

April 21, 2023

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

**Re: City of Yes for Carbon Neutrality**

Dear Chair Garodnick,

We are 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, it is crucial that the 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.

Solar One is a not-for-profit organization whose mission is to design and deliver innovative education, training, technical assistance, and advocacy that fosters sustainability and resiliency in diverse urban environments. We provide comprehensive solar technical assistance to building owners, affordable housing providers, and community organizations to facilitate high-impact solar projects, and we advocate for policy solutions that make solar affordable and accessible to low-income communities and affordable housing. Making our city more sustainable, equitable, and healthy is central to our goals. Climate change is a direct threat to residents across the city, especially frontline communities that have been historically burdened by environmental injustices and continue to bear the brunt of climate impacts like storm surges and extreme heat. For all these reasons, we are very motivated to mitigate this threat.

While we support City Planning's comprehensive approach to the zoning proposal, and we hope that it is not watered down during the public review process, we want to highlight a few key aspects that are especially crucial:

**Elevated Solar Trellises.** COYCN would allow elevated solar trellises over 100% of roof area, a change that we support wholeheartedly. We provide solar feasibility assessments to multifamily housing across the city, and we understand first-hand how additional solar capacity can benefit a building. Allowing elevated solar trellises over 100% of roof coverage can typically increase potential solar energy generation by two or three times what is currently allowed. 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. Additionally, electrification often involves putting new equipment on rooftops, which compete for space with low-profile solar arrays. Lifting solar trellises above HVAC equipment and other obstructions increases the solar capacity of multifamily buildings and can allow for much-needed tenant space and rooftop green space. In some cases, property owners with large trellis solar arrays can generate enough power to distribute solar to tenants, which can help low-income residents save on energy costs, and we should support this model in whatever means we can. We've seen many beautiful and

successful solar trellises, and we believe 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 and public housing, a change we support. 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. While our work is to help buildings add solar to save on electricity costs, we know it is just as important to retrofit the building envelope to increase efficiency and reduce energy consumption. We support efforts to update the existing zoning code to allow for retrofits that are needed to preserve our city's affordable and public housing stock. We recognize there is a cost associated with this, but we encourage the city to push for more funding from the state and federal government.

**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 parts of the Zoning Resolution. We appreciate the efforts in the previous zoning change, Zone Green, that allowed solar to be a "permitted obstruction" under certain circumstances. But we know that solar is just one aspect of building decarbonization, and we encourage further changes through COYCN that allow more flexibility for other equipment that is necessary for electrification to be placed on roofs and in yards.

It is essential to update the zoning code to allow buildings across the city to play a role in reducing our emissions and mitigating climate impacts. This is all the more important for affordable and public housing, which often cannot afford to navigate the existing zoning code as it applies to retrofits and electrification. We see COYCN as a crucial step for New York City to make buildings more resilient to climate impacts and help buildings and residents save money as they decarbonize. We look forward to participating in the public process and supporting community education efforts so that this process is equitable and accessible to all New Yorkers.

Sincerely,

Steve Levin,  
CEO, Solar One  
Stephen@solar1.org

Kate Selden  
Policy Analyst, Solar One  
Kate@solar1.org