

**Testimony of the Landmarks Preservation Commission  
before the Land Use Committee of the City Council on Intro. 775 and Intro. 837  
September 9, 2015**

Good morning Chair Greenfield, Landmarks Subcommittee Chair Koo, and Members of the City Council Land Use Committee. I am Meenakshi Srinivasan, Chair of the Landmarks Preservation Commission. I am here today with Sarah Carroll, our Executive Director and Mark Silberman, our General Counsel. Thank you for giving us the opportunity to testify on two bills to amend the Landmarks Law: Intro. 775, which would establish time periods for the Commission to take action on items calendared for potential landmark designation; and Intro. 837, which would require the agency to publish an on-line database of all designated items and items under consideration for designation.

I will address each bill in turn, but first I would like to acknowledge our support for the goals of these bills, which seek to enhance the efficiency, predictability and transparency of the Commission's processes. These are admirable and important characteristics of good government, we embrace them and, in fact, we have implemented several reforms and policy changes to achieve these objectives. However, as a threshold matter, because the bills seek to regulate and dictate internal agency processes, we believe the goals are best achieved through internal policy changes and, if necessary, agency rulemaking. Rulemaking, which requires public notice and a hearing allowing stakeholders a voice, has traditionally been the mechanism to regulate policies and procedures, is a more efficient way to implement binding requirements, and is more agile in responding to stakeholders needs and to changing conditions that render the rule less effective..

In addition, we believe that both bills, as currently drafted, are unworkable and have the potential to undermine the Landmarks Law and the agency's ability to work efficiently. With respect to Intro. 775, our greatest concern is the 5-year moratorium provision to recalendar properties, which would severely compromise the agency's ability to carry out its mandate to designate historically significant sites. We are also concerned that there is no provision to extend the deadlines for designation under certain circumstances. With respect to Intro. 837, we believe the bill is far too broad by treating properties identified in internal staff surveys or

the subject of a Request for Evaluation submitted by the public, as “considered for designation”. Such properties are not the same as calendared properties that are actively considered for designation. This treatment in the context of an on-line database could potentially be misinterpreted and set unclear expectations for the public, and the mandate to create such a database would be expensive and take away resources from agency mandates, including on-going designations and processing of permit applications.

**Intro. 775:**

I would like to now discuss Intro. 775 in more detail. The Landmarks Preservation Commission’s authority to identify and designate historically, architecturally and culturally significant sites is one of our agency’s primary functions and is at the core of our mission. We believe that establishing reasonable timeframes would assist the agency in meeting its statutory mandate in a responsible manner.

I want to affirm my commitment as Chair to advance proposed items through the designation process efficiently and fairly. Since assuming this position, I have introduced reforms to make the designation process more transparent and timely. In fact, every Individual landmark that has been calendared under my tenure (including Stone Avenue branch of Brooklyn Public Library, Stonewall Inn and the Bank of Manhattan Tower, aka Queens Clocktower) has been designated within two months of calendaring. Similarly, we designated Chester Court Historic District in two months, and the Mount Morris Historic District Extension, which was calendared in April, is scheduled for vote in late September --approximately five months from calendaring. This commitment applies equally to the agency’s backlog of calendared properties. When I became Chair, I found that 95 properties had been calendared for more than 5 years, 85% of which had been calendared for more than 20 years. On July 8, the agency released a detailed plan for addressing these 95 items. In summary, this plan set out a process for notification and public input on the backlog properties, and then advances such properties to Commission action within a timeframe of 18 months.

While these reforms address past practices, we understand the need to ensure that such reforms continue under different administrations and provide future accountability. However, as I already stated, we believe that the goals of Intro. 775 would be best addressed by the Commission promulgating rules to establish timeframes.

As for the specific provisions of Intro. 775, we have the following concerns on details of the proposed legislation:

First, regarding the timeframes from calendaring to action, we believe a one-year timeframe is reasonable for individual, interior and scenic landmarks, but that three years, instead of two, is more appropriate for historic districts. Potential districts vary in size from less than a 100 buildings to more than a thousand, and the extent of research and public outreach, including the need to have multiple public hearings, vary as well. The additional time will ensure a fair, transparent and, if necessary, iterative process for property owners and other stakeholders.

