



OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007
(212) 669-8300 p (212) 669-4306 f
431 West 125th Street, New York, NY 10027
(212) 531-1609 p (212) 531-4615 f
www.manhattanbp.nyc.gov

Gale A. Brewer, Borough President

March 22, 2018

Meenakshi Srinivasan, Chair
Landmarks Preservation Commission
1 Centre Street, 9th Floor North
New York, NY 10007

Dear Chair Srinivasan:

I write in regard to LPC's Proposed Rules, which are the subject of public comment and a public hearing on March 27th. I understand that these rules, some new and some amendments to existing rules, will significantly affect the regulatory process for applicants and the review process for the public. My office has had several discussions with our Manhattan Community Boards, and members have expressed a number of substantive and procedural concerns. Given the density, breadth, and implications of the 131-page Proposed Rules, I ask that the comment period be significantly extended beyond March 27th so stakeholders will have adequate opportunity to give their informed input on the changes.

I have long been a proud supporter of LPC and its mission, and I would wholeheartedly endorse initiatives to improve efficacy and empower the agency to do more of their good work. However, the Proposed Rules raise certain questions about transparency and process that should be properly addressed. Many approvals that were previously reviewed by the Commission would instead be moved to the staff level. While we understand that these are items "consistently approved" or "regularly approved" by the Commission, we would like to better understand cases that might be exceptions, and how they should be resolved. We would also like to explore ways in which the public can still be notified of these changes at staff level, as currently the Community Boards are only alerted to applications heard by the Commission. Further, seeing as the Proposed Rules are meant to improve transparency and efficiency for LPC staff, we would be interested to learn more about how the work of the agency would change in terms of metrics and output should these new rules be adopted.

I hope we will have the sufficient time to consider and address these important issues.

Sincerely,

Gale A. Brewer
Manhattan Borough President