#) to theft and property damage

after hours. The original rationale for requiring transparent gates appears increasingly misaligned with on-the-ground realities, as greater visibility into storefronts after hours may inadvertently make businesses more susceptible to theft by allowing would-be offenders to easily identify valuable merchandise or equipment. In neighborhoods where many businesses already face persistent public safety concerns, owners are questioning why functioning security infrastructure should now require costly replacement at a time when many commercial corridors are still struggling economically.

For small businesses already navigating rising costs tied to rent, insurance, and day-to-day operations, these additional compliance burdens present a serious challenge. Independent retailers in particular continue to operate under significant economic pressure, with little flexibility to absorb another major capital expense.

Small businesses remain essential to the economic and cultural fabric of communities throughout New York City. As the Council considers this issue, we hope that you choose to support vibrant commercial corridors by not imposing avoidable burdens on the local businesses that keep our neighborhoods economically resilient.

We appreciate your attention to this matter and stand ready to work collaboratively with the Council on solutions that strengthen local businesses and support economic opportunity in every borough.

Respectfully submitted by the undersigned member organizations,

Brooklyn Chamber of Commerce

Queens Chamber of Commerce

Bronx Chamber of Commerce

Manhattan Chamber of Commerce

Staten Island Chamber of Commerce

Alliance for Coney Island

Bed-Stuy Gateway BID

Bronx Economic Development Corporation

Business Outreach Center

Chinatown Partnership

Downtown Alliance

Downtown Brooklyn Partnership

Dumbo Improvement District

East Midtown Partnership

Grand Central Partnership

Greater Jamaica Development Corporation

Hudson Square BID

Long Island City Partnership

Morris Park BID

Myrtle Avenue Brooklyn Partnership

New York Building Congress

Queens Economic Development Corporation

Rockaway Development and Revitalization Corporation

Small Business Majority

Sunset Park BID

The Business Council of New York State

The Flatbush Junction BID

White Plains Road BID



**Testimony of
The Legal Aid Society**

**before the New York City Council Committee on Small Business
in Support of the Proposed Local Law to Amend the New York City Charter in Relation to
Accelerating the Opening of New Businesses by Coordinating Required Inspections**

Good afternoon and thank you to the Committee for the opportunity to testify.

My name is Andrea Tan and I am the Supervising Attorney of the Community Development Project at The Legal Aid Society. We provide free transactional legal assistance to entrepreneurs and nonprofit organizations across New York City, many of them first-time operators and immigrant entrepreneurs.

We support this bill because it addresses a problem we see all the time. We have clients paying rent for months on spaces they cannot use while waiting for permits, inspections, and agency approvals.

Please note that many of the entrepreneurs who would benefit most from this program are not English speakers. The bill requires an online application for enrollment but does not include language access requirements. We encourage the Council to make clear that the portal and program materials must be accessible in multiple languages, consistent with the City's obligations under Local Law 30.

One thing that is not entirely clear from the bill is what coordination will look like in practice. The bill talks about coordinating inspections and plan reviews but provides little detail about how the program will operate. For example, will businesses have a dedicated point of contact,

will agencies share information, or will there be a process for resolving delays involving multiple agencies? Additional clarity on how the program will function would be helpful.

We saw this firsthand with a daycare client in the Bronx who was still working through the licensing process when an inspection led to a corrective action that took significant advocacy from our office to resolve. A coordinated program that gives agencies visibility into where a business is in the process could help prevent situations like this.

We also want to point out that some delays are outside the business owner's control. For example, changing the use in a certificate of occupancy requires landlord cooperation. As the program is developed, it would be worth considering how to assist businesses when delays stem from building-related issues they cannot control.

Finally, we encourage the Council to clarify if nonprofit and community organizations will be eligible for the program, as they often face many of the same permitting challenges as small businesses and frequently have fewer resources available to absorb months of delays while waiting for approvals.

Thank you for the opportunity to testify. We appreciate the Council's attention to this issue and look forward to working with the Council, SBS, and other stakeholders to support the implementation of this program.



115 Bowery, New York, NY 10002 | www.welcometochinatown.com

Thursday, June 11, 2026

To the Members of the New York City Council:

Welcome to Chinatown (WtC) is a 501(c)(3) nonprofit organization based at 115 Bowery in Manhattan's Chinatown neighborhood. Our mission is to preserve and promote the cultural and economic vitality of Chinatown by supporting small businesses, connecting residents to resources, and advocating for equitable policies that protect one of New York City's most historic and resilient immigrant communities.

We submit this written testimony to propose a modified version of Int. No. 910, which would include the following amendments to Local Law 75 of 2009: change the compliance deadline to July 1, 2028; not subject grilles installed prior to July 1, 2028 to the regulation; and include a multi-lingual outreach campaign. While we support the long-term goal of more visible, open storefronts, we believe the original law will cause disproportionate harm to small business owners in Chinatown.

We Propose a More Fair Amendment

While Int. No. 910 is a step in the right direction, it does not completely address the harms that small businesses will face. We propose to amend Item 3 of Section 1010.1.4.4 of the New York City Building Code to read as follows:

“Except as to buildings or structures classified in occupancy Group S, buildings or structures that have been designated as a landmark by the landmarks preservation commission or located in a historic district designated by such commission, on or after [July 1, 2011] July 1, 2028, no security grille may be installed [or replaced], nor shall the owner of a structure classified as a Group B or M occupancy or the operator of the business occupying such structure allow to be installed [or replaced], a security grille to secure such property where the grille abuts the sidewalk, unless the grille, when closed, permits visibility from the sidewalk of at least 70 percent of the area covered by such grille.”

