



Rohit T. Aggarwala
Commissioner

59-17 Junction Boulevard
Flushing, NY 11373

Tel. (718) 595-6565
raggarwala@dep.nyc.gov

November 19, 2024

New York City Council
City Hall
250 Broadway
New York, NY 10007

Dear Councilmembers,

I wrote in October to express my support for the City of Yes for Housing Opportunity (COY HO) proposal. I am writing today to reiterate that support and explain how the accessory dwelling unit (ADU) and basement apartment legislation would shape COY HO's implementation.

As I stated previously, because the housing created through COY HO will be dispersed throughout the city, the proposal would not result in significant adverse impacts to the City's water and sewer infrastructure, nor would it require DEP to make notable adjustments to our current capital commitments.

COY HO is not a neighborhood rezoning designed to create the type of high-density developments that might require system upgrades. Additionally, we do not expect COY HO to have much impact on stormwater flows entering the system. Increases in stormwater flow or flooding are generally a result of increases in non-porous development. Much of the new housing permitted under COY HO will be developed within existing structures. If any new developments increase impervious surfaces above a certain threshold and meet certain other size requirements, they will have to manage stormwater on-site, which will result in a net decrease in the volume of stormwater entering the sewer system.

DEP has been an active partner in the drafting of the ADU and basement apartment policies developed to implement COY HO. For the first time, the likelihood of inland stormwater flooding is being considered in the building code. All areas of the city will be required to have some basement flood protection, like flood alarms. Some areas will have to have higher levels of protection, and in the most vulnerable areas of the city, basement apartments will not be permitted at all. These requirements are being informed by DEP's existing stormwater flood maps. We are committed to working with partner agencies to develop maps designed specifically for housing and building decisions.

As I have said before, I strongly urge the Council to support COY HO. It addresses the city's urgent housing needs and helps keep New Yorkers safe without compromising essential infrastructure. DEP is committed to our role in fostering sustainable development throughout the city.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rohit T. Aggarwala', written in a cursive style.

Rohit T. Aggarwala



FIRE DEPARTMENT

9 METROTECH CENTER

BROOKLYN, NY 11201-3857

Assistant Chief Thomas J. Currao
Chief of Fire Prevention

New York City Council

250 Broadway

New York, NY 10007

Dear Members of the City Council,

From the inception of the interagency working group in the Summer of 2023, the New York City Fire Department has been an integral part of the bill drafting process for the legislation that this Committee is considering today.

FDNY firefighters are regularly called to respond to emergencies in basements, cellars, and other occupancies which they discover have been illegally converted into residential units. The conditions in these illegal units are frequently unsafe, and present a danger not only to the tenants who reside in the building, but also to the first responders who are tasked with saving the lives of victims.

It is critical that, while recognizing that these locations would be inhabited regardless of legality, we can provide a pathway for homeowners to make these ADUs a safer home for themselves, their tenants, and the first responders who are risking their lives to protect them. Creating an appropriate framework for ADU legalization helps promote the safety of tenants, homeowners, and first responders.

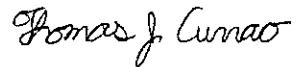
A number of provisions of this bill are especially important to firefighters. By implementing a requirement of smoke alarms, carbon monoxide alarms, and automatic sprinklers for ADUs greatly increases safety, while reducing the risk for residents and reducing the severity of the heat, flames, and smoke for firefighters. Ensuring sufficient egress from ADUs will also greatly increase safety for residents. Simultaneously, an adequate egress requirement for all ADUs ensures an appropriate access path for rear yard ADUs to ensure first responders have an

unobstructed access point to the premises.

The health and safety of all New Yorkers is the FDNY's utmost priority, and the legislation you are considering reflects input on fire and life safety from the Department.

Thank you for the opportunity to provide feedback.

Respectfully,

A handwritten signature in black ink that reads "Thomas J. Currao". The signature is written in a cursive, flowing style.

Assistant Chief Thomas J. Currao
Chief of Fire Prevention



JUMAANE D. WILLIAMS

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON HOUSING & BUILDINGS
NOVEMBER 19, 2024**

Good afternoon,

My name is Jumaane D. Williams and I am the Public Advocate for the City of New York. I would like to thank Chair Sanchez and the members of the Committee on Housing and Buildings for holding this important hearing.

There are a number of bills being heard today, but I would like to talk about two in particular, requested by the Mayor. Intro. No. 2764 would require the Department of Environmental Protection (DEP) to promulgate rules around flood risk areas, and further set eligibility and design requirements for new ancillary dwelling units (“ADU”) in these flood risk areas. Similarly, Int. No. 2765 tackles the issue of converting existing basement apartments by establishing a legalization pilot program under the Department of Buildings .

ADU’s are a critical component of our housing stock with an estimated 400,000 people living in basement and cellar dwellings across the five boroughs¹. Despite this, many units still remain illegal, out of code and at risk of flooding, putting countless New Yorkers at risk. We saw the devastating impact that Hurricane Ida had on families living in these basement apartments, when the storm took the lives of 13 New Yorkers. The efforts of these bills, in my opinion, are long overdue, but it is never too late to make these critical policy changes.

It is also important to note, however, that the city alone cannot make these changes – we know this much from the basement legalization pilot program, which saw only 5 out of 8,000 potential units able to participate. Despite high interest, many landlords were unable to join the program due to restrictive zoning, and a lack of financial support from the city and state to facilitate the conversions. I look forward to seeing the passage of these bills and working with our state partners to legalize, regulate, and protect these units and the countless tenants who call them home. But if we are to truly solve our city’s housing crisis, these efforts must also go hand-in-hand with the construction of new affordable housing. Thank you.

