



**Testimony of Bomee Jung
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**Before the New York City Council Committee on Housing and Buildings
in support of Proposed Intro's 262, 263, 264, 266, 267, 268, 271, 273, and 277**

Thank you for the opportunity to give this statement in support of these intro's to enable greater energy efficiency by updating the building and administrative codes of the city.

Enterprise has been a national innovator in creating affordable homes and revitalizing communities for 25 years. Since our inception, we have invested \$2 billion towards 30,000 affordable home in New York. With the launch of the Green Communities initiative in 2004, Enterprise made an early commitment to improving the health and environmental performance of the homes we help to build and preserve. Enterprise now plans to green 100% of our products, services, and advocacy by 2013. The reason for our expanded commitment is simple: building green makes sense for affordable housing.

Enterprise has worked with various agencies at the State and local levels to meet our national commitment to making "green" and "affordable" housing one and the same. Enterprise is an active member of the Industry Advisory Committee of the Green Codes Task Force. We are also working to support the Department of Housing Preservation and Development's green initiatives.

I thank the Green Codes Task Force for the extensive outreach and stakeholder process it has conducted, and would like to offer the following specific comments:

Int. 273: Lighting of temporary walkways at construction sites

This intro adds a definition of 'photosensor' to the building code and amends the method by which the amount of lighting required is measured. While we support these changes, we find that the proposal could be strengthened in three aspects:



First, specifying the minimum level of illumination required at the walking surface may not be sufficient to achieve the intended result of reducing energy consumption. For example, under the proposed language, sidewalk shed lighting may provide 1 foot candle of light in one area while providing much more light in an adjacent area. I urge the committee to consider modifying the language to be consistent with the recommended practices of the Illuminating Engineering Society of North Americas (eg. RP 33): specify both the maximum illumination level and uniformity ratios.

Secondly, the measure could both meet the energy efficiency goal and enhance safety and comfort of pedestrians and drivers by addressing glare and light trespass from sidewalk shed lighting. I encourage the committee to consider specifying that visible glare from an exposed light source, including refractive parts, be shielded by opaque means from any location off the originating property or into roadways. Requiring fully-shielded lighting would ensure that light is directed to the walking surface without causing undesirable glare and light trespass. Such an addition would be consistent with any future initiatives to reduce light pollution.

Finally, the flexibility of this measure would be enhanced by including energy efficiency-enhancing control devices other than photosensors, such as commonly used controls that calculate night hours by latitude and longitude. These controls may be a frugal alternative to photosensors, and have the advantage that their performance is less likely to be impacted by variations in installation (such as a photosensor installed in the shade).

Int. 268: Preventing water waste in buildings

Regarding sub-metering makeup water supplies to boilers, we ask that the department of environmental protection be directed to include both remote-read and non-remote-read submeters for the list of submeters. Submetering the makeup water line is an important component of enabling informed and responsible property management; however, remote-read submeters may require investments in technology and networking infrastructure beyond the financial means affordable housing. Therefore, it would be desirable that low-cost, low-tech alternative be available in complying with this measure.



Int. 277: Improving lighting efficiency in dwellings

This measure states that “Automatic, occupant sensor or photo- sensor lighting controls may be installed to operate lighting fixtures in *mechanical equipment rooms, storage rooms, and laundry rooms*”, but does not specifically allow equivalent controls to be used in stairwells and hallways. In residential buildings, lighting in stairwells and hallways represent the lion’s share of the common area electric use for lighting. The omission may lead to an erroneous interpretation of this provision that such controls are disallowed in hallways and stairwells, and thereby fail to achieve the intended energy saving goals. We ask that the language be revised to specifically allow equivalent light controls in hallways and stairwells.

Int. 271: Enhancing water efficiency standards

The standards applicable to residential buildings proposed in this measure are consistent with the Enterprise Green Communities Criteria.

The Enterprise Green Communities Criteria is the nation’s only comprehensive framework for bringing the health, economic and environmental benefits of green to affordable housing — to date, nearly 16,000 homes in 360 development projects around the country meet the Criteria. HUD has adopted the Criteria as a requirement for capital grant funding for public housing authorities. Many States and cities have adopted, or are in the process of adopting, the Criteria, and at least 40 housing finance agencies have adopted portions of the Criteria as part of their scoring systems for awarding allocations of Low-Income Housing Tax Credits. New York City and New York State are among those that use the Enterprise Green Communities Criteria as the green standard for their QAPs, and all new construction and substantial rehabilitation projects receiving HPD funds will meet the Criteria starting this year.

In our experience, the water standards applicable to residential buildings proposed in this Intro are achievable at virtually no additional cost.

Thank you for your leadership in improving the energy and environmental performance of New York City.