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Noah D. Genel
Commissioner and Chair

**Testimony of Commissioner and Chair Noah D. Genel of
the New York City Business Integrity Commission before the
Committee on Sanitation and Solid Waste Management of the
New York City Council Regarding Implementation of Local Law 145 of 2013**

April 30, 2019

Good morning, Chair Reynoso and the other members of the City Council's Committee on Sanitation and Solid Waste Management. My name is Noah Genel, and I am the Commissioner and Chair of the Business Integrity Commission. With me at the table today is Alyssa Preston, Deputy Director of Air and Noise Policies and Regulations at the New York City Department of Environmental Protection. Thank you for inviting us to testify at today's hearing regarding Local Law 145 of 2013 – the vehicle emissions law for the trade-waste industry. I would like to welcome Council Members Chin and Constantinides, who are new to the Committee. We would be more than happy to set up a briefing with each of you to give you background on BIC over and above what I provide in my testimony today. I will begin with some background on Local Law 145, and then tell you how we are preparing for the law to go into effect next year.

Background

A study from 2013, commissioned by BIC and the Environmental Defense Fund, found that heavy-duty trade-waste trucks spew a number of different harmful substances into the air that greatly reduce the City's air quality, cause illnesses and contribute to climate change. Local

Law 145 of 2013 was passed in an attempt to combat these issues, setting new standards on those trade-waste trucks and, as a result, helping to clean the air we all breathe.

The Business Integrity Commission (originally, the Trade Waste Commission) was created by local law in 1996 to rid the trade-waste-hauling industry of the grip of organized crime and various forms of corruption. Trade waste is essentially commercial garbage or waste. Soon after BIC was created, it was also given jurisdiction over New York City's public wholesale markets. For the past 23 years, BIC has fought with significant success against organized crime and other criminality in the industries it regulates. And over the last several years, BIC has prioritized taking action to improve safety in the trade-waste industry and how the trade-waste haulers conduct themselves on the City's streets. But, we also have been focusing on another important issue, which has received less public attention: preparing for January 1, 2020, when Local Law 145 of 2013 goes into effect and all heavy-duty trade-waste trucks will have to comply or be retired, unless the company has received one of the few financial hardship waivers that BIC has issued.

Local Law 145 requires that, by January 1, 2020, all trade-waste trucks that use diesel fuel and have a gross weight of more than 16,000 pounds must have an engine that meets federal EPA emissions standards for the year 2007 or later or utilizes "best available retrofit technology," as that standard is set by the New York City Department of Environmental Protection. Among other vehicles, the law covers all diesel-fueled packer trucks that carry traditional garbage, as well as construction and demolition debris.

This law was passed in late 2013. Its requirements are not something new; the law has been on the books for more than five years – though it has not yet gone into effect. All trade-waste companies should be prepared for this effective date. I will repeat when it is: January 1,

2020. That is a firm deadline. Compliance requires planning. This is not a change that can be made over night – particularly for companies with multiple trucks. Buying additional trucks – new or used – or retrofitting older trucks takes time and costs money. But that is what is required to work in this industry.

When BIC was created, the City made a decision that the trade-waste industry needed regulation. It needed help to operate within the law. The trade-waste industry provides an essential service to New York City. We all rely on businesses' waste to be collected and removed. But, companies that operate in the industry must recognize that there are more rules and regulations that they must comply with than in some other industries. We are at a time when conditions in our environment have become extremely important – when we all need to do what we can to support our environment. Proper implementation of Local Law 145 will help the City achieve its sustainability goals. This law requires trade-waste companies to do their part in reducing air pollution. It is estimated that achievement of full compliance with the law by 2020 would result in a reduction of particulate matter released into the air equivalent to taking 27,000 delivery trucks or 1,300 intercity coach buses off the road every year from 2020 to 2030.

And this law will complement the City's transition toward Commercial Waste Zones, in which the City will be divided into zones and carting companies will have to bid for a contract giving them the right to operate in particular zones. This new system, once enacted, will also improve our environment by reducing the total number of miles traveled by these large trucks.

Steps BIC has taken to date

I would now like to give you an update as to what we have done, where we are, and what we will be doing through the rest of this year to prepare for Local Law 145 to go into effect. First, we have taken numerous steps to ensure that the industry is aware of its obligations under

Local Law 145 and the timing of those requirements. Our action on this front began more than two years ago – in March 2017 – when the Commission issued a directive requiring all licensees and registrants to submit a spreadsheet of fleet data, so that the Commission could begin to track compliance with the local law. In April 2018, the Commission debuted its online vehicle management portal, which allows licensees and registrants to sign in to a website in which they can input all of the relevant data regarding their vehicles. Such data includes information that allows BIC to determine whether each vehicle is subject to Local Law 145's requirements. Along with the opening of the portal, BIC published a user's guide for the portal.

On April 2, 2018, the Commission issued a directive requiring all licensees and registrants to submit their information into the vehicle management portal by May 4, 2018. The Commission subsequently sent three reminders to the industry regarding the deadline. In July 2018, BIC began issuing administrative violations to licensees who had not complied with the directive requiring them to enter their vehicle information into the portal. To date, BIC has issued 162 violations for failure to provide vehicle data in the portal.

On June 13, 2018, the New York City Department of Environmental Protection held a hearing pursuant to the Citywide Administrative Procedure Act, or CAPA, regarding rules to establish requirements regarding retrofitting 2006 or older engines to make them Local Law 145-compliant. On June 20th, BIC held a CAPA hearing regarding financial hardship waivers. After considering the comments we received through the CAPA process, BIC created an electronic financial waiver application, which went live on November 1, 2018. BIC promulgated rules relating to the waivers, which became effective on November 16, 2018. All waiver applications for existing licensees, registrants, and applicants for a license or registration were due by January 1, 2019. BIC sent three reminders about the deadline to the industry. Ultimately, we received 83

financial waiver applications. Of those, we granted 25 waivers. We may receive a limited number of additional hardship applications – from companies applying for a license or registration for the first time after January 1, 2019. We will review those applications once they are submitted.