¹ Office of the NYC Comptroller Brad Lander. “*Bringing Basement Apartments Into the Light: Establishing a NYC Basement Board to Provide Basic Rights, Responsibilities, and Protections for Basement Apartment Residents and Owners*”. August 30, 2022, available at: <https://comptroller.nyc.gov/reports/bringing-basement-apartments-into-the-light/>



BUILDING & CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK

GARY LaBARBERA
PRESIDENT

AFFILIATED WITH THE
BUILDING CONSTRUCTION TRADES DEPARTMENT
OF WASHINGTON, DC

★ **NABTU** ★

NYS BUILDING AND CONSTRUCTION TRADES COUNCIL
—
AMERICAN FEDERATION OF LABOR AND CONGRESS
OF INDUSTRIAL ORGANIZATIONS

TESTIMONY

On behalf

BUILDING AND CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK AND VICINITY

New York City Council Committee on Housing and Buildings

November 19, 2024

The Building and Construction Trades Council of Greater New York & Vicinity (“BCTC”) is an organization of local building and construction trade unions that are affiliated with 15 International Unions in the North American Building Trades Union. Our local union affiliates represent approximately 100,000 union construction workers. The BCTC’s mission is to raise the standard of living for all workers, to advocate for safe work conditions and to collectively advance working conditions for our affiliates’ members, as well as all workers in New York City. With the goal of advancing working conditions and raising standards for all construction workers, the BCTC has successfully advocated for safety legislation before this council, wage theft legislation in Albany, and wage standards on certain construction projects that would benefit all workers regardless of union status, regardless of race, religion, ethnicity, or gender. As part of its mission, the BCTC promotes safe construction practices, not just for our members whom perform the construction work, but also for the general public that will live, work, and otherwise utilize the buildings and structures that our members build.

We submit this testimony to address very distinct provisions of T2024-2764 and T2024-2765 that would bypass New York City’s Plumbing Code. Specifically, T2024-2764 contains the following provision:

T103.5.5 Plastic piping. Notwithstanding any inconsistent provisions of the *New York City Plumbing Code*, plastic piping shall be permitted in ADUs as permitted by the *New York State Residential Code*.

The use of plastic piping, PEX tubing, and/or Polyvinyl Chloride (PVC) is a controversial issue that raises serious health and safety concerns. Plastic piping, PVC, and/or PEX tubing is more permeable than copper and more susceptible to contamination. Additionally, PVC is highly flammable and highly toxic. This type of piping also presents serious issues that do not exist with traditional copper pipes if bacteria was detected, and the pipes need to be sanitized. In short, the New York City Plumbing Code does not exist to make construction more expensive, or to require the use of more expensive materials, it exists to protect the Citizens that live and work in these buildings. The City should not deviate from the well established and proven guidelines and regulations set forth in the New York City Plumbing Code for the purposes of creating affordable housing. Affordable housing should not be subject to any less stringent standards than any other form of housing or building in our City.

The Building and Construction Trades Council of Greater New York & Vicinity strongly urges this committee to remove the language that would allow the installation of plastic piping in these units.

We thank you for this opportunity to submit testimony on this important matter.

**Testimony to the City Council Committee on Housing and Buildings
From Arthur O. Klock, Jr., Director of Trade Education,
Plumbers Local 1 Trade Education Fund.
November 19, 2024, 1:00 pm**

Good afternoon. My name is Arthur Klock, and I am Director of Trade Education for the Plumbers Local 1 Trade Education Fund.

My thanks to Chair Sanchez and to the members of the City Council Committee on Housing and Buildings for the opportunity to speak before you this afternoon.

I am here to express strong opposition to both T2024-2764 and 2765, proposed legislation governing the construction of ancillary dwelling units and a pilot program to convert existing basement or cellar apartments to dwelling units.

The use of plastic piping or plastic PEX tubing in the plumbing of these units has been quietly slid into both bills and makes them risky and unacceptable.

There are serious and well-documented safety and health issues surrounding plastic piping and by including it in a bill to expand affordable housing, I fear this body might be unwittingly creating two different Plumbing codes. One that adheres to the most stringent safety standards for those that can afford it, and one that ignores chemical contamination and fire hazards for “affordable housing”.

It is my opinion that the creation of a secondary Building code in New York City for underprivileged residents is abhorrent. Our building code has always been a beacon of equity. No more tenements for the poor. I was born and raised in this city, and I was taught that we learned that lesson generations ago.

This is not a labor issue. Yes, plastic itself is cheaper, but it is well known that the purported labor savings when installing plastic piping is exaggerated by the plastics industry as a sales technique.

Plastic water piping has a terrible record that is only getting worse. Do not take my word for it – check with the FDNY and NYCHA, who only a short time ago reiterated their opposition to the use of plastic piping, including saying that even if its use was approved, they would not use it.

Plastic pipes are known to commonly leach chemicals used in their manufacture into the water passing through them. Environmental chemicals have also been shown to leach from the environment into plastic piping, because it is permeable, while copper and other metal piping is not. This means that water passing through plastic piping is susceptible to BOTH internal and external chemical contamination.

Polyvinyl Chloride or PVC is highly flammable. PVC is a substance that burns and can sustain a flame, and you can ask the FDNY how well PVC burns behind walls. You are essentially putting solid fuel into a building when you install PVC drainage piping. And remember, it travels through shafts and drilled holes from floor to floor. When burning, it releases Polyvinyl Chloride Gas, which is highly toxic.

To those who would say that plastic piping has been found safe and legal for over 30 years – allow me to clarify the record – every 4 or 5 years, when a previously unidentified chemical is found to be leaching from plastic piping, the plastic companies reformulate the chemical makeup of the piping. They do this every 4 to 5 years – because you can only spot a dangerous chemical if you know what you are looking for. These companies, however, do not remove the dangerous previous generation of plastic pipes. Once installed they remain hidden, like the lead pipes of yesteryear.

It is also critical to mention that these plastic lines cannot be sanitized in case of biological contamination, such as if Legionella or other pathogenic bacteria is detected. There are only two ways to sanitize potable water piping – by pushing either chlorine or high temperature water through the system – you cannot do either with PEX plastic piping. It won't survive the required chlorine levels or the required heat.

Plastic piping has also been found to be attractive to rodents who chew holes in it and cause tremendous damage to the building when those pipes leak or burst. NYC surely has its share of rodents.

Along with health concerns and safety issues, many multi-million-dollar lawsuits have accompanied the installation and subsequent failures of plastic piping. Indeed, in Florida you cannot obtain home insurance if your house has certain types of plastic piping installed.

Another plastics industry untruth is that plastic pipes are recyclable; they are not - unlike copper.

Even though we are told plastic piping is safe, research continues to point to serious problems including ingestion of microplastic particles. But this has happened before – there was a time not too long ago when we were told that lead piping was the way to go. At the time it was installed, lead pipe was widely available, affordable, and marketed by the lead industry as proven safe for use across a wide range of applications.

