
September 9, 2026

Comments by Linda M. Baran, President & CEO of the Staten Island Chamber of Commerce

Re: The Department of Buildings (DOB) proposal to add a new section 101-20 to Subchapter A of Chapter 100 of Title 1 of the Rules of the City of New York regarding incomplete inspections.

Good morning. My name is Linda Baran, President and CEO of the Staten Island Chamber of Commerce. Thank you for the opportunity to comment on the proposed rule regarding incomplete inspections.

Our concern is fairly straightforward. New York City is already an extremely expensive place to operate a business, and we continue to hear from our small businesses about the cumulative impact of fees, fines, insurance, permitting costs, and other expenses. Adding another \$200 fee only adds to that burden.

We certainly understand that DOB needs businesses and contractors to be prepared when an inspector arrives. But there should be a reasonable opportunity to correct an issue before a fee is imposed, particularly for a first occurrence. There may also be circumstances that prevent an inspection from being completed that are outside of the business owner's or contractor's control. The rules should distinguish repeat offenders from a small business or contractor experiencing a one-time access issue.

We also believe businesses and contractors should be given clear information ahead of time about exactly what is required for an inspection to be completed. If that information is not already being provided when an inspection is scheduled, it should be. A simple checklist or clear set of requirements could help avoid incomplete inspections in the first place. The goal should be to help businesses comply before imposing a fee.

We are also concerned that under the proposed rule, an incomplete inspection cannot be rescheduled until the \$200 fee has been paid. That means the impact on a business may go beyond the fee and potentially delay a project or necessary work. The proposed rule states that payment of the fine is required before an incomplete inspection can be rescheduled.

We are also concerned that this proposal seems to run counter to the direction Mayor Mamdani has taken with his recent small business initiatives, including efforts to reduce fees, fines, and unnecessary regulatory burdens. We strongly support those efforts and believe City

agencies should be looking for ways to make compliance easier, not adding new costs for businesses that are trying to do the right thing.

We would ask DOB to reconsider the proposed fee and explore alternatives, including providing a warning and an opportunity to reschedule without a fee for a first incomplete inspection and making inspection requirements clear in advance. We appreciate that the proposed rule includes a 30-day process to challenge a fee. However, we believe DOB should provide clearer standards for when a fee will be dismissed based on circumstances outside the permit holder's control instead of leaving that determination to DOB's sole discretion.

We all want businesses to comply with City regulations. We just want to make sure the process is fair, reasonable, and doesn't make it even more expensive to do business in New York City.

Thank you for the opportunity to comment.