Industry compliance with Local Law 145

That is a summary of the actions we have taken to promote compliance with Local Law 145. Now, I will give you a sense of where the industry is in terms of compliance. In the trade-waste industry, BIC regulates approximately 2,000 companies, including roughly 300 licensees, 570 class 1 registrants and 1,100 class 2 registrants. Class 1 registrants haul waste that they generate during the course of their own business. Class 2 registrants haul construction and demolition debris exclusively. (BIC also has a relatively small number of registrants who are trade-waste brokers.) Of BIC's licensees, approximately 90 of them haul putrescible waste, more commonly referred to as traditional garbage.

Of the companies in the trade-waste industry, there are approximately 6,100 trucks that are subject to Local Law 145's requirements. That number may actually be smaller, but because there are several companies in the industry that have not yet complied with the directive to provide all of their fleet information to the Commission, we are assuming that all of those vehicles for which we do not have information are subject to the law. The approximate number of trucks subject to Local Law 145 breaks down as follows: 1,900 for licensees; 400 for class 1 registrants; and 3,800 for class 2 registrants. As of April 29, 2019, by our records, approximately only 62% of those trucks are in compliance with Local Law 145.

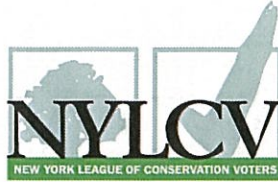
Looking ahead to January 2020

Clearly, the industry as a whole has a lot of work to do to reach full compliance by January 1, 2020. For the remainder of 2019, BIC will continue its public education and outreach campaign to educate the trade-waste industry about Local Law 145 and its imminent compliance deadline. To this end, we are working closely with DEP to organize a resource fair to connect trade-waste companies with the various vendors that provide retrofits. The fair will be held on June 19, 2019, in Jamaica, Queens. We invite everyone to attend and will record the event for those who are unable to join us. We will also be distributing fact sheets regarding Local Law 145 at trade-waste transfer stations, sending regular reminders to the industry about the deadline for compliance and continuing to push for full information from the carters regarding their fleets and compliance with the law.

Thus, the next eight months will be a period of continued education – making sure that everyone in the industry is aware of their obligations and how to fulfill them. Once January 1, 2020 arrives, BIC's mission will change: the industry will have had more than six years to prepare for the effective date for Local Law 145. In the new year, the focus will be on enforcement. The message to the industry is this: if you have a noncompliant truck, keep it off the streets. If you use it, you are jeopardizing your entire business. We can issue administrative violations for that conduct: \$10,000 for a non-compliant truck. There will be an opportunity to correct the issue within 60 days and avoid the penalty. But if not corrected, we can assess continuing penalties in addition to the \$10,000 of \$500 per day. Failure to comply can also jeopardize your trade-waste license or registration.

Conclusion

I offer this review of BIC's remedies so that everyone is on the same page, and so that no one can say that they were not aware of how seriously noncompliance with Local Law 145 will be treated. My hope is that we will not have to take such serious action, because companies will comply with the law. Compliance is good for the individual businesses; it is good for the industry as a whole; and it is good for the people of the City of New York. I look forward to working on this issue with Chair Reynoso and the other members of the City Council's Committee on Sanitation and Solid Waste. Now, we are glad to answer any questions you have.



Statement of Adriana Espinoza
Director, New York City Program
New York League of Conservation Voters
New York City Council Committee on Sanitation and Solid Waste
April 30th, 2019

According to research conducted by NYLPI, few states allow for waivers to emissions regulations, and when states do enact hardship waivers, they do so either (a) through a non-renewable exemption lasting a single emissions-inspection cycle or (b) through a single exemption that lasts the life of the vehicle (with rigorous standards associated).

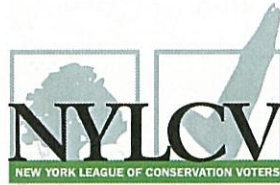
One potential boon to LL 145 is the proposed move to commercial waste zones. According to DSNY's plan, haulers will have to be in compliance with LL 145 to compete for a zone. NYLCV believes commercial waste zones can substantially improve the waste industry, and would certainly help to improve compliance with LL 145, but we believe the waste zone plan should push beyond this low bar and incentivize carters to green their fleet well beyond 2007 standards.

While compliance with existing law should of course be a prerequisite to apply, NYLCV urges DSNY to give extra points/credits for haulers who commit to going further with alternative fuel technologies such as electric, CNG, and renewable biogas.

Unfortunately, commercial waste zones don't apply to haulers of construction and demolition waste. Since these carters don't have the added incentive of commercial waste zones, more focus is needed to ensure C&D carters comply with LL 145. This is especially critical given that C&D makes up a larger portion of the city's waste and it's much heavier, leading to more trucks and more emissions.

If implemented as originally planned in 2013, the resultant reduction in emissions from LL 145 would be the equivalent to removing approximately 341,829 cars from city roads every year. We must do all we can to ensure these reductions are achieved. The waste industry's compliance with LL 145 just seven months out from enforcement is abysmal. New York can and must do better. The industry has had years to plan ahead for this law to take effect and we need to take further steps to improve air quality, not simply provide waivers from obligations that have been on the books for years.

I'd like to thank Chair Reynoso for his leadership, and for shining a light on this important issue. We look forward to working with the Sanitation Committee, BIC, and the Department of Sanitation to realize a fair and sustainable waste system in New York City.



Statement of Adriana Espinoza
Director, New York City Program
New York League of Conservation Voters
New York City Council Committee on Sanitation and Solid Waste
April 30th, 2019

Good morning. My name is Adriana Espinoza, and I am the Director of the New York City Program at the New York League of Conservation Voters (NYLCV). NYLCV represents over 31,000 members in New York City and we are committed to advancing a sustainability agenda that will make our people, our neighborhoods, and our economy healthier and more resilient. I'd like to thank Chair Reynoso and the entire Committee on Sanitation and Solid Waste for holding this important oversight hearing over Local Law 145 of 2013 (LL 145).

Local Law 145 was passed in 2013 as part of Mayor Bloomberg's clean air initiative. The law requires heavy duty waste hauling vehicles to be equipped with either an EPA certified 2007 or newer engine or utilize "best available retrofit technology," as defined by the NYC Department of Environmental Protection, by January 1, 2020. When NYLCV carried the bill on our 2013 City Council Environmental Scorecard, it was common sense environmental policy that was designed to allow for a sufficient planning to make compliance attainable within a carter's capital cycle. It was not something that should be overly challenging for businesses to meet. And it was meant to significantly improve air quality.