Furthermore, we believe that the requirement that a public hearing be held not later than halfway between calendaring and the action date is overly prescriptive. The Commission determines the public hearing date based on various factors including accommodating property owners or a change in ownership, staff assignments and agency resources, and the Commission's schedule. In addition, one of my reforms with respect to the designation process includes conducting a significant amount of research prior to the public hearing -- this allows for a potentially briefer time period between a public hearing and a vote. Therefore, while overall timeframes may be reasonable, we believe the agency needs to have the flexibility to determine when to hold a hearing within that timeframe.

Second, as noted earlier, we strongly oppose the five-year moratorium to reconsider an item for designation if the Commission fails to meet the public hearing timeframe, or votes not to designate or fails to designate an item at the end of the timeframe. We believe that there is no public policy objective served by curtailing the Commission's ability to rehear an item that is meritorious, and such provision interferes with our ability to carry out our legal mandate to protect historically significant properties. There may be several impediments to designation (or lack of action), including the need for more research or owner outreach, significant opposition,

or lack of political support, none of which relate to the merits of the item, and therefore reconsideration may be warranted in the near future. Even when the Commission has voted not to designate, which is a vote on the merits, the Commission should to be able to reconsider based on new information previously not in the record.

Third and finally, we strongly believe that the legislation should include a provision to allow the Commission to extend the timeframe for designation under certain conditions including accommodating an owner's needs.

**Intro. 837:**

Moving now to Intro. 837, we concur that information on designated and calendared properties should be available to the public. I have introduced several reforms to increase transparency in all aspects of the agency's work, including providing a searchable database of all designated properties, putting designated properties on CityMap (the City's on-line map portal) with links to the Commission's designation reports. We are also posting all public hearing permit application presentations (including modifications) as well as Commission decisions on these applications. We launched the designation database in September 2014, and the permit presentations in March 2015. We have also been providing information on our website about recently calendared items.

We support the goal of providing more information about properties under active consideration. To clarify, the Commission formally considers a property for designation only when it votes to calendar a property at a public meeting. We believe that adding all calendared items to the online database of designated items, along with any scheduled hearing or meeting dates, and information on the significance of each item, would enhance the public's knowledge of the Commission's work as well as allow for more robust discussions at designation hearings. Calendared buildings should be added to CityMap, and we are prepared to do this immediately. However, it should be stressed again that many of these changes are already in place or in the

works and should not be the subject of legislation, but instead can be accomplished by the agency's commitment to implement these changes within an agreed upon timeframe.

With respect to the specifics of the bill, we have serious concerns about the scope of properties covered by the definition of "items under consideration for designation." As defined in the bill, this includes items officially calendared by the Commission as well as "properties or neighborhoods surveyed," and buildings and districts for which a member of the public has submitted a "Request for Evaluation" or "RFE." By treating surveyed or RFE properties as properties under consideration for designation, the bill manifests a misunderstanding of the Commission's process for identifying and proposing items to be considered for designation.

An RFE is a request by the public to evaluate a building or district to determine eligibility for possible designation. It is not an application, nor the first step in the designation process. Similarly, surveys are internal, non-final and non-public research documents and planning tools, and the agency constantly evaluates, analyzes, and updates these surveys. While, both are effective tools to assist the Commission in identifying meritorious buildings and districts, they neither automatically nor directly lead to designations, and therefore should not be characterized as "items under consideration." The process of identifying, analyzing and prioritizing items for consideration is far more nuanced. To flag these properties on an on-line database would not enhance transparency but, rather, convey misinformation to the public, set unclear expectations, and result in ambiguity about the Commission's intentions.

It could also unnecessarily put such buildings at risk. While it doesn't happen very often, there have been instances in the past where property known or thought to be under consideration by the Commission has been modified or even demolished in an attempt to avoid designation.

Finally, the requirement that the Commission create and maintain a database of RFE's and agency surveys, and post a significant amount of information, including "copies of relevant documents" related to each item would be extremely burdensome. We receive over 200 RFE's

and survey over 2,000 properties each year. We see little justification for expending scarce agency resources on compiling, uploading and maintaining updated information about properties that are not under active consideration.

