

| | Section/Item | Pages | Comments |
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| Statement of Basis and Purpose of Proposed Rules | Introduction: Item 1 | 2/131 | Allowing the staff to make decisions without public involvement does not promote transparency. The DOB has BIS, the LPC could do something similar. |
| | Introduction: Item 2 | | Time and again the Commision as stated that its decisions are not precedent, yet now those decisions are being engrained as rules which will bypass public review. |
| | Introduction: Item 3 | | Time and again the Commision as stated that its decisions are not precedent, yet now those decisions are being engrained as rules which will bypass public review. |
| | Introduction: Item 4 | | Time and again the Commision as stated that its decisions are not precedent, yet now those decisions are being engrained as rules which will bypass public review. |
| | Introduction: Item 5 | | Agreed. |
| | Introduction: Item 6 | 3/131 | We believe there are other ways to make public hearings and meetings more efficient. Reference testimony. |
| Summary of Proposed Changes to Title 63 | | 3-5/131 | Organization seems reasonable. |
| Chapter 2 | Section 2-04 | 5/131 | What is the legal implication of changing a Notice of Violation to a Summons? Does this remove authority from the LPC? |
| | Section 2-06 | 6/131 | We can understand an extension without renewal, but why 180 days and not 120? |
| | Section 2-11 | 6-7/131 | We are concerned about many of the replacement elements, how they will age with respect to original historic fabric. For example, a cornice of painted metal may flake but can be repainted. A fiberglass section will crack and fade. Due to the fabrication involved, it invites larger sums of replacement than may be needed for repair. When adjacent to original fabric, the replacement will likely look different as time goes on, further encouraging replacement rather than repair resulting in an overall loss of historic material. |
| | Section 2-12 | 7/131 | We would need to review the case typologies. Our concern is that this would invite a catalog of repairs that then become the homogenous standard by default. |
| | | | We feel that films should specifically exclude advertising akin to buswrap or similar. |
| | | | We would like to see a conditions check list. In the past we have seen non-original yet still historic features such as mosaic entries with addresses and art deco curved glass lost because it was not original to the building. There should be a threshold of consideration, especially in districts like the Upper West Side where there was not necessarily originally planned street level retail. Under any other guise, it almost always is allowed to be eradicated then. |
| | | | We believe that scissor-style security gates which are always somewhat visible and do not retract to an awning hood should not be sanctioned. |
| | Section 2-13 | 7-8/131 | Regarding sidewalk canopies, we agree that this is reasonable for buildings that historically featured canopies but would suggest limits on name/address and font scale. |
| | | | Agreed. |
| | Section 2-14 | 8-9/131 | We understand the removal of half-round, elliptical arch and quarter-round and pointed windows from the "special" category, our concern remains that often there is a cumulative impact. We would suggest that when more than 15% of the windows are deemed "special" that the ENTIRE package go before the Commission rather than part of it be considered and approved by staff. This would not further burden the Commission and could result in a very different outcome. This is especially true for the primary facade. |
| | | | We have reservations about tilt/turn sash in lieu of double-hung at rowhouses especially where the sense of rhythm along the street will be changed when opened. We would prefer an exception be made for windows of row houses of three or fewer floors on the primary facade. |

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| Section 2-15 | 9-12/131 | With respect to one-over-one windows on visible secondary facades in historic districts, we have reservations. Coincident with our many rows of mid-block rowhouses, many avenues from Central Park West, to Columbus, to West End Avenue and Riverside Drive have larger buildings with visible secondary facades. We feel these should be reconsidered. |
| | | Regarding rowhouse rear yard elevations, we would ask that language be included to exclude cases where there are decorative bays and special windows, whether visible or not. Such cases would raise the application to the Commissioner level. |
| | 10/131 | Agreed, consolidating HVAC seems logical. |
| | | We would ask that you define "minimally visible" for rear yard additions. Does this mean that the staff cannot approve an addition of non-occupiable space i.e. a bulkhead? |
| | 10/131 | These rules seem to preclude visible elevator bulkheads on rowhouses meaning those would continue to go before the commission, correct? |
| Section 2-16 | 11/131 | Rear Yard rules seem clear. We would ask that bullet three be clarified. It states "an addition of not more than two stories". Please clarify that this is two over-all, or two on top of any addition that may already exist. |
| | 11-12/131 | In regards to Cumulative Impact, please clarify that it is two story rear yard over-all, not an addition of two stories on top of any addition that may already exist. |
| | 12/131 | We are concerned that this has safety implications for the neighbors and public notice should be required beyond the posting of a permit. The BSA requires proof of notification of items, the LPC could do something similar. The neighbors should really be warned in advance. |
| | 13/131 | Agreed, no objections |
| Section 2-18 | 13-14/131 | We ask that these be considered in conjunction with all storefront proposals so that they can be integrated from the start rather than retro-fit after the design is implemented for least invasive, most cohesive results. |
| | | We ask that the LPC consider UK precedents like the Sesame Stair. |
| | | We ask that a chair lift addition to an individual landmark be considered at Commissioner level. |
| Section 2-19 | 14-15/131 | We would consider that in an instance of historic sidewalks or vault lights where they exist, they are indeed a feature. Erradicating these features dilutes the streetscape. Diamond plate is not a parallel to vault lights. |
| Section 2-20 | 15/131 | Agreed, no objections |
| Section 2-21 | 15-16/131 | We disagree that through-wall HVAC installations should not be held to a pattern or standard. |
| | | Swing stairs are much more visible but safety triumphs. We would ask the the color to be consistent. |
| Section 2-22 | 16/131 | Agreed, no objections |
| Section 2-23 | 16/131 | Agreed, no objections |
| Section 3-31 | 16/131 | Unclear of implications |
| Section 3-32 | 16/131 | Agreed, no objections |
| Section 3-34 | 16/131 | Unclear of implications |