

**TESTIMONY SUBMITTED TO THE NEW YORK CITY
DEPARTMENT OF BUILDINGS
ON LOCAL LAW 97 OF 2019 PROPOSED RULEMAKING
OCTOBER 24, 2023**

I am Elizabeth Crowley, President and CEO of the Building Trades Employers' Association ("BTEA"). The BTEA represents twenty-four contractor associations and over 1,200 union construction managers, general contractors and specialty trades subcontractors doing business throughout New York. BTEA members employ 130,000 workers and are responsible for more than \$65 billion in construction revenue. The BTEA appreciates the opportunity to submit testimony in support of two proposed rulemakings by the New York City Department of Buildings ("Department") related to Local Law 97 of 2019 ("Local Law 97").

Local Law 97 was enacted with the laudable goal of reducing greenhouse gas emissions from buildings twenty-five thousand square feet or larger beginning next year. Local Law 97 established annual emissions targets, with the failure of building owners to reach those targets resulting in civil penalties.

Local Law 97 requires the Department to consider any good faith efforts an owner has made when determining any penalties for non-compliance. The Decarbonization Plan detailed in this rulemaking provides an even-handed, thoughtful approach to assist owners in meeting their compliance obligations, without the use of draconian penalties that would ultimately serve as an impediment to compliance.



The limited resources available to owners should be used to green their assets, not pay penalties to the City, and the BTEA and its member contractors stand ready to assist in this important work to reduce greenhouse gas emissions from the City's building stock.

Thank you for the opportunity to submit testimony and we welcome the opportunity to discuss further.