However, despite the temperate bar it set, as of 2017 only 35% of trucks were compliant with LL 145. Given the reality of the climate crisis we all face, we should be looking ahead to alternative fuels and finding ways to incentivize new zero emissions technologies. Instead, here we are 6 years later, struggling to comply with emissions standards that are at this point 12 years old.

Under LL 145, the Business Integrity Commission (BIC) is allowed to develop a "temporary waiver based on undue financial hardship". In reality, BIC's rules regarding the waiver are broad and allow haulers to defer compliance for two years with the ability to renew the waiver, seemingly multiple times, until 2025. Although the application criteria seem strict, the resultant waiver is far too lax. As a City aiming to lead with bold action on reducing emissions, we simply cannot promulgate a waiver wide enough to swallow a majority of the environmental benefits that were the impetus for the law in the first place.

Additionally, BIC has not made it clear how many waivers they will grant, who will receive them, and how many have applied. This lack of transparency leaves advocates without an ability to analyze potential loss of benefits, including impacts on expected emissions reductions and air quality improvements in environmental justice communities.



**New York City Council Oversight Hearing on Local Law 145
Committee on Sanitation and Solid Waste Management
April 30, 2019**

Thank you for the opportunity to provide testimony on this important issue. My name is Daisy Chung, and I am the Deputy Director at ALIGN: Alliance for a Greater New York. ALIGN is a longstanding alliance of community, labor and environmental justice organizations dedicated to creating good jobs, vibrant communities, and an accountable democracy for all New Yorkers.

When it comes to the commercial waste industry, we cannot overstate the need for immediate reforms. While Local Law 145 was an attempt to reduce pollution from dirty diesel waste trucks back in 2013, the requirement of satisfying 2007 EPA regulations--standards set well over a decade ago--will not be enough to meet the City's ambitious environmental and sustainability goals. In fact, implementation of the law may allow haulers to use less effective retrofit technologies for older trucks and does not require clean alternatives to diesel that could significantly reduce pollution and greenhouse gas emissions caused by waste trucks. The city must do more to address chronic problems and inequities in the private waste industry that plague communities, workers and the environment.

Old waste trucks are common on NYC streets, creating challenges to addressing climate change and meeting the city's 80x50 goals. With a commercial waste system that is highly polluting, inefficient, and inequitable, the impact of hundreds of companies deploying over 4,000 dirty trucks to collect waste along criss-crossing routes create serious threats to our environment and public health. A single block can be serviced by up to 26 different carters operating dirty trucks. The vast majority of waste is transported by heavy truck to and from waste transfer stations in a handful of low-income communities and communities of color in North Brooklyn, the South Bronx, and Southeast Queens, which suffer negative health impacts as a result. These communities suffer elevated asthma rates up to five times the city's average.

Workers in the commercial waste industry also bear outsized health risks associated with antiquated diesel engines, poorly designed infrastructure, and inefficient truck routes. Commercial waste workers inhale large quantities of diesel exhaust from old, dirty trucks, facing increased risks of lung cancer, nervous system impairment, stroke, chronic bronchitis, and asthma, among other ailments. This is on top of other poor working

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conditions that waste workers face at work every day - from exposure to hazardous waste to low safety standards that result in occupational injuries and sometimes fatalities.

In addition, the hardship waiver in Local Law 145 creates an unacceptable loophole that allow commercial waste haulers to dodge accountability and compliance. The industry already has a history of poor fleet management standards that put the public at risk. According to the US Department of Transportation's vehicle inspection data from 2014-2016, 96% of all safety violations of NYC's largest haulers involved vehicle maintenance problems.

The commercial waste industry does not have to operate in this way. New York City has the power and responsibility to transform this broken system with a comprehensive plan to reduce harmful emissions, lift working conditions, and protect communities. ALIGN and our partners of the Transform Don't Trash NYC coalition are calling for an exclusive zone system that will bring about the greatest reductions of miles traveled and decrease in emissions, and will result in meaningful vehicle upgrades by waste haulers eager to be awarded the rights to collect waste in a particular zone. The benefits of this new system do not end there. An exclusive zone system will mean that the city can require fair rates and transparency for small businesses, better working conditions and safety standards for workers, and healthier communities.

Our city can and must do more than Local Law 145 to transform our broken commercial waste system and ensure the industry's compliance to standards that protect workers and communities. City Council will soon have an opportunity to pass legislation that includes strong labor and environmental protections through an exclusive waste zone system. We cannot afford to withhold bold action.

Thank you for the opportunity to testify before you today.



**NYC City Council Committee on Sanitation and Solid Waste Management
Hearing on Local Law 145 of 2013**

250 Broadway

April 30, 2019

Testimony by Phil Vos, Program Director, Energy Vision

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Energy Vision is a New York City based environmental 501(c)(3) that since 2007 has been studying clean, alternative fuels for heavy-duty vehicles. We are grateful to the Chair and the Committee for this opportunity to submit testimony regarding Local Law 145.

The purpose of Local Law 145 of 2013 is to reduce pollutant emissions from trade waste vehicles. These emissions are an environmental and a public health issue, and New Yorkers—especially those living in neighborhoods that see heavy traffic from these vehicles—should expect a requirement that provides them the greatest possible protection.

The standard for LL145 is the EPA's 2007 requirements for heavy-duty vehicle emissions, or the "best available retrofit technology" to achieve those levels. In the context of protecting New York's environment and public health, this now-12-year old standard is a low bar to clear.

From the perspective of protecting the health of millions of New Yorkers, the standards for health damaging nitrogen oxides (NOx) and particulate matter (PM) are arguably most important. For NOx the 2007 standard is .2 grams per given unit of energy; for PM it is .01 grams.

Should this be the standard? In 2017, the California Air Resources Board (CARB), which 145 puts on equal footing with EPA as an adjudicator of emissions, certified heavy duty "Near Zero" natural gas engines in both 9 and 12 liters. The 9 liter model tested at between .13 and .01 grams of NOx—a reduction of between 35% and 95% against the standard—and at between .002 and .001 grams of particulate matter—a reduction of between 80% and 90%. The 12 liter tested at between .15 and .03 grams of NOx per unit energy—a reduction of between 25% and 85% relative to the 2007 standard and emissions of PM emissions came in between .003 and .001 grams per unit energy—a reduction of 70% to 90%. Diesel technologies that less dramatically exceed the standard are also on the market.

