

April 18, 2023

Re: City of Yes for Carbon Neutrality

**Kizzy Charles-Guzman**  
Executive Director  
Mayor's Office of Climate  
and Environmental Justice

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Dear Chair Garodnick,

I am writing to express our full support for Mayor Eric Adams' proposed city text amendment, City of Yes for Carbon Neutrality (COYCN). After working closely with your team to create this proposal, I'm excited to see the project reach this important milestone! With the threat that climate change and sea level rise pose to our city, the Adams' administration – and the city as a whole – are acting today to reduce or eliminate carbon emissions from buildings and vehicles. There is no more time to wait.

While we support City Planning's entire zoning proposal, I want to highlight key aspects that are especially crucial to advancing the City's climate goals and making certain that the Zoning Resolution aligns with the ambitions of Local Law 97:

- **Elevated Solar Trellises:** COYCN would allow elevated solar trellises over 100% of roof area. 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.
- **Green Retrofits:** COYCN would allow buildings to be retrofitted with exterior, insulating panels, which is crucial for preserving affordable and public housing – I support this vociferously. Nearly 70% of carbon emissions come from buildings, making them the largest contributor to climate change in NYC. When it comes to older affordable and public housing stock, improving building insulation is a key task.
- **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 yard – this is vital for reducing our carbon footprint. 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.
- **Electric Vehicle Charging:** COYCN would more than double the commercially-zoned land where EV charging facilities can locate. It would also clarify regulations and facilitate safe bicycle and e-mobility parking. By 2035, all vehicles sold in New York State must be electric, which will greatly increase demand for charging stations. But today, electric vehicle charging facilities are not allowed in many commercial districts closest to where people live. This proposal would permit EV charging in those districts and is essential to meet this growing electric fleet.
- **Decarbonize Our Waste Streams:** COYCN would expand infrastructure, including permeable paving and high-performance tree pits, to help manage stormwater runoff and other contributors to the city's waste stream, which accounts for 4% of its greenhouse gas emissions. Despite its role in reducing waste and its associated emissions, the word "composting" does not appear in today's Zoning Resolution. This proposal would rectify that, clarifying that small-scale, neighborhood-focused composting are allowed in commercial storefronts. It would also permit rooftop greenhouses atop non-residential buildings as-of-right, another way we can create a cleaner, greener city for all.

Given that climate change is an existential threat to our city, we hope that the Community Boards, Borough Boards, Borough Presidents, Planning Commission, and City Council vote to approve this zoning text amendment.

We look forward to our continuing relationship with the Department of City Planning as we jointly advance numerous efforts to reduce the City's carbon footprint, including the future City of Yes initiatives.

Sincerely,



Kizzy Charles-Guzman