

**MICHAEL ALACHA
ASSISTANT COMMISSIONER
NEW YORK CITY DEPARTMENT OF BUILDINGS**

**HEARING BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING & BUILDINGS**

December 9, 2014

Good morning Chair Williams and members of the City Council. My name is Michael Alacha and I am Assistant Commissioner of Engineering and Safety Operations at the Department of Buildings. I am joined by my colleague Patrick A. Wehle, Assistant Commissioner of External Affairs. We are pleased to be here this morning to offer testimony on Introductory Number 252, which requires the posting of information related to stop work orders on the Department's web site.

Specifically, Intro. 252 amends the City's Administrative Code to require, upon the issuance or rescission of a stop work order, the immediate posting of the address at which the order or rescission was issued on the Department's web site, including the date of issuance or rescission. This information would be disaggregated by zip code, community board, and City Council district.

The Buildings Department ("Department") issues a stop work order when our inspectors find unsafe work or conditions on a site or building. Stop work orders are issued to protect the public and property. Full stop work orders stop all work on a construction site or building, excluding any remedial work necessary to make the site or building safe. Partial stop work orders stop a part of the work on the construction site or building, allowing other code-compliant work to

continue. Stop work orders are typically issued for work without a permit, work contrary to the approved plans, continuance of work after a permit has been revoked by a borough commissioner, and for unsafe construction affecting the public or property.

The Department takes a great deal of pride in the enormous amount of information we make available to the public. On our web site users have access to our Buildings Information System (“BIS”), which is a database that provides property profiles and information on construction applications, complaints, violations, and licensees. Currently, information on stop work orders can be accessed through BIS. Users can type in an address and receive a wealth of information on that location, including whether a stop work order has been issued, why it was issued, the date it was issued, and the date of rescission, if applicable.

Given that information on stop work orders is currently available to the public on our web site, we question the added value that would result in making it available in a variety of geographic subsets. Complying with Intro. 252 would also present several challenges for the Department. For the twelve month period ending November 30, 2014, the Department issued 6,509 stop work orders. During that same period of time we also issued 4,430 full rescissions of stop work orders and 195 partial rescissions. As drafted Intro. 252 would require the addresses for these more than 11,000 actions to be posted immediately on our web site and be grouped by zip code, community board and City Council district. Immediately posting this enormous volume of information would amount to a drain on the Department’s resources that can be better utilized elsewhere. In addition, the Department only disaggregates information in BIS by zip code and community district, not City Council district.

Thank you for your attention and the opportunity to testify before you today. Mr. Wehle and I welcome any questions you may have.

**Testimony of the Department of Housing Preservation and Development
Committee on Housing and Buildings
December 9, 2014**

Chairman Williams and members of the Committee, my name is Mario Ferrigno, and I am the Assistant Commissioner for Code Enforcement at the Department of Housing Preservation and Development (HPD). I appreciate the opportunity to testify about Intro 526, a bill requiring owners to provide notice to their tenants when building amenities are unavailable, and about Intro 346, regarding providing notice to the Council about multiple dwellings with numerous code violations.

Intro 526 adds a broad definition of building amenity to the Housing Maintenance Code. The bill would require owners of multiple dwellings to post a notice if any of the listed amenities or other building amenities will be unavailable for 24 hours or more. Emergencies would be exempted. The Department does not support this legislation.

First and foremost, the Housing Maintenance Code was created to ensure that multiple dwellings are maintained in safe and sanitary condition. We understand the interest in and value of notifying tenants when certain services will not be available, such as heat and hot water or electrical services, but we do not believe that access to recreational areas, activities or amenities broadly should be addressed in the Housing Maintenance Code nor should it be HPD's responsibility to enforce the notice requirements. Enforcement would distract from our core responsibilities and legal mandates to enforce correction of unsafe and unsanitary conditions.

Further, in order to enforce this legislation our inspectors would need to know what amenities are actually provided in any particular building, know if the amenity is a "shared" amenity, determine whether the amenity is in fact inoperable, and then somehow figure out whether such unavailability is occurring on an emergency basis or not. This should not be the responsibility of an HPD inspector.