Energy Vision's decade and more of research into clean heavy duty vehicles indicates that to achieve maximum reductions in emissions of pollutants like NOx and particulate matter, and of greenhouse gases—and do it *right now*—compressed natural gas trucks represent the proven, cost effective and most road-ready option. CNG refuse trucks are firmly on the market, representing 60% of new orders in the US and successfully being used in L.A., Toronto, Phoenix, Milwaukee and other cities, as well as by major haulers like Republic Services and Waste Management.

Use of CNG immediately cuts GHG emissions by 20% or more relative to diesel. CNG trucks equipped with Near Zero engines achieve GHG reductions closer to 30%.

In addition, CNG vehicles can be fueled with *biomethane made from organic waste*, also called “renewable natural gas”. Biomethane is completely interchangeable with fossil natural gas and is available on the market now. Made from the biogas released by decomposing organic waste, biomethane’s lifecycle GHG emissions are 80% or more lower than diesel, and 50% or more lower than conventional natural gas. Because its production captures potent methane emissions from organic wastes, depending on what it’s made from it can be net-carbon-neutral or even net-carbon-*negative*, meaning that making the fuel prevents more GHG emissions than come from burning it. Carters could potentially produce this fuel from the very waste they haul, or the City could produce it at wastewater treatment plants—as will soon be happening at the Newton Creek wastewater treatment plant.

Engine technologies and fuels that improve significantly on the 2007 EPA emissions requirements are readily available. The City and the private waste industry have the opportunity to raise the bar on emissions requirements, to protect New York’s environment and public health. Local Law 145 should not be the end; the City should continue to move forward on reducing emissions from trade waste vehicles, and encourage the use by carters of cleaner CNG trucks—for instance, by incentivizing their use under the Commercial Waste Zone plan. The industry should look beyond diesel technology to the cleaner options on the market right now.

**Testimony of Melissa Iachan,
New York Lawyers for the Public Interest,
Before NYC Council Committee on Sanitation and Solid Waste Management
Oversight Hearing on Local Law 145
Dated April 30, 2019**

Good afternoon, my name is Melissa Iachan, and I am a Senior Staff Attorney in the Environmental Justice Program at New York Lawyers for the Public Interest. Today I am here together with my colleague Justin Wood, the Director of Strategic Research and Community Organizing at NYLPI, to stress the importance of Local Law 145 and admonish the industry for being far behind where they are required to be at according to this important City law. NYLPI has been advocating and litigating over the serious environmental justice repercussions from the way our City collects and processes our waste for more than two decades, and I have worked on waste regulation for more than five years. We thank Chair Reynoso and the Sanitation Committee for holding this important oversight hearing to shed light on the critical environmental justice issue of air pollution caused by ancient waste trucks who criss-cross low income communities and communities of color at more than twice the rate of other neighborhoods in New York City.

I. History of Local Law 145

Local Law 145 was passed by the City Council and signed into law by Mayor Bloomberg in 2013 as part of the Mayor's initiatives to greatly reduce air pollution in New York City. While by any account, this law was not as radical or revolutionary as many advocates had hoped, it at least represented the first step in pushing an industry far too content to continue to operate on the backs of low income communities and communities of color to raise their standards and start to clean up after themselves. As NYLPI stated in 2013, before Local Law 145 was passed, "By accelerating the rate at which waste and debris haulers convert to 2007-compliant trucks, [this law] would eliminate nearly 600 tons of particulate matter emissions in New York City by 2030. This would have tremendous public

health benefits as a rapidly growing body of research has linked particulate matter exposure with negative health effects. . .” (NYLPI Memo of Support of Intro 1160, 2013). Other environmental and environmental justice organizations added their voices to highlight that despite the law being modest in its goals and allowing an extended amount of time for compliance, it still represented meaningful hope of reduced air pollution, particularly in communities where transfer stations and truck depots are clustered.

The then-chair of the Committee on Environmental Protection who presided over the hearing in 2013 indicated that the final version of the legislation was the result of “very extensive negotiations” with members and representatives of the trade waste industry to ensure that the law would not drive anybody out of business, but would still eventually lead to a reduction in harmful air pollution.

II. EJ community air quality linked to commercial waste truck traffic

The reason advocates and community members supported Local Law 145’s passage so strongly is because they see the real life detrimental impacts of high levels of particulate matter on their children, their elderly, and other vulnerable community members. As we have discussed on numerous occasions, most private waste processing facilities in New York City are clustered in low income communities and communities of color, especially those in North Brooklyn, the South Bronx, and Southeast Queens. In fact, in 2018, 73% of all putrescible and construction and demolition waste was handled in just four community districts in these areas.

What we haven’t mentioned as much is that these neighborhoods--or those adjacent to them--also tend to be where the same waste companies house their truck depots or garages. This means that all of the diesel trucks utilized by New York City’s waste companies travel through the same communities at much higher rates than other communities. In fact, if you look at this heat map here, which indicates the headquarters of all companies who own and operate at least three trucks not in compliance with Local Law 145, you will see that a large majority of these out of compliance trucks come from North Brooklyn—the same area where approximately 40% of the City’s waste is dumped.

It is no surprise, then, that North Brooklyn suffer from higher rates of asthma-related hospital visits than the rest of the City.

III. Waivers as loophole

This law was pushed by Mayor Bloomberg to reduce our greenhouse gas emissions as a City, and welcomed by environmental and environmental justice advocates alike for the potential to improve air quality in low income communities and communities of color. Six years after its passage, compliance with its terms and enforcement set to begin in seven months is more critical than ever.

So is, however, the assurance that the loophole built into the law doesn't swallow all of the law's potential benefits. As we testified in the June, 2018 hearing on BIC's proposed rules regarding potential waivers for compliance with Local Law 145, the bar should be set high for any waivers, because the law sets the environmental bar so low for haulers. Since this law passed, the private waste industry has already had a full five and a half years to bring their trucks up to the minimal 2007 EPA standards-- and by the 2020 deadline for compliance, the waste industry will have had a full seven years to meet this minimal standard.