In conclusion, we support the underlying goals of Intro. 775 and Intro. 837, have been advocates for good government practices, and have implemented reforms related to designation timeframes and the backlog, as well as provided information to the public on calendared and designated properties. While we believe that changes in these areas are most appropriately accomplished through the agency rulemaking process and internal policies, we hope that our serious concerns regarding the moratorium, the lack of provision for the Commission's discretion to extend the timeframes for certain circumstances, and the requirement to maintain a database of items beyond those that are calendared, will be given serious consideration and incorporated in any approved legislation and we are open to working with the Council toward this end.

Thank you for giving us the opportunity to testify before you today, and we are happy to take any questions.



DEBORAH J. GLICK  
Assemblymember 66<sup>th</sup> District  
New York County

# The Assembly State of New York

CHAIR  
Higher Education Committee  
Intern Committee

COMMITTEES  
Environmental Conservation  
Governmental Operations  
Rules  
Ways & Means

## Testimony of Assemblymember Deborah J. Glick Before the New York City Council Land Use Committee, Subcommittee on Landmarks September 9, 2015

Thank you for the opportunity to testify today regarding Intro 775. I am here today on behalf of residents who live and work in the 66<sup>th</sup> Assembly district, which includes Tribeca, SoHo, the West Village, and the East Village, who are vehemently against the proposed legislation. While this legislation claims to be aimed at increasing the efficiency of the Landmark Preservation Commission (LPC), it would do so at the expense of the historic preservation of our City. I urge you not to pass Intro. 775.

The Landmark Law, established in 1965, was created to protect the architectural, cultural and historic fabric of communities. The passage of Intro 775 would jeopardize these protections going forward. While it is laudable to try to create a more efficient bureaucratic system at LPC, this is not the way in which that can be accomplished. Instead, this legislation would aid in destruction of many historic buildings in New York City by automatically disregarding historic sites if rigid, arbitrary timelines are not met. This is of great concern to all of us who admire the historic and architectural character of the City. Additionally, we recognize its value to our neighborhoods, but also its value to our economy as a tourist draw. We should be focused on how to support the preservation of this character, not help buildings become targets for developers.

In my district alone, there are a number of historic buildings currently being threatened by avaricious real estate developers who want to convert these neighborhoods and buildings into high rise luxury towers. If stalling long enough to surpass a deadline was an option, I have no doubt that developers would start to intentionally slow down the LPC review process in hopes that the application is dismissed for no valid reason other than a missed deadline.

There are at least two neighborhoods within my district alone that are currently lacking neighborhood landmark designation status- Tribeca Southwest, Tribeca Southeast and the South Village. If this legislation is passed, these efforts could be permanently derailed, and large swaths of our important history could be erased.

Unlike in other countries that revere historic buildings, we seem eager to destroy them instead of preserving them for future generations. New Yorkers fought hard against Robert Moses efforts to destroy the cultural heritage of our community, and we continue to do so. Not only is Intro 775 a failed attempt to streamline the landmark process, it would do more damage than good to some of New York City's most beloved treasures. I urge you not to pass intro 775 into law.

Thank you for your attention.



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](http://www.manhattanbp.nyc.gov)

**Gale A. Brewer, Borough President**

**Testimony before the New York City Council  
Land Use Committee  
Intros 775-2015 and 837-2015  
September 9, 2015**

Good afternoon Chair Greenfield and members of the Land Use Committee. I am Manhattan Borough President Gale A. Brewer. Thank you for the opportunity to testify today on Intros 775 and 837 which respectively pertain to the process of considering and tracking the City's landmarks and historic districts.

Most of you know how important historic preservation is to me. I represent New York County -- the densest county in the United States. Without our City's Landmark Law preserving historic areas of Manhattan from Greenwich Village to Harlem, and beautiful buildings from Grand Central Station to the Cloisters, this county would look more like an impenetrable wall of steel and glass boxes, than the mix of old and new that makes our Borough so special. I strongly believe that our City's Landmarks Law can be improved but we need to be very careful that in an effort to make it more efficient we don't weaken it.

