



**NEW YORK CITY DEPARTMENT OF BUILDINGS
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING AND BUILDINGS
OCTOBER 16, 2024**

Good morning Chair Sanchez and members of the Committee on Housing and Buildings. I am Gus Sirakis, Deputy Commissioner for Development and Technical Affairs for the New York City Department of Buildings (“the Department”). I am joined today by Tarek Khalil, Assistant Commissioner for Central Inspections. We appreciate the opportunity to testify before you today regarding Intro 429, which makes several amendments to the New York City Construction Codes (“Construction Codes”).

The Department’s code revision process represents a true collaborative effort on the part of the industry, the New York City Council, and the Code Development team at the Department. The most recent version of the Construction Codes, the 2022 Construction Codes, went into effect on November 7, 2022. Revising the Construction Codes involved a public-private partnership that I included over 650 industry professionals and stakeholders who volunteered their time to contribute their expertise. This code revision effort resulted in over 40,000 hours of service by our committee members, which included architects, engineers, attorneys, as well as representatives of construction, labor, real estate, other city agencies, and stakeholder organizations.

Work is already underway to revise the Construction Codes, and to create a first-ever New York City Existing Building Code (“EBC”), which will establish a robust regulatory framework for the alteration and maintenance of existing buildings. The Department has several concerns with Intro. 429 as it would undo positive changes made by and efficiencies achieved through the 2022 Construction Codes. Further, we believe that, as drafted, certain provisions could create confusion, rather than provide clarity. Our concerns are as follows:

Emergency Work (AC Section 28-105.4.1)

Understanding that emergency situations may arise that require immediate action to resolve, the current code allows for emergency work to be performed prior to obtaining a permit to address a hazard to prevent harm to persons or property. An application for a permit must be filed with the Department within two (2) business days of commencing the emergency work. The bill seeks to incorporate language into the introductory paragraph of the section that would allow work necessary to “restore the system to a good working condition” to be performed prior to obtaining a permit. It is unclear what issue the proposed text, “restore the system to a good working condition,” is intended to address. It is the Department’s position that the proposed language is too broad, ambiguous, and goes well beyond the scope of what’s contemplated with respect to emergency work. The provision is intended to allow only for the work that is necessary to abate the emergency. Any additional work beyond that must be performed under a Limited Alteration Application, which means any required permits must be obtained prior to commencement of the work.

With respect to the proposed amendments to item 4, it is the Department’s position that the current limitation to educational and residential buildings is appropriate. The intent is to allow for emergency work necessary to ensure that heat and hot water is provided to buildings in those occupancy groups during what is referred to in New York City as heating season. The proposed amendments seek to expand that allowance beyond those occupancy groups. The proposed deletion of the phrase “servicing education or residential occupancies” effectively expands the allowance to all occupancy groups. Such expansion, coupled with other proposed edits, would significantly expand the allowance beyond what was originally intended. The Department believes that such a change could pose potential safety concerns.

Ordinary Plumbing Work (AC Section 28-105.4.4)

Conceptually, the Department is not opposed to the proposed amendments related to ordinary plumbing work. However, it does not believe that this is the best way to address the issue. The Department has been working on developing the EBC, which it anticipates finalizing for submission to the New York City Council by the end of this year. Consistent with the Department’s

other code revision and development efforts, there was a committee process that allowed for input by industry stakeholder groups and subject matter experts. The proposed amendments to the provisions pertaining to ordinary plumbing work are included in the draft EBC. The Department believes this proposal is more appropriately covered in the EBC, which will be a comprehensive code that regulates alterations and work in existing buildings. If these changes are adopted and incorporated into the current administrative provisions, legislation will be needed to relocate the provisions to the EBC where they should reside. Therefore, the Department is opposed to this proposal as it addresses the issue in a piecemeal rather than comprehensive approach.

Periodic Inspection of Gas Piping Systems (AC Section 28-318)

The bill proposes several changes to the requirements for the periodic inspection of gas piping systems, which I will address at a high level.

- **AC Section 28-318.1:** The current law exempts covered buildings with no gas piping and covered buildings that aren't currently supplied with gas from the inspection requirements. There are already provisions in the law for informing the Department of such and those have been successfully implemented. The proposed amendments, as drafted, would require the owner to hire a Licensed Master Plumber or a Registered Design Professional to conduct an inspection to inform the Department that the building has no gas piping or is not currently supplied with gas, which is contrary to what was intended by the existing exceptions to the inspection requirements.
- **AC Section 28-318.2:** The current code already allows for modification of the inspection frequency by rule. The Department has promulgated and implemented a rule, 1 RCNY 103-10, related to the periodic inspection of gas piping systems. The Department has the ability, pursuant to the City Administrative Procedure Act, to amend that rule. Therefore, the proposed change is unnecessary and would have no meaningful impact.
- **AC Section 28-318.3.1:** It is unclear what issue the proposed changes to the inspection entity qualification requirements are intended to address. As mentioned earlier, the Department promulgated rule 1 RCNY 103-10 setting forth certain inspection and other

requirements. That included the minimum qualification requirements for the inspection entity. Inspectors must be a Licensed Master Plumber or an individual working under the direct and continuing supervision of a Licensed Master Plumber, provided that such individual has five years of experience and has completed a related training program. The proposed amendment includes language requiring those working under the direct and continuing supervision of the Licensed Master Plumber to also hold a journeyman plumber registration, which would significantly limit the pool of individuals who are qualified to perform these inspections. The Department believes the existing code and rule provisions are sufficient to address the qualifications for entities conducting the inspections. Additionally, mandating proof of inspector qualifications on each report and certification submitted to building owners and the Department reflecting that the required inspection has occurred is unnecessary. The Licensed Master Plumber is ultimately responsible for work performed by those working under their direct and continuing supervision, including verifying that they possess the appropriate qualifications. The Department believes including the proposed language could muddy the waters with respect to the line of responsibility.

- **AC Section 28-318.3.2:** The proposed changes to the scope of the inspection are significant and may pose an undue burden on building owners as the current inspection requirement does not include tenant spaces. This includes logistical challenges since access to tenant spaces would now be required. Additionally, expanding the scope may directly correlate to increased inspection costs for building owners. We encourage you to discuss these changes further with building owners to better understand what impact they may have on their requirement to perform these inspections.
- **AC Section 28-318.3.4:** The proposed changes to this section include deletion of the list of unsafe or hazardous conditions where notification to the owner, utility, and the Department is required. The Department believes deletion of the list is a step backwards. Providing a definitive list of when notification is triggered is useful to all parties. It provides clear direction and avoids the potential for confusion and uncertainty.

- **AC Section 28-318.3.4.1:** The bill proposes to add a new section related to reporting and correction of abnormal operating conditions that don't pose an immediate hazard and requirements for correcting abnormal conditions related to service piping. The requirements that pertain to service piping, are beyond the intended scope of Local Law 152 of 2016. Service piping is under the jurisdiction of the Public Service Commission and not the Department.

This proposed new section also adds a provision that would require the Department to be notified in connection with any abnormal operating condition that does not present an immediate hazard discovered during the inspection. The current code requires notification to the owner, utility, and the Department when an unsafe or hazardous condition is identified. Requiring notification to the Department in connection with any abnormal operating condition that does not present an immediate hazard would be unduly burdensome. In addition, requiring the Department to promulgate a rule dictating what corrective measures should be undertaken to address an abnormal condition is impractical as this should appropriately be left to the qualified individuals performing the inspections. The determination as to the appropriate course of action to remediate an abnormal condition is done on a case-by-case basis by the inspection entity based on their assessment of the condition. The proposed provision would potentially shift responsibility from the inspection entity to the Department, which would be inappropriate.

Definition of Fire Suppression Piping Work (AC Section 28-401.3)

During the 2022 Construction Code revision project, industry stakeholder groups sought clarification regarding what constitutes plumbing work and what constitutes fire suppression piping work. Changes were made to provide that clarification including the addition of the sentence now proposed for deletion. The Department believes that deletion of the sentence would create confusion rather than provide clarity. Certain sprinkler work may be performed by either a Licensed Master Plumber or a Master Fire Suppression Piping Contractor. However, only a Licensed Master Plumber can perform the related work on the domestic water piping. If supplied by domestic water, only a Licensed Master Plumber can perform the initial takeoff. Therefore, fire suppression work should not include plumbing work. The sentence that is proposed to be deleted

must be retained in order to maintain that distinction and separation between the discrete scopes of work and experience.

Plumbing and Fire Suppression Piping Contractor License Board (AC Article 417)

One of many changes enacted by the 2022 Construction Codes was the elimination of the Plumbing and Fire Suppression Piping Contractor Board. As the regulatory entity, the Department is in the best position to determine license qualification. Elimination of the Board has streamlined the license application process. When the Board was in existence, meetings were held quarterly and applications had to be reviewed by a quorum of Board members. Coordination of multiple Board members' schedules resulted in delays in the review of license applications. Since the board was eliminated, processing times for plumber and fire suppression piping contractor licenses has significantly decreased as there is not a dependence on quarterly Board meetings. That is a benefit to applicants seeking licensure. It's worth noting that only one (1) other trade licensed by Department has a Board and that is the electricians. As part of the current Electrical Code revision, that board is similarly being eliminated. The goal is for the licensing process for all trades to be managed consistently and avoid any disparity.

Seizure and Forfeiture (AC Section 28-419.1)

This proposal is being reviewed during the current Construction Code revision cycle. The Department believes that the code committee process is the appropriate mechanism for tackling this issue as it provides for a comprehensive evaluative process. Moreover, this proposal may necessitate changes elsewhere in the Construction Codes to achieve the intended goal. It is our position that this is best addressed through code revision rather than a standalone item in this bill.