We continue to believe that any waivers for genuine financial hardship should be non-renewable, and yet BIC's final rule allows the waivers to renew until at least 2025—twelve years after the law passed, and six years after it went into effect. NYLPI reviewed diesel emissions regulation waivers from 14 different states and cities, and none of them grant renewable waivers for heavy diesel vehicles, much less five year renewable permanent waivers for financial hardship.

IV. Conclusion

You will hear more today about how the imminent reforms we're looking forward to with the coming Commercial Waste Zone plans will do a lot to reduce pollution caused by private waste haulers, and those improvements are important and we are looking forward to seeing them through and ensuring that policy accomplishes all the benefits for our city's air it has the potential to bring. However, it is important to note that zoning will not provide the incentives or requirements for construction and demolition trucks to upgrade as it only applies to private putrescible waste haulers—

and so Local Law 145 remains our only policy on record with the potential to truly reduce particulate matter pollution from all private waste haulers in our City. We look forward to continue to work with the City Council, BIC and other stakeholders to ensure that the industry come into compliance in a timely fashion, and that enforcement begin in earnest on January 1, 2020.

Thank you.

Testimony
of the
NYC Chapter
National Waste and Recycling Association
on the
Implementation of New York
Local Law 145
Regarding Trade Waste Truck Emissions
Sanitation Committee Oversight Hearing
NYC City Council
Tuesday, April 30, 2019
at 10:00am
City Hall

By
Steve Changaris, NYC Chapter Director
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My name is Steve Changaris and I am the NYC Chapter director for the National Waste and Recycling Association (hereafter the Chapter). The Chapter is part of the national trade association that represents America's private sector waste and recycling industry. We have an active group of member companies operating in the city. The hard-working men and women of our chapter collect and manage the waste, recyclables and organics produced by the City's 200,000 plus commercial entities. It is a herculean task done, day-in, day-out, year-round - in good weather and bad. We work - as Business Integrity Commission (BIC) licensees -- to provide excellent service to our customers; and, good paying, characteristically union jobs, for our employees; and, to collect and manage the City's waste, recyclables and organics as safely as possible; and, to be as good corporate citizens as possible in the neighborhoods and communities of the City we serve.

The Chapter supported the enactment of the legislation that led to the adoption of Local Law 145 of 2013 (hereafter LL 145) and that is the focus of your Sanitation Committee oversight hearing today. We did so even

though the proposal was a mandate and imposed new costs on our customers and us as BIC licensed companies doing business in the City. In the case of LL 145, the Council and Mayor agreed to a 7-year lead time for us to fully phase-in the new truck emission requirements mandated by Local Law 145. This 7-year phase-in period was an acknowledgement of the extensive capital investment that the trade waste industry had in the truck inventory it uses to service the needs of the City's commercial trade waste generators. This phase-in period also recognized that the trucking upgrade demanded when the local law was adopted would represent unplanned and significant, additional investment in that trucking inventory by BIC trade waste licensees. And that it would take this amount of time to plan, implement and pay for. We are glad to be nearing the end of this very positive change cycle.

The NYC Chapter is proud of the accomplishment made by its member companies, and all the companies in NYC's trade waste industry, that have either already come into full compliance with the truck emissions requirements of LL 145 or have demonstrated that they will be there by the legislated compliance date in January 2020. Our work with BIC and with NYC carters leads us to be very confident today, that since major

milestones of LL 145 have been largely accomplished already, that come January 2020 the City's private trade waste carting industry will be dispatching a truck fleet to collect trade waste which is nearly 100% compliant with LL 145.

The Committee should know that when BIC held hearings, in June of last year, about creating the regulations for the "mandatory waiver from the January 2020 emissions compliance deadline" section of LL 145, the Chapter testified that the BIC should be as restrictive as possible with the granting of any compliance waivers from LL 145. The NYC chapter argued against a proposed two-year period for such waivers as being too long. We said waivers should be granted rarely – if at all -- and only for the shortest 30-60-90-day time periods only; while having BIC retain the discretion to extend those periods only under exigent circumstances. Also, we called for the 2025 proposed sunset end date for the emissions

compliance waiver in the BIC proposed regulation to be adjusted so no BIC truck emission waiver will be in force after January 2021 – only one full year – instead of five years -- after the statutory date of truck emissions compliance for all others called for in LL 145.

In our work with BIC and others in the industry, the Chapter has come to learn there is currently a small group BIC licensed trade waste companies that have not been as forthcoming -- as so as many others -- about their being on track to comply with LL 145 by January 2020. While it will be ultimately up to the BIC about what to do with non-compliant LL 145 licensees come January 2020, we believe that there will be no significant disruption in the delivery of trade waste services to customers of non-compliant LL 145 licensees should the BIC not allow them to collect trade waste in January 2020 with their LL 145 non-compliant trucks.

Earlier in this testimony the seven-year phase-in for LL 145 law was mentioned; and how this time-period was needed to get these environmental upgrades paid for. In most other places where the association is active, the costs for a change like the LL 145 truck emissions

improvement mandate would be integrated into the cost of our companies doing business and absorbed or passed along to customers in the bills presented for service. However, the wrinkle for us in NYC is

the BICs rate cap on the maximum rates allowed to be charged trade waste customers. Since the companies of our industry are taxpaying businesses the costs for these improvements have already been absorbed under the

current rate cap. However, these LL 145 improvements remain a pressure point, along with poor recycling markets, long haul trucking and other issues, on our ability to operate under the current rate cap. Accordingly we call for the City to speed up the biennial two-year rate cap review timeline and commence rate cap proceedings now to help us further accommodate these mandated costs.

The NYC chapter appreciates this opportunity to provide this testimony and looks forward to continuing its work with the NYC Council Sanitation Committee on this and other trade waste issues.

The NYC chapter of the National Waste and Recycling Association is comprised of the city's private recycling and waste services companies. Chapter members are dedicated to the environmental and economically efficient handling of recyclables, discards and wastes.

NYC's Vehicle Emissions Law Information & Resource Fair

REGISTER NOW!

Wednesday, June 19, 2019

10:00 a.m. – 11:30 a.m.

