



New York City Department of Investigation
MARGARET GARNETT
COMMISSIONER

New York City Police Department
DERMOT SHEA
COMMISSIONER

October 2, 2020

Honorable Corey Johnson
Speaker
The New York City Council
250 Broadway, 18th Floor
New York, NY 10007

Dear Speaker Johnson:

The New York City Police Department (NYPD) and the New York City Department of Investigation (DOI) are jointly writing the City Council regarding certain requirements under Local Law 6 of 2020 pertaining to parking enforcement and placard abuse. As discussed below, NYPD and DOI write to notify the Council that certain requirements under Local Law 6 are not currently feasible or practical due to the COVID-19 pandemic and to request a temporary suspension of those requirements.

Pursuant to Local Law 6 of 2020, NYPD is required to conduct weekly evaluations of “no fewer than 25 blocks and intersections experiencing a prevalence of improper use of parking permits”, and “no fewer than 25 blocks experiencing obstruction of bike lanes, bus lanes, sidewalks, crosswalks and fire hydrants by vehicles.” The evaluation locations are selected by NYPD following an analysis of available complaint and enforcement data. These evaluations were to commence no later than January 1, 2020 and continue for a period of six months. The results of NYPD’s analysis and evaluations are to be submitted to the Mayor, the Speaker of the City Council and DOI no later than 30 days following the end of each month.

Under the law, DOI is required to conduct an investigation and prepare a report “regarding the issuance of parking permits and enforcement of parking laws” that includes, but is not limited to, an analysis of NYPD’s monthly reports. DOI’s report is to be submitted to NYPD, the New York City Department of Transportation (DOT), the Mayor, and the Speaker of the City Council no later than September 30, 2020.

The COVID-19 pandemic has presented the City with unprecedented challenges. City agencies, including NYPD, have had to operate with limited staff and capacity for several months. The massive staffing issues faced by the NYPD prevented the NYPD from collecting all of the required data as envisioned under Local Law 6. Furthermore, while NYPD’s staffing numbers have returned to pre-COVID-19 levels, the number of vehicles entering and parking on city streets has not. Observation of current conditions enumerated

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under Local Law 6 will fail to produce data that informs the Mayor, Council and relevant agencies of the extent of these problems, and will make it difficult or impossible for DOI to produce analyses and recommendations that would be applicable to the City’s normal traffic and parking patterns. Any report prepared under these conditions would undermine rather than further the intent of the law.

Therefore, NYPD and DOI respectfully request that the deadline imposed by Local Law 6 for the issuance of the report be suspended until such time as commuting and parking patterns return to a level sufficient for meaningful evaluation. NYPD and DOI jointly propose that the two agencies convene no later than January 15, 2021, to re-evaluate parking activity and report back to the Council on whether the activity is appropriate for the resumption of actions required under Local Law 6, and provide a proposed timeline for compliance.

Sincerely,

Daniel G. Cort
First Deputy Commissioner
New York City Department of Investigation

Jeffery Schlanger
Deputy Commissioner – Risk Management
New York City Police Department

cc: Honorable Bill de Blasio
Mayor of the City of New York
City Hall
New York, NY 10007

Honorable Polly Trottenberg
Commissioner
New York City Department of Transportation
55 Water Street, 9th Floor
New York, NY 10041