Access to an amenity is a contractual matter between a tenant and landlord, not a matter of safety. Access to an amenity may be a regulatory matter, in some circumstances: if a rent-regulated tenant's lease states that he or she will have, for example, access to a courtyard that is always locked, the tenant may have recourse to file for a rent reduction with HCR due to a diminution of services. But again, that is not a matter of whether the building is maintained in safe and sanitary condition.

We also note that different amenities have varying levels of importance in the day-to-day life of tenants. For example, not having access to parking or to a laundry room may be a true inconvenience for a resident. An inoperable treadmill or vending machine, on the other hand, often does not have a quality of life impact. Also, these types of amenities are generally provided as a convenience, may require the payment of a fee (parking and swimming pool access is often paid for) and do not relate to the maintenance or habitability of a particular unit or the multiple dwelling. In essence, this bill seeks to enforce notification about the temporary loss of amenities that most people would not

consider essential to the safety or condition of the building. We previously testified in October that with revisions, we could support Intro 222, which would require notice when certain services are such as water, electricity, gas, heat and hot water are interrupted. These are the types of services that the loss of, even temporarily, significantly affects the quality of life at the building. The proposed expansion of the notice requirements will divert HPD's inspectors from addressing problems with those essential services.

Intro 346 requires HPD to notify the Council and the relevant Councilmember of any multiple dwelling that has 50 or more open violations under the Housing Maintenance Code as well as other laws. However, this information and an abundance of other relevant information about these properties is already available to the Council and the general public in a variety of forms. First, HPD posts on its website comprehensive information about violations of the Housing Maintenance Code in individual buildings, including information about the property owner, complaints received by the agency, emergency repairs, and litigation brought by HPD or by tenants. This information is also published monthly on HPD's website in formats which can be used for creating reports or analyzing data in a flexible way.

Second, under Local Law 11 of 2012, all New York City agencies must make data available ("Open Data") in summary formats by 2018. HPD was one of the first agencies to respond to this requirement. Local Law 11 made the operations of city government more transparent, effective and accountable to the public. HPD continues to respond to requests and suggestions to make Open Data easier to access, easier to work with and easier to understand for the public. Further, because of Open Data, the Council has data available not only from HPD, but also from numerous other city agencies whose work affects multiple dwellings in their district.

Using city data to help identify those buildings that may require intervention, support or outreach is an important task and HPD applauds the Council's interest in obtaining this information. However, we do not support this specific introduction. As compared to the static reporting that would be created by this Introduction (which would have to be amended as needs change), the information provided through Open Data gives the Council much more flexibility to tailor analysis of the data to specific problems and questions, which likely will change over time. Unlike the reports this Introduction would require, Open Data also allows users to combine information. For example, the Department of Buildings has 26 available data sets, the Department of Finance has 96 available data sets and the Department of City Planning has 85 available data sets, which can be used in addition to HPD specific data to get a broader picture of the conditions – financial and physical – of buildings in a Council District.

In addition to our concerns about the need for the bill, Intro 346 is also vague and would be burdensome to comply with. The legislation does not indicate any timeframes for this reporting, or the form that the notification should take. By triggering reporting at 50 violations it does not take into account whether those violations are non-hazardous "A" violations or immediately hazardous "C" violations. The legislation also does not consider

the size of the building and number of violations per dwelling unit. Building violation totals change from day to day, as new violations are issued and as owners certify correction of conditions or request violation dismissals, making such reporting stale.

Thank you for the opportunity to testify. I'm happy to take any questions.

THE SENATE
STATE OF NEW YORK



TONY AVELLA
SENATOR, 11TH DISTRICT

ALBANY OFFICE: ☐
ROOM 902, LOB
ALBANY, NEW YORK 12247
(518) 455-2210 OFFICE
(518) 426-6736 FAX

DISTRICT OFFICE: ☐
38-50 BELL BOULEVARD
SUITE C
BAYSIDE, NEW YORK 11361
(718) 357-3094 OFFICE
(718) 357-3491 FAX

INTERNET ADDRESS:
AVELLA@NYSenate.GOV

CHAIR
SOCIAL SERVICES
VICE-CHAIR
ENVIRONMENTAL CONSERVATION
COMMITTEES
BANKS
CODES
EDUCATION
HOUSING
INSURANCE
JUDICIARY
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NYC EDUCATION SUBCOMMITTEE

Statement
New York State Senator Tony Avella

New York City Council
Housing & Buildings Committee

Int. 252/2014

December 9, 2014

I would like to thank Council Member Dromm for introducing this legislation and Chair Williams for allowing me to testify before you today.

