



The Community Preservation Corporation

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New York City Department of Buildings Public Hearing on Proposed Amendments to Rules Relating to LL97 Emissions Calculations, Adjustments, Filing fees, and LL87 Provisions

November 7, 2024

Thank you to the Department of Buildings (DOB) for holding this public hearing and providing the opportunity to provide feedback on the proposed amendments to rules relating to Local Law 97 (LL97). My name is Emily Klein, and I am the Assistant Vice President for Policy and Government Affairs at the Community Preservation Corporation (CPC), a nonprofit community development finance institution (CDFI) formed in the early 1970s to help New York City and State restore and rebuild communities that had been devastated by deterioration and abandonment. As a fifty-year-old affordable housing lender with a significant footprint in New York City, CPC is honored to provide testimony today in support of the Proposed Amendments to Rules Relating to LL97.

The proposed amendments under consideration today aim to enhance the effectiveness of LL97 by providing detailed guidelines for adjustments to emissions limits and introducing a new pathway to support the electrification of affordable housing. These amendments are informed by DOB's on the job learnings since the compliance period began in January 2024, and DOB has more information now than when the law was originally passed. These proposed amendments demonstrate DOB's ability to utilize this new information and initial program data to inform how enforcement of the law should be executed and how operational emissions should be evaluated.

We appreciate that these proposed rule changes will make it easier for building owners to comply, submit reporting, and navigate alternative pathways where strict compliance is not yet possible. The ability to access mediated resolutions to non-compliance, cure missing reporting, and file for hardship related to financial constraints and the physical condition of a building is particularly important to the owners we serve and the buildings within their portfolios.

CPC is also very supportive of the Affordable Housing Reinvestment Fund and its associated offset scheme. The ability to purchase offsets serves as a pathway towards compliance for many buildings still on their way to reaching the emission limits, while the proceeds from these offset purchases will be reinvested into decarbonizing affordable housing across the City. While advancing the objectives of LL97 and working towards electrification, the fund also supports the development of quality and affordable housing for New Yorkers – a laudable mission. We applaud DOB for their efforts to date to stand up the compliance and reporting program around LL97 and strongly support the proposed amendments to rules being considered today. Thank you for this opportunity to provide testimony.