



AIA
New York

January 31, 2017

Hon. Antonio Reynoso, Chair
Committee on Sanitation and Solid Waste Management
City Hall, Committee Room
New York, NY 10007

Re: Intro 201-2014

Dear Chair Reynoso,

The American Institute of Architects New York (AIANY) represents over 5,500 registered architects and associated design and construction professionals. AIANY leads, inspires, and educates our members on design and sustainability. We organize engaging programs that focus on exemplary green buildings, current technologies and product research, and sustainable design and construction practices by leading architects. Our efforts are based on the belief that sustainability should be an essential part of the design process and be fully integrated with all aspects of a building, including function, form, site, structure, systems, and construction.

AIANY is partaking in a sustained effort to promote initiatives that reduce waste in the built environment and create healthy spaces for New Yorkers to live and work. In order to achieve the City's zero waste goal, AIANY supports Intro 201 in its effort to require recycling of discarded carpet from commercial buildings, which would help reduce landfill and carbon emissions from waste transport. While Intro 201 represents a step in the right direction, we believe the bill needs fine-tuning in order to be more enforceable and to ensure that it is capturing the right projects. In particular:

- The carpet recycling requirements may need to live in both the sanitation section and the building code section of the Administrative Code, and have a clearly designated responsible party, in order to be fully enforceable.
- While the bill only targets commercial properties, it seems likely that carpet used in the common areas of multi-family properties could be recycled as well.
- It may be more effective to include in the size limits for projects captured, and to step down from 10,000 to 5,000 square feet as the recycling industry matures.
- The bill needs more specificity in terms of which aspects of carpeting need to be recycled.

The AIANY and our members are available to work with relevant stakeholders to address these and other issues to move this effort forward, including through a working group we have convened to address construction and demolition waste in the city. We also generally support the concept of Extended Producer Responsibility, which seeks to hold manufacturers accountable for managing end-of-life product costs, and we recommend that the Committee consider in future how that concept could work for carpet recycling. We are excited that NYC is taking the lead on these efforts and thinking holistically about our next steps.

Submitted on behalf of AIANY.

Benjamin Prosky
Executive Director

The American Institute of Architects

AIA New York
536 LaGuardia Place
New York, NY 10012

T (212) 683 0023
F (212) 696 5022

www.aiany.org

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