Having said that, and despite the fact that I am fond of saying I would landmark the entire Borough, I strongly believe in a balance between development and historic preservation. Recently, my colleague, Council Member Dan Garodnick and I finished working on a conceptual plan for East Midtown that balances the need for significant increases in density with the need to preserve some of our City's most historic assets. We worked closely with developers, BIDs, preservationists and community leaders to achieve a fair and balanced plan and in so doing, have added significantly to the workload of our Landmarks Preservation Commission which is now tasked with reviewing a sizeable list of potential landmarks prior to certification of the East Midtown ULURP.

As you also may know, I am a proponent of transparent and predictable government operations, so I share the goals of Chair Greenfield and Landmarks Subcommittee Chair Peter Koo on improving transparency and process at the Landmarks Preservation Commission (LPC). Reasonable timelines can and should be a part of this needed predictability. I don't think we should ever allow a backlog consisting of items up to four decades old to accumulate on LPC's calendar. In fact, as Borough President, I have met with both sides of the issue over a dozen times, with discussions going up to three hours at times, because I believe good government should be about balancing those interests while ensuring the strength of the Landmarks Law for the next 50 years.

But there is a lot of space between an item being calendared for 40 years and a time frame of 12 to 24 months, with a five year bar on reconsideration for anything that goes over this

timeframe whether or not a decision was ever reached on the merits. And those are my principal concerns with the timelines proposed by Intro 775.

While many if not most individual landmarks are calendared and designated within a year, and most historic districts are calendared within two years, almost 30 percent of historic districts have taken more than the two-year time period proposed by Intro 775. These changes would eliminate the LPC's ability to deal with more complex or negotiation-intensive landmarks applications. In order to increase efficiency we should not create a situation in which once the LPC calendars an item and holds a public hearing they must cut short substantive discussions with stakeholders to make a decision because the clock is ticking and if the clock runs out their hands will be tied from further consideration.

Historic Districts such as SoHo and Hamilton Heights in Manhattan, Bedford Stuyvesant in Brooklyn, and Mott Haven in the Bronx all were calendared for over two years before designation. Indeed, the creation of many of our historic districts have been the product of intense debate and negotiation, and once created have undergone expansion. A five year bar on reconsideration could put that careful and incremental consideration at risk.

Finally, I am troubled by the provision at the end of Intro 775 that would require the LPC to clear its entire calendar within 18 months. I am in complete agreement with the bill sponsors that to have buildings sitting in limbo for decades is a practice that must end. However, I strongly believe that mandated timelines, coupled with a fair process and transparency, will prevent a future backlog. Moreover, the LPC realized that true public input and process is the more appropriate way to go, and they have developed a strong backlog plan for the first three and a half decades of a four decade backlog. Yet even this may take 18 months to clear. I fear that superimposing a legislative drop dead date on the work that the LPC has done together with community leaders and advocates, may undermine all the hard work that has been done to clear the backlog through a timely public process.

Intro 837 of 2015, which I am proud to co-sponsor with my friend and colleague Council Member Dan Garodnick, requires the Landmarks Preservation Commission to maintain a publicly available database of all items designated as landmarks, historic districts, interior landmarks, and scenic landmarks, and items under consideration for designation. As we celebrate and reflect on the 50<sup>th</sup> Anniversary of the City's Landmarks Law, I believe this bill presents an opportunity to make government operations transparent in a way that will benefit all stakeholders in the years ahead.

Owners, preservationists and members of the community have shared with my office a variety of concerns regarding the fairness and clarity of the landmarking process. These include the unknown status of requests, unclear scope for public comments, and unclear standards for what type of work will make it through the permitting process. For example, Community Board Five submitted a Request for Evaluation of the beautiful Rizzoli Bookstore at 31 West 57 Street. They waited seven years for a response, only to learn in the press that their request had been denied. As many of you know, the building has already been demolished to make way for another glass box. The LPC now promises written responses to these requests, and the public should know of any final determinations the agency makes.

The proposed database would include information regarding the current status of consideration or designation for each item including, for items under consideration, the location of property under consideration, the person or organization who submitted a request, copies of relevant documents, any scheduled hearings or meeting dates, the date of the request and the date on which an item is calendared or designated.

The shared goal being expressed by many today is to make the operations of the LPC more transparent and provide the public with information on LPC decisions. I believe that Intro 837 accomplishes this and encourage the Committee to vote in support of the bill.

Thank you again to Chair Greenfield and the members of the Land Use Committee and Council for the opportunity to testify before you today.



