



August 14, 2023

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

Subject: Support for City of Yes for Carbon Neutrality citywide zoning proposal

Dear Chair Garodnick,

New York Passive House and PHIUS are writing to express our shared support for Mayor Eric Adams' proposed citywide zoning text amendment, City of Yes for Carbon Neutrality.

Both organizations advocate for more energy efficient and healthy buildings both in new construction as well as retrofits.

1. We believe revising Zone Green to a 5% FAR bonus for an “ultra-low-energy building” will be an effective, performance-centered way to promote the adoption of high performance buildings and expedite New York City’s ability to meet its decarbonization goals.
2. We strongly advocate for the addition of a certified Passive House pathway for compliance with the “ultra-low-energy building” definition and qualification for the Zone Green FAR bonus (both PHI or PHIUS should be identified as acceptable certifications).

In particular, we see the following opportunities for a Passive House building to be certified under either a Passive House Institute (PHI) or Passive House Institute US (PHIUS) protocol.

1. Passive House protocols offer a proven method for significant reduction in building energy demand.
2. By leveraging this third-party protocol you reduce the review and verification burden on DCP and DOB.
3. Alignment with efforts made by organizations like HPD and NYSERDA to promote the use of Passive House as a pathway to Carbon Neutral Ready Buildings.

In addition to primary comments, NYPH and PHIUS also support key changes included in the document that will encourage the development of Passive House , and other high-performance buildings in the City of New York:

1. 12-10, Accessory use (21)(4): Allowing energy storage systems as an accessory use will simplify the incorporation of battery systems that can be used for grid-resiliency, load-shedding, and emergency backup power.
2. 12-10, Energy Infrastructure Equipment: Including “all types of energy generation systems, or energy storage systems, unless specific rules are otherwise specified” future-proofs this concept by including innovative future systems within this zoning definition.
3. 12-10, Qualifying Exterior Wall Thickness (b): allowing a floor area bonus for recladding existing buildings provides options to designers beyond over-cladding without sacrificing a floor area bonus.

We applaud DCP for bringing forward such necessary improvements to the zoning text that would remove unnecessary barriers and promote decarbonization of the city’s building stock, a move necessary to mitigate climate change.

Thank you for your time and consideration.
Sincerely,

New York Passive House

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