



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

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Daniel Garodnick, Chair  
New York City Department of City Planning  
120 Broadway, 31st Floor  
New York, NY 10271

**RE: HDC's Updated Commentary on City of Yes**

Dear Chair Garodnick,

The Historic Districts Council appreciates the opportunity to provide further comment on the Department of City Planning's final proposal for the zoning text amendments related to City of Yes for Carbon Neutrality. HDC knows we are in a climate crisis, and remains supportive of New York City's decarbonization efforts. In particular, we commend increased flexibility and coverage for rooftop solar panels, and increased flexibility for green sidewalk interventions. HDC welcomes and supports solar panels in historic districts and believes they are a positive part of the streetscape. We also continuously advocate for more street trees and environmental interventions in historic districts, including in formerly industrial districts.

HDC also supports code-compliant retrofits for existing buildings, because we know that New York City's historic structures are a vital tool in the fight against climate change. Given that it has never been more important to conserve resources, it is vital that we harness the embodied carbon of historic structures, many of which have footprints which are over-FAR, and offer meaningful opportunities to create new housing.

That said, **we remain concerned about the city's plan to allow "the widest range of exterior retrofits" for existing structures.** We continue to worry that this retrofitting provision will strongly incentivize developers and property owners to wholly re clad the facades of historic buildings, destroying the possibility of preservation and permanently destroying significant architectural features. **We suggest exploring interior retrofits, which could support a greener New York, and uphold the integrity of landmarked buildings.**

In the name of facilitating exterior retrofits, the Carbon Neutrality text amendment allows additional wall thickness from 8 to 12 inches, but the environmental review documents do not explain how additional wall thickness translates to increased energy efficiency. **We would appreciate more information on the relationship between wall thickness and energy efficiency given that such recladdings have the potential to have dramatic effects on historic structures.**

**Further, the City of Yes for Carbon Neutrality Text Amendment proposes to eliminate two clauses (k,l) defining Floor Area as (k) "floor space that is or becomes unused or inaccessible within a building;" (l) "floor space that has been eliminated from the volume of an existing building in conjunction with the**

development of a new building or in the case of a major enlargement...of another building on the same zoning lot.” **DCP annotations regarding the elimination of this language claim that the Commission is “removing these paragraphs because they are obsolete, and have caused issues with the reapportionment of mechanical rooms as part of electrification retrofits.”** It is unclear to us why these clauses are obsolete and how exactly they help facilitate building retrofits. **We do not support this proposed redefinition of Floor Area and are concerned that this significant change is not made sufficiently clear in public information materials regarding this text amendment.**

HDC supports facilitating rooftop food production via rooftop greenhouses on commercial buildings, but we are concerned that the Carbon Neutrality text amendment does not explain how the DCP will ensure that the greenhouses will be used for their intended purpose for the life of the structure. **Given that the greenhouses’ floor area, and height up to 25’ would be exempted from FAR, we wonder how DCP will ensure that these structures are not being used for other purposes such as outdoor space for commercial tenants, or as entertainment venues.**

HDC is glad that the city is pursuing the worthy and necessary goal of decarbonization, and looks forward to continuing to be part of the City of Yes process.

Thank you,



Frampton Tolbert  
Executive Director