Over the last decade, however, hundreds of communities have spent billions of dollars and countless hours finding and replacing toxic pipes made of lead in local homes, schools, and businesses. We are still paying for that previous belief in corporate marketing. Do we really want to use the underserved as guinea pigs again? The plastic piping industry cannot be trusted and the fact that they need to change the chemical makeup of their product every few years speaks to their dishonesty.

I would strongly encourage this committee to remove the language on plastic piping from these bills. There should only be one building code that respects the health and safety of everyone in our city equally, regardless of their socioeconomic situation.

As a child I often took the bus to Riis Park beach. I learned who Jacob Riis was and what he did. I urge the members of the Council to act in the spirit of Mr. Riis and be careful not to create an alternate code for “the other half”. Sacrifices might have to be made to expand affordable housing, but it should never be the health and safety of fellow New Yorkers being sacrificed.

Thank you for your time and your attention to this critically important issue.

Arthur O. Klock, Jr.
Director of Trade Education
Plumbers Local 1 Trade Education Fund



**PLUMBING
FOUNDATION
CITY OF NEW YORK**

To: NYC Council Committee on Housing & Buildings

From: April McIver, Executive Director, The Plumbing Foundation

Date: November 19, 2024

Re: T2024-2764

INTRODUCTION

My name is April McIver and I am the Executive Director of the Plumbing Foundation City of New York, Inc. The Plumbing Foundation was founded in 1986 and is a non-profit organization of small and large, union and non-union plumbing contractors, engineering associations, supply houses, and manufacturers whose mission is to protect the public health and safety of New York City through the enactment and enforcement of safe plumbing codes. On behalf of our industry, we have concerns with portions of T2024-2764. Below outlines our concern and recommended solution.

COMMENTS

The Plumbing Foundation was notified on Wednesday, November 13, 2024 of the hearing on November 19, 2024 covering several pieces of legislation to be preconsidered for introduction at a stated meeting. One of the pieces of legislation is T2024-2764 which sets forth standards for construction of ancillary dwelling units (ADUs). We understand that this bill is an important component to Mayor Eric Adams' *City of Yes* initiative. While we are overall supportive of the initiative and parts of T2024-2764, we must urge the Council to strike the below language in its entirety:

U103.5.5 Plastic piping. *Notwithstanding any inconsistent provisions of the New York City Plumbing Code, plastic piping shall be permitted in ADUs as permitted by the New York State Residential Code.*

There is a long history of the plumbing industry—and to an extent, the NYC Department of Buildings (DOB)—being in opposition to the use of plastic piping for plumbing purposes. NYC is a uniquely dense city riddled with high rises, older buildings, gas piping and sewage piping (7,400 miles¹), and the NYC Building Code is very specific to our building and infrastructure needs. Industry experts meet with the DOB for each Code Revision Cycle during which these topics are addressed, plastic piping being brought up time and time again. The safety and feasibility of current plastic products have not met the standards of our industry experts and DOB experts in order to expand the Code requirements. While the state code may allow for plastic piping for certain sewage and water distribution systems, NYC's plumbing industry experts argue that there is not enough evidence that such systems are rated to perform equally and safely at the identical conditions encountered in NYC potable water systems.²

¹ NYC DEPARTMENT OF ENVIRONMENTAL PROTECTION (DEP), *Sewer System*, <https://www.nyc.gov/site/dep/water/sewer-system.page>.

² The current NYC Plumbing Code only allows under "storm drainage" the following:
PC 1101.10 Plastic pipe.
Plastic piping and fittings shall not be used.

Importantly, there are recent studies raising concerns about the safety and health impacts of certain plastic piping. In *Plastic Pipes, Microplastics & Impacts on Human Health* by Safe Piping Matters,³ it explains the hazards of polyvinyl chloride (PVC) and polyethylene (PE) pipes which crack and peel quickly as they age due to water and additives, particles from which can affect the stomach, lungs, brain, and reproductive system when digested by humans over time. Further, it should be clearly noted that “[s]ince plastic is made from petroleum-based chemicals, plastic pipes are combustible and can burn and/or melt in fires, releasing toxic substances into air and water.”⁴ Finally, in a study titled *Plastic water supply connectors: Leaching, hydrocarbon contamination, and decontamination*, once hydrocarbon contaminants reached building water systems, “sorbed mass remained in the” PVC tubing at the end of decontamination, “indicating the products posed continued leaching risks.”⁵ Clearly there remains very serious concerns associated with use of plastic piping in plumbing systems.

While the text proposed in T2024-2764 states “***notwithstanding any inconsistent provisions of the New York City Plumbing Code***” arguably ensuring that our City’s specific plumbing code requirements are met, it is also our understanding that the City seeks to allow manufactured ADUs (pre fabricated) which already contain plastic piping in compliance with NYS Code. This would not be in compliance with the NYC Plumbing Code. Therefore, the entire section should be stricken from the law to ensure there is no confusion or loopholes.

CONCLUSION

We thank the Committee for their consideration of our comments, and furthermore, the opinions of NYC plumbing industry experts on this topic. We hope this questionable provision, referenced above, on plastic piping was an unintentional insertion not to expand plastic outside of the Code Revision process but only reaffirm the existing language in the current NYC Plumbing Code. Please do not hesitate to contact us for any reason.

Exceptions:

1. Plastic piping and fittings may be used in residential buildings five stories or less in height.
2. Corrugated polyethylene and corrugated polypropylene piping and fittings, with a diameter of 12 inches (305 mm) or more may be used in connection with any type of building for underground yard drainage and storm water piping when used outside of the foundation wall of the building and not connecting to any piping system from the interior of the building.

This is similar to “sanitary drainage” under PC 701.9.

³ SAFE PIPING MATTERS, *Plastic Pipes, Microplastics & Human Health*, <https://safepipinmmatters.org/plastic-pipes-microplastics-impacts-on-human-health/>.

⁴ SAFE PIPING MATTERS, *Plumbing Specification Guide (2024 Edition)*, https://safepipinmmatters.org/wp-content/uploads/2024/05/Spec_Guide_2024edition_05-21-2024.pdf.