Piping Systems (FGC Section 101.2.2)

As drafted, the proposed language amending the Fuel Gas Code could be interpreted to impose an obligation on the Department to perform inspections for scopes of work such as the replacement of stoves. We are concerned that this would strain our inspectorial resources. It would be helpful to understand the intended goal of this proposed change. To the extent a change to the provision is warranted, the Department strongly recommends that it be evaluated through the code revision committee process as all possible impacts need to be considered.

That concludes the Department's testimony regarding Intro 429. Thank you for the opportunity to testify before you today. We welcome any questions you may have.

Testimony of the
New York City Department of Housing Preservation and Development
to the New York City Committee on Housing & Buildings regarding Oversight of

Introduction 925

October 16, 2024

Good morning, Chair Sanchez and members of the Housing and Buildings Committee. My name is AnnMarie Santiago, and I am the Deputy Commissioner of the Office of Enforcement and Neighborhood Services (ENS) at the New York City Department of Housing Preservation and Development (HPD). Thank you for the opportunity to testify today about Intro 925, which seeks to amend the administrative code of the city of New York in relation to requiring the inspection of steam radiators in multiple dwellings.

We are here today talking about this bill because of the events of January 2024, in which an 11-month-old boy died after suffering severe burns from a malfunctioning steam radiator. This tragedy highlights the importance of understanding how we can protect our children from the dangers that many of us don't think of often, those within our homes, and HPD is committed to working with the City Council to explore strategies to prevent such tragedies in the future.

HPD's primary enforcement goal each and every day is to ensure that tenants live in safe housing that complies with New York City and New York State housing codes. Our Housing Inspectors respond to hundreds of thousands of complaints, inspecting for health and safety issues including potentially life-threatening conditions such as a lack of heat or electricity. On every inspection, a Housing Inspector proactively checks for ten health and fire safety issues which, left unaddressed, can expose tenants, particularly children, to serious risk of death or injury, including missing or improperly installed window guards, non-functioning or missing self-closing doors and missing or defective smoke detectors. We dedicate resources to housing court actions both with and on behalf of tenants, emergency repairs when landlords fail to fulfill their responsibilities to correct the most immediately hazardous conditions, and landlord and tenant education. We invest heavily in enhanced enforcement against landlords whose buildings grossly fail to meet the standards our city has set for safe and healthy housing.

As part of our inspection work, HPD responds to complaints regarding defective radiators. In FY2024, HPD received almost 6,400 complaints regarding radiators, in several categories including: air valve broken or missing; radiator loose, disconnected or missing; radiator cracked or leaking; and shut off valve broken. Either in response to these complaints or as observed in their line of travel, Inspectors issued more than 1,600 violations related to radiators during that same time. Approximately 450 of those violations were considered to be immediately hazardous and received follow-up from our emergency repair program. We strongly encourage any tenants experiencing issues with their radiator – whether the radiator is leaking or there is steam escaping – to report the condition to the landlord first and then, if the owner is unresponsive, to file a complaint with HPD by calling 311 or using 311ONLINE to file an apartment maintenance complaint.

Intro 925 requires property owners to inspect, make repairs and report on radiator inspections and repairs. Under the proposed bill, property owners of buildings with steam radiator systems would be required to: identify whether a child under six resides in an apartment; have an annual inspection of steam radiators performed by a licensed master plumber in dwelling units where a child under six resides; and file a report with the department annually regarding the results of these inspections. A civil penalty will be established for owners who fail to file. Obtaining civil penalties requires HPD to go to Housing Court to obtain the penalty. Should a licensed master plumber find a problem either as a result of the inspection or in response to any complaint made to the owner or to HPD throughout the year, immediate repairs would be required, and the department would have to be notified. Failure to have inspections conducted or to remediate damage, defects, or hazardous conditions would also be subject to a civil penalty obtainable through Housing Court action. These requirements would likely affect more than 100,000 buildings citywide.

Implementing this bill will be time and resource intensive for HPD. The agency will have to establish a public portal and manual process for the submission of annual reports and reports of defect related to steam radiators. Under the best-case scenario, creating such a portal and process takes multiple years to implement. We must identify and contract with a vendor to build a portal with specific administrative functionality necessary to support our enforcement

process. The functionalities of the system must include accepting and processing reports to ensure proper submissions (including rejecting reports that are not complete) as well as interfacing with our existing technology to generate, track and close violations. In addition to new technology specific to this mandate, new staff will be required to manage the process and perform duties such as handling inquiries, doing data entry related to manual submissions, addressing ongoing technology issues, conducting document review, monitoring violation issuance and closure, and potentially initiating litigation to obtain civil penalties if significant issues of non-compliance are identified.

We also recognize the administrative and cost burden this bill will place on tens of thousands of property owners, especially owners of older properties. Some of these property owners are already struggling to meet the expenses associated with existing mandates, and HPD continues to seek ways to provide assistance to address aging building systems and move towards greener infrastructure to improve overall building and tenant health.

Given that HPD already has the tools in place to respond to radiator conditions, we do not support Intro 925. Recognizing that defective steam radiators can be a serious hazard, we do encourage all tenants and property owners to identify defects when they arise and correct the conditions immediately. HPD stands ready to respond to the most serious complaints and has the ability to issue class C violations, which require a 24 hour response from landlords for immediately hazardous radiator conditions. We believe that focusing on working with the Department of Buildings and industry professionals to ensure that tenants and owners have the information they need to identify, report and have professionals properly repair defective radiators may help prevent tragedies related to steam heat in the future.

We are interested in continuing conversations with the council about alternative strategies such as enhanced education, for which there are multiple possible existing pathways that can be replicated, and I thank you for the opportunity to testify today.

Thank you, Chair Sanchez and the New York City Council Committee on Housing and Buildings for holding this hearing. Our names are Oksana Mironova, Iziah Thompson, and Samuel Stein, and we are senior policy analysts at the Community Service Society of New York (CSS). For over 175 years, CSS has advocated for low-income New Yorkers. Throughout that time, we have maintained a focus on housing affordability, quality, and stability.

We are here today to testify in support of Int 429 and Int 925, both of which would make the city's aging residential housing stock safer by expanding inspections and repairs of gas piping systems and requiring annual inspections of steam radiators located in dwellings where a child under six resides.

CSS's engagement with the health and safety of the city's housing stock goes back to our advocacy for the city's tenement housing laws of 1901 and 1919, which set minimum size requirements for apartments and created fire safety, lighting, ventilation, and plumbing standards. Today, a substantial share of the city's 2.3 million tenant households continue to live in the same apartments that were built in the wake of those Tenement Housing Laws.

Eighty-three percent of the city's apartments are in buildings that are at least 50 years old, while 16 percent are in buildings built before 1919. Some of these buildings have been subject to the whims of multiple negligent landlords for decades, who have cut costs by deferring maintenance. At the same time, the city's proactive code enforcement capabilities have waned.

This combination of factors has resulted in unhealthy and unsafe living conditions for many. For example, one in five New York households experienced heating breakdowns, according to the 2023 Housing Vacancy Survey (HVS). Households earning under 300 percent of the federal poverty line were more likely to not have heat in the winter: nearly one in four experienced a heating breakdown in 2023.

At the same time, the 2023 HVS also found that 38 percent of households had to keep their windows open in the winter for some or most of the time, because their apartments were overheated. In most cases, this is a symptom of aging and imprecise steam heating systems.

Sometimes, deferred maintenance of heating systems leads to tragedy. In 2024, 11-month-old Binyomin Zachariah Kuravsky was killed by a faulty radiator in Brooklyn. In 2016, one-year-old Scylee Vayoh Ambrose and two-year-old Ibanez Ambrose, were killed by scalding heat from a steam radiator.

We at CSS compel the City Council to take action on Int 429 and Int 925, and to ensure that the agencies that are charged with enforcing these laws are fully funded in next years budget.

If you have any questions, please contact us at omironova@cssny.org, sstein@cssny.org, and ithompson@cssny.org.

TO: NYC Council Housing & Buildings Committee
FROM: Terence O'Brien, Executive Vice-President
DATE: October 16, 2024
RE: Support of Introduction 429



Good morning, I am Terence O'Brien, Executive Vice-President of the Association of Contracting Plumbers of the City of New York. The Association ("ACP") is the oldest plumbing contractors' association in the United States, founded in 1881. The ACP is a union-affiliated contractor organization employing thousands of Plumbers Local 1 members installing new plumbing systems as well as servicing all types of buildings: residential, commercial, and institutional; exclusively in New York City. The ACP is wholeheartedly supportive of Intro. 429. Intro. 429 is a wide-ranging bill that will positively impact the construction industry as a whole, union and non-union plumbers alike, and strengthen public transparency, provide clarity and additional safety for all people who live, work, and visit in New York City. The ACP will be submitting my brief comments and further expansive written comments jointly with the Plumbing Foundation.

Intro. 429 is a much-needed clean-up bill on several commonsense matters not currently within the NYC Administrative and Technical Construction Codes. Due to time constraints, I will limit my oral comments on 2 aspects of the bill: the reestablishment of the license board and the expansion of the City's seizing of vehicles and tools of unlicensed plumbers.

- 1) The re-establishing of the License Board is a necessity. It was a travesty that the City decided to abolish the Board at the end of 2022. There are 2 functions of the Board: reviewing applications of potential new license holders and, more importantly, the review of disciplinary matters of existing plumbing and fire suppression licensees. Plumbing and Fire Suppression are highly regulated trades and peer review is a value to the industry not a negative. NYS engineers, doctors, lawyers, and many others all have

peer review which aids in regulating their professions. The industry has received no valid explanation as to why the City disbanded the Board. This is especially odd when there has been a trend for more oversight being established towards other trades, professions, and other sectors, not just construction, with even less direct impact on public health and safety as plumbing and fire suppression. The Board would not be involved in the investigation of license holders but should and must be a resource for the DOB Commissioner to advise before a stipulation against a licensee has been executed. Furthermore, DOB has informed us that a majority of the tips regarding bad actors (both licensed and unlicensed) come from plumbing organizations that would have members serve on the Board. So why not involve industry experts in advising DOB on how to discipline their fellow licenseholders?

