

28 March 2023

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

Re: City of Yes: Carbon Neutrality

Dear Chair Garodnick,

We write to support your proposed zoning text amendment, City of Yes: Carbon Neutrality (COY:CN). Given the threat that sea level rise poses to our city, it is crucial that you are acting now to grant property owners the flexibility they need to reduce or eliminate their carbon footprints.

Affordable and public housing is especially vulnerable to climate change. From the 1940s to today, the land available for affordable housing and public housing was often former industrial land located on the waterfront. Because this land didn't have any existing residents, and the port facilities had left for New Jersey, it was available for affordable housing. This means that a huge amount of affordable and public housing is in low-lying areas and is therefore very vulnerable to storm surge and sea level rise. As the statewide association for affordable housing, we are very motivated to mitigate this threat.

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 affordable housing:

Elevated Solar Trellises. COY:CN would allow elevated solar trellises over 100% of roof area, a change which we support wholeheartedly and have called for publicly.

- In cooperation with the Citizen's Housing and Planning Council (CHPC), in 2022 we wrote a paper calling for the Zoning Resolution to be amended to allow elevated solar trellises over 100% of roof coverage. This paper included a study that showed that this could increase potential solar energy generation by 290%. As electric building 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. COY:CN would allow buildings to be retrofitted with exterior, insulating panels, which is crucial for preserving affordable and public housing – we support this vociferously.

- As we renovate our older affordable and public 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. We need to be able to put exterior cladding on buildings to improve their insulation, but arcane zoning

definitions, like what is exactly considered “floor area,” often keeps us from doing it. This needs to be changed so we can preserve our affordable and public housing stock.

Heat Pumps on Roofs and in Yards. COY:CN 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.

- “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 a lot of 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 actually convert to heat pumps.

Given that climate change is an existential threat to our city, we 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,



Jolie Milstein
President and CEO
New York State Association for Affordable Housing