As a City Council Member in 2006, I introduced similar legislation that called upon the Department of Buildings to make information about stop-work orders more readily accessible to the public. The framework of that legislation is included in Council Member Dromm's Int.252 which simply requires the Department of Buildings to provide a list of addresses, disaggregated by zip code and then disaggregated by community and council district where a stop-work has been issued and the date when such order was issued.

The problem that existed in 2006 still exists today. Concerned residents must still navigate the labyrinth of the Department of Buildings website in order to determine if a stop-work order has been issued in order to alert the department to illegal work if it's occurring. The current system of organizing website information based solely on address, block/lot and community board creates unnecessary delays in getting this information and requires one to search through hundreds of address listings at a time.

The lack of timely notification of stop-work orders leads to an inability to properly enforce them and allows illegal work to go on unfettered for days at a time. As I stated in the October 2006 committee hearing, "it's the lack of timely notification that not only leads to confusion but may lead to the developer getting away with something for a couple of days" possibly endangering workers or others in the immediate area of construction or allowing a potentially dangerous construction project to get closer to completion.

On October 30, 2006 the Housing and Buildings Committee held a hearing to consider several stop-work order related initiatives including my bill, Int. 43/2006, which included the provisions for required website information. During this hearing, Stephen Kramer, Senior Counsel to the Buildings Commissioner, testified that "the function [to disaggregate information was] not available" even though

the Department of Buildings did “think that’s a good idea to do that”. Mr. Kremer also testified that “with some money ... and time, we think that [zip codes] could be built in and might be a useful function”.

I recently searched the Department of Buildings website to see what changes have been made since this hearing in 2006 and unfortunately it does not appear to be much. There is a link to “Building on My Block” which still only allows you to search by Community Board and still fails to provide a direct search for stop-work orders. Instead I was forced to search through page after page of separate listings for new buildings, major alterations and enlargements, minor enlargements and full demolitions through multiple Community Board districts since I, like many residents, am not sure where the exact Community Board lines fall within a certain neighborhood.

I suggest that after 8 years, there should certainly have been enough time and enough money to make this simple programming change to the BIS system which will have a direct impact on the city’s ability to stop illegal construction from occurring.

**Testimony before the Committee on Housing and Buildings
of the New York City Council**

**By Ryan J. S. Baxter, Senior Policy Analyst
Real Estate Board of New York
December 9, 2014**

Good afternoon Chairperson Williams and members of the Committee on Housing and Buildings. My name is Ryan Baxter and I am a Senior Policy Analyst for the Real Estate Board of New York. The Real Estate Board of New York, representing over 16,000 owners, developers, managers, and brokers of real property in New York City, thanks you for the opportunity to testify regarding the proposed changes to the Administrative Code. We also appreciate that the New York City Council has been proactive in seeking our comments and in collaborating with building owners.

We have been actively engaged in discussions with our membership to help ensure the proposed regulations efficiently and effectively meet the goals these bills try to accomplish. While we support the intent of the proposals, we have a few concerns with two of the three on today's agenda.

Int. No. 0252-2014 – Online publication of information relating to stop work orders issued by the DOB

- We are concerned about unnecessary delays in the rescission of stop work orders if the Department need post the information on the appropriate website prior to issuing the rescission.
- We ask that the bill be revised in order to clarify whether or not the validity of rescissions of the stop work orders are dependent on the proposed posting requirement.