- 2) The ability to seize tools and vehicles of persons/companies without a NYC plumbing or fire suppression license is a real deterrent. Currently, the Code only allows for much seizure in connection with residential new construction. There are countless persons and even whole companies actually conducting plumbing work without a license and thereby have no ability to obtain permits to legally perform that work. These unlicensed plumbers are performing work in residential and commercial buildings of all sizes and jeopardizing public health and safety. Currently, DOB and Courts can only do what they are legally allowed to do against these unlicensed actors: a small monetary fine of a few thousand dollars which is regularly not collected. Impounding the vehicles and tools of unlicensed plumbers is truly the only way to stop this pervasive and growing problem.

I thank Chairperson Sanchez, the Housing and Building Committee, and the City Council Staff for the ability to speak before them today and I can gladly answer any questions the Committee may have of me. As stated at the beginning of my comments, we are fully supportive of Intro. 429.



To: New York City Council Committee on Housing & Buildings
From: Master Plumbers Council
Date: October 16, 2024
Re: Testimony on Intro. No. 429

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Introduction

Good morning

I'm George Bassolino speaking on behalf of the Master Plumbers Council (MPC) regarding plumbing and gas safety legislation. The MPC fully supports Intro 429 much of which includes cleanup provisions of existing Codes and directly protects public safety.

Ordinary Plumbing Work is an important tool available to tenants, owners and licensed plumbers. It saves your constituents time and money by enabling licensed plumbers to safely perform ordinary plumbing work without permits or inspections. This negates incentives for owners to utilize unqualified persons which pose a direct threat to public safety. This amendment clarifies the approved work scopes that are completed safely by their licensed plumber. The Department receives reports of all work performed and may audit the work at their discretion.

We are quickly approaching the 10th anniversary of the **preventable** East Village explosion. That crime was the driving force in the adoption of ten gas safety laws. The compliance rate for gas safety inspections are low because many owners fear their existing gas systems may be shut down or they could incur thousands of dollars in repair costs. Extensions, outreach and the threat of fines have failed to increase compliance during the first cycle. Fines are not a deterrent and compliance will **only** increase when owners are comfortable with the process. As gas is phased out over the coming decades, less attention will be paid to maintenance of systems and compliance will be essential to protect the public from a **reoccurrence**. While written in very technical terms, this amendment simply clarifies the current inspection process and terminology. There is nothing new. A key clarification eliminates any misconception that the Council intended to exempt the same type of COMMERCIAL tenant space where the Second Avenue crime occurred from being inspected.

Adoption of this amendment sends a clear message that gas is only shut for an emergency, repairs are limited and everything else is just listed on a report. It's that simple. Besides allaying the concerns of owners this will reduce overall compliance costs, not increase them. New York City is comprised of dense construction. In the second avenue incident one building exploded but three were ultimately destroyed. One person's greed and selfish disregard for the law took innocent lives and displaced many others.

I have focused my comments on only two of the amendments but am happy to answer any questions or concerns regarding the others. We will be sending supplemental comments regarding the Departments testimony.

Thank you for your time.

George Bassolino
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CC: Arthur Goldstein Esq. Davidoff Hutcher & Citron LLP

1. §28-105.4.1 Emergency work.

Department Issue: The Department is misinterpreting this amendment to be an expansion of the work permissible to be undertaken and potentially limiting a plumber's ability to restore essential services. In section 4 the Department has misinterpreted the existing Code section seeking to place limitations on the restoration of heat and hot water.

Response :

This Code section permits work that would otherwise require a permit may be performed without a permit to the ***extent necessary to relieve an emergency condition***. The proposed verbiage simply clarifies of the original intent of this Code section while the Department believes it is an expansion and is seeking to limit its use. The Department issues and our explanations are listed below.

- Repairs completed *to the extent necessary to relieve an emergency condition*.

In their response to the proposed amendment the Department stated the intent of this Code section is to simply alleviate the hazard and no work can start until a permit is obtained. Examples of that would be to simply shut of the gas or water to your house. Not being able to bathe, use the toilet, cook or heat your home constitutes a personal emergency. If you have tenants this becomes an even bigger issue as you are required to maintain your *building and all of its systems in good working condition at all times*. ‘

- Work cannot start until a permit is obtained

This section states that an *application for a permit shall be submitted within 2 business days after the commencement of the work and shall include a written description of the emergency condition and work undertaken to mitigate the hazard*. The Departments interpretation that work cannot start until a permit is obtained does not align with the Code verbiage. It clearly requires that the applicant list work undertaken at the site. There is also a published emergency work notification process that notifies the Department work is in progress. The Code requires permit submission within 2 days. There is a decade's long practice whereby Licensed Master Plumbers restore services and follow up with reports or permits. One example of this is the emergency repair of gas piping systems in order to alleviate a hazardous condition. The Code permits Licensed Master Plumbers to undertake the emergency repair and the gas system is repaired then inspected, tested and **restored** by qualified utility personnel. After the permit is obtained the Department conducts a final inspection. This process is consistent with the Codes and aligns with the Departments published Emergency Work notification process. Waiting causes unnecessary delays and creates conditions where people may seek to circumvent the Code.

- Limitations on work scopes

This Code section states that *emergency work may include but shall not be limited to* follow by a list of suggested items. In their response the Department has made the determination that the list is an exception to the permissible work scopes. An example is the repair or replacement of heat and hot water equipment may only be completed during the heating season (October 1- May 31) It further restricts use to two occupancies (educational & residential). Interpreted literally if the water heater in your residential building breaks in the summer this would not constitute an emergency. Would it also prohibit emergency work in hospitals, nursing homes and your family business?

- “Expansion” could create safety concerns

The Department contends that “expansion” of permissible work scopes could pose potential public safety concerns but provided no specific examples of any incidents that occurred where emergency work was performed by a Licensed Master Plumber. This work is required to be reported or permitted and inspected in accordance with the Code. Work is either inspected by the Department or they have the ability to audit it at their discretion.

We implore the Council to reaffirm that the intent of this section is *to restore the system to a good working condition*. This clarification enhances public safety by removing unnecessary roadblocks that can incentivize owners to utilize unqualified persons to perform this work. When NYC residents have a plumbing emergency they demand an immediate response and resolution. The work is going to get done one way or another. Passage of this amendment makes it more likely it will be done safely by a Licensed Master Plumber.

2. §28-105.4.4 Ordinary Plumbing Work.

Department Issue: The Department is conceptually in agreement with the proposed amendments related to ordinary plumbing work. They are seeking to delay the implementation for about two years.

Response:

Ordinary Plumbing Work (OPW) is an important tool available to tenants, owners and plumbers. It saves constituents money by enabling a licensed plumber to safely perform this plumbing work without requiring fees, permits or inspections. This amendment clarifies the approved work scopes and adds several that will be completed safely by a licensed master plumber. The Department receives reports for all of the work performed and maintains the ability to audit the work at their discretion. Removing these obstacles negates incentives for owners to utilize unlicensed and unqualified persons which is direct threat to public safety.

This section will eventually reside in an Existing Building Code when one is adopted. Waiting should not be an option as today many gas stoves and dryers are being replaced illegally by unqualified persons directly threatening public safety. Since DOB agrees on the concept, they should withdraw the mediation they filed to remove this section of the Code and support this legislation. It provides constituents with immediate financial relief and enhances public safety by having Licensed Master Plumbers performing the work.

3. §28-318 Periodic Gas Inspections

Department Issues: The Department has taken exception with many of the proposed amendments in this bill.

- Section 28-318.1 Department believes that buildings already certified to have no gas must be respected.
- Section 28-318.3.1 Department is opposed to verification of inspectors' experience and training
- Section 28-318.3.2 Department is opposed to clarifying that the original intent of the law was to gain access to the same type of spaces that precipitated the Second Avenue incident.
- Section 28-318.3.4 Department believes that clarification of process of addressing immediate hazards is confusing.
- Section 28-318.3.4.1 Department believes that this relocated section (from 28-318.3.4) addressing nonhazardous conditions which requires maintenance of a list of conditions and determining which conditions must be remediated is burdensome.

Response :

We are quickly approaching the 10th anniversary of the **preventable** East Village explosion. That crime was the driving force in the adoption of ten gas safety laws. The compliance rate for gas safety inspections are low because many owners fear their existing gas systems may be shut down or they could incur thousands of dollars in repair costs. Extensions, outreach and the threat of fines have failed to increase compliance during the first cycle. Fines are not a deterrent and compliance will only increase when owners are comfortable with the process. The Department has issued violations for exiting conditions that do not require remediation creating further concern among owners. The Department is seeking to lower the fines for three family buildings by seventy percent citing a hardship to afford the fee. The cost of compliance for these buildings is less than one-half of the violation amount. What message does this send? As gas is phased out over the coming decades, less attention will be paid to maintenance of systems and compliance will be essential to protect the public from a reoccurrence. While written in very technical terms, this amendment simply clarifies the current inspection process and terminology. A key clarification eliminates any misconception that the Council intended to exempt the same type of **commercial tenant space** where the Second Avenue crime occurred from being inspected.