TOPIC

The Fair will include information about Local Law 145 of 2013 (NYC's Vehicle Emissions Law) and various methods you can use to bring your fleet of vehicles into compliance with Local Law 145 requirements

FEATURED RETROFIT VENDORS

E. Global Solutions, Inc.
Mondial Automotive, Inc.

LOCATION

NYC Business Solutions Industrial & Transportation
168-46 91st Avenue, 2nd Floor (Sorbonne Room), Jamaica, NY 11432

REGISTRATION IS NOW OPEN!

Attendance is free.

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Testimony of Patrick Hyland, Executive Director – April 30, 2019
Committee on Sanitation and Solid Waste Management
RE: Oversight – Implementation of Local Law 145

Good morning. I would like to thank Chairman Reynoso and the members of the City Council Committee on Sanitation and Solid Waste Management for scheduling this hearing and allowing me to speak here today. The crux of the testimony I will be presenting this morning will speak to the unforeseen consequences of this legislation and the impact it may have on construction delivery in New York City if action is not taken.

I am here representing employers who own dump trucks, dump trailers, and flat beds performing heavy construction truck hire work in New York City. Approximately half of our membership are certified M/WBE firms with growing fleets. These employers exclusively hire Teamsters Local 282 drivers and perform large scale Public Works Projects throughout the Five Boroughs. Some prime examples are Second Avenue Subway, Barclays Center, Moynihan Station, Javits Center Expansion, Belt Parkway expansion, etc. These trucks deliver and haul away aggregate materials essential to these projects.

As you are all aware, our membership must register all of their vehicles with the New York City Business Integrity Commission (BIC) in order to conduct business within the five boroughs. We all collectively understand that Local Law 145 was enacted six years ago. Full disclosure; our Association was engaged in discussions with the Bloomberg Administration in 2012-2013 along with other Trade Associations and felt at that time that the 2020 implementation date was fair and reasonable.

Admittedly, when the Business Integrity Commission started holding Public Hearings on this law in 2018 I was taken aback about the impacts of this law on the industry. We had begun to survey our membership about their compliance with this law early on 2018 and I can report that we have several members (some of which are certified M/WBE's) who will be significantly negatively impacted by this law. Approximately a third of our members vehicles have engines 2006 or older. When you break it down even further what really stands out is that some of these companies have more than two thirds of their fleets with trucks older than 2007. For those companies, this could have devastating consequences.

As soon as we realized the impacts of this regulation, we began to engage BIC to voice our concern. Representatives of BIC explained that they were initiating a Hardship Waiver Application process and that they were not looking to “cripple the construction industry” with this law. We engaged with our membership and constantly reminded them to get their Hardship Waiver Applications in by the December 31st, 2018 deadline. Many of our members expressed their opinions and concerns are some of the criteria BIC had established to secure a waiver. I instructed them to get the waiver into BIC on time and that the Association will express those concerns to BIC after the New Year as the waivers are being evaluated.

That brings us to 2019. I spent January confirming with BIC the members of ours who submitted waiver applications. I then proceeded to formally request on four different occasions a meeting to discuss these Hardship Waiver Application parameters and the potential impacts of this law on the industry. Those requests were met with deafening silence! I never received a meeting and I can confirm to City Council that members started getting denial letters last week. This has been a very frustrating process for our association.

So here we are today and I hope City Council understand and respect the impacts of this law on project delivery in New York City better than BIC does. Perhaps BIC just thinks that these small business owners will replace all this older equipment with new trucks which cost over \$200,000 per vehicle. I am here to provide today’s reality check...they are not in financial position to do so and will not do so. I can assure you that when BIC set the parameters for this waiver process, they were totally unaware of the costs associated with doing business in this city. They did not consider Union labor costs, real estate/rent costs, insurance costs, tolls/congestion pricing, etc. Which is even more head scratching when you factor in that before considering these hardship waivers BIC raised insurance requirements in 2019 on these small business owners which has resulted in some premiums rising several thousand dollars per month. This law will significantly impact the amount of available trucks to perform this work and it goes without saying will result in a loss of good paying Union jobs. Local Law 145 will also have a negative impact on the Teamsters Local 282 Pension Funds if these trucks are taken off the roads. Need I go on...

BIC does not appear to have any interest in considering the impacts that Local Law 145 will have on construction delivery here in New York City. Hopefully, New York City Council does. The heavy construction trucking industry needs your assistance and we need it quickly. Thank you again for scheduling this hearing and for your consideration on this matter.

Committee on Sanitation and
Solid Waste Management
New York City Council

Oversight Hearing Regarding
Local Law 145 (of 2013)

Tuesday, April 30, 2019



Kendall Christiansen
Executive Director

917.359.0725

kendall@gaiastrategies.com

Chairperson Reynoso, and Members of the Committee on Sanitation and Solid Waste Management – especially new Members Councilmembers Chin and Constantinides.

I am Kendall Christiansen; I serve as Executive Director of New Yorkers for Responsible Waste Management, a consortium of approximately 25 locally-owned and operated waste and recycling service companies licensed by the Business Integrity Commission to service commercial businesses, and supplement the City's Department of Sanitation.

In November 2013, the City Council's Environmental Protection Committee held a hearing that led to the adoption of Local Law 145 – the subject of today's hearing. I was not at the hearing, but reading the transcript from it was illuminating – it included historical references to prior air quality-related decisions by the city to eliminate apartment-house and then municipal incinerators; the first portion of the hearing – even before the DEP Commissioner's testimony – related to concerns about the impacts on bikers (motorcycles), followed by testimony about boilers in buildings, on-site stationary equipment, char-broilers, and other large-scale emission generators.

With respect to commercial waste trucks, it was acknowledged that what became Local Law 145 was about bringing commercial trucks up to the standards imposed on the city's own fleet – sooner rather than later – while acknowledging the small percentage of waste services trucks among the tens of thousands that occupy the city every day and night, as well as many other significant sources of emissions that the City sought to reduce.

At that hearing, the representative of the trade association for the city's commercial waste and recycling industry testified in support of the concept and environmental goals of the section of the proposed law targeting heavy-duty collection trucks, while cautioning against the expense associated with the requested upgrade in the industry's fleet – even with a six-year period, as it significantly accelerated the ordinary replacement cycle for heavy-duty fleets. [The testimony also affirmed the relatively small number of commercial waste trucks relative to all heavy-duty trucks that traverse the city - less than 1%.]

