

City Planning Commission
120 Broadway
New York, NY 10271

July 26, 2023

Dear Members of the City Planning Commission,

The American Institute of Architects New York (AIANY) writes to express our strong support of the City of Yes for Carbon Neutrality. Nonetheless, after a close review of the proposal, AIANY has identified some concerns with proposal 8 to “Fix Zone Green”. While we support the goals laid out to create more ultra-low-energy buildings in the city, the proposal’s language has raised concerns regarding the feasibility of the targets outlined. We understand the below issues were referenced in Monday’s review session, so we thought it may be helpful to share them formally here as well.

AIANY makes the following recommendations for the City Planning Commission to consider, specifically in regard to proposal 8 to fix Zone Green of the City of Yes for Carbon Neutrality plan:

Recommendation #1: Reconsider a 50 percent reduction from the ASHRAE 90.1. Instead, consider setting a very progressive yet potentially achievable reduction factor or adopting a tiered approach for energy reduction, such as 30 percent reduction for 3 percent area exclusion and 50 percent reduction for 5 percent area exclusion.

Recommendation #2: Amend EUI language from 38 kbtu source EUI to 38 kbtu site EUI. Consider EUI targets specific to building use, as energy use will differ significantly amongst different building uses. These targets could be similar to goals and thresholds set by other local laws.

Recommendation #3: Establish an expert group to review and refine the Ultra-Low-Energy Building criteria.

The purpose of our recommendations is to add more nuance to the text amendment so that the goals outlined are ambitious, achievable, and specific to various building typologies. We want to emphasize the benefits of making our recommended changes to proposal 8 for occupants, not just practitioners. By setting achievable targets, we are setting practitioners up for success to meet the sustainability and resiliency requirements and goals set out in Local Law 97. Without these changes, today’s most progressive design will not be able to achieve the current performance standard in proposal 8 for most building typologies. This will result in a net worsening of energy performance since Zone Green incentives will effectively disappear, leaving practitioners with little motivation to strive towards the out of reach current definitions of ultra-low-energy buildings.

Thank you,

Matthew Bremer, President of AIA New York & Founder of Architecture in Formation
Yasemin Kologlu, Co-Chair of AIA New York Committee on the Environment
Mallory Taub, Co-Chair of AIA New York Committee on the Environment