Adoption of this amendment sends a clear message that gas is only shut for an emergency, repairs are limited and everything else is just listed on a report. Besides allaying the concerns of owners this will reduce overall compliance costs. New York City is comprised of dense construction. In the second avenue incident one building exploded but three were ultimately destroyed. One person's greed and selfish disregard for the law took innocent lives and displaced many others.

These modifications are essential to meet the intended goal of protecting the public from **preventable** natural gas accidents in the future.

Highlights of the **clarifications** and alignments include:

- Section 28-318.1 (When does a building really have no gas?)

The law exempts covered buildings with "no gas". It is essential that buildings deemed exempt actually have no gas within. Some buildings have converted to electric yet the gas service in the building is still active. These situations pose potential safety risks because no one is paying attention. Until gas is capped in the street it can pose a safety issue to the building and other buildings on the street. This section clarifies the process and will help to avoid tragedies such as the March 12, 2014 incident in Harlem where gas migrated into a building causing an explosion that destroyed two apartment buildings displacing 100 families.

- Section 28-318.3.1 (Is the inspector qualified?)

This requires individuals performing these inspections that are not licensed plumbers obtain a Journeyman registration. This registration is simple to obtain (online application, letter from employer, W-2's and a \$50 fee.) does not require any exam and can usually be obtained within a few months of application. Possession of this registration provides guaranteed proof that the individual has the requisite five years of work experience. There are presently over 3,000 registered Journeyman Plumbers listed on the DOB site. This requirement will not create a shortage of qualified persons to perform this work. Codifies the current rule that individuals that are not licensed plumbers complete a training program acceptable to the Department.

- Section 28-318.3.2 (you have to see it to report it)

This law was written to prevent a reoccurrence of the preventable second avenue crime were one persons greed and callous disregard for the law killed two innocent persons. When the law was written it was understood that residential tenant spaces would be exempt from inspection because these areas have a historically low probability for incidents and the inspection process requires the space around the tenant door in the public spaces to be leak tested. The Council also recognized that access to these areas would be problematic and result in incomplete inspections.

When this law was implemented the Department declined to require access to any nonresidential tenant spaces. Not testing these spaces results in incomplete inspections and endangers public safety. The Second Avenue crime primarily occurred in a commercial tenant space. Why would the 2016 Council pass a bill to prevent future incidents and exempt that very location from an inspection? Most inspection entities have been inspecting nonresidential tenant spaces but clarifying the intent of this law will make us all safer.

If an owner did not inspect their tenant space in the first cycle they may see an increase in the overall inspections cost. It will be determined upon the size of the space. The costs should be more than offset by the limitations for repair work that this amendment provides.

- Section 28-318.3.4 (reactions to immediate hazards)

This section clearly defines the process when an immediate hazard is encountered. It requires the inspector to take make safe actions to protect life and property. The inspector will contact qualified responders who will arrive and mitigate the potential hazard. The utility will make the final determination if a situation is hazardous and take the required make safe actions. The section removes the prior list of reportable items because it is incomplete may create confusion about what is immediately reportable. This change enhances safety by aligning the verbiage with the NYS approved inspection requirements. Conditions that are not immediately hazardous are reported in the new section 28-318.3.4.1. This will not require immediate reporting of non code compliant conditions that are not hazardous.

- Section 28-318.3.4.1 (how to handle everything else)

Gas piping located at a building may fall under several jurisdictions. The inspection scope includes all of them and this section continues to require conditions to be reported to the owner, Department and utility. Everyone gets a report because it increases the likelihood that required remedial work will be completed. While this is a new section it does not add any new reporting requirements for owners, inspectors or the Department. It simplifies the required reporting for non-compliant conditions that are NOT immediate hazards. Examples of this could be non-compliant fittings or installations that do not pose a threat to life or property.

Conditions that are required to be remediated will be determined by the authority having jurisdiction. The utility will determine what remedial work is required for utility piping. The Department will determine what conditions need to be remediated for gas piping under their jurisdiction. Repairs are limited to items which can be corrected without causing a leak to the existing system. All other items are noted and the gas system remains in service until the piping is shut down in the future.

Presently the Department has not defined what conditions must be remediated. This has resulted in buildings being shut down unnecessarily and driven up the costs of repairs. The industry is willing to work with the Department to develop a list of required remedial repairs that will minimize costs while maximizing safety. This approach will streamline the process and reduce the overall compliance costs.

4. §28-401.3 Definitions FIRE SUPPRESSION PIPING WORK.

Department Issue: The Department believes that a technical clarification could create confusion.

Response :

Licensed Master Fire Suppression Contractors are not permitted to undertake plumbing work. The Code permits Licensed Master Plumbers to perform work on *Fire suppression piping systems* with a plumbing permit which by definition classifies it as plumbing work. The 2014 Code clearly defined the separation between Plumbing and Fire Suppression piping work. The 2022 Code provides for a Master Fire Suppression Piping Contractors to perform fire suppression piping work on a domestic water system. If the Department believed that it was necessary to identify a demarcation point this could have been accomplished by the publication of a Buildings

Bulletin. It is important to resolve this contradiction to maintain consistency in the Code as well as the distinction between the discrete Codes.

Code definitions:

Plumbing Work includes the installation, maintenance, repair, modification, extension or alteration of plumbing, standpipes, and the installation of up to thirty sprinkler heads off the domestic water in any building in the city of New York.

Fire Suppression piping system includes any and all equipment and materials in connection therewith, the purpose of which is to control, contain, suppress or extinguish fire and shall include up to thirty sprinkler heads off the domestic water in any one building.

Standpipe System piping, installed in a building or structure that serves to supply water to hose connections at one or more locations in a building or structure, for firefighting purposes.

Fire Suppression piping work includes The installation, maintenance, repair, modification, extension, or alteration or testing of a fire suppression piping system in any building in the city of New York. Fire suppression piping work **shall not include plumbing work.**

5. §28-417.1 Plumbing and fire suppression piping contractor license board.

The Department opposes an Advisory Board

Department Issue: The Department opposes reinstatement of an advisory board.

Response:

Why is the Department opposed to empaneling a group of subject matter experts with real life experience in their licensed trade and receiving their advice which is nonbinding? In order for the regulatory authority to be in the best position to protect public safety they must have access to the best possible information. The current Department administration has been very forthcoming in seeking industry input and meeting to discuss important industry issues. However, there is no statutory requirement or guarantee that future administrations will do the same. The original license Board was established to review applications, allegations of maleficence, Code issues, rules and any other areas that the Commissioner would deem necessary. Over the years the role of the Board has been diminished to reviewing applications. Plumbing and Fire Suppression work are life safety trades. When someone is granted a license, they are given the legal authority to perform work that has a direct impact on public safety. They perform their work largely unsupervised and this system can only work properly with the proper checks and balance in place. From a public policy perspective there is no downside for this Board to exist and we urge the Council to pass this legislation to reinstate it.

- Applicants

Prior to the disbandment of the Board the streamlined the process took weeks versus the months in years past. In fact some applicants had to wait for review because the meetings were held quarterly. Prior to Covid when all meetings were in person there cancellations did occur due to a lack of a quorum. They were infrequent and responsibility for that can be attributed to both sides. The Boards roles is purely advisory, there is no need for a quorum and simply removing it from this bill would resolve this perceived issue. The Departments stated goal is to manage all licenses consistently. Managing occurs after the license is issued. Plumbing and Fire Suppression are much more complex than other licenses and registrations. The persons performing the review process must be familiar with the industry and only group that should benefit from the vetting process is the public.

- Illegal practices

In the past persons accused of wrongdoing were brought before the board who would hear the facts and make a recommendation. The Board members were able to ask questions and help to make a determination if an act was accidental or intentional. Their knowledge of the codes, rules and processes coupled with their real world experience made them a valued resource. Lawyers, architects and engineers are all reviewed by panels of their peers.

- Piping practices, code applications, regulations, and legislation.

Today 650 volunteer industry professional are busy revising the NYC Construction Codes. The Department paid a company to write the new Code and these volunteers are reviewing it to ensure it works for NYC. The Department hosts quarterly industry meetings to discuss issues. They also regularly ask for input from the industry prior to creating a process or updating and existing one. Having

the License Board and these duties as part of the Code will ensure that these practices will continue.

- To perform other duties as may be requested by the commissioner

Under this section the Board can advise on issues, define the problem and suggest a solution before they become systemic.

6. §28-419 Seizure and forfeiture.

Department Issue: The Department opposes this amendment as a standalone bill and seeks to have it considered as part of the Code revision process.

Response :

It pays to be an unlicensed contractor in NYC. These unqualified individuals operate almost with impunity. They advertise on billboards, social media, and the internet most without the burden of costly insurance. It is rare that they will be caught by the understaffed DOB Marshall and the worst thing that can happen is that they will receive an ECB violation, most of which are ignored and go into default. The work is being done by unqualified persons and this directly threatens public safety.

The only way to deter unqualified persons from engaging in the life safety trades is to have effective deterrents in place. Issuing violations would work better if they were class A misdemeanors as the plaintiffs would have to respond or face warrants. Seizing an unlicensed contractor vehicle will be effective by slowing them down and driving up their operating costs. This program if adopted would send a message and reduce the flow of illicit work.

The industry has sought to have this legislation passed for many years. During industry meetings, the Department stated they were in support of this legislation. During their testimony they opposed it stating it should be discussed during the current Code revision process. This makes no sense since they have rejected the industry's request to list it's an agenda item for discussion during this 2023 Code revision process.

7. NYC Fuel Gas Code Section 101.2.2 Piping systems

Department Issues: The Department believes this technical clarification would impose an additional obligation to perform inspections. They oppose this amendment as a standalone bill and seeks to have it considered as part of the Code revision process.

