



January 27, 2020

### **AIA New York Testimony on Intro 1816**

AIA New York in consultation with advisors on its Committee on the Environment offers its support for Intro No 1816, which would make NYC’s Energy Conservation Code one of the most advanced building energy codes in the country and would make a major contribution toward advancing the goals of energy efficiency and carbon reduction that the city has set for 2030 and beyond. While the new Code takes significant steps to reduce energy consumption and hence emissions, it is not stringent enough on its own to meet the 80x50 goal and the targets set by Local Law 97.

There are many improvements to lighting and mechanical systems that can improve a building’s energy performance and the updated regulations do address these to some extent, but as architects we have a particular awareness of the impact a building’s envelope can have on energy efficiency, and occupant health and comfort. High performance glazing, more effective insulation, and airtight construction should be the standard for all of our buildings, not just the exceptional few.

The new code does take steps toward envelope improvement, but there is still a long way to go. The argument is often made that setting standards for glazing, insulation, and airtightness will result in significantly higher construction costs and will have negative impacts on real estate values. But in fact, the opposite is true: high performing envelopes lead to lower upfront mechanical costs, increased leasable area, higher productivity from occupants, lifetime energy savings, and increased resilience.

While we think that this legislation is undeniably a step in the right direction and will help architects design better, more energy-efficient buildings, and we are unanimous in our opinion that adoption of the new code is far preferable to the alternative, our enthusiasm for the progress it offers is tempered by the knowledge that it simply does not go far enough to respond to the current climate emergency.

Sincerely,

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