⁵ Kristofer P. Isaacson et al., *Plastic water supply connectors: Leaching, hydrocarbon contamination, and decontamination*, AWWA WATER SCIENCE (Aug. 1, 2024), available at <https://awwa.onlinelibrary.wiley.com/doi/10.1002/aws2.1382>. This study is specific to plastic connectors used in various things like coffee machines, ice-makers, refrigerators, kitchen sink spray hoses, water fountains, water softeners, and shower wands.



Plastic Pipe and Fittings Association

800 Roosevelt Rd., Bldg. C, Suite 312 • Glen Ellyn, IL 60137-5833
Phone: 630/858-6540 • Fax: 630/790-3095 • www.ppfahome.org

Nov 19, 2024

NYC Committee on Housing and Buildings

Testimony@council.nyc.gov

Pierina Ana Sanchez, Chair
Shaun Abreu, Alexa Avilés, Eric Dinowitz,
Oswald Feliz, Crystal Hudson and Lincoln Restler

Re: [Int 1127-2024](#) T2024-2764 / 2765 re ADUs and piping

My name is Michael Cudahy and I represent the Plastic Pipe and Fittings Association (PPFA) and we would like to submit a comment supporting the bills heard on the 19th involving ADUs and adoption of piping materials other than copper.

We support NYC's efforts to modernize all NYC building codes to better create housing for New Yorkers, via ADUs, building conversions, and massive office to residential projects.

Plastic piping is an ideal product choice not just for ADU's, but for all projects from residential to commercial and it is time to adopt them in NYC. Not just for cost, time and availability, but for flexibility, ease of conversion, and to conserve copper for vital electrification projects where there is no substitute. Plastic piping will even deliver hot water faster and more efficiently, saving both water and energy.

There are **three** model plumbing codes in the United States and **all** of them include copper and plastic piping, offering product choice to everyone utilizing these codes. The systems all have standards of manufacture, and all are certified by NSF as safe for use or they simply couldn't be adopted in the model codes.

The codes require rodent proofing, they require firestopping, they require product certification.

New Yorkers simply deserve the same product choices available to people residing just outside NYC and the rest of the country.

City of Yes will work for all New Yorkers.

Thank you for the opportunity to comment.

mikec@cmservices.com



ANHD
50 Broad Street, Suite 1402
New York, NY 10004
Tel: (212) 747-1117

Testimony Before the New York City Council Committees on Housing and Buildings

November 20th, 2024

Thank you to Chair Pierina Sanchez and members of the Committee on Housing and Buildings for the opportunity to submit testimony.

About the Association for Neighborhood and Housing Development

ANHD is one of the City's leading policy, advocacy, technical assistance, and capacity-building organizations. We maintain a membership of 80+ neighborhood-based and city-wide nonprofit organizations that have affordable housing and/or equitable economic development as a central component of their mission. We bridge the power and impact of our member groups to build community power and ensure the right to affordable housing and thriving, equitable neighborhoods for all New Yorkers. We value justice, equity and opportunity, and we believe in the importance of movement building that centers marginalized communities in our work. We believe housing justice is economic justice is racial justice.

The Role of Basement Apartments and ADU's in NYC's Housing Crisis

New York City is grappling with a severe affordability crisis, disproportionately affecting low- and moderate-income communities, immigrants, people of color, and essential workers. Basement apartments, one of the few affordable housing options for these groups, remain largely illegal and are penalized instead of recognized for their critical role in the housing market. Legalizing basement apartments and accessory dwelling units (ADUs) is essential to stabilizing homeownership, increasing the affordable housing supply, and preserving our diverse neighborhoods, as these units can provide affordable housing for tenants and help homeowners avoid displacement.

Support for the Legislation

ANHD supports the proposed legislation **T2024-2764** and **T2024-2765** as it aligns with the values of the Basement Apartments for Everyone Campaign (BASE); this is a coalition of community organizations, advocates, tenants, homeowners, and community members who are organizing working-class neighborhoods and communities of color working to increase the number of legally-recognized, affordable, and safe basement apartments, as well as other accessory dwelling units ("ADUs") in New York City.

These bills represent a vital step toward addressing the affordability crisis by making low-cost housing options—specifically basement apartments and ADUs—safe, legal, and available in our communities. As an affordable housing advocate, we strongly urge the City Council to approve these bills, as they would create critical opportunities for homeowners and renters alike, while contributing significantly to the city’s overall housing stock.

That being said, we believe there are specific amendments that could make these bills even more effective, particularly for homeowners in lower-income neighborhoods who are seeking to create or legalize ADUs in their basements or cellars. We outline our key recommendations below:

Key Recommendations

1. **Clear and Predictable Standards for Homeowners**

Homeowners need clear, uniform standards to make significant investments in their properties. A case-by-case review process could be a burden for ordinary homeowners, particularly those with limited financial resources. We recommend setting clear and consistent standards for the conversion of basements and cellars into habitable units, which will give homeowners the predictability they need to make these investments in their homes.

2. **Align Minimum Ceiling Heights with National and State Codes**

We recommend aligning the minimum ceiling height for habitable spaces with national and state codes (7 feet). This change would eliminate the need for costly and disruptive excavation, which many homeowners would find financially infeasible.

3. **Streamlined and Accessible Program Process**

The process for converting basement apartments must be navigable for ordinary homeowners, not requiring the resources or expertise of a professional developer. The city should provide financial and technical assistance to help low-income homeowners, but the program itself should be designed to be user-friendly for homeowners of modest means who may not have specialized knowledge in construction or building codes.

4. **Expand the Program to Include Single-Family Homes**

While state legislation applies to only 15 community districts, the provisions of these bills should be available to homeowners with basement or cellar apartments in single-family homes as well. This expansion would help address the large share of existing informal basement units that are not currently eligible for legalization.

Conclusion

We strongly support the passage of **T2024-2764**, and **T2024-2765**, as they represent crucial steps toward solving the affordable housing crisis in New York City. These bills would provide the legal framework needed to support the development and preservation of basement apartments and ADUs as a viable, affordable housing option.

We urge the Council to approve these bills and consider the recommended amendments to ensure they are effective and accessible to the homeowners and tenants who need them most. Thank you for your time and consideration.

For any questions or additional information, please reach out to Sonali Govind, Housing Development and Preservation Policy Associate, at sonali.g@anhd.org.