Response:

The intended purpose of this technical change is to align this section with section 401.1 of the NYCFCG. This clarification enhances public safety by removing any misconceptions that any portions of gas work are not covered by the Code and may be undertaken by unqualified persons. It poses no additional obligations on the Department to perform any additional inspections such as gas stoves which are already required to be inspected under current law. The fact that this clarification has generated confusion with the Department alone warrants its immediate approval.

TESTIMONY ON BEHALF OF THE
MECHANICAL CONTRACTORS ASSOCIATION OF NEW YORK
TO THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS
REGARDING INT. NO. 429
OCTOBER 16, 2024 - 10:00 AM



Housing & Buildings Chairperson Pierina Sanchez, members of the Committee, and other distinguished members of the City Council, this testimony is submitted on behalf of the Mechanical Contractors Association of New York, Inc. (MCA). We thank you for the opportunity to submit our testimony expressing our concerns about Int. 429 (Sanchez), a Local Law to amend the administrative code of the city of New York and the fuel gas code in relation to periodic inspections of gas piping systems, ordinary plumbing work, reestablishing the plumbing and fire suppression piping contractor license board, piping systems, emergency work, fire suppression piping work, and seizure.

Our testimony pertains to the following code sections:

- Modification of the Definition of FIRE SUPPRESSION PIPING WORK
- ARTICLE 417 BOARDS
- § 28-419.1. General – Seizure & Forfeiture

CHAPTER 4 LICENSING AND REGISTRATION OF BUSINESSES, TRADES AND OCCUPATIONS
ENGAGED IN BUILDING WORK

Definition of FIRE SUPPRESSION PIPING WORK

To ensure the City's construction regulations do not fall out of date, Local Law 33 of 2007 mandated that the city develop code revisions every three years to keep the Code in line with the latest version of the I-Codes. During the last code revision cycle, industry, including representatives from the plumbing and fire suppression sectors, participated in multiple meetings involving a variety of stakeholders to discuss changes to fire suppression and plumbing code language. The Department ultimately, and we feel correctly, determined that it is important to recognize fire suppression piping work and plumbing as two distinct types of work. The Department of Buildings has once again convened committees to review our City's Construction Codes. The 2023 Administrative Code Committee is an advisory committee that is part of this framework. Appointed by the Department of Buildings and charged with making recommended language changes to the Administration Code Chapter 1-5, the Advisory Committee consists of volunteers who are experts in the subject matter considered by the committee. The 2023 Advisory Committee is presently meeting monthly and will be reviewing recommended Chapter 4 language changes. Rather than through the Council, we believe that this committee is the correct place for vetting this definition change.

TESTIMONY ON BEHALF OF THE
MECHANICAL CONTRACTORS ASSOCIATION OF NEW YORK
TO THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS
REGARDING INT. NO. 429
OCTOBER 16, 2024 - 10:00 AM



ARTICLE 417 BOARDS

MCA strongly supports the reinstatement of the Master Plumber and Master Fire Suppression Piping Contractor Licensing Board. Prior to the adoption of the 2022 codes, the Board had been in service for the better of the industry for over 50 years. Comprised of 17 highly qualified, DOB appointed members, the Board served an important advisory role to the Commissioner regarding the character and fitness of applicants for licenses and on allegations of illegal practices, including violations of Code and plumbing practices. The Board provided valuable industry input, however final decision-making authority remained solely with the Commissioner.

Plumbing & Fire Suppression License Boards are present in a significant number of jurisdictions in New York State and across the country. The existence of licensing boards helps consumers feel safer and more secure with the knowledge that those providing a service are subject to oversight and regulation. The best decision-making is a result of multiple perspectives, including the perspectives of community and industry members. Reestablishing the license board will reinstate an important Department resource and create a vital layer of transparency.

• § 28-419.1. General – Seizure

MCA supports the inclusion of larger residential as well as commercial properties to be subject to seizure and forfeiture where unlicensed work is taking place. As presently written, the Code permits forfeiture of tools and vehicles when there is unlicensed work but only at construction sites involving new residential construction of 3 units or less. However, most unlicensed work takes place on commercial alteration work, wherein a rogue builder brings in unlicensed entities. In the past the Department has opposed this expansion citing a lack of budget and personnel resources, however, the need to enforce the laws against the plethora of unlicensed construction activity, to stop dangerous conditions, and to deter future unlicensed construction work must be a priority.

Thank you for your consideration of our testimony. Should you have any questions or wish to discuss our comments further please reach out to Melissa Barbour at (917) 327-5409 or melissa@nymca.org

TESTIMONY ON BEHALF OF THE
MECHANICAL CONTRACTORS ASSOCIATION OF NEW YORK
TO THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS
REGARDING INT. NO. 925
OCTOBER 16, 2024
10:00 AM



Housing & Buildings Chairperson Pierina Sanchez, members of the Committee, and other distinguished members of the City Council, this testimony is submitted on behalf of the Mechanical Contractors Association of New York, Inc. (MCA). We thank you for the opportunity to submit our testimony expressing our concerns about Int. 925 (Louis), in relation to requiring the inspection of steam radiators in covered multiple dwellings where a child under six resides and that such inspection be performed by a New York City Licensed Master Plumber.

While we are in favor of the intent of this legislation that seeks to proactively reduce serious injury or death caused by radiator malfunction, however, we believe that this legislation can be improved upon to offer a better chance for success and compliance.

We have two recommendations that we believe would better protect vulnerable populations:

1. Steam radiator covers: By shielding the hot metal surface, covers reduce the risk of accidental contact with the radiator, which could lead to burns. In 2021, New Jersey mandated that landlords install insulating covers or guards on steam radiators in rental units upon a tenant's written request. Landlords are also required to notify tenants annually of their right to request these covers. New York City should amend Intro. 925 to include similar language.
2. Expand the scope of individuals who can perform steam radiator inspections. We believe that requiring inspections to be performed by only Licensed Master Plumbers is too narrow. A portion of Heating and Mechanical contractors happen to also be NYC Licensed Master Plumbers, but there is nothing relating to the LMP that signifies whether that contractor performs work on steam heating systems and/or radiators. New York City does not currently require a mechanical contractor license, however there are a significant amount of local mechanical contractors that are qualified and regularly perform work on these steam heating systems. One solution to ensure qualified individuals are performing this inspection work could be through the creation of a FDNY Certificate of Fitness. The current New York City Fire Code Chapter 9 mandates that fire sprinkler systems are

TESTIMONY ON BEHALF OF THE
MECHANICAL CONTRACTORS ASSOCIATION OF NEW YORK
TO THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS
REGARDING INT. NO. 925
OCTOBER 16, 2024
10:00 AM



maintained in “perfect working order.” The council and City should consider if the same requirement makes sense for steam radiators. The creation of a Certificate of Fitness would provide an opportunity for building superintendents, oil burner licensees, engineers, mechanical contractors and licensed plumbers to take a test to demonstrate competence to perform this work. Expanding the universe of qualified individuals to test and inspect systems would help with compliance and make this mandate more feasible.

In closing, we also believe that annual outreach to landlords and tenants with guidance on steam radiator safety and education would benefit all New York City residents living in occupancies with steam radiators. Our Association would welcome any opportunity to help craft this guidance.

Thank you for the opportunity to submit this testimony on behalf of MCA. If you have any questions or need additional information, you may contact MCA Assistant Director Melissa Barbour at melissa@nymca.org or via phone at 917-327-5409.



To: NYC City Council / testimony@council.nyc.gov / NYC DOB Leadership / Borough Superintendents / Commissioners

From: New York City ACEC Metropolitan Region Plumbing Committee - Representing: Manhattan, Queens, Brooklyn, Staten Island, and Bronx Counties

Date: October 14th , 2024

Subject: NYC Committee Housing and Building Introduction , Int. No. 429

The American Council of Engineering Companies (ACEC) is a federation of state and local metropolitan Member Organizations that advocate for America's engineering companies and promote essential value to authorities, developers, and society. The New York City Metropolitan chapter of ACEC New York is our local proactive coalition representing nearly 300 member firms, who engage in consulting and the design for a multitude of engineering disciplines related to plumbing, electrical, civil, structural, mechanical, environmental, and geotechnical projects and builds.

Summary

Collectively, our association's 2024 /2025 ACEC Plumbing Committee, comprised of members who all work with developers and property Owners on projects throughout our city, has reviewed Int. No. 429 , in relation to periodic inspections of gas piping systems, ordinary plumbing work, reestablishing the plumbing and fire suppression piping contractor license board, piping systems, emergency work, fire suppression piping work, and seizure, and have compiled the following list of remarks to the document that present our understanding of significant implications for the plumbing industry. Our remarks are identified in bold or as indicated in highlight:

1. § 28-105.4.4 Ordinary plumbing work
 - a. **Item #5:** In buildings classified as residential occupancy groups occupied by five families or fewer [in occupancy group R-2 occupied by fewer than six families or in buildings in occupancy group R-3], the replacement of a gas water heater, **gas furnace** or a gas-fired boiler with a capacity of 350,000 BTU (103 kW) or less where the existing appliance [gas cook] shutoff valve is not moved, provided that the plumber has inspected the chimney and found it to be in good operational condition. In buildings classified as residential occupancy groups occupied by three families or fewer, the replacement of a gas furnace with a capacity of 350,000 BTU (103 kW) or less where the existing appliance shutoff valve is not moved, provided that the plumber has inspected the chimney and found it to be in good operational condition.

