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December 4, 2018
Testimony before New York City Council
Committee on Environmental Protection
Re: Intro. 1253

Good morning Chair Constantinides and Committee Members. My name is Justin Pascone, Director of Policy for the New York Building Congress. On behalf of my organization, I would like to express our support for the goals of this legislation and the efforts the City Council has taken to reduce our carbon emissions.

The New York Building Congress has, for almost a hundred years, advocated for investment in infrastructure, pursued job creation and promoted preservation and growth in the New York City area. Our association is made up of nearly 550 organizations comprised of more than 250,000 professionals. Through our members, events and various committees, we seek to address the critical issues of the building industry and consistently promote the economic and social advancement of our city and its residents.

Our members know the outsized role New York's built environment has on the production of carbon. New York Building Congress is aligned with the City's goal of reducing greenhouse gas emissions by at least 80 percent by 2050. New York City was responsible for 52 million metric tons of greenhouse gases in 2016, two-thirds of which came from buildings. While the city is on its way to reducing greenhouse gas emissions, it still has a long way to go.

The Building Congress supports the intentions of this legislation and recognizes that achieving our 80x50 goal requires significant reductions in emissions produced by the city's buildings. We also recognize that there are gaps that exist in the current legislation that should be addressed in order to successfully implement this policy. These include:

- In order to obtain the required 12 months of building carbon emission data needed to demonstrate compliance with the 2022 milestone, all required building alternations and retrofits need to be completed by December 31 of 2021. The thousands of buildings that would need to complete this comprehensive and complicated process should have a longer timeframe.
- The metrics used for measuring building emission intensity and categorizing buildings do not have consensus among industry experts. Legislators should work with the industry and stakeholders to find a set of metrics that are appropriate and contextual so that true carbon reductions can be achieved. The Building Congress and our members would look forward to participating in these discussions.
- While we fully support the need to preserve affordable housing for New Yorkers, the elimination of all rent-regulated/affordable housing from compliance would not support the goal of meaningful carbon reduction from our buildings.

New York City's building industry should serve as a national and international example of combating climate change through our built environment. The Building Congress supports efforts to incentivize energy-efficient and resilient building design and construction, as well as efforts to bring our aging building stock into the 21st century. We look forward to working with the Council to achieve these necessary goals.

Thank you for the time to be heard on this important matter.