



Preservation League of NYS

July 1, 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

To Whom It May Concern:

Thank you for the opportunity to comment on the New York State Climate Action Council Draft Scoping Plan which seeks to provide strategies for New York State to meet the nation-leading goals it has set forth in the New York State Climate Act.

The Preservation League of New York State is New York's statewide, non-profit advocate for historic preservation. For nearly fifty years we have been empowering New Yorkers to use historic preservation to revitalize their communities, protect their diverse heritage, and build a sustainable future. We believe strongly that reusing our existing buildings, both historic and non-historic, is one of the best ways we know to keep demolition debris from landfills, defend forests and open space from development, maintain walkable downtowns, and protect the special and meaningful places that New Yorkers want to live in.

We applaud you for your hard work in crafting the Draft Scoping Plan and believe that there is much in it that can be achieved while there is still time to impact our ever-accelerating climate crisis. However, we would like to see greater emphasis placed on the reuse of existing and historic buildings as an immediate strategy for addressing the climate change threat.

A 2011 study by the National Trust for Historic Preservation entitled "The Greenest Building: Quantifying the Value of Building Reuse" found the reuse of our buildings matters. *"Building reuse typically offers greater environmental savings than demolition and new construction. It can take anywhere from 10 to 80 years for a new energy efficient building to overcome, through efficient operations, the climate change impacts created by its construction"*

It is clear from the Draft Scoping Plan that New York does not have 80 years to wait to reduce embodied carbon emissions inherent in demolition and new construction.

The National Trust study focuses on the whole life carbon of existing buildings, not just the operational carbon of existing buildings. Looking only at the operational carbon of a building minimizes the importance of the embodied carbon emitted in demolishing existing buildings, and the mining, manufacturing, moving, and erecting of the materials needed to build its replacement.

OFFICERS

Frank Emile Sanchis III – Chair
Karen Arrison – Vice Chair
Angel Ayón, AIA – Vice Chair
Lee Miller – Vice Chair
Charlotte Worthy, AIA – Vice Chair
Ruth Pierpont – Secretary
Mark W. Warren – Treasurer

BOARD OF TRUSTEES

Patrick Ciccone
Suzanne Clary
Andrew Capitman
Bret Garwood
Dr. Georgette Grier-Key
William A. Hurst
Thomas Jayne
Gregory R. Long
Evan Mason
Paul R. Provost
Lori Zabbar
Caroline Rob Zaleski

Jay DiLorenzo
President

TRUSTEES COUNCIL

Jan C. K. Anderson
Kent Barwick
Duncan Barrett
George H. Beane
William L. Bernhard
Ildiko Butler
Constance L. Clapp
Randall T. Crawford
Joan K. Davidson
Scott Duenow, AIA
Steven C. Engelhart
Stephen A. Facey
R. Brandon Fradd
Lionel Goldfrank III
Roberta Brandes Gratz
Christopher Holbrook
Gerald A. Holbrook
Anne A. Hubbard
Robert J. Kafin
Marilynn G. Karp
Alexia Lalli
Richard J. Lippes
Robert B. MacKay
Richard A. Maitino
Jean M. McCarroll
Henry A. McCartney
Norman M. Mintz
Dede B. Nash
Anne G. Older
Rev. Dr. Thomas Pike
Robert C. Quinlan
Daniel G. Romualdez
Janet C. Ross
John Sare
Thomas J. Schwarz
Robert D. Snedeker
Robert A.M. Stern, FAIA
Miriam Tremontozzi
Anne H. Van Ingen
Cynthia C. Wainwright
Diana S. Waite
Areta Swartz Warren

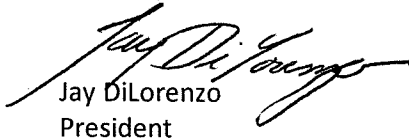
The reuse and sensitive weatherization of New York's existing buildings, including historic buildings, should be a core component in the plan and recognized as an important strategy for achieving the State's nation-leading climate directive to reduce carbon emissions by 2050. While low-carbon construction techniques may be years from wide acceptance, and newly constructed, energy efficient buildings will take years to pay back the carbon debt from their construction, reuse and weatherization is the fastest and cheapest way to reduce embodied climate emissions now.

We recommend:

1. Prioritizing the reuse and sensitive retrofitting of existing buildings over demolition and new construction.
2. Supporting efforts to develop a trained workforce of craftspeople knowledgeable of effective techniques to restore and retrofit existing and historic buildings.
3. Enhancing existing tools like the New York State Rehabilitation Tax Credit Program as a way of encouraging building reinvestment in lower-income census tracts.
4. Encouraging deconstruction and salvage of building materials when building removal is the only option.

At the Preservation League we stand ready to assist New Yorkers in protecting their communities from the damaging effects of climate change. We welcome opportunities to engage with the Climate Action Council, state agencies, and elected officials in making building reuse and retrofit an important part of the solution.

Sincerely,



Jay DiLorenzo
President