

CYRULI SHANKS & ZIZMOR LLP  
ATTORNEYS AT LAW

January 28, 2026

VIA FIRST CLASS MAIL

The Honorable Zohran Mamdani  
Mayor of the City of New York  
City Hall  
New York, NY 10007

Re: Recommendations for DOB Reform to Mitigate Operating Costs for Small Residential Property Owners

Dear Mayor Mamdani:

I am writing on behalf of the New York Association of Realty Managers (NYARM), an organization dedicated to the professional management of New York City's diverse residential building stock, and the Small Property Owners of New York (SPONY), which represents small residential property owners throughout the city. NYARM and SPONY share your administration's priority of lowering housing costs for New Yorkers, and we recognize that the affordability of a home is inextricably linked to the cost of maintaining the buildings that house it.

For small residential owners—the "mom-and-pop" landlords who provide a critical portion of the city's naturally occurring affordable housing—the Department of Buildings (DOB) often functions as a source of unpredictable and escalating "soft costs." For purposes of this letter, "small residential properties" refers to buildings containing fewer than 10 dwelling units, including non-owner-occupied small rentals. While we applaud your recent initiatives to streamline permitting and enforcement, including efforts aligned with the SPEED Task Force, we respectfully propose the following targeted administrative reforms to DOB that can further reduce operating costs for small owners while preserving safety and code compliance.

1. Unified "Single-Window" Code Enforcement

Small owners must currently navigate a labyrinth of overlapping jurisdictions across DOB, HPD, FDNY, DEP, and DOHMH, where a single underlying issue, such as a localized boiler repair, can trigger multiple inspections and duplicative fines. Consolidating housing and building code inspections under a single unified office for small residential properties would reduce "cascading fines" for the same condition, improve consistency of enforcement, and free limited owner resources for actual repairs rather than transactional costs.

2. Digitalization and Automated "Instant" Permitting

For modest projects, the cost of architectural and legal filings often exceeds the cost of the underlying repair, especially for small residential buildings. Leveraging the mandated 2028 Digital City Map and existing digital tax lot and zoning data, DOB could implement automated zoning and compliance checks so that clearly low-risk, small-scale work in small residential buildings (such as minor plumbing repairs, like-for-like boiler or water heater replacement, or small exterior deck or stair repairs) is eligible for “instant” digital permits, thereby eliminating months of mortgage and carrying “holding costs” associated with permitting delays.

### 3. Tiered Fine Structures Based on Building Size

Current flat-fee penalty structures impose identical fines on a three-family home and a large institutional owner, even though their operating budgets and access to capital bear little resemblance. A \$2,500 fine for a minor clerical or paperwork error may be a rounding error for a corporate REIT, but it can represent an entire month’s maintenance budget for a small, owner-operated building. Implementing scaled penalties calculated by total square footage or unit count would preserve the deterrent effect of enforcement for all owners, while preventing disproportionate impacts on small-scale providers who are essential to neighborhood stability.

### 4. Expansion of the “Homeowner Relief Program” to Small Rentals

The Department’s Homeowner Relief Program and related rule changes currently extend a 60-day cure period for certain non-safety-related violations to eligible owners of one- and two-family homes, allowing conditions to be corrected without immediate fines or formal enforcement. A similar approach for small rental buildings would significantly reduce unnecessary penalty exposure while still prioritizing timely remediation of unsafe conditions. Extending a 60-day “Request to Correct” window to all residential buildings with fewer than 10 units for non-hazardous, non-injury-related violations would better align DOB’s enforcement posture with a focus on safety and voluntary compliance, rather than creating unavoidable financial burdens for small owners who are willing and able to cure conditions quickly.

### 5. Standardized “Prototypical” Plans for ADUs and Conversions

Your administration’s stated goal of creating approximately 200,000 new affordable units will require unlocking the potential of basement apartments, accessory dwelling units (ADUs), and small-scale conversions in existing building stock. Developing and publishing free, pre-approved, code-compliant architectural templates for common ADU and basement conversion typologies would dramatically reduce professional service costs, which can otherwise reach \$20,000 or more per project, even for small buildings. Owners who utilize these standardized plans could be eligible for expedited review and reduced or waived filing fees, ensuring consistent life-safety standards while empowering small property owners to add legal, safe housing units at scale.

NYARM, SPONY, and their legal partners stand ready to collaborate with your administration and with the SPEED Task Force in drafting and refining the regulatory frameworks necessary to implement these reforms. We would welcome the opportunity to meet with your staff at your earliest

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convenience to share on-the-ground experience from small residential owners and managing agents about how these changes can stabilize the city's naturally occurring affordable housing and reduce cost pressures on tenants.

Respectfully submitted,



Harry A. Kritzer

Counsel to NYARM and SPONY



cc: Margie Russell, Executive Director, NYARM ([mrussell@nyarm.com](mailto:mrussell@nyarm.com))  
Ahmed Tigani, NYC Department of Buildings Commissioner, ([atigani@buildings.nyc.gov](mailto:atigani@buildings.nyc.gov))  
Leila Bozorg, Deputy Mayor for Housing and Planning ([LeBozorg@cityhall.nyc.gov](mailto:LeBozorg@cityhall.nyc.gov))  
Ann Korchak, Board President, Small Building Owners of New York ([ann@spony.org](mailto:ann@spony.org))  
Pierina Ana Sanchez, Chair, Committee on Housing and Buildings, Committee  
[District14@council.nyc.gov](mailto:District14@council.nyc.gov)