MEMO

To: New York City Council – Committee on Housing and Buildings
Hearing Date - November 19th, 2024

From: Brian Sampson, President, Associated Builders and
Contractors Association, Empire State Chapter

Subject: Testimony Submission Support for Intro T2024-2764 / Intro 1128-2024

Date: November 21, 2024

Associated Builders and Contractors (ABC) is a national construction industry trade association representing over 23,000 members across the U.S. Founded on the merit shop philosophy, ABC and its 68 Chapters work to develop people, win work, and deliver projects safely, ethically, and profitably for the betterment of the communities in which our members operate. ABC's membership spans all specialties within the U.S. construction industry, with a primary focus on firms engaged in industrial and commercial projects.

ABC submits this testimony in support of Intro T2024-2764, which proposes allowing the use of cross-linked polyethylene piping (PEX) in potable water systems within Ancillary Dwelling Units (ADUs). Currently, Table 605.4 of the New York City Plumbing Code restricts the use of PEX in this application. Since its introduction in 1968, PEX has become a trusted and reliable piping system globally for both new construction and renovation projects. It has met all technical requirements, including certifications, listings, standards, and national model code compliance, demonstrating its suitability for potable water systems. However, New York City and Chicago remain outliers in North America in continuing to restrict PEX for potable water systems.

The International Plumbing Code (IPC), which forms the foundation of the NYC Plumbing Code, has permitted the use of PEX in potable water systems for 24 years, since 2000. At present, New York City limits PEX to hydronic systems and one- and two-family fire suppression systems. Adopting PEX for potable water systems is a technical decision supported by decades of performance data and industry experience, not a political one. At a time when affordable housing is urgently needed, reducing construction costs is essential. PEX provides a cost-effective alternative to traditional metallic piping and is especially advantageous for renovation projects in occupied buildings. Its flexibility allows it to be pulled through walls with minimal disturbance to tenants, which aligns with the Department of Buildings' goal of minimizing tenant inconvenience.

The cold joining systems unique to PEX eliminate risks associated with hot work, such as copper sweating via torch, significantly reducing the likelihood of construction-related fires in non-fireproof buildings where most ADUs are located. Additionally, PEX joining systems avoid the use of combustible or flammable chemical solvents, adding another layer of safety.

The use of PEX also supports New York City's environmental initiatives. Expanding the materials available for potable piping systems is especially important as the city transitions to electrification, which



has increased the demand for copper in electrical applications. PEX offers a sustainable alternative and has been proven to perform consistently for nearly five decades. PEX potable water systems comply with stringent disinfection standards, including the New York City Plumbing Code, the International Plumbing Code, and AWWA guidelines. Over decades of use, there have been no documented failures of PEX systems due to disinfection processes.

In addition to its performance and safety benefits, PEX is recyclable. Studies, including the Plastic Pipe and Fittings Association's 2015 findings, confirm that PEX can be mechanically recycled, with its material commonly repurposed for use in manufacturing other products. Many PEX manufacturers incorporate recycled materials into their production processes, reducing waste and supporting the circular economy.

ABC believes that allowing the use of PEX for potable water systems is a logical and necessary step forward. This proposal aligns with global best practices, supports the city's affordability and sustainability goals, and offers a proven, safe, and efficient alternative to traditional piping systems.

Thank you for the opportunity to provide this testimony. We urge the City Council to approve Intro T2024-2764 / Intro 1128-2024 and prioritize technical merit, safety, and affordability in its decision-making.

Respectfully submitted,
Brian Sampson, President
sampson@abcnys.org

Associated Builders and Contractors
Empire State Chapter
6369 Collamer Drive,
East Syracuse, NY 13057

###

I want to thank the City Council for accepting this comment of support on Intro 0436-2024 regarding the revision of the New York City Electrical Code.

My name is Jack Lyons. I am a Technical Field Representative for the National Electrical Manufacturers Association (NEMA). I am also a 11 year member of the NYC Electrical Code Review and Interpretations Committee (ECRIC) within the DOB and a member of the former NYC Electrical Advisory Committee. I served as Chair of the Electrical Technical Committee for the review of the Electrical Code that sits before you.

I want to be clear and transparent that today I do not speak for NEMA, I speak on behalf of my participation in the development of this document.

Updating the current version of the NYC Electrical Code allows the DOB to address the electrical safety of systems that have gone through major technological transformations over the past 10-12 years. The safety of the residents and protection of property within the City will be strengthened by the new requirements in the next version of the electrical code. The current version is based on the 2008 National Electrical Code (NEC) and the proposed package is based on the 2020 NEC. The NEC is revised as an American National Standard every three years to ensure relevancy and strengthen the requirements for shock and fire safety that is associated with electricity. The 2020 NEC and the revised NYC amendments that deal with the unique infrastructures within the city, addresses new products, new systems and updated safety features for workers, residents, and fire and life safety.

I want to compliment the DOB for their tireless efforts to move forward in the update of the Code and I will want to extend my gratitude to the countless volunteers who served on the many committees that made this revision possible. The dedication of the people that worked diligently to assure protection of the citizens in the city was impressive. I felt humbled working the professionals who applied their expertise toward a document that is in the best interest of the safety of the people living and working in the City and I can assure the Council with the utmost confidence that this revision does just that. I would be remiss if I didn't call out and commend FDNY for their contributions towards life and fire safety requirements.

I encourage the Council to vote in the affirmative to move this forward for adoption.

Thank you again

Jack Lyons

Northeast Technical Field Representative

National Electrical Manufacturers Association

jack.lyons@nema.org

November 19, 2024

**New York City Council
Committee on Housing and Buildings,
Consumer and Worker Protection and Aging
2024 Deed Theft Hearing**

My name is Noelle F. Eberts. I am a Supervising Attorney at New York Legal Assistance Group (NYLAG), and I submit this testimony regarding the practice of deed theft and other real estate scams.

Founded in 1990, New York Legal Assistance Group (NYLAG) is a leading civil legal services organization that combats economic, racial, and social injustice by advocating for New Yorkers experiencing poverty or in crisis. Our work includes comprehensive free civil legal services, financial empowerment, impact litigation, policy advocacy, and community partnerships. NYLAG exists because wealth should not determine who has access to justice. We aim to disrupt systemic racism by serving individuals and families whose legal and financial crises are often rooted in racial inequality. NYLAG goes to where the need is, providing services in more than 380 community sites in New York, such as courts, hospitals, libraries, and on our Mobile Legal Help Center. NYLAG's staff of 400 impacted the lives of nearly 130,000 people last year.