Int. No. 0526-2014 – Requiring multiple dwelling owners to provide notice to their tenants prior to temporarily or permanently making building amenities unavailable

- We appreciate the need for consistent and reliable communication between landlords and tenants regarding service outages, however, we suggest that an "emergency basis" be defined by the reasonable judgment of the landlord. At the very least, the bill and department rules need to explicitly exclude all work conducted on an urgent preemptive basis to investigate possible emergencies.
- Finally, all penalties and violations associated with proposal should be clearly stated within the bill to avoid unnecessary confusion.

We believe that effective legislation can be crafted to achieve the Council's goals while addressing the operational concerns listed above, and we look forward to working to that end with the Council. Thank you again for the opportunity to comment.



MEMORANDUM IN OPPOSITION INTRO. 346

The Rent Stabilization Association of New York represents over 25,000 owners and managers of buildings in New York that collectively contain over 1 million units of housing. RSA is opposed to Intro. 346 because it is not necessary.

Intro. 346 would require the Department of Housing Preservation and Development (HPD), to give notice to council members of any building that has 50 or more violations from multiple data bases. It's not clear how HPD would compile such a list across multiple data bases managed by different agencies. Nonetheless, the information is already there for any council member to access for any given building. Additionally, even if the bill was limited to HPD violations such a report could be highly misleading without looking at the specific violations. Class A violations are usually for de-minimus conditions such as a color mismatched tile in a bathroom. More significantly, there are tens of thousands of violations written each year that are tenant caused and the tenants responsibility to remediate such as missing batteries in smoke detectors and double cylinder locks. Also adding to the potential misrepresentation of a buildings condition is the fact that many violations are corrected by owners but not certified as such within the timeframe allocated.

All the above items have the potential for painting a very misleading picture of a building's condition with no real purpose. If any elected official has a concern about a particular building a thorough review of the available data is the best first step in determining a buildings true condition, not a misleading report.

For the above reasons RSA is opposed to Intro. 346.



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

**TESTIMONY OF JONATHAN FURLONG, BEFORE
THE NEW YORK CITY COUNCIL COMMITTEE ON HOUSING AND BUILDINGS**

December 9th, 2014

Good afternoon--Thank you Chairman Williams and to the members of the Committee on Housing and Buildings for the opportunity to testify today.

My name is Jonathan Furlong and I am the Senior Tenant Organizer for the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of New York City neighborhood-based housing and economic development groups, CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have nearly 100 members throughout the five boroughs who have developed over 100,000 units of affordable housing in the past 25 years alone and directly operate over 30,000 units.

ANHD would like to comment on two bills that have been introduced in the council. The first, **Intro 526** by chairman Williams that would require multiple-dwelling owners to provide notice to their tenants prior to temporarily or permanently making building amenities unavailable. The second, **Intro 346** by council member Rodriguez would require HPD to report any multiple dwelling with 50 or more open violations. These are common sense approaches to making building conditions more transparent and ANHD would like to express its support for both.

Despite our belief that people have a right to decent, safe, affordable housing, that ideal is often far from the reality on the ground. Hundreds of thousands of tenants across the five boroughs live in substandard conditions, and far too often have to face a reduction or cessation of building-wide amenities with little or no notice. While we understand that opponents of this bill feel it might be a waste of the councils' time, its passage has very real significance for tenants. From 2012 to 2014 as a tenant organizer for one of ANHD's member groups, the Pratt Area Community Council, I worked with a Tenants Association in a Project-based Section 8 building in Brooklyn, at 1002 Clarkson Ave. There were a number of instances when the landlord took the elevator out of service with little or no notice to the tenants, leaving the many elderly tenants who could not get up and down the stairs stranded in their homes. To compound this problem the intercoms were also taken off line leaving those same people without means to not only get downstairs, but communicate with anyone coming to the building. Passage of the proposed legislation would give tenants in a situation like that adequate time to make the appropriate arrangements for delivery of food, medicine and access to other services.



ASSOCIATION FOR
NEIGHBORHOOD
& HOUSING
DEVELOPMENT, INC.