- i. **Remarks: It is our recommendation to add in "gas furnace" to Item #5, as outlined above in yellow highlight.**
- 2. *Item #7: The repair or replacement of any non-gas, non-fire suppression branch piping after the riser shutoff valve, including the replacement of fixtures, limited to two bathrooms and one kitchen per building per monthly reporting period.*
 - a. **Remarks: Our committee understands that the current proposed text may allow for the replacement of a significant number of plumbing fixtures without a permit. We recommend that this bill reconsider reinstating the original limitation on fixture replacements, ensuring that it is based on the existing fixture count, with no increases allowed.**

We look forward to working with the NYC DOB / Borough Superintendents and welcome the opportunity to meet and opine on these items further if needed.

Sincerely

NYC ACEC Metro Plumbing Committee



Chair - Michael Zaborskis, P.E., WSP

cc: 2024 New York City ACEC Committee

PLUMBERS AND GASFITTERS LOCAL UNION NO. 1

OF THE

UNITED ASSOCIATION OF JOURNEYMEN AND APPRENTICES OF THE PLUMBING
AND PIPE FITTING INDUSTRY OF THE UNITED STATES AND CANADA
NEW YORK CITY

PAUL O'CONNOR
Business Manager

FREDDY DELLIGATTI
Financial Secretary-Treasurer



Business Agent-At-Large
RICHARD GILLIGAN

Business Agents
PAUL COTTO
RICHARD GARNER
JOHN HICKEY
CARL L. JOHNSON, JR.
TOMMY KINIRONS
GEORGE MALANDRAKIS
ROBERT MURRAY
LOUIS J. PASQUALE
JOHN TOTINO

Organizers
ANDREW FRISCIA

President
TIMOTHY J. SPELLMAN

Vice President
ALAN PAWELSKY

Recording Secretary
ALBERT ESPOSITO

Executive Board
MICHAEL ALOISI
DOMINICK BRUNO
JUDALINE CASSIDY
CHRIS CONBOY, JR.

Finance Committee
ANDREW DONLEVY
MATTHEW GRIMES
DAVID J. McINTOSH

Examining Board
PIOTR AKSAMITOWSKI
RAFAEL CRUZ
MICHAEL FUSCO
STRACY JONES
MICHAEL J. REED
VICTOR ROSSI

Inside Sentry
MICHAEL PINTO

TESTIMONY OF JOHN SULLIVAN OF PLUMBERS LOCAL UNION No. 1 TRADE EDUCATION FUND TO THE NYC COUNCIL COMMITTEE ON HOUSING AND BUILDINGS WEDNESDAY, OCTOBER 16, 2024

Good morning, I am John Sullivan and I am a full-time instructor for the Plumbers Local Union No. 1 Trade Education Fund.

Thank you, Chair Sanchez and to the members of the City Council Committee on Housing and Buildings for the opportunity to speak before you this morning.

I am here this morning as a representative of Local 1 to speak on my members' behalf in full support of Intro 429.

I have worked in the Plumbing Industry in New York City for more than 25 years. Since 2007, I have served as a full-time instructor for the Plumbers Local Union No.1 Trade Education Fund.

Over the course of my career, I have been fortunate enough to review and comment on code proposals, sit on professional qualification Standards committees, be appointed to sit on the International Plumbing Code Revision Committee, and currently, I sit on the New York City Plumbing Code Technical Committee.

For over 20 years, I have worked with dedicated professionals locally and nationally developing and protecting code and legislative language intended to efficiently and prudently protect the health and safety of our population.

So it is with this perspective that I come here today urging support for Intro 429.

Intro 429 is broad in scope, so I would like to speak to the specifics of three items that comprise this law.

Item 1. Support of revisions to Section 28-105.4 of the administrative code of the city of New York.

Section 28-105.4 of the administrative code of the city of New York addresses plumbing work not requiring the filing of a permit prior to commencement.

Specifically, the revisions address work categorized as “Emergency work” and work categorized as “Ordinary plumbing work.”

In plain language, “Ordinary Plumbing Work” covers plumbing work which requires a Master Plumber to perform the work but is allowed to be done without a Department-issued permit or Department inspection. The Ordinary Plumbing Work process is intended to streamline the paperwork and provide cost savings for property owners, while notifying the Department and maintaining the highest levels of public safety.

Paragraphs 8 and 9 identify replacement of gas appliances as ordinary plumbing work. Identifying this as ordinary plumbing work will speed up the process of appliance replacement while ensuring safety and bringing down end user cost.

Item 2. Section 318 of the administrative code of the city of New York.

Initially known as **LL 152 of 2016**, Article 318 has become a silent protector of our aging building stock. LL 152 of 2016 was a great step forward in protecting our city from repeating the horrific disasters which led to its passing, and these updates to Article 318 are a result of lessons learned since the initial passage.

Intro 429 further solidifies the intent of Article 318 by placing a burden of proof on the inspection entity to prove relevant training and experience.

Abnormal Operating Conditions, known as “AOC’s,” are specific instances in gas piping installations which may be deemed hazardous. Updates to Section 318 will advance the protection of our building stock and our population by requiring the inspection entity to take action for certain AOC’s categorized as immediately hazardous situations. At the same time, Intro 429 sets a clear path for reporting and remediation of AOC’s which are not immediately hazardous while allowing for a reasonable path to remediation, without an unplanned interruption of gas service.

Item 3. Article 417 of the administrative code of the city of New York - Boards.

Amending Administrative Code of the City of New York with new article **417 Boards**, a reinstatement of the plumbing and fire suppression licensing boards. The purpose of a plumbing and fire suppression piping contractor license board is to advise the commissioner regarding fitness of applicants for certificates and licenses, to advise the commissioner regarding allegations of illegal practices, to advise the commissioner regarding piping practices, applications, regulations and legislation and to perform other such responsibilities as requested by the commissioner.

Article 417 aims to protect the public by ensuring license holders have been thoroughly vetted by an unbiased cross section of registered and licensed professionals, ensuring new license holders are properly qualified in their trade. A licensing board ensures a proven application of checks and balances by utilizing the collective knowledge and experiences of industry leaders who have worked within the jurisdiction of the NYC Administrative Code for years. The representative

membership identified by Article 417 ensures a fair and equitable administration of the board scope.

As a Registered Journeyman Plumber who has seen and understood the importance of the licensee's voice in code administration, I urge you to vote yes on Intro 429 – reinstating the plumbing and fire suppression license board, extending the scope of ordinary plumbing work, and clarifying elements of periodic gas inspection.

Thank you again, Chair Sanchez for allowing me this opportunity to speak with you today.

###

John Sullivan
Plumbers Local Union No. 1
10/16/24



To: NYC Council Committee on Housing & Buildings

From: April McIver, Executive Director, The Plumbing Foundation & Terence O'Brien, Executive Vice President, Association of Contracting Plumbers of the City of New York

Date: October 16, 2024

Re: Testimony on Int. 0429-2024

INTRODUCTION

We issue this joint testimony on behalf of The Plumbing Foundation City of New York, Inc. (PFCNY), a trade association representing NYC Licensed Master Plumbers, engineers, manufacturers, and supply houses whose mission is to ensure the enactment and enforcement of safe plumbing codes, and the Association of Contracting Plumbers of the City of New York (ACP), the management bargaining party counter to Plumbers Local 1. We work with our members, industry stakeholders, and policymakers to ensure our lawmakers adopt and enforce safe codes and rules in the interest of the public health and safety. We respectfully urge the NYC Council Committee on Housing and Buildings to pass Int. No. 429-2024 as it includes necessary safety measures under the NYC Building Code.

COMMENTS

I. Make Necessary Amendments to Gas Inspection Law (Local Law 152/2016)

As the Committee is no doubt aware, the NYC Council passed a host of gas safety laws in 2016 in response to two deadly gas explosions (East Harlem in 2014 and Lower East Side in 2015). Now that those laws are in effect, specifically Local Law 152 requiring periodic inspections of building gas piping, we are seeing flaws and loopholes that are otherwise undermining the purpose of the important 2016 gas safety law.

Therefore, we have worked with industry partners, including the Council, utility companies, as well as the NYC Department of Buildings (DOB), to devise a comprehensive revision to the law:

- Clarify and streamline the process for owners to obtain certification of no gas piping or if their building has gas piping, certification it is not being supplied with gas. The process to require a utility letter is not a procedure the utility companies can or will do, rendering the law impracticable. Licensed Master Plumbers (LMP) are in the best

position and best qualified to certify gas supply/piping status.

- Ensure DOB keeps abreast of the NYS Public Service Commission (PSC) inspection regulations on jurisdictional gas piping and any changes to inspection cycles in order to align inspection cycles to ease burden on owners.
- Require that the inspection is conducted by an LMP or individual under the LMP that is a journeyman plumber registered with the DOB. This is consistent with DOB's rule that a person has 5 years' experience to conduct these inspections but provides an easier and clearer way to certify that the experience requirement is met. Currently, upon information and belief, DOB is not verifying the experience of these gas piping inspectors working under LMPs.
- Clarify that the scope of the inspection includes commercial tenant spaces but not residential tenant spaces and clarify that the point of entry of the gas piping must be inspected regardless of location. This ensures a more thorough and accurate safety inspection, especially in restaurants, etc.
- Replace "imminently dangerous" with "immediately hazardous" conditions to ensure law aligns with industry training.
- Clarify the provision on reporting and correction of unsafe or hazardous conditions to adopt industry training and terminology, e.g., use of "abnormal operating conditions" (AOC), and to distinguish between immediately hazardous and non-immediately hazardous AOCs.