NYLAG's Foreclosure Prevention Project is a part of the Home Ownership Protection Program (HOPP), which is the statewide network of housing counseling and legal services agencies providing foreclosure prevention services to New York's low and moderate income (LMI) homeowners. We help New York homeowners, coop owners and condo owners avert homelessness and displacement by preventing avoidable foreclosures, combating mortgage fraud, deed theft, loan modification and partition scams, and challenging predatory and discriminatory lending and abusive mortgage servicing practices that disproportionately affect New York's most vulnerable communities—seniors and people of color. Through our foreclosure prevention work we encounter allegations of real estate fraud on a regular basis.

New York City continues to see high mortgage delinquency rates and the economic pain is felt more acutely among black and brown New Yorkers. A lack of estate planning also leads to mortgage delinquencies and the loss of inter-generational wealth.

A complicated patchwork of federal and state mortgage relief programs have been developed but many homeowners are ill equipped to navigate relief on their own. The complexity of the relief and homeowner's desperation to resolve their mortgage delinquency make them particularly vulnerable to deed theft and other real estate scams. Overwhelmed and confused homeowners are easy targets for fast talking scammers full of false promises, misinformation, and high-pressure sales tactics. Unlike many other states, New York has repeatedly failed to expand its General Business Law §349 to prohibit unfair business practices.

Consequently, many real estate professionals continue to take advantage of unwitting homeowner's lack of real estate knowledge. For this reason, among others, homeowner education is essential to prevent deed theft and other real estate scams, particularly in gentrifying neighborhoods where home values are at historic levels.

For homeowners who lose title to their property, justice can be elusive. Statewide legislative reforms have made deed theft a crime and provide paths to title restoration but the process is onerous and confusing. These proceedings require victims to monitor lengthy dockets to ensure they do not miss critical deadlines to assert their ownership claim. Failure to properly appear puts victims at risk of losing their home to the government, a bona fide purchaser, or an encumbrancer. To get their homes back, victims must prove their claim is superior to all others. In criminal cases, the court and the government can take months or years to return homes to the victims, if they are returned at all.

Where there is no criminal case, the cost to litigate a deed theft claim can be prohibitive. These cases require intensive factual investigation and discovery and they rely heavily on witness credibility. The rampant use of limited liability corporations can mask patterns of fraud and shield the identity of the scammer, and the vulnerabilities that make homeowners susceptible to deed theft often hinder their ability to effectively advocate for themselves.

Recent legislative reforms and zealous law enforcement have undoubtedly made an impact in combatting and deterring deed theft in New York City but civic education and prevention assistance is critical if we are to preserve homeownership and intergenerational wealth. In closing, NYLAG supports the requirement that all unsolicited real estate offers disclose the subject home's fair market value and we support additional homeowner services through the Office of Financial Empowerment, which could be tailored to the unique needs of New York City homeowners. We believe these initiatives will help homeowners avoid falling prey to deed theft scammers and ensure they have the resources they need to protect their home.

For more information, please contact me at neberts@nylag.org.

**The New York City
Council Committee on
Housing and Buildings**

Pierina Ana Sanchez,
Chair
November 19, 2024

Note: This testimony
reflects the position of Pratt
Center for Community
Development and not
necessarily Pratt Institute

Re: Introduction of Local Laws related to the Construction of ancillary dwelling units (T2024-2764) and a Pilot program to convert existing basement or cellar apartments to habitable dwelling units (T2024-2765)

Good afternoon Chair Sanchez and members of this Committee. Thank you for the opportunity to testify in support of two urgently needed local laws to advance the safety of basement and cellar apartments in our city. I am Sylvia Morse, Senior Program Manager for Research and Policy at the Pratt Center for Community Development, which has been working on this issue for more than fifteen years with the Basement Apartments Safe for Everyone (BASE) coalition.

Basement apartments are a critical part of the city's low-income housing stock, home to tens of thousands of New Yorkers. Pratt Center has found that unaccounted-for units are concentrated in neighborhoods that are majority people of color and where rent burden and poverty rates are higher than the citywide average. Amidst our City's housing affordability crisis, many low-income New Yorkers will continue to rely on basement apartments. Yet, because this housing is unregulated, residents lack basic tenant protections and may be living in unsafe conditions. When the BASE campaign started in 2008, the primary concerns were fire risk and evictions by vacate order. Today, basement homeowners and tenants also face the risk of floods, as tragically shown by the deaths of 11 New Yorkers living in unregulated homes during Hurricane Ida. To protect our neighbors and mitigate these risks, basement and cellar apartment safety must be regulated.

We urge this committee and the Council to pass the two bills related to ADU regulations and the creation of a program to safely convert existing basement and cellar apartments.

We also ask that City Council consider steps to ensure that these bills have the greatest possible public safety impact.. Most urgently, the geography of the basement and cellar conversion program should be expanded to include as much of the city as possible. The program area currently includes the 15 Community Districts authorized by the State to pilot reforms to the Multiple Dwelling Law, which affects 2- and 3-family homes converting a basement or cellar unit. As reported in the press at the time, these 15 Community Districts were decided without transparency and seemingly arbitrarily, excluding many neighborhoods where unregulated units are concentrated. The City has the authority to extend significant regulatory relief to single-family homes, which are not affected by the State MDL, outside of those 15 districts. A Pratt Center analysis found that half of the city's potentially-convertible basements and cellars citywide are in single-family homes. We urge City Council to use its powers to make sure the basement and cellar program improves safety in as many homes and neighborhoods as possible.

We also echo the additional recommendations outlined in testimony from our BASE coalition colleagues at Cypress Hills LDC, Citizens Housing and Planning Council, and Chhaya CDC, including to reflect lessons learned from the East New York pilot program.

Beyond regulatory reform, the city will need to ensure that the basement conversion program is adequately funded to serve low-income homeowners and is developed and implemented in partnership with community-based organizations in frontline communities.

Further, basement apartment safety requires not just property-level upgrades but a broader climate adaptation and flood mitigation strategy including infrastructure upgrades to the city's sewer system and expanding the porous pavement program and Flood Sensor Network.

