



April 24, 2023

Chair Dan Garodnick  
City Planning Commission  
120 Broadway  
New York, NY 10271

Re: City of Yes for Carbon Neutrality

Chair Garodnick,

On behalf of the Association for A Better New York (ABNY), we are writing to express our support for the Adams administration's proposed City of Yes for Carbon Neutrality (CoYCN) text amendment.

The climate crisis prompted countries to develop international pacts and ambitious decarbonization goals, to reduce greenhouse gas emissions and their impact on our climate. In many ways, New York City has led the effort amongst global cities to take actionable steps to reduce its carbon footprint. For the city to achieve its climate goals by 2050 - as stipulated in its own 80x20 Roadmap - we must transform our energy grid, retrofit our buildings, and shift our transit systems and vehicles to electric. Stringent zoning regulations, however, impede the city's ability to meet these goals head-on. A shift in the City's regulatory standards is needed in order to achieve the City's sustainability goals and to mitigate the climate crisis.

Updated regulations, for example, could enable buildings in NYC to further reduce their carbon footprint through increased retrofitting activities. Further, for the city's building stock to come into compliance with Local Law 97 and achieve its ambitious emission reduction goals, the City must take steps to equip the real estate sector with clearer regulatory guidance and incentives.

ABNY is also concerned about how transportation impacts our climate goals since our current modes significantly contribute to the climate crisis. According to data from the Environmental Protection Agency, greenhouse gas emissions emitted from transportation account for about 27 percent of total U.S. greenhouse gas emissions, making it the single largest contributor to U.S. carbon pollutants. To address this, by 2035, all vehicles sold in New York State must be electric, a requirement that will greatly increase demand for charging stations. Currently, electric vehicle charging facilities are not allowed in several commercial districts. The proposed text amendment would allow for siting of EV charging stations in areas more accessible for motorists, which will further advance the city's climate goals. Additionally, through the Carbon Neutrality Amendment, the city's carbon footprint would be further reduced through regulations that will streamline car-sharing, car rental, and commercial parking rules.

Renewable energy is also a hallmark of the proposed amendment. These updates to the zoning code would remove zoning impediments for rooftop solar installations, allowing for more



sustainable and renewable sources throughout the city. As the costs of using solar to produce electricity decrease, regulation changes must be made to accommodate increased utilization.

In closing, because of its myriad of potential positive impacts in advancing the City's goals and maintaining our place as a leader in reducing emissions, ABNY supports the City Planning Commission's proposed Carbon Neutrality Text amendment.

A handwritten signature in black ink, appearing to read "AS", is positioned above the name Aaron Sanders.

**Aaron Sanders**

Public Policy Director  
Association for a Better New York