We appreciate your time and attention to this important gas safety matter and consideration of the proposed revisions. **We kindly urge the Committee to pass this legislation to ensure the important and necessary changes to LL152 periodic gas inspections is in place before the next cycle begins January 1.**

III. Reinstate License Board

The Master Plumber and Master Fire Suppression Piping Contractor License Board was in service for the betterment of the industry for over 50 years, ending in November 2022 once the 2022 Code came into effect. It was composed of 17 members, each of whom was appointed by the DOB Commissioner and each of whom could be removed at the Commissioner's sole discretion. As was clearly delineated in sec. 28-417.1 of the prior Article 417, the License Board's function is to "advise" the Commissioner regarding the character and fitness of applicants for licenses and on allegations of illegal practices, including violations of Code and plumbing practices. However, DOB's own administrative units conduct all license application reviews and disciplinary investigations. Once those reviews and investigations are completed, DOB then presents its findings and recommendations to the License Board for input. All decision-making authority remains solely with the Commissioner. The License Board meets once a month. Nevertheless, DOB sought to eliminate the License Board.

Upon information and belief, virtually all jurisdictions that license trades have a license board composed partly of licensees. It is also common practice in many professions to have peer

review (e.g., medical and legal professions). At the time that this was removed from the law, the DOB staff (many of whom are no longer there) explained that its sole rationale to eliminate the License Board is to speed up the licensing process. DOB's license application process typically takes several months, therefore waiting an additional couple of weeks until the next monthly meeting of the License Board is not a significant delay to the applicant. In addition, there is no reason DOB could not hold the meetings more frequently as the prior Code provision required at minimum a monthly meeting (which DOB rarely complied with). Rather, the "delay" rationale may not be the real reason for the proposed change. There have been instances when some members of the License Board have questioned the conclusions made by the DOB staff (e.g., amount of time credited for experience). Even though everyone agrees that decision-making rests solely with the Department, government agencies do not relish anyone questioning their decisions. There was no demonstrated reason to eliminate the License Board. DOB's elimination of the Board simply removes a level of transparency and oversight that exists all throughout the state and a peer review process that occurs in many other professions.

We urge the Council to pass Int. 429 and reinstate the Master Plumber and Master Fire Suppression Contractor License Board.

IV. Expand Seizure & Forfeiture Abilities of the Department

Currently, under section 28-419.1 of the Administrative Code, it permits forfeiture of tools and vehicles when there is unlicensed work but only at construction sites involving new residential construction of 3 units or less. That is typically not where the problem of unlicensed work exists, since a builder cannot obtain a Certificate of Occupancy (CO) for a new building from the DOB without documentation from a licensed firm. The real problem of unlicensed work is alteration work, wherein the rogue builder brings in unlicensed entities and the work is completed without having to obtain COs. Accordingly, DOB's authority to seize tools and vehicles should be expanded to include ALL unlicensed and unpermitted work **other than** work in residential buildings containing 3 units or less.

We met with DOB several times in the past two years regarding this amendment and have been told that they are in support. There is a dire need to enforce the laws against unlicensed construction activity, i.e., to stop dangerous conditions and to deter future unlicensed construction work. Enforcement against unlicensed construction activity is an important safety matter that the City should be making a priority with taxpayer funds.

We urge the Council to pass Int. 429 and include this necessary authority for DOB to enforce against bad actors.

V. Other Provisions

Int. 429 also amends two relevant sections that the Plumbing Foundation strongly supports:

A. Emergency Work

Section 28-105.4.1 is amended to make technical clarifications as well as to ensure that this type of work, which does not require a permit, covers the time from when a licensed master plumber diagnosis a problem arising to the level of emergency work through *the actual restoration of the system to a good working condition*. This is vital to ensure consumers facing emergency situations are not burdened by red tape to have their systems in safe condition.

B. Ordinary Plumbing Work

Section 28-105.4.4 is amended to clearly define additional work types that do not ordinarily require pulling a PW-1 or LAA but rather should be captured as “ordinary plumbing work” which is conducted by a licensed master plumber and reported to the DOB on a monthly basis. This will ensure consumers can reasonably comply with licensing requirements and that these smaller jobs are done properly, rather than owners going to unlicensed “handypersons” that do shoddy and dangerous work. It will incentivize owners to hire proper contractors to, for example, install their gas equipment without relying on a big-box store to send an unlicensed and inexperienced technician. Even work that falls under ordinary plumbing work needs to be done properly to ensure safety.

We strongly support the above revisions to the sections on emergency work and ordinary plumbing work and urge the Council to pass Int. 429.

Conclusion

Thank you to the Committee for their time and consideration of Int. 429. The Plumbing Foundation and Association of Contracting Plumbers strongly urge you to pass this legislation to ensure that the safe and fair enhancements proposed in the bill to the NYC Plumbing, Fuel Gas, and Administrative Code are implemented in a timely manner.



NEW YORK'S VOICE OF THE COOP/CONDO COMMUNITY REPRESENTING OVER 100,000 RESIDENTS

October 15, 2024

**TESTIMONY OF WARREN SCHREIBER & BOB FRIEDRICH, CO-
PRESIDENTS OF THE PCCC
Intro 0925/2024**

The undersigned are co-president's of the Presidents Co-op & Condo Council, an advocacy group representing almost a hundred middle-income properties in Queens. We also serve as President's at our respective Cooperatives.

While recognizing that faulty radiators pose serious risk to the public, the proposed legislation is drafted in such a way as to be overly restrictive, which would create significant unnecessary costs. Our shareholders are working and middle-class families who cannot afford more unfunded mandates from the New York City government. We ask that any portion of this legislation that would increase costs onto shareholders be eliminated, and consideration be given to the plight of middle- and working-class families.

Radiators are relatively simple equipment to inspect to determine if they are operating as intended. However, the legislation restricts those who can undertake the inspection to only master plumbers. The proposed bill should greatly expand the types of workers, including building superintendents, who could conduct radiator inspections in both dwelling units and in common areas. Expanding the range of individuals who can conduct an inspection would be consistent with recently adopted parapet inspection requirements.

It is also not necessary to conduct annual inspection of radiators. As an alternative, an inspection cycle of 3 years could ensure that units are visited regularly. Or, instead of annual requirements, tenants could be provided the right to request an annual inspection from the property owner and be provided with information annually about how to report concerns about radiator safety and obtain an inspection.

Finally, the requirement to include the owner's responsibility to comply with this law in every tenant lease is excessive. Posting of the requirement in a conspicuous location, or a similar noticing approach, would be sufficient and more effective.

Respectfully submitted,

Bob Friedrich/Warren Schreiber, PCCC Co-Presidents



Testimony from Steamfitters Local 638

RE: INT 429

October 16, 2024

Thank you, Chairperson Pierina Sanchez and members of the committee, for holding this hearing. This testimony is submitted on behalf of Steamfitters Local 638, which represents over 9,000 members in New York City and Long Island and maintains jurisdiction over all general pipe fitting, sprinklerfitting and HVAC installation and maintenance/service in the five boroughs. Thank you for the opportunity to submit our testimony expressing our concerns about Int. 429 (Sanchez), a Local Law to amend the administrative code of the city of New York and the fuel gas code in relation to periodic inspections of gas piping systems, ordinary plumbing work, reestablishing the plumbing and fire suppression piping contractor license board, piping systems, emergency work, fire suppression piping work, and seizure. We would like to draw your attention to the following code changes proposed in the legislation:

Modifications to the definition of fire suppression work: Local Law 33 of 2007 mandates that the City develop code revisions every three years in order to ensure that construction regulations do not fall out of date. To comply with this law, DoB has been responsible for convening committees to review the 2022 Construction Code. The 2023 Construction Code Committee is comprised of volunteer experts in the industry and subject matter they are tasked to consider; they are currently meeting monthly and reviewing recommended changes to building code. We strongly encourage vetting of definitional language to be vetted by this committee rather than the Council. Particularly, as the union that represents the experts who install fire suppression sprinkler systems in New York City's buildings, we caution against making any changes to building code as it pertains to these life-saving systems, if it hasn't been reviewed and vetted by professionals in the industry.

Secondly, we wanted to express our strong support for the reinstatement of the Master Plumber and Master Fire Suppression Licensing Board. Prior to 2022, the board was an integral part of maintaining the standards and practices of the industry, and was a critical part of the Commissioner's eyes and ears on the ground regarding the qualifications and fitness of applicants applying for license. Via 17 high-qualified industry experts, appointed by DOB, the board was able to provide insight and details about illegal practices and violations of code, as it pertained to applicants for license. While final decision-making was always maintained by the Commissioner, the board provided valuable insight from labor organizations like our own, as well as from other industry experts. Licensing boards are present in many jurisdictions across the country, because they are seen as an important layer of transparent government, and they provide a valuable tool whereby agencies and regulators can seek input from labor, the community and industry.

Thank you for your time and consideration of our testimony. I am always available to answer questions or discuss further at bthomason@lu638.com or at ###-###-####.



Council of New York Cooperatives & Condominiums

INFORMATION, EDUCATION AND ADVOCACY

850 7th Avenue • Suite 1103 • New York, NY 10019-5230

Testimony Submitted to the Committee on Housing and Buildings

October 16, 2024

Re: Intro 925-2024 - Requiring the inspection of steam radiators in multiple dwellings.

The Council of New York Cooperatives & Condominiums (CNYC Inc.) is a membership organization providing information, education, and advocacy for housing cooperatives and condominiums located throughout New York City's five boroughs and beyond. More than 170,000 New York families make their homes in CNYC member buildings, which span the full economic spectrum from very modest, income-restricted housing to solid middle-class apartment complexes to upscale dwellings. The shareholders and unit owners in New York's housing cooperatives and condominiums are committed to this city and as homeowners have invested heavily in its future. We appreciate the opportunity to submit testimony on Intro 925 before the committee today.