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

In other buildings I organized in with active and engaged tenants associations, management would routinely make the community room unavailable or say that there was 'necessary repair work' that needed to be done with little or no notice. Regular tenant meetings and other events had to be rescheduled or cancelled entirely at the last minute because of the lack of notice. Had the tenants had adequate time to prepare for these changes, meetings and other events could have continued. In light of these examples, and many others like them ANHD fully supports the passage of **Intro 526**

ANHD would also like to voice its support for **Intro 346**. We have always been steadfast in assisting our member groups in locally-based building campaigns focused on improving conditions for tenants, and we see the council as having an integral role in that work. Having a more comprehensive knowledge of which buildings in a particular district have the most physical distress allows for more collaboration between community groups and local elected officials. While ANHD is fully supportive of the council being made aware of buildings that are physically distressed, we are also cognizant of the many responsibilities HPD has and the different aspects of housing preservation it is tasked with reporting on. With this in mind, we would like to recommend that the agency report to council when a building has more than five violations *per unit*, as a way of focusing on particularly distressed properties that need immediate help. While fifty violations might be a significant number for a 6-unit building, it is a lot less so for a 60-unit building, for example. In order to best utilize HPD's resources and time, as well as that of the council members we recommend calculating distressed properties in terms of a ratio, rather than a number.

In sum, ANHD is pleased that the council is addressing these issues around transparency with regard to building amenities and violation counts and support the passage of both.

TESTIMONY

ON

**INT. NO. 0252 LOCAL LAW TO AMEND THE ADMINISTRATIVE CODE
IN RELATION TO ONLINE PUBLICATION OF INFORMATION ON
STOP WORK ORDERS ISSUED BY THE DEPARTMENT OF BUILDINGS**

**INT. NO. 0346 LOCAL LAW TO AMEND THE ADMINISTRATIVE CODE
IN RELATION TO REPORTING MULTIPLE DWELLINGS WITH
NUMEROUS CODE VIOLATIONS**

**INT. NO. 0526 A LOCAL LAW TO AMEND THE ADMINISTRATIVE
CODE IN RELATION TO REQUIRING MULTIPLE DWELLING
OWNERS TO PROVIDE NOTICE TO TENANTS PRIOR TO MAKING
BUILDING AMENITIES UNAVAILABLE**

PRESENTED BEFORE:

THE NEW YORK CITY COUNCIL
COMMITTEE ON HOUSING AND BUILDINGS

CHAIR JUMAANE D. WILLIAMS

PRESENTED BY:

Kelly Glenn

HOUSING & DEVELOPMENT COORDINATOR
URBAN JUSTICE CENTER
COMMUNITY DEVELOPMENT PROJECT

URBAN
JUSTICE
CENTER



COMMUNITY DEVELOPMENT PROJECT

December 9, 2014

Good afternoon and thank you for the opportunity to testify today. My name is Kelly Glenn and I am the Housing and Development Coordinator at the Community Development Project of the Urban Justice Center.

The Urban Justice Center is a project-based umbrella legal services and advocacy organization serving New York City residents. Over the past 25 years, the Urban Justice Center has provided direct legal assistance, systemic advocacy and community education to low and moderate income rent regulated tenants in New York City. The Community Development Project (CDP) of the Urban Justice Center formed in September 2001 to provide legal, technical, research and policy assistance to grassroots community groups engaged in a wide range of community development efforts throughout New York City. Our work is informed by the belief that real and lasting change in low-income, urban neighborhoods is often rooted in the empowerment of grassroots, community institutions.

I am here to support proposed legislation 0252, 0346 and 0526. First, let me begin with my support for 0252, and 0346. The Department of Buildings (“DOB”) is responsible for ensuring the safe and lawful use of over 975,000 buildings in New York City ranging from skyscrapers such as One World Trade Center to small, privately owned multi-family dwellings. Despite its best efforts, the DOB cannot independently and effectively monitor and enforce every construction project in the City. Understanding that the DOB has a significant responsibility and limited resources, we do not want to place an undue burden on an already strained agency.