As a result, the final sentence in Item 5 of Intro 910 stating, “It shall be an affirmative defense that the nonconforming security grille was installed prior to July 1, 2011,” should be deleted. Security grilles installed prior to July 1, 2028 would no longer be subject to regulation under Section 1010.1.4.4 of the New York City Building Code.

Further, it is imperative that the final legislation include two years of multilingual outreach to business owners. Almost all of the business owners we talked to were unaware of Local Law 75 of 2009, through no fault of their own. Because there was inadequate notice and

communication to business owners about the impending deadline to update their gates, Local Law 75 amounts to a surprise mandate that will cost small business owners thousands of dollars they cannot afford.

We propose these updates for the following reasons, expressed below.

Gate Replacement Costs Will Harm Businesses

The single greatest concern driving our testimony is cost. Replacing a rolldown security gate is not a routine maintenance expense. For many businesses in Chinatown, replacing their gates is a major capital expenditure that can run into the thousands of dollars. This is not an abstract fear: Welcome to Chinatown recently had a section of our own gate at 115 Bowery repaired, and the **repair** alone cost \$4,000. A full gate replacement for a typical small business could easily cost two to three times that amount or more, depending on the size of the storefront and the complexity of the installation.

For the restaurants, grocery stores, and small retail shops that make up Chinatown, that kind of expense is not feasible. It could be the difference between staying open and closing permanently. Many of these businesses are immigrant-owned, still recovering from the devastating economic impact of the COVID-19 pandemic, and operating on margins that leave little to no room for steep surprise expenses.

Chinatown is home to a particularly high concentration of small, independently owned businesses. These are not chain stores or large commercial tenants with the financial backing to absorb sudden compliance costs. A mandate to replace security gates by July 1, 2026, with very little advance notice, risks triggering a wave of closures that would hollow out the neighborhood and permanently harm the community that these businesses sustain.

Contradictory Communication Around Enforcement

Compounding the financial hardship is the fact that the City's own communications have sent contradictory signals about who is actually responsible for replacing the gate, the property owner or the tenant business?

The public promotional materials for Local Law 75 were unclear about whether the landlord or tenant will be responsible for the gate replacement cost and any associated fines. While the property owners may be fined for noncompliance, most commercial tenants have unfavorable leases that make the tenant, not the property owner, ultimately responsible for gate maintenance and costs. It is unclear in the promotional materials what the legal responsibilities for gate compliance will be between landlords and their tenants.

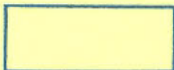
We urge the Council to incorporate our amendment swiftly and to include requirements for two years of multilingual outreach in any final legislation. Chinatown's small businesses have survived extraordinary hardship. They deserve a regulatory process that works with them, not against them.

Thank you for the opportunity to submit this testimony.

Respectfully,
Welcome to Chinatown

**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: 06/08/2026

(PLEASE PRINT)

Name: Jason Adulley

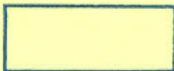
Address: One Liberty Plaza

I represent: Rpt. of Small Business Services

Address: One Liberty Plaza

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 910 Res. No. _____

in favor in opposition

Date: 6/8/2026

(PLEASE PRINT)

Name: Matthew Bauer

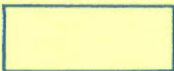
Address: [Redacted] Forest Hills, NY 11375

I represent: NYC BID Association

Address: 46 Madison Ave BID, 2a E 61 St, NY NY 10065

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 910 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JOANNA TALLANTIRE

Address: 157 13th St Brooklyn NY 11215

I represent: PARK SCOPE FIFTH AVENUE BID

Address: [Redacted] GARFIELD PL [Redacted] BROOKLYN NY 11215

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 910 Res. No. _____

in favor in opposition

Date: 6/8/26

(PLEASE PRINT)

Name: Mark Caserka

Address: 253 26th St, Brooklyn, NY 11232A

I represent: Brooklyn Chamber of Commerce

Address: [Redacted] Brooklyn, NY 11209

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

MIP

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

in favor in opposition

Date: 6/8/26

(PLEASE PRINT)

Name: Andrea Tan (186 Prospect Pl Ct 35 BK)

Address: 2090 Adam Clayton Powell Jr. Blvd.
NY, NY 10027

I represent: The Legal Aid Society

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Red Tape Relief Act Res. No. _____

in favor in opposition

Date: 6/8/26

(PLEASE PRINT)

Name: Andrea Tan

Address: [Redacted] Brooklyn, NY 11238

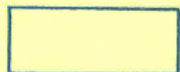
I represent: The Legal Aid Society

Address: 2090 Adam Clayton Powell Blvd.
NY, NY.

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. ALL Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: LISA SORIN

Address: _____ BX 10461

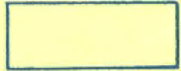
I represent: Bronx Chamber of Commerce

Address: 1200 WATERS PLACE BX 10461
Suite 112

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. 910, 799, 7202^b Res. No. 328
 in favor in opposition

Date: 6/8/26

(PLEASE PRINT)

Name: ANDREW RIGIE

Address: 244 FIFTH AVE, 2947, NY, NY 10001

I represent: NEW YORK CITY HOSPITALITY ALLIANCE

Address: SAME

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: 06/08/2026

(PLEASE PRINT)

Name: Kenny Minaya

Address: One Liberty Plaza

I represent: Dpt. of Small Business Services

Address: One Liberty Plaza

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: Associate Commissioner Renaldo Hyton

Address: _____

I represent: DOB

Address: _____

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