Cooperatives and condominiums provide homes to their resident-shareholders and unit owners. For this reason, owner-occupied units in cooperatives and condominiums are exempted from Stove Knob Cover requirements, Local Law 1 of 2004 (Annual Lead Paint Notices), and Local Law 55 of 2018 (Indoor Allergen Notices), much as single-family homes are also exempted from the same laws. Further, the governing documents for cooperatives and condominiums dictate which parties are responsible for the maintenance of items within apartments, and generally, shareholders and unit owners are responsible for the upkeep of plumbing fixtures that are within their units, including radiator valves, air valves, radiator covers, etc. Given the above, we respectfully request that owner-occupied cooperative and condominium units be exempted from the proposed legislation.

10/16/2020

Hi

MY NAME IS BARBARA
MANN. I AM 56 YEARS OLD
WITH TWO DISABLED BOYS; 18 AND
ALMOST 27 YEAR OLD. MY ALMOST
27 YEAR OLD ALSO HAS TYPE
2 DIABETIC AND SEVERE MENTAL
DISEASE.

WE ARE HOMELESS FROM
JUNE 2018; AFTER NYCA SECTION
8 TOLD US TO MOVE FROM OUR
273 ROCHESTER AVENUE SHELT
AFTER WE MOVED TO A SHELT
OUR SECTION 8 VOUCHER WAS
ILLEGALLY AND CRIMINALLY GIVEN
TO MY THIRTY TWO YEAR OLD
WHOSE NAME IS NOT ON THE
VOUCHER.

THE HOMELESS CONDITION
HAS AFFECTED MY EIGHTEEN
YEAR OLD EDUCATION. HE HAS
NOT ATTENDED SCHOOL SINCE HE
TURNED THIRTEEN YEARS.

WE HAVE MOVING FROM STATE
TO STATE, CONTINENT ~~AND~~ CT TO
CONTINENT.

ALSO AS WE BECAME
HOMELESS MY EIGHTEEN
SOCIAL SECURITY BENEFIT
CHECKS WERE STOLEN BY
UNKNOWN PERSONS BECAUSE

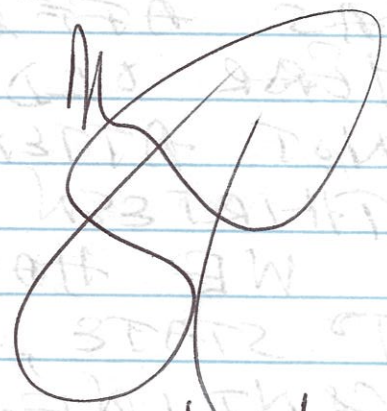
HRA CHANGING MY TWO
CHILDREN ADDRESSES FROM
SOCIAL SECURITY TO UNKNOWN
ADDRESSES WHITE HOMELESS
WITH WIFE.

AS A RESULT WE ARE
UNABLE TO AFFORD AN
APARTMENT TO RENT.

PLEASE I HAVE BEEN
IN HEARINGS HERE AT
CITY HALL. BUT ALL I HAVE
BEEN DEAF EARS.

PLEASE WE NEED
YOUR HELP TO GET OUR
SECTION 8 BACK AND
ALSO ASSISTANCE WITH
HOUSING.

Thank you
Barbara Mary



12/16/2024

To whom it may concern,

A total of THREE children have died from a steam radiator malfunction in their NYC apartment.

Scylee Ambrose, age 1. Ibanez Ambrose, age 2. Binyomin Zachariah, 11 months (just days away from celebrating his first year birthday party)

The babies' deaths occurred inside of the apartment through no fault of the tenants occupying the residence. The deaths occurred from poor steam radiator maintenance.

As of now, boilers are inspected on an annual basis. However, steam radiators are untouched and not even examined or looked at by anyone.

A super is often unqualified to determine any real underlying problem, and often lacks the expertise needed to replace different essential parts of the radiator.

NYC tenants deserve to live. No one, especially not a child or a baby should die in the comfort of their own home from a steam radiator that is supposed to provide warmth throughout the cold winter months.

If it was your own son, grandson, nephew, or best friend's child (think of his name) or your own daughter, granddaughter, niece, (think of her name) and you got a call in the morning that they were found dead from a steam radiator in the home, would you take ANY steps to ensure this doesn't happen again? Would you say it was a "freak accident" and go about your day or would you DO something about it?

What if you saw a picture of what the baby looked like after the steam radiator sent 212 degrees of steam into the room? Would that make

you think about a way to stop it from happening? Or would you keep browsing your phone and mumble that it was a “freak accident?”

What will it take to ensure that NYC tenants do not die in such an awful, horrible, absolutely devastating tragic way?

The only logical step is to pass a bill that brings plumbers into pre-war apartment buildings to inspect steam radiators for apartments that have families with children living there.

There is no context or nuance or complexity or case by case basis when it comes to telling someone their child died from a steam radiator. Only tears. Only shouts. Only mourning. Only irreversible damage that will forever change the lives of their loved ones.

We ask that the plumbers Union take a strong stance on the Ben-Z law; a law that council member Farrah Louis’s office has drafted in response to the horrific tragedy that took the lives of three beautiful, innocent children.

Please stand with life. Stand with dignity. Stand with morality and ethics and heroism. Do what it takes to save and preserve human life.

Some bills require careful analysis to consider the pro’s and cons. But saving children’s lives only has pro’s. If you see a father or a mother holding their lifeless child in their arms in a movie, you cry. You feel the pain and despair in the parents’ eyes and souls. But our life isn’t a

movie. Our lives, along with the Ambrose's are utterly destroyed. And no, no individual, regardless of rank, gets to dismiss a loss of a human life as something that was merely a "freak accident." Labeling the loss of a human life in this manner is insulting and degrading. This wasn't a drunk driver that lost control. Binyomin wasn't on the road at 80 mph with his family. He was in the safest place in the world; his own home, his own bed, his ultimate safe space. It's because of the lack of necessary inspections that the safest place in the world turned into the most dangerous, steaming a room to 212 degrees, as acknowledged by the FDNY fire marshall at the scene, saying, " It appears that the room reached a temperature of 212-215 degrees Fahrenheit.

Not signing is a decision. Inaction is still an intentional act. Not doing the right thing is a conscious decision that is made with intent. We boldly and truthfully say that if one is against approving a bill that is designed to prioritize the physical safety of New York City children, then they are choosing to dismiss the value of human life. Whether it's one life, or one million lives; We've already lost THREE to a steam radiator, how many more lives are you waiting on to be lost and taken before you decide that children are worth protecting? How many children need to die before the right laws are in place?

Many often say that certain things are out of their control. But here today, it IS in your control. You had an opportunity to listen to the Ben-Z bill; you heard the details and now understand that its' purpose is to prioritize human life. Its' purpose is to protect children from experiencing the fate of three babies so far, and the eternal nightmare that their families now have to live in for the rest of their lives.

So, today, it is FULLY within your control. What you approve or do not approve matters. Will you make the right decision? We have passionate

discourses about appropriate recycling laws that should be passed. Well now we have stepped into a very different discourse. The discourse of whether you value human life. The discourse of whether or not you think it is a priority to ensure that children are protected in their very own home, in their own bedroom, after their parents snuggle with them and kiss them goodnight. Do not dare say that you value human life and want to ensure that children are safe, if you refuse to sign onto a bill whose sole mission is to do just that—to make sure that children are protected and safe. But most importantly, this bill that would require steam radiator inspections for apartments with children under the age of 6—would make sure that innocent New York City children get to live.

Where do you stand on the issue of human life? What decision will you make? Will you take passion and advocacy and use it in the most important way possible? Will you use your advocacy to destroy or to build? Will you use your ability to reject or approve? Will you use your ability today to ignore or to acknowledge and vow change? What decision will you make today?

**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: Anne L Martinez

Address: 720 Hunts Point Avenue Bronx

I represent: The President of Tenant Association

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0429 Res. No. 0125

in favor in opposition

Date: 10.15.21

(PLEASE PRINT)

Name: Dkara Mironova

Address: 632 Third Ave NY NY

I represent: CSNY

Address: 633 Third Ave NY NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 925 Res. No. _____

in favor in opposition

Date: 10/16/21

(PLEASE PRINT)

Name: Ann Marie Santiago

Address: 100 Gdd

I represent: HPD

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. 429/925 Res. No. _____

in favor in opposition

partial favor

Date: 10/16/24

(PLEASE PRINT)

Name: Melissa Barbour

Address: 535 8th Ave NY NY 10018

I represent: Mechanical Contractors Assoc. of NY

Address: _____

*Industry
Panel*

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

492

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

in favor in opposition

Date: 10-16/24

(PLEASE PRINT)

Name: George Bussolino

Address: _____ District No. 1056

I represent: Master Plumbers Council

Address: _____

*Industry
Panel*

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 429 Res. No. _____

in favor in opposition

Date: 10/16/24

(PLEASE PRINT)

Name: TERENCE OBRSEN

Address: 535 8th Ave Fl 87 NY NY 10018

I represent: Association of Contracting Plumbers

Address: _____

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

Industry Panel

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 429 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: April McIver

Address: 535 8th Ave NY NY

I represent: The Plumbing Foundation

Address: same

Industry Panel

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 429 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: John Sullivan

Address: 47th Avenue Long Island City, NY

I represent: Plumbers Local One

Address: 37-11 47th Avenue Long Island City, NY 11101

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: Gus Sirakis

Address: DC Development and Technical Affairs

I represent: DOB

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: Tarek Khalil

Address: HCC, Central Inspection

I represent: DOB

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. Ben-z law Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Alexander Kuravsky

Address: _____

I represent: _____

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. Ben-2611 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Alexander
Bessie Kimmel

Address: _____

I represent: _____

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: 10/16/24

(PLEASE PRINT)

Name: BARBARA
MARY

Address: homeless with kids

I represent: _____

Address: _____

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