Neither of these bills creates such a burden. These bills do not require the DOB to collect additional information. The information to support both of these bills is currently available; it is just not easily accessible by the public. Bill 0252 may even reduce the burden on the DOB by: (i) reducing individual requests for information about buildings subject to stop work orders; (ii) making stop work order information easily accessible, community groups and local leaders can help monitor and raise awareness of stop work order violations in their communities; and (iii) acting as a deterrent to contractors that would be risking arrest and seizure of equipment for violating the order. Bill 0346 only requires the DOB to notify the relevant Council Member when a building in her district has a significant amount of open violations. Again, this information is already tracked by the DOB and is not unduly burdensome for the DOB to notify the Council Member. This particular piece of legislation will not add a burden to the DOB and it will help Council Members effectively represent their constituents by being apprised of some of the most significant and pervasive issues in their districts.

Lastly, I would like to voice my support for proposed legislation 0526. This particular piece of legislation seems like a common sense bill. It does not mandate that there cannot be a disruption to the amenities offered, but simply asks the landlord to provide residents with a notice that the amenities will be disrupted. This legislation will help protect some of the most vulnerable resident’s in the City, and help prevent tenant harassment in low income and rent regulated apartments. It is well known that low income residents of New York City suffer

harassment by their landlords in an effort to push them out of rent regulated apartments. By forcing out the rent regulated tenants, the landlord is able to lease the unit at "market-rate," which is usually significantly higher than the regulated rate. One tactic is to scrupulously restrict, deny or prevent access to the building's common amenities. Notice allows the residents to make alternative arrangements and prepare for the disruption. But more importantly, the notice gives tenants an opportunity to document the disruption of services and amenities. By documenting the disruption of services, the residents will be afforded the opportunity to combat harassing behavior in a manner more substantial than their word against that of a "more powerful" landlord.

In summary none of these bills add unnecessary burdens to the DOB, but rather, empower the residents of New York City to combat construction violations and tenant harassment in residential buildings. As such I fully support the passage of the legislation.

Once again, thank you for the opportunity to testify.



NYSFAH Comments on Int. 252 and 526
Prepared for the New York City Council Committee on Housing and Buildings
December 9th, 2014

On behalf of the New York State Association for Affordable Housing (NYSFAH), we would like to thank Chair Williams and the members of the Committee on Housing and Buildings for the opportunity to submit comments on Int. 252 and 526.

NYSFAH is the trade association for New York's affordable housing industry statewide. Our 300 members include for-profit and nonprofit developers, lenders, investors, attorneys, architects and others active in the financing, construction, and operation of affordable housing. Together, NYSFAH's members are responsible for most of the housing built in New York State with federal, state or local subsidies.

NYSFAH commends the Council's efforts to ensure the safety and wellbeing of housing for New York City residents. However, NYSFAH is concerned about the unintended consequences that Int. 252 and 526 could have on the ability of affordable housing owners develop and to maintain their buildings.

Int. 252: Requiring online publication of information relating to stop work orders issued by the department of buildings.

NYSFAH recognizes the intent of the legislation, but is concerned with the following language in Section 28-207.2.7:

No rescission of a stop work order shall be valid unless it is made in writing, and immediately upon the issuance or rescission of a notice or order to stop work, the department shall post the information regarding such notice or order on the appropriate website as required in this section.

The rescission of a stop work order is already made in writing through an OP-109 form (Stop Work Order Rescind), which is posted at construction site. The intent of the requirement for the rescission of the stop work order to be made in writing is unclear given the current process. In addition, sentence wording is unclear in regards to the relationship of the rescission of the stop work order to the requirement for posting. NYSFAH requests that the legislation clarify that the validity of the rescission of the stop work order and the ability of the contractor to resume construction is not contingent upon the department's requirements to post such notice. Requiring processing and posting of the rescission prior to its validity would prolong the time it takes to clear a stop work order, unnecessarily delaying affordable housing construction jobs, driving up the cost of producing the units – meaning less affordable housing overall – and delaying the date these units become available to the public.

Int. 526: Requiring multiple dwelling owners to provide notice to their tenants prior to temporarily or permanently making building amenities unavailable.