For more than 15 years, BASE has been sounding the alarm for the need to regulate the safety and tenancy of widespread basement and cellar apartments, and in that time, the growing severity of our climate and housing crises have only increased this need. Passing these bills to create a basement and cellar apartment conversion program will help prevent deaths like the drownings during Hurricane Ida, and help prevent displacement of low-income tenants and homeowners of color. We urge City Council to act now.

For more information, contact

Sylvia Morse
smorse@prattcenter.net



To: New York City Council – Committee on Housing and Buildings
Hearing Date - November 19th, 2024

From: David Nickelson
Codes Manager for Uponor

Subject: Testimony Submission Support for Intro T2024-2764 / Intro 1128-2024

Date: November 21, 2024

Uponor is a global pioneer in intelligent plumbing and climate solutions, with over a century of industry leadership in providing high-quality, reliable piping products. Our solutions have enriched millions of lives around the world.

We are writing in support of Intro T2024-2764, which would allow the use of cross-linked polyethylene piping (PEX) in potable water systems for Ancillary Dwelling Units (ADUs) as an alternative to traditional metallic piping. Currently, Table 605.4 of the New York City Plumbing Code prohibits this use.

Since its introduction in 1968, PEX has become a trusted, proven, and reliable piping system for new construction and renovation projects. All technical challenges, including certifications, listings, standards, and national model code compliance, have been addressed, as evidenced by its worldwide acceptance for use in potable water systems. The only holdouts in North America have been New York City and Chicago. Uponor believes PEX offers numerous benefits for engineers, installers, building owners, homebuilders, homeowners, and occupants, including:

- **Durability:** PEX's ability to expand and contract makes it highly resilient in freezing conditions, and its flexibility allows it to withstand seismic activity. This property makes PEX especially well-suited for challenging environments where traditional metallic piping might fail.
- **Efficiency:** PEX's flexible nature minimizes the need for fittings and connections, simplifying and speeding up installation. This results in reduced labor time and costs, allowing for projects to be completed on time and within budget. Additionally, PEX's lightweight nature makes it ideal for prefabrication, thus further optimizing the efficiency of construction workflows.
- **High Performance:** With fewer connections and no scale buildup, PEX performs better than rigid metal systems. The smooth inner walls reduce pressure drops and maintain optimal flow rates, contributing to improved overall system performance.
- **Safety:** The lightweight nature of PEX makes it easier for installers to handle, which reduces body strain and the risk of musculoskeletal injuries. Additionally, PEX eliminates dangerous open flames and chemical solvents from the job site, which are typically required for the installation of copper piping. This is particularly beneficial in densely populated urban environments, where job site safety is paramount.

- **Safe for Drinking Water:** PEX is approved for drinking-water applications, complying with NSF/ANSI/CAN Standard 61. This standard ensures that PEX piping systems meet stringent requirements for health and safety. PEX piping systems are rigorously tested under extreme acidic and alkaline conditions (pH 5.0 to 10.0) as well as at varying temperatures to verify that no chemical contaminants are imparted into the drinking water.
- **Sustainability:** Studies have demonstrated that PEX is more sustainable compared to traditional metal piping systems, largely due to its reduced carbon footprint during manufacturing and longer lifespan. This aspect is crucial for projects aiming to meet green building requirements, particularly as PEX contributes to both energy efficiency and waste minimization.
- **Risk Reduction:** PEX is resistant to corrosion, pitting, and scale buildup, issues that often plague metal piping systems. Additionally, unlike copper, PEX has no scrap value, which reduces the risk of theft from construction sites. This helps prevent costly project delays and ensures that materials remain secure throughout the construction phase.
- **Cost-Effectiveness:** PEX offers stable pricing because it is not subject to the fluctuations of commodity markets, as is the case with copper. This stability allows contractors to bid projects more accurately, avoiding surprises when market prices change

We would like to take the opportunity to rebut the testimony of representatives of the union plumbing industry. We feel this testimony was riddled with inflammatory statements and much misinformation that was not supported by any actual facts.

We are in agreement with the testimony given by the New York City Department of Building's Deputy Commissioner Gus Sirakis. The DOB's statements refer to this legislation lining up with the New York State Codes which are based on the International Code Council's family of codes which is accepted as the National model code – even international. These codes are developed utilizing multiple nationally recognized product standards. The products are then third-party certified to these nationally recognized standards. The development of a plumbing code is a rigorous task that takes place over many years. The fact that PEX has been included in the ICC's family of model codes (specifically the IRC and the IPC) since 1997 shows that it has a proven track record of being a safe and reliable plumbing product.

Regarding the health and safety of PEX piping, PEX is subjected to the requirements of the NYC Plumbing Code section 303.3 which requires all plastic pipe, fittings and components to be third-party certified to NSF 14. This standard then requires all plastic piping and associated fittings and components to be certified to NSF/ANSI/CAN 61 were used in potable water systems. NSF 61 was originally developed in the mid-1980s as a direct action of the EPA. This standard was developed by NSF along with the American Water Works Association, the American Water Works Association Research

Foundation, as well as the Association of State Drinking Water Administrators. NSF/ANSI/CAN 61 was finalized and ANSI accredited in 1989 as a direct result of the EPA

program to show that products carrying drinking water are not adding contaminants to the drinking water.

Lead is toxic to humans. For many decades drinking water was supplied in lead pipes with the amount of lead detected in the drinking water being below the threshold that is defined in the EPA's Lead and Copper Rule (40 CFR 141). However, the supplied water chemistry has changed and the lead content that is now leaching from the pipes into the drinking water is unacceptable. Therefore, lead pipes are now being removed from drinking water applications. Copper is also toxic to humans as is identified in the EPA's Lead and Copper Rule (40 CFR 141). Even though it is toxic to humans, copper has been used as a transport of drinking water for many years. If the water chemistry changes, a similar situation to lead could arise where the amount of copper leaching from the pipe into the drinking water is higher than the acceptable limit set by the Lead and Copper Rule from the EPA. This would be catastrophic.

PEX has been widely used in plumbing and hydronic applications for almost 5 decades. Throughout that time Uponor has not deviated from the original formulation as some have come to believe. It is also our understanding that other manufacturers of PEX piping have also continued to produce with the same basic formulation for the same time period (50 years). Some things do change over time (e.g., suppliers of raw materials, manufacturing processes...), but the formulation remains the same with the same basic ingredients (same basic chemical composition).

