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July 18, 2023

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

Re: City of Yes for Carbon Neutrality

Dear Chair Garodnick,

Catholic Charities Progress of Peoples Development Corporation (CCPOPD)—an affiliate of Catholic Charities Brooklyn & Queens—is writing to express our support for Mayor Eric Adams' proposed city text amendment, City of Yes for Carbon Neutrality (CoYCN). Given the threat that climate change and sea level rise pose to our City's most vulnerable populations, it is crucial that we all act today to reduce or eliminate carbon emissions from our built environment.

Through our development of affordable housing and solar projects in Brooklyn and Queens, we are working to foster a more sustainable city and a greener planet. Climate change is a direct threat to our City's low-income households, as it will impact residents, especially older adults, across the City. A significant portion of affordable housing residences are located in low-lying areas of New York City and are therefore vulnerable to storm surges and sea level rise. For all these reasons, we are very motivated to mitigate these threats.

While we support City Planning's entire zoning proposal—and we hope that it is not watered down during the public review process—we want to highlight three key aspects that are especially crucial to CCPOPD and Laudato Si Corporation, our mission-aligned sustainability entity:

Elevated Solar Trellises. COYCN would allow elevated solar trellises over 100% of roof area, a change which we support wholeheartedly and have called for publicly. Allowing elevated solar trellises over 100% of roof coverage could increase potential solar energy generation by 290%. As electric buildings and electric cars increase the demands on the grid, it is more important than ever to be able to generate clean power locally. We are also convinced this rule change would have very little impact on the way pedestrians experience our city at street level.

Green Retrofits. COYCN would allow buildings to be retrofitted with exterior, insulating panels, which is crucial for preserving affordable housing. Nearly 70% of carbon emissions come from buildings, making them the largest contributor to climate change in NYC. When it comes to older affordable housing stock, improving building insulation is a key task. Adding insulation inside a building often reduces the size of apartments and also leaves many gaps in the façade for heat to leak out. Putting exterior cladding on buildings improves their insulation, but arcane zoning definitions, like what is exactly considered “floor area,” often stymie these efforts. This needs to be changed to preserve our city’s affordable housing stock. We recognize there is a tremendous cost associated with this, but also that there are city and state and federal support, either in place or coming. We encourage the city to push for more funding.

Heat Pumps on Roofs and in Yards. COYCN would expand the ability of building owners to place HVAC equipment, like heat pumps, on roofs and in yards – this is vital for reducing our carbon footprint. “Permitted obstructions” are one of the most obscure part of the Zoning Resolution, but what is and isn’t allowed on roofs and in yards is a huge problem. To electrify buildings, that is, to take them off gas or fuel oil and convert them to heat pumps or other green HVAC systems, you need to have equipment on roofs and in yards. Often there is a very tight allowance for what can go where, meaning that it may be impossible for a building owner to convert to heat pumps.

Given that climate change is an existential threat to our city, Catholic Charities and its affiliated agencies hope that the Community Boards, Borough Boards, Board Presidents, Planning Commission, and City Council vote to approve this zoning text amendment and do not weaken its provisions.

Sincerely,

DocuSigned by:

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Reverend Monsignor Alfred P. LoPinto
President and Chief Executive Officer
Catholic Charities and Affiliated Agencies