Testimony from others underscored the truly significant environmental benefits associated with using the EPA 2007 emissions standard, which affirmed the importance of adopting Local Law 145; massive decreases were projected for all types of emissions – a critical goal for the city’s environmental community, especially in heavily impacted communities.

Nearly six years later, I am pleased to report that the city’s locally-owned and operated waste service companies (licensed by BIC) are nearing full compliance of their fleets, and will be fully compliant before the end of 2019.

I specifically mean the thirty (30) largest companies that provide 95% or more of the industry’s total service. While I cannot speak directly for the two largest companies that are not locally-owned, I recently conducted a survey of the status of those affiliated by **New Yorkers for Responsible Waste Management**. Based on more than fifteen (15) responses, here are the top-line results

1. **Compliance – 85% of the trucks covered by LL145 are compliant as of April 1.**
2. **Post-2013 – two-thirds of the trucks are “new”; 2013 models or later.** [2013 is a significant year because of additional emission reductions that became standard]; approximately 75% of those trucks are packer-trucks, while 25% are container-trucks.
3. **BAT retrofit – a s - mall number of trucks (less than 10%) were retrofitted** with “best available technology” emission reduction systems as determined by DEP.
4. **Investment – the respondents indicated investment totaling nearly \$50M; extrapolated to the entire industry (top 30 companies), investment likely approached \$100M.**

As an earlier benchmark - **June 30, 2016** – an earlier industry survey (20 companies) found **40% compliance of packer/rear-loader trucks** as of three years ago.

In other words, the city’s commercial waste industry has largely met its commitment made when it endorsed Local Law 145’s adoption. That success also is a credit to the **Business Integrity Commission (BIC)**, which has aggressively promoted the law’s requirements, and worked over the past several years with the industry to make clear the importance of compliance, as well as the consequences of non-compliance. Last fall, for example, BIC adopted rules regarding the very limited circumstances under which financial hardship waivers would be considered and granted.

It should be noted that “newer” trucks means more than just a cleaner engine; while I don’t yet have data, it can be assumed that newer trucks already meet the city’s sideguards requirement, and are highly likely to be covered in on-board cameras, essential for driver monitoring and training, service verification, and accident investigations. GPS also is a standard feature on newer trucks.

There is one “however”: as projected in 2013, “some carters will likely go out of business” as a result of this requirement. As is now well-known, the industry’s economic structure – beyond the top thirty companies – includes perhaps 30 to 40 active waste collection companies that operate just one or two trucks, and together comprise less than 3% of the overall market. Those companies are the least responsive to BIC, and are not active in industry matters, making it difficult to predict their survival or demise beyond an educated guess.

But it would not be a surprise if the industry’s consolidation took a quick hop forward to effectively result in 30 to 35 efficiently-operated companies as active participants - with the industry’s smallest companies, and the ones most likely to have inefficient routes, largely gone, thereby challenging a key argument for the city’s zone-franchising proposal.

Finally, a look ahead – both to what is possible and what’s holding back progress. To the question of how LL145 might be updated if it was drafted today, improvements in truck-related technology – both engines and compaction equipment - continue to address both overall performance and air quality.

Elsewhere in the U.S. industry compressed natural gas (CNG) vehicles have become nearly-standard in both municipal and commercial fleets. In NYC, at least two (2) waste service companies have experimented with early-generation CNG trucks. Unfortunately, the lack of DSNY support for municipally-developed infrastructure for fueling and maintenance has severely inhibited the purchase and use of CNG trucks by both sectors.

Many observers believe that the next step is already in front of us: electric trucks. As I wrote in *Crain’s* last year¹, the industry is looking closely at fast-developing technologies for both new and retrofitted engines that will be the next generation. A few other cities are testing such trucks of various sizes; more than one company is competing for this space; and the availability of public subsidies (through NYSERDA, EDC, VW restitution funds, etc.) could facilitate a demonstration project, or two. Beyond the obvious benefits of less noise and near-zero emissions, electric trucks are presumed to be much easier to maintain – fewer moving parts, etc. and to operate.

The final “however”: a major constraint to pursuing even a small-scale demonstration project is the threat to the industry’s existence – or at least that of many individual companies – represented by the city’s intention to restructure the industry and reduce the number of companies that survive. Even a heavily subsidized demonstration project would require company investments with at least a three-to-five-year recovery period – which is too risky under the circumstances.

This advance forward with zero-emission trucks is just one example of how industry investments are being slowed or inhibited as a consequence of the zone-franchising plan.

Conclusion:

The city's waste services industry is pleased to present this testimony today as evidence of what can be achieved through collaboration and cooperation. We welcome additional opportunities to mutually benefit from that approach.

FROM OUR READERS

Agency's plan for cleaner air is actually postponing it

"CAN SANITATION GO GREEN?"
(published Sept. 17)

noted that electric trucks can be part of the future of the waste-collection industry—starting now. Unfortunately, beyond resisting renewable natural gas for its own fleet, the Department of Sanitation is unwittingly delaying New York City's ability to benefit from electric trucks for commercial waste collection.

For haulers in the private sector, with a fleet one-third the size of Sanitation's, electric trucks offer a real opportunity to go beyond the city's 2020 mandate for using cleaner diesel engines. Our industry consortium's working group on electric trucks is talking with manufacturers and the New York

State Energy Research and Development

Authority about launching a demonstration project before a potential scale-up to widespread deployment.

But the biggest obstacle isn't technical or financial; it's political. Sanitation's misguided attempt to restructure the commercial waste industry is freezing investments in the infrastructure and technology needed to put electric trucks on the road.

Waste-service companies now face the threat of not surviving the city's proposed system of exclusive franchises that will limit choice and competition. Without that threat, electric trucks could be collecting commercial waste

and recyclables within two years.

For now we remain stuck in the wait-and-see limbo created by a bad decision based on interest-group politics.

KENDALL CHRISTIANSEN
Executive director
New Yorkers for Responsible
Waste Management

VACANCY DEBATE

YOUR ANALOGY of the savanna is an excellent one for the retail rental market ("Pols ponder commercial rent control, aka survival of the weakest," editorial, Sept. 17). Commercial rent control is the wrong solution to a complex issue. The current situation has been decades in the making, so it will take more than a few years to remedy.

Three factors have

contributed to the city's high retail vacancy rate.

