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

Re: City Of Yes: Carbon Neutrality

Dear Chair Garodnick,

On behalf of the Citizens Housing & Planning Council (CHPC), I am pleased to share our strong support for Mayor Eric Adams’ proposed city text amendment, City of Yes for Carbon Neutrality (COYCN). In light of the increasingly devastating impacts of climate change, it is critical that the city commits to taking bold, forward-thinking action to decarbonize our buildings, transportation systems, and energy sources.

CHPC has long advocated for zoning and regulatory reform as a means to promote necessary investment in all segments of our housing stock and to clear bureaucratic barriers to meeting the needs of New Yorkers today and into the future. Many of our city’s current zoning provisions are outdated and burdensome, inhibiting sustainable development and low-carbon retrofits rather than encouraging it. COYCN would make necessary changes to zoning regulations to enable greener buildings. For New York City to achieve its forward-thinking climate goals, myriad investments will be required of all building owners, aligned toward this shared goal. COYCN is an indispensable step to make this possible.

For these reasons, we extend our support for the significant changes in City Planning’s COYCN proposal. There are three items that CHPC believes are especially critical for buildings:

Elevated Solar Trellises. COYCN would allow elevated solar trellises over 100% of roof area, a change that we have long advocated for. Last year, we produced a policy brief on “[Zoning for Solar](#)” in partnership with the New York State Association for Affordable Housing (NYSFAFH) in which we argued that the city must remove current zoning barriers for producing solar energy.

Zoning changes made a decade ago to allow rooftop solar systems included limitations that have curtailed the deployment of solar generation citywide. The proposed allowance for 100 percent solar coverage on rooftops, extending provisions recently pioneered in the Gowanus rezoning, would increase the solar wattage a typical rooftop can generate by 290 percent, and would greatly aid achievement of the city’s goal of 1000 megawatts of solar generation by 2030.

Green Retrofits. COYCN would make it easier for buildings to be retrofitted with exterior insulating panels. Buildings are responsible for 70% of greenhouse gas emissions in New York City. Relaxing restrictions on wall thickness would make heating, cooling, and powering our buildings more efficient.

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This is especially critical for our affordable and public housing stock. Interior insulation often reduces usable space inside an apartment and may leave gaps for heat to leak out. Exterior insulation makes it easier to renovate and improve energy performance while minimizing disruption to tenants' living space.

Heat Pumps on Roofs and in Yards. COYCN would make it easier for building owners to place low-carbon HVAC equipment, like heat pumps, on roofs and in yards.

The current list of “permitted obstructions” in the Zoning Resolution makes it unnecessarily costly or even impossible for existing buildings to switch existing gas-powered heating systems to heat pumps, because of limitations on where these systems may be installed. The proposed changes would allow sufficient flexibility for both new and existing buildings to use clean energy systems, supporting State and local goals for the electrification of building systems.

Permeable Surfacing. COYCN removes administrative barriers to the use of permeable paving, an important surfacing option that helps reduce stormwater runoff.

Two of CHPC's publications, [*Onward and Upward: A Technical Guide to Zoning and Regulatory Reform in the Crisis Era*](#) and [*From Lot to Neighborhood to City: An Action Plan for Basement Flood Safety & Stormwater Equity*](#), recommended that the City promote the use of permeable paving materials. Both publications cite Zoning Resolution text that requires special permission by the Buildings Commissioner to use common permeable surfacing materials as an unnecessary administrative barrier to their use. The text amendments proposed under COYCN would allow permeable materials as-of-right without any additional approvals. CHPC hopes that these important changes are adopted and coupled with updated design guidelines and incentive programs that encourage participation, particularly in residential neighborhoods prone to stormwater flooding.

COYCN will help us meet our climate goals and eliminate outdated zoning regulations that add unnecessary costs to energy efficiency and make sustainability too often a luxury good rather than something available to all New Yorkers. As Community Boards, Borough Boards, Board Presidents, the Planning Commission, and the City Council consider this zoning text amendment, we urge them to support the enactment of these changes and not to diminish their effect, so that we can fight climate change with the force it demands.

Sincerely,



Sarah Watson
Deputy Director