NYSFAFH recognizes the intent of Int. 526 legislation to enhance communication between owners and residents, and ensure that residents have adequate time to prepare for disruptions to access to amenities. Though owners strive to provide as much notice to their residents as possible, the two week timeframe required in the legislation is not feasible in many cases and will likely make it significantly more difficult for owners to maintain their buildings. While the legislation provides an exemption for building amenities made unavailable on an emergency basis, it does not provide a definition of “emergency,” rather leaving the definition to the rule-making process. Owners must be allowed to use reasonable discretion to when determining what constitutes an emergency, recognizing the need for work that is conducted on an urgent basis to investigate and prevent potential emergencies in order to properly maintain their buildings. In addition, this legislation conflates critical services – such as access to entrances and elevators – with recreational amenities such as foosball tables and tennis courts.

We thank you again for the opportunity to submit comments and for your consideration of NYSFAFH’s concerns.

Contact: Alexandra Hanson, Policy Director alexandra@nysafah.org (646) 473-1209

**TESTIMONY OF THE QUEENS & BRONX BUILDING ASSOCIATION
BEFORE THE COMMITTEE ON HOUSING & BUILDINGS
DECEMBER 9, 2014**

Good Morning. My name is Robert Altman and I am the legislative consultant to the Queens & Bronx Building Association. We are testifying today in opposition to Intro. No. 526.

Our opposition to Intro. No. 526 is philosophical. We understand the importance of the City Council considering legislation and regulations regarding the core functions of the infrastructure that is within the City. Keeping housing structures safe, clean and livable are basic functions and appropriate for legislative action.

However, amenities are additional items provided in a housing situation that are most often not required. Regulating notices for items such as foosball tables, swimming pools and the like starts a precedent that has the potential to have no end and take away City and private sector resources from the core functions each should be providing. In starting down this road, the Council establishes a predicate for regulating the actual amenities themselves. Over-regulation will simply lead to the question for a developer, cooperative, condominium association, building owner and the like, of whether the amenity should be provided in the first place, since the amenity is often optional (with the rare exception, in the case of an elevator). Since amenities are not core functions and can be accessed by residents off-site, regulating these items in a building will have the ultimate impact of discouraging their inclusion, except in luxury situations. Moreover, regulation on these items will simply discourage buildings, currently thinking of including such items, from adding them.

We believe Intro. 526 is unnecessary in meeting the basic housing needs of this City and urge that it not be passed, lest it set an improper precedent.

**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: _____

Name: Andrew Hoffman (PLEASE PRINT)

Address: 4 Egg St NYC 10128

I represent: Chip

Address: 5 Honour St.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 346/526 Res. No. _____

in favor in opposition

Date: _____

Name: Jordan Press (PLEASE PRINT)

Address: 100 Gold Street

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 346/526 Res. No. _____

in favor in opposition

Date: _____

Name: Mario Ferrigno (PLEASE PRINT)

Address: 100 Gold

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 252, 346, 526 Res. No. _____

in favor in opposition

Date: 12/9/14

(PLEASE PRINT)

Name: Kelly Glenn
Address: ~~123 William St 16th floor (2nd)~~ 236 W 135th St

I represent: Urban Justice Center
Address: 123 William St, 16th floor

**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: JON FURLONG
Address: 50 Broad St., NY NY 10004
I represent: Association for Neighborhood + Housing Development
Address: Same as above

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 252 & 526 Res. No. _____

in favor in opposition

Date: 12/9/14

(PLEASE PRINT)

Name: Ryan Baxter
Address: 570 Lexington Avenue, 2nd Fl
I represent: REBNY
Address: Above

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

252

I intend to appear and speak on Int. No. 252 Res. No. 12/9/14

in favor in opposition

Patrick Wehle ^{Date} 12/9/14
(PLEASE PRINT)

Name: Michael Alacha

Address: DOB

I represent: DOB

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 252 Res. No. _____

in favor in opposition

Date: 12/9/14

(PLEASE PRINT)

Name: Patrick Wehle/Alacha

Address: Michael

I represent: DOB

Address: DOB

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 252 Res. No. _____

in favor in opposition

Date: 12/9/2014

(PLEASE PRINT)

Name: REBECCA A. SHEEHAN

Address: 38-50 Bell Blvd. Suite C

I represent: Senator Avella

Address: O/A/A

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