A change from traditional rent/sales metrics. All-in rent was once expected to be from 8% to 12% of a store's sales. In the past 20 years, this metric had gone up to the high teens and even up to 50%. This bubble had to burst eventually.

Amazon. Online shopping has decimated stores. Neighbors complain about the demise of their local retailer yet shop (and shop) online. When they do, they're part of the problem.

Ownership structure. Owners finance their buildings with debt and/or equity partners who often set minimum-rent requirements. It's a way to ensure the property can meet the debt service

(or equity returns) promised to others. The agreements may or may not have ways to allow for lower rents in the case of a downturn, but it's an arduous process and one that can result in "chasing the market down" because there are not enough other spaces renting to document the new, lower market rent.

TERRI GUMULA
Manhattan

HANDS OFF BENNIES

RE "THINK TANK pushes plans to get city out of debt" (CrainsNewYork.com):

I am a Port Authority retiree with medical benefits picked up by the Port. That was a benefit guaranteed by my employment. These think tank people would object to my reaching into their

401(k)s and cutting their income in retirement but have no problem with reducing my medical benefits. Hypocrites.

Retirees worked long and hard for their benefits. In many cases, the city is contractually obligated to provide them; in others, morally obligated. Reduce bennies for new hires? No problem. But for long-term employees and retirees? No.

If the city pays down its debts to reduce the interest on what it owes, there will be plenty of money to pay its other obligations, including the cost of new schools and libraries, out of pocket and not by borrowing.
ENOCH LIPSON
Queens

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10 | CRAIN'S NEW YORK BUSINESS | OCTOBER 1, 2018

New zero-emission micro-hauler supported via a partnership with a BIC-licensed waste services company – battery-assisted bike collecting organics





New York City Environmental Justice Alliance

166A 22nd Street, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table

Local Law 145 Oversight Hearing, NYC Environmental

Justice Alliance
April 30, 2019

Hello, and thank you to Council Member Reynoso and members of the Committee on Sanitation and Solid Waste Management for the opportunity to speak at this hearing. My name is Dr. Tok Oyewole, and I am testifying on behalf of the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their fight for environmental justice.

For decades, NYC-EJA has led efforts for comprehensive policy reforms to address the disproportionate burden of New York's solid waste system on a handful of environmental justice communities. To handle nearly 35,000 tons of putrescible garbage generated each day in NYC, waste trucks needlessly travel thousands of miles per night through multiple boroughs of New York City, polluting our air with diesel fuel, clogging our streets, and diminishing our quality of life. The impacts are greatest in those few low-income and communities of color where truck-dependent transfer stations are clustered, causing higher proportions of health consequences such as asthma, heart disease, and cancer. Not only do waste carters dispose of 75% of their waste in three communities, but they tend to house depots and garages in these communities as well, essentially doubling the disproportionately high number of trucks already flowing into the communities. In North Brooklyn as part of an air quality monitoring project, citizens counted 203 trucks going by per hour, 30% of which were waste trucks; and in the South Bronx at a particularly bad corner, citizens counted 304 trucks going by per hour, 45% of which were waste trucks. Consequently, these neighborhoods experience PM 2.5 emissions 5 and 7 times higher than ambient levels, respectively. Exposure to air pollution, even at concentrations below regulatory thresholds, causes chronic illnesses such as asthma and bronchitis and contributes to terminal illnesses such as cancer and heart disease.

Local Law 145, passed in 2013, is intended to reduce pollution from waste trucks by mandating the installation of emissions control technologies, however, the law does not incentivize a shift from diesel to cleaner fuels and technology, such as electric or hybrid trucks. We argue that mandating eventual compliance with standards set over a decade ago is a relatively low bar, and that the city must take the necessary steps to ensure dramatic reductions in PM 2.5 emissions in EJ communities, starting with setting and enforcing more rigorous standards, appropriate to the climate crisis and air pollution inequities that our city is currently facing.

Thank you.

**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: 4.30.19

Name: Kondall Christensen (PLEASE PRINT)

Address: 151 Maple St. Brooklyn

I represent: New Yorkers for Responsible Waste Mgmt.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 145 Res. No. _____

☐ in favor ☒ in opposition

Date: 4-30-19

Name: Patrick Hyland (PLEASE PRINT)

Address: PO Box 41262 ST, NY 10304

I represent: NYC Metro Trucks Assoc.

Address: SAME AS ABOVE

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1145 Res. No. _____

☐ in favor ☒ in opposition

Date: 4/30/19

Name: Hye Won Chung (Daisy) (PLEASE PRINT)

Address: 50 Broadway 29th Floor

I represent: ALIGN

Address: 50 Broadway 21st Floor

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THE CITY OF NEW YORK**

Appearance Card

overly
LC 145

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

☒ in favor ☐ in opposition

Date: 4-70-19

(PLEASE PRINT)

Name: Charans, Steve
Address: 482 Southbridge St. #373
I represent: private center (NWRP)
Address:

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THE CITY OF NEW YORK**

Appearance Card

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

☒ in favor ☐ in opposition

Date: 4/30/17

(PLEASE PRINT)

Name: JUSTIN WOODS
Address: 151 W 34th St
I represent: NYCP
Address: "

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THE CITY OF NEW YORK**

Appearance Card

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

☐ in favor ☐ in opposition

Date: 4/30/19

(PLEASE PRINT)

Name: Tok Ayewole (Michelle)
Address:
I represent: New York City Environmental Justice Alliance
Address:

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THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Noah D. Gene

Address: 100 Church St.

I represent: Chairman & Chair of

Address: NYC Business Integrity
Commission

**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: 4/30/19

(PLEASE PRINT)

Name: PHIL VOS

Address: 488 7th St., BROOKLYN, 11215

I represent: ENERGY VISION

Address: 138 E. 13 St., NYC, 10003

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THE CITY OF NEW YORK**

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Alyssa Preston

Address: DEP.

I represent: _____

Address: _____

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THE CITY OF NEW YORK**

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☒ in favor ☐ in opposition

Date: 4/30/2019

(PLEASE PRINT)

Name: Melissa Tachan

Address: _____

I represent: NYCP1

Address: _____

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**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: 7/30/19

(PLEASE PRINT)

Name: Adriana Espinoza

Address: _____

I represent: NYLCV

Address: _____

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