



November 14, 2022

## NYC LL97 Rules

I am chair of the NYC 2030 District is a Private / Public Partnership of property owners and community stakeholders which leverages financing, public support and collaborative action to spur sustainable innovation and progress. We implement the NYSERDA-funded, Brooklyn Borough Pres. sponsored Heat/Cool Smart Brooklyn community retrofit campaign: <https://heybrooklyn.org/>

Strict LL97 enforcement to drive retrofits is essential, but more incentives and comprehensive support is required. NYC Land Use and Economic Development policies should be aligned with LL97 goals.

We support the proposed limitation of REC offsets, as recommended by many climate groups, while urging the expansion of clean distributed energy installations in NYC.

The projected carbon valuation of grid electricity for 2030 to include anticipated renewable energy resources is too optimistic, and may reduce the incentive of property owners to perform energy efficiency work. The grid's carbon intensity should only be revised once carbon reductions are achieved.

NYC must support climate initiatives at the community scale to engage public-private partnerships; to integrate and streamline access to NYS & NYC programs, bond funding and private financing options; and to bundle small and large projects together to drive climate progress and distribute benefits widely.

- **Community Scale Initiatives** are necessary to accelerate successful and innovative projects for buildings, infrastructure, public engagement and behavior.
- **Project Aggregation** drives implementation of building energy improvements, economic development benefits and workforce training opportunities through critical mass of engagement, economies of scale and streamlined project management.
- **Integration of Technologies & Solutions** produces complementary performance benefits and whole-building.
- **Multi-family buildings have few resources to meet the targets**, particularly Small & Med. sized, and for middle & moderate incomes, Aggregated and streamlined programs with substantial funding can move retrofits to high gear, expand equity and economic development benefits.
- **Technical assistance and public education resources are needed** to make progress. The NYC Accelerator, PACE financing and carbon trading are not sufficient.
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The implementation of LL97 is an opportunity for Mayor Adams to show vision and to exercise leadership to advance innovation, community engagement and civic collaboration to meet the climate challenge, not to allow property owners to evade the responsible investments to improve building performance.

Best,

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<http://www.2030districts.org/new-york-city> <http://www.2030districts.org>