Where PEX has been used in potable water systems over the past few decades it has been subjected to disinfection of the system in accordance with the New York City Plumbing Code 2022 Section 610, the International Plumbing Code 2024 Section 610, as well as the AWWA C651. These methods prescribe a specified concentration of chlorinated water that is to fill the system and remain in the system for a specified amount of time. Over the past few decades of filling and flushing PEX piping systems in this manner there have been no failures of the piping systems due to the disinfecting of the system.

Based on an investigation performed by the Plastic Pipe and Fittings Association (PPFA) and the subsequent document summarizing their findings, *PEX Is Recyclable (2015)*, PEX has been found to be recycled and reused for many years. PEX can be mechanically recycled and used in other materials to make new products. Many PEX manufacturers rely on manufacturers of other products who buy their regrind (ground-up PEX) generated from typical scrap from production and use this in the manufacturing of other products.



David Nickelson
Codes Manager

Uponor North America
uponor.com

Uponor Inc.
5925 - 148th Street West
Apple Valley, MN, USA 55124
800.321.4739

Uponor Ltd.
6510 Kennedy Road
Mississauga, ON, Canada L5T 2X4
888.594.7726

Why is action on basement apartments important?



The Problem

Tens of thousands of people live in unregulated basement and cellar apartments because there aren't enough legal apartments they can afford. Because these homes are not legally recognized, the City is unable to regulate their safety, homeowners cannot make safety upgrades, and tenants and homeowners risk losing their homes if they report unsafe conditions.

Why do we need to act?

- **Basement and cellar apartments are an important source of housing for people at low incomes and communities of color.** While no official records exist of these units, it is estimated that they are home for tens of thousands of New Yorkers, and most common in Community Districts that are majority non-white, with rent burden and poverty rates higher than the citywide average.¹
- **These units also provide much-needed income for low- and moderate-income homeowners** who are often struggling to remain in their communities. This can be especially important for older homeowners who live on fixed incomes,² and for Black homeowners, who are nearly three times more likely than other homeowners to rely on rental income.³
- **Inaction has only made the problem worse.** Without reasonable options for legalization, enforcement could lead to the eviction of thousands of people with few housing options. Doing nothing leaves residents without leasehold rights, sometimes in unsafe conditions, and puts homeowners under constant threat of losing income.

What would legalization of subgrade apartments do?

- **It would make housing safer.** Establishing achievable, safety-driven standards would enable homeowners to invest in critical improvements, including protections against flood risk and installation of active fire suppression systems.
- **It would give renters and owners greater security.** Today, homeowners and tenants risk a vacate order and hefty fines if they report a safety issue or attempt to remedy one. With lawful status and a proper lease, both homeowners and tenants would have the legal protections others have.
- **It would bring housing out of the shadows.** Making subgrade apartments safe and legal allows owners and tenants to insure their property, and gives communities and officials a better understanding of area population and needs.

¹ Pratt Center for Community Development, [New York's Housing Underground: 13 Years Later](#), 2021

² AARP, [ABCs of ADUs: A guide to Accessory Dwelling Units and how they expand housing options for people of all ages](#), 2022.

³ Citizens Housing & Planning Council, [Home Truths: A Survey of Unmet Housing Need in Lower-Density Districts](#), 2023.

What does the Council need to do for basement apartments?

1. Approve zoning reforms in the City of Yes that enable legalization

- Allow the residential conversion of a basement or cellar space** in small (1-3 family) homes, by allowing them to add a small unit and make other limited alterations to buildings.
- Relax parking requirements** — it's virtually impossible to add for a basement or cellar apartment.
- Don't consider conversions to be creating new floor area** — they don't make buildings any larger. Conversion of a cellar to residential space could bring a building out of compliance with zoning restrictions on floor area.

2. Amend construction codes to enable safe, cost-effective basement and cellar conversions

- Permit cellar occupancy** as has been done in the East New York pilot legalization program.
- Rationalize code requirements** to facilitate conversions, for example, allowing a 7'-0" ceiling height in basements and cellars in alignment with the International Existing Buildings Code.
- Apply sound but achievable fire and inland flood safety standards** for subgrade apartments. Meeting these standards would represent a significant life-safety improvement.
- Limit the scope of work to the conversion.** Legalizing a safe subgrade apartment should not require renovating the entire building.

3. Help ordinary homeowners use these programs

- Create an amnesty program** for existing basement and cellar apartments citywide, giving units legal status as long as the homeowner commits to upgrading the space within a specified time frame and meets defined milestones for compliance.
- Provide technical assistance** to homeowners and tenants. Fund CBOs to provide services including financial counseling, application and process support, and tenant placement assistance. Create a one-stop-shop to make the program accessible to homeowners.
- Implement the tax exemption authorized by State law**, so owners legalizing units aren't rewarded with a higher tax bill.
- Offer low-cost financing** options for qualifying homeowners.



**Basement
Apartments
Safe for
Everyone**

The BASE Campaign is mobilizing New York communities for the creation of a citywide program to streamline basement and cellar conversions into legal apartments.

Stay in touch
[x.com/nyc_base](https://www.nyc.gov/x.com/nyc_base)

Learn more
bit.ly/BASEcampaign
bit.ly/BASElibrary

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 72764 Res. No. _____

in favor in opposition

Date: 11-19-24

(PLEASE PRINT)

Name: Georgia Bassolino

Address: _____

I represent: NYC Master Plumbers Council

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 72024-2764 Res. No. -2025

in favor in opposition

Date: 11/19/24

(PLEASE PRINT)

Name: HOWARD SLATKIN

Address: 42 BROADWAY

I represent: CITIZENS HOUSING & PLANNING COUNCIL

Address: 42 BROADWAY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: SYLVIA MORSE

Address: 63 FLUSHING AVE BK NY 11205

I represent: PRATT CENTER/BASE

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/19/24

(PLEASE PRINT)

Name: ARTHUR KLOCK

Address: [REDACTED] LONG ISLAND CITY

I represent: PLUMBERS LOCAL 1 TRADE EDUCATION

Address: 50-02 57th ST. LONG ISLAND CITY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Kimberly Dugg

Address: _____

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Stephen Fisher

Address: _____

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Eugene S. Scobie

Address: D.C.P.

I represent: D.C.P.

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: John A. ...

Address: _____

I represent: D.C.P.

Address: _____

Please complete this card and return to the Sergeant-at-Arms