



THE COUNCIL OF
THE CITY OF NEW YORK

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COREY JOHNSON
SPEAKER

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March 22, 2018

Hon. Meenakshi Srinivasan
Chair
New York City Landmarks Preservation Commission
Municipal Building, 9th Floor
One Centre Street
New York, NY 10007

Re: Proposed Amendments to the Landmarks Preservation Commission (“LPC”) Rules

Dear Chair Srinivasan:

We write to share with the Commission our comments on the proposed amendments to the Landmarks Preservation Commission Rules (“Proposed Rules”) for which a public hearing before LPC is scheduled on March 27, 2018.

While we applaud the Commission’s efforts to update the existing rules in order to comply with other criteria such as barrier-free access, energy codes, and resiliency mandates, we do not support the portions of the Proposed Rules that diminish opportunities for public input and delegate discretionary functions away from the Commission to staff. In particular, we urge the Commission to remove from the Proposed Rules those provisions delegating to staff approval of work related to these areas: primary facades (Section 2-11, Section 2-14), duration of temporary signage (Section 2-05), rooftop additions and rear yard additions (Section 2-15), and sidewalks (Section 2-19).

The participation of the public adds value to our civic processes and, in the case of LPC, ensures that the Commission’s determinations are based upon the best possible information. Contrary to the stated goals of the Statement of Basis and Purpose, the Proposed Rules will not increase transparency, but rather will reduce it. Under the Proposed Rules, there is no provision for any kind of public review of these delegated determinations.

The Statement of Basis and Purpose also states that the Proposed Rules, by delegating approval authority to staff, would ensure that the Commission has the capacity to review an increasing number of applications. Reducing public input and diminishing the discretion of the Commission is not the appropriate solution to a workload problem.

If the challenge is a staffing one, we look forward to working with you and the Office of Management and Budget and our Finance division to ensure that the necessary resources are secured for the LPC to undertake its important work, while still ensuring appropriate oversight over our landmark buildings and historic districts.

We're fortunate to represent Council Districts that have hundreds of beloved landmarks, for which thousands of people have fought hard to preserve, over the course of many decades. We, and our communities, feel a special responsibility to be faithful caretakers of these treasured buildings and historic districts. For the reasons noted above, we don't believe portions of the proposed rules are appropriate. We welcome a conversation with you or your staff to ensure that as we make improvements to LPC processes, we don't undermine the role of public participation in these decisions.

Sincerely,



Corey Johnson
Speaker



Rafael Salamanca, Jr.
Chair, Land Use Committee



Adrienne E. Adams
Chair, Landmarks, Public
Siting & Maritime Uses
Subcommittee

cc: Sarah Carroll, LPC
Mark Silberman, LPC
Raju Mann, New York City Council Land Use Division
Julie Lubin, New York City Council Land Use Division