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

COMMITTEES  
Consumer Affairs  
Higher Education  
Judiciary  
Labor  
Transportation

Chair  
Sub-Committee  
Tuition Assistance Program

JO ANNE SIMON  
Assemblymember 52<sup>nd</sup> District

Testimony

Int. 775

September 9, 2015

I wish to thank Land Use Committee Chair David Greenfield and the members of the committee for this opportunity to testify today in connection with Intro 775, which proposes to establish a maximum time period within which the Landmarks Preservation Commission (the “Commission”) may act on any item calendared for consideration. I also wish to thank the bill’s prime sponsor Councilman Peter Koo for the courtesies extended by his office in facilitating my testimony at this time today.

Since January of this year, I have been fortunate to represent the City’s first historic district, Brooklyn Heights and well as the historic districts of Boerum Hill, Carroll Gardens, Cobble Hill, DUMBO, Fulton Ferry Landing, Park Slope, Vinegar Hill, and a small part of the Prospect Heights historic district. Because these historic districts are small sections of the neighborhoods in which they are located, a fair number of historic properties in my district remain endangered.

I agree with the points made in the letter of September 4, 2015 sent by Manhattan Borough President Gale Brewer and 8 members of the City Council. I support the stated goals of Int. 775, namely, transparency and predictability in the landmarking process. However, I share their concerns that the proposed bill would not further these goals, but would instead curtail the preservation of historic properties and do so in an inequitable manner.

Eliminating the legendary backlog of applications for historic designation by capping the time frame within which a decision must be made and a five year ban on reconsideration for any calendared item on which the Commission is unable to rule within the proposed deadlines seems contrary to the pursuit of the twin goals of transparency and predictability. Rather, goals and timetables are needed that are demanding, yet sufficiently elastic to accommodate the realities of public review and process as well as unexpected circumstances.

As a community leader and preservationist for many years, I know firsthand the frustrations of those seeking designation only to wait for lengthy periods of time without a decision on the merits. I understand that it the Commission’s decisions or lack thereof can feel opaque to many people, but I believe the proposed bill will not only fail to provide the relief sought, but may exacerbate current inequities. The landmarking process is, *and ought to be*, labor intensive. I suggest the Council give serious consideration to the fact that a lack of progress towards

eliminating the Commission's backlog may not be simply a matter of willful delay, but an insufficiency of resources with which the Commission can fairly be expected to make significant progress.

Four of the historic districts I represent (Boerum Hill, Carroll Gardens, Cobble Hill and Park Slope) would not have been created if the proposed rules applied at the time. I cite as an example my own neighborhood of Boerum Hill, which was designated in 1973 after years of hard work on the part of an all-volunteer army of dedicated residents. Unlike today, Boerum Hill was not an affluent neighborhood. Quite the contrary. Instead, the demographic was poor, and predominantly Latino and African-American.

In the years immediately following World War II, many Boerum Hill houses that had been owned by working families for a century were broken up into SRO's and many became home to illegal activities. In the late 1960's and early 1970's, many properties were in danger of destruction. No one in Boerum Hill had money to hire a consultant to engage in the necessary and highly iterative process of historic designation. If Boerum Hill had had to meet the proposed deadlines to hearing and designation, whole blocks of historic homes would have been razed, including the one in which I lived for 22 years. If a five year ban on reconsideration were to have been in place, Boerum Hill would not be the thriving community it is today, nor would other neighborhoods in my district. These neighborhoods are why people now come to Brooklyn. The value that is currently being capitalized upon by varying commercial interests would not be there were it not for these neighborhoods, yet we would have lost them had the Commission at that time been hamstrung by the deadlines this bill seeks to impose.

The timelines of the bill are insufficient; this is true for the 18 months within which the Commission must cure its current backlog, the 360 days within which a hearing must be held and a decision rendered for individual properties and the 2 years within which historic district determinations must be made. The nature of the work done by the Commission is an intensely iterative process and necessarily so.

The public's interest is well served by that process. A Commission that is forced to "beat the clock," cannot not engage in this highly fact intensive process with transparency or integrity. The cost is not merely losing historic properties and elements, but important losing elements of our collective history. I am confident that this was not the sponsors' intent. Please do not hesitate to call on my office if we can be of any assistance.

