



## **Legislative Feedback on Int. 13-A**

April 14, 2017

*Int. 13-A – A Local Law to amend the administrative code of the city of New York, in relation to requiring the base building systems of certain buildings to be operated by individuals with training in building energy efficiency*

Thank you for this opportunity to provide additional feedback on Int. 13-A prior to the bill being aged. NYSFAH continues to have concerns with this bill’s potential to add yet another of layer of regulation and cost to the affordable housing industry, which is increasingly burdened by such requirements at all stages of the process, from development to building management.

As NYSFAH previously raised, a requirement such as this will substantially increase demand for the training or certification programs being required, which will increase their costs. The layering of additional costs that legislation such as Int. 13-A imposes is a barrier to affordable housing development due to its slimmer profit margins.

As a result of the way the legislation is currently written, it is impossible to quantify the impacts, both in cost and logistics, of compliance. This is because the legislation does not include specific training requirements, but rather requires an advisory board to determine the specifics. There is no guarantee that this board will recommend requirements that are tailored based upon specific buildings and their often very different systems’ complexity. Additionally, there is no clause that exempts already trained or qualified workers from these new requirements. In short, it is a one-size-fits-all approach—the specific details of which are not developed—that leaves NYSFAH only with the certainty that it will in some way be burdensome.

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