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Gale A. Brewer, Borough President

Testimony of Manhattan Borough President Gale A. Brewer's Office on Landmark Preservation Commission Rules Amendments

March 27, 2018

Good morning Chair Srinivasan and Commissioners. On behalf of Manhattan Borough President Gale A. Brewer, our office would like to thank the Commission for agreeing to our written request to extend the comment submission deadline for six weeks to allow the public sufficient time to consider and become informed on the proposed landmarks rule changes.

My office has heard concerns from landmarks advocates and community boards about the impact these proposed rules will have on the public engagement process. Questions have been raised about the effect on transparency that the **modification** of public review could have on the decision-making process. There are so many development, construction and quality of life issues facing every neighborhood in Manhattan that it is often difficult to get information to residents in a meaningful manner. We need to make sure that changes to the landmarks decision-making process are accompanied by an increase – and certainly not a decrease – in transparency.

Last week we were happy to host your staff for a presentation on the proposed rule changes at a monthly meeting **generally only attended by community board staff. We had four community board chairs attend this meeting which only underscores the importance of the landmarks process** to our community boards and the neighborhoods they represent.

We would like to work with the Commission, community boards and landmarks groups over the next six weeks to achieve the goals of the rules changes: To improve the efficiency of the Commission's review process; reorganize the rules so they are user-friendly; and reduce some of the time and expense burden on owners of landmark buildings for routine applications such as those seeking approval for the use of widely accepted materials. In this regard it would be helpful to have more information for each category of action where the proposed rules would transfer decision-making responsibility from the Commission to staff; for example, what percentage of the applications in each category does the Commission accept the staff recommendation; in what percentage of the applications in each category does the Commission alter or reject the staff recommendation; and what types of applications in each category tend to be the subject of Commission decisions that differ from staff recommendations.

In addition, we believe that in all instances where decisions are transferred from the Commission to the staff, the rules should include a process by which the community boards and public are notified of the pending applications and given a chance to make their views known to LPC staff. We are willing to entertain the general proposition that some decisions now made by the

Commission could be made by staff. **BUT** community boards, interested neighborhood organizations, and individual neighbors of landmark buildings must continue to have the right to be apprised of changes.

Finally, a number of community boards and landmarks groups have raised specific concerns with us over the transfer of certain specific types of actions from the Commission to LPC staff. These actions include applications for rooftop extensions, rear yard additions and excavation work. We urge you to provide detailed and case specific information on how these decisions have been made, and how they would be made under the proposed changes. It is important that you continue to work with all stakeholders, and that any changes in these sensitive areas not move forward unless communities and neighboring buildings are sufficiently protected.

The Manhattan Borough President and Manhattan's community boards care deeply about maintaining the contextual and historic integrity of their neighborhoods. We know the Commission does as well. We are confident that with additional time to comment on these proposed rules, and the continued responsiveness of the Commission to everyone's concerns, we can increase both efficiency and transparency without sacrificing landmarks preservation.

Thank you for your time and consideration.