**Testimony - Manhattan Chamber of Commerce**

**City Council Hearing – Committee on Land Use Intro 775**

***The Manhattan Chamber of Commerce supports Intro 775***

**By Nancy Ploeger, President, Manhattan Chamber of Commerce**

**FOR THE RECORD**

We join a broad coalition of supporters for Intro 775, a new measure that will standardize the Landmarks Preservation Commission's (LPC) review process for designating new landmarks.

The bill will create timelines for LPC's process of designating new landmarks and require the LPC to eliminate the backlog of buildings it has "calendared" for consideration as landmarks, but on which it has not yet held a hearing.

For individual landmarks, Intro 775 would require the LPC to hold a public hearing within six months of calendaring the building for consideration, and take final action within six months of the public hearing. For historic districts, the time period would be twice as long, with a one year period between calendaring and a public hearing and an additional year for final action.

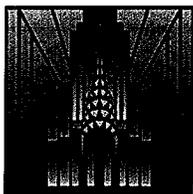
These measures will be both beneficial for the residential and business communities as well as landlords so that proper planning can be made on all parts. New businesses must be able to review all processes and issues relating to opening a new store or office. It cannot be a surprise to them to find out months after signing leases that now they are not going to be allowed to make any changes in their space or follow through on plans they may have made. Nor should they be delayed in making sound judgements based on the fact that a property has been calendared for consideration with no deadline as to the determination. In addition, businesses that know a building is being considered will have a proper timeline in which to judge whether or not to be engaged with the space (or nearby if affected by such landmarking.) And the same holds for homeowners in the sense that they will be able to properly plan their course of action without being hampered by a long drawn out process.

Intro 775 would also require the LPC to determine whether to designate items (both individual landmarks and historic districts) that are currently on the calendar within 18 months of the effective date of the local law. We know that this is already being done as a backlog of over 3,400 calendared properties existed and was reduced to 1,700 under the current administration. This should be continued so that overwhelming numbers of backlogs are eliminated and brought to reasonable expectations.

Intro 775 also proposes that if the LPC considers a building for landmarking but does not designate it, the property in question could not be reconsidered for landmark status for a period of five years. This would ensure that a property is not repeatedly re-calendared, effectively bypassing the timelines put in place by the legislation.

For these reasons, we applaud the Council's move to improve our current landmarking procedures to the benefit of all New Yorkers and encourage the adoption of Intro 775.

The Manhattan Chamber of Commerce (MCC) is a vibrant business membership organization comprised of a cross section of 10,000 business members and subscribers ranging from sole proprietors to large corporations and multi-national firms.



# Art Deco Society

## NEW YORK

**FOR THE RECORD**

From:

Roberta Nusim of the Art Deco Society of New York  
400 East 56<sup>th</sup> Street, suite 39N  
New York, NY 10022-9998

Date:

Wednesday, September 9, 2015

As President and spokesperson for the Art Deco Society of New York, I represent more than 600 New Yorkers committed to the preservation and celebration of our city's great Art Deco architectural treasures, and therefore we are very concerned and strongly oppose Intro 775 as currently written.

Instead of streamlining the Landmarking process, we believe that this bill will actually encourage delays and stalling tactics, and result in important Art Deco sites and others which merit serious consideration for Landmark designation being demolished.

This bill forces the Landmarks Preservation Commission to act on a schedule, without providing additional resources or other assistance to ensure that the Commission will always be able to complete a designation in the mandatory timeframe.

As we all know, more than half the city's current landmarks, many of them Art Deco gems, would not have received Landmark status under the timeframes imposed by Intro 775, and might easily have been destroyed.

The bill does nothing to prevent instances where a backlog or legitimate extensive research requirements keep a designation from moving ahead quickly. This will result in sites, buildings, or districts that warrant consideration of designation not being landmarked and prevented from being considered for landmark designation, and thus potentially being destroyed.

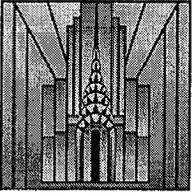
We at the Art Deco Society of New York urgently request that more time and thought be given to addressing this serious issue.

