



THE COMMITTEE TO PRESERVE THE UPPER WEST SIDE

**Testimony of LANDMARK WEST!
Certificate of Appropriateness Committee
Before the City Planning Commission
City of Yes for Carbon Neutrality
July 26, 2023**

Dear Commissioners,

LANDMARK WEST! is a not-for-profit community organization committed to the preservation of the architectural heritage of the Upper West Side. LANDMARK WEST! is committed to sensible land use of the Upper West Side and we can appreciate stated goals of the proposed Zoning for Carbon Neutrality under the City of Yes initiative to reduce our city's carbon emissions.

When we first heard of the title of the proposed changes, certain expectations arose. Some were met in the text, but much was left to be desired in terms of both meeting the goals of reducing carbon emissions and the continued effort to safeguard aspects of the city's urban heritage. We find it hard to support a 'feel good' document without real world implementation and vague language at this review stage. We remain concerned about proposals to eliminate any and all impediments to reducing carbon emissions which don't take into account the preservation of our cultural heritage.

These evolving energy policies will likely incur significant challenges for NYC's historic buildings. Our biggest concern is incrementalism. A traditional Upper West Side block features an elaborate street wall guarding the doughnut, an urban green space. A century of tweaking and further encroachment and underpinning into the doughnut has led to eroding the lungs of each block. The proposed zoning - further cluttering the roofs and yards of historic districts - adds to this - or, more appropriately put, detracts from this asset. One would imagine the goals of carbon neutrality would support permeable surfaces and enhanced greening rather than the production of further bulk, construction and obstruction.

The greenest choice is reusing and therefore retrofitting a historic building rather than creating more waste and emissions building a new 'efficient' tall building. While we cautiously advocate for adapting historic buildings to energy efficient ones (acknowledging that almost one-third (32%) of the built floor area of Manhattan is energy code-exempt due to historic status), we

don't believe the current proposed zoning for decarbonisation of existing buildings pays mind to the preservation of the character of historic buildings. Our main concerns and questions include:

- Changing the definition of Floor Area for unused floor space within a building may yield unintended consequences and leads our Committee to question the full intentions of this maneuver. Reflecting on Floor Area, will Supertalls with their average of 16'-4" floor-to-floor heights ever meet carbon net zero emissions and therefore will they have to comply with the same zoning regulations as a smaller structure?
- The proposed increased rooftop coverage and height allowances could inflate the volume allowed on rooftops by up to 170%. New mechanical equipment could reach three or four floors in height and solar panel canopies could cover 100% of the roof, reaching all the way to the street wall. These additions would be fully visible and contribute to an increase in the bulk and volume already present in many historic districts. Our Committee requests specific language whether these volume increases would apply to smaller residential buildings.
- Our Committee understands that electrifying old buildings is on the forefront of tackling carbon emissions but these proposals are not adequately addressing the impact the bulk and weight of new mechanical overruns and solar panels will have on not only the durability of the buildings but the integrity and authenticity of their historic character.
- Our Committee seeks a clearer definition of the term Accessory Use that spans different zoning lots. We support greater bike parking allowances, however a bike is not the same as it used to be three or four years ago. More consideration has to be taken into account before removing limits on where e-vehicle infrastructure can be placed. Additionally, if an amusement park ride in a hotel can be classified as Accessory Use, therefore what precedent is being set for this proposal?

NYC has a Zoning Code that exceeds 1,300 pages. Too often, the complaint is that building in NYC is too difficult to navigate and execute. Let's be wise and pointed in any further goals rather than incrementally tweaking the Code with under-examined proposals that yield further unintended consequences.

Thank you.