Thank you,

Roberta Nusim

President, Art Deco Society of New York

212.679.DECO | [RobertaNusim@ArtDeco.org](mailto:RobertaNusim@ArtDeco.org) | [www.ArtDeco.org](http://www.ArtDeco.org)



# Art Deco Society

## NEW YORK

To:

Council Member Ben Kallos District 5  
244 East 93<sup>rd</sup> St  
New York, NY 10128

From:

Roberta Nusim of the Art Deco Society of New York  
400 East 56<sup>th</sup> Street, 39N  
New York, NY 10022-9998

Date:

Tuesday, September 8, 2015

As President and spokesperson for the Art Deco Society of New York, representing over 600 New Yorkers concerned about the celebration and preservation of our city's great Art Deco architectural treasures, we strongly oppose Intro 775 as currently written.

In the name of streamlining the Landmarking process, this bill will actually encourage delays and stalling tactics, and result in sites which merit serious consideration for landmark designation being demolished.

This bill, in essence creates a "pocket veto" for landmark designations, and forces the Landmarks Preservation Commission to act on a "do or die" schedule, but does nothing to provide additional resources or other assistance to ensure that the Commission will always be able to complete a designation in the mandatory timeframe allotted.

While in a small percentage of cases consideration of landmark designation by the Commission can draw out over very long periods of time, Intro. 775's approach is not an intelligent or viable solution.

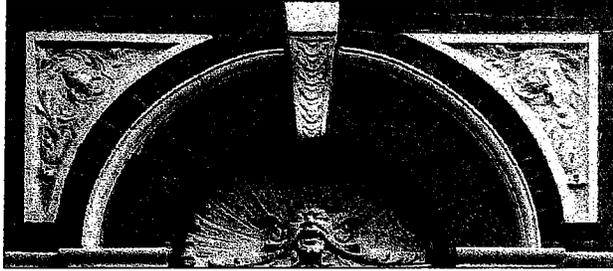
More than half the city's current landmarks would not have been designated under the timeframes imposed by Intro 775, and might easily have been destroyed. By changing the law so that if the Commission does not act within a limited period of time a building or area is not landmarked and is off limits for consideration for landmark designation for five years, the bill would encourage developers to simply stall and try to "run out the clock."

The bill would also do nothing to prevent cases where backlog or extensive research requirements legitimately keep a designation from moving ahead swiftly. But the result would be sites, buildings, or districts which might warrant consideration of designation automatically not being landmarked, prevented from being considered for landmark designation, and potentially being destroyed. The bill would have a chilling effect on designations, as the Commission would be discouraged from considering a site if they thought there was a chance that delays would result in their automatic non-landmarking.

There must be more time and thought given to addressing this serious issue.

Thank you,

Roberta Nusim  
President, Art Deco Society of New York  
212.679.DECO | [RobertaNusim@ArtDeco.org](mailto:RobertaNusim@ArtDeco.org) | [www.ArtDeco.org](http://www.ArtDeco.org)



**FRIENDS OF THE LOWER EAST SIDE**

Post Office Box 1000  
New York, NY 10002

friendsoftheles@gmail.com  
<http://www.friendsofthelowereastside.org>

**Friends of the Lower East Side Testimony, City Council, September 9, 2015**

Good morning Councilmembers,

I am Joyce Mendelsohn representing Friends of the Lower East Side urging the City Council to reject this proposed bill. Typical of many other local preservation organizations, we are an all-volunteer group – fueled not by money, but by the energy and commitment of members of our communities working to preserve and protect the architectural and cultural character of our neighborhoods.

We caution you not to be misled by the bill under consideration to impose new constraints on the Landmarks Preservation Commission. This legislation was designed and supported by big money from developers and the Real Estate Board of NY in a campaign to hasten development by circumventing the Landmarks Law and weakening the Commission's powers.

Since there is real concern about a backlog of buildings, we urge the Council to move forward to increase funding for the woefully understaffed Landmarks Commission to provide additional resources for their work.

Thank you for your consideration.

Joyce Mendelsohn  
[jamboree\\_nyc@yahoo.com](mailto:jamboree_nyc@yahoo.com)

# **L. E. S. P. I.**

LESPI-NYC.ORG

---

September 3, 2015

The Honorable Rosie Mendez  
NY City Council  
237 1st Avenue, # 504  
New York, NY 10003

Dear Councilmember Mendez:

I am writing on behalf of the Lower East Side Preservation Initiative to express our strong opposition to NY City Council Intro 775, which establishes strict time limits on NYC Landmarks Preservation Commission landmarking procedures.

Landmark designation requires formidable amounts of historical research and political and community outreach. Our city's political environment is increasingly complicated, and corporate real estate interests are pushing back harder than ever against historic preservation using their immense wealth and influence. New Yorkers looking to save their historic buildings and streetscapes face greater challenges than ever, and the LPC must navigate these shoals with the limited resources of a small government agency.

As shown in the August 25 letter prepared by the Historic Districts Council et al, many of the city's most cherished historic districts would likely not have been designated under this legislation's deadlines, including the St. Mark's Historic District and Extension within the historic East Village / Lower East Side, as well as such "superstars" as Soho-Cast Iron and Greenwich Village Historic Districts. Going forward, this legislation will certainly deprive our communities with the new landmark buildings and districts residents want and deserve.

We support providing LPC with additional funding to expedite the process of historical research. And we are not opposed to establishing target time frames for designation, but any targets must be generous and flexible, to allow for districts with particularly challenging circumstances to move forward. Furthermore, there should not be any moratorium on reintroducing a district that does not pass, to allow for changing circumstances and political climates. Finally, any new legislation addressing the landmarking process should not only respond to the LPC's input, but to the input of preservation and community advocacy groups, who understand the process of landmarking in NYC and the need for policies to facilitate rather than obstruct the process of protecting our future landmarks.

We respectfully urge the Council not to enact this legislation. Thank you,

Sincerely,



Richard D. Moses  
President

cc: The Hon. Melissa Mark-Viverito, NY City Council

**Lower East Side Preservation Initiative**

Neighborhood Preservation Center, 232 E. 11th Street, New York, NY 10003 info@LESPI-NYC.ORG

## FOR THE RECORD

Dear Councilmember:

I write as a lifelong New Yorker, and historian of art and architecture. Since childhood and during my long life I have admired and revered the city's landmarks (official or not yet official). I enjoy living in the Upper West Side Historic District because it contains an interesting variety of buildings which have made the area increasingly attractive to residents and visitors alike.

I have observed the importance of preservation of sites is in many cities, especially Paris, Edinburgh and elsewhere. I have seen how lack of interest in sites, through ignorance or haste to make money, has destroyed urban areas like much of Brussels.

Because of my background and experience, I strongly oppose Intro. 775 as currently written. In the name of streamlining the landmarking process, the bill would actually encourage delays and stalling tactics, and result in sites which merit serious consideration for landmark designation being demolished. It would in essence create a "pocket veto" for landmark designations, and forces the Landmarks Preservation Commission to act on a "do or die" schedule, but does nothing to provide additional resources or other assistance to ensure that the Commission will always be able to complete a designation in the mandatory timeframe allotted.

While in a small percentage of cases consideration of landmark designation by the Commission can draw out over very long periods of time, Intro. 775's approach throws the baby out with the bathwater. More than half the city's current landmarks would not have been designated under the timeframes imposed by Intro 775, and might easily have been destroyed. By changing the law so that if the Commission does not act within a limited period of time a building or area is not landmarked and is off limits for consideration for landmark designation for five years, the bill would encourage developers to simply stall and try to "run out the clock," The bill would also do nothing to prevent cases where backlog or extensive research requirements legitimately keep a designation from moving ahead swiftly. But the result would be sites, buildings, or districts which might warrant consideration of designation automatically not being landmarked, prevented from being considered for landmark designation, and potentially being destroyed. The bill would have a chilling effect on designations, as the Commission would be discouraged from considering a site if they thought there was a chance that delays would result in their automatic non-landmarking.

Sincerely yours,

Barbara L. Michaels  
336 Central Park West #6F  
New York 10025

## FOR THE RECORD

Dear Mark Levine:

I strongly oppose Intro. 775 as currently written. In the name of streamlining the landmarking process, the bill would actually encourage delays and stalling tactics, and result in sites which merit serious consideration for landmark designation being demolished. It would in essence create a "pocket veto" for landmark designations, and forces the Landmarks Preservation Commission to act on a "do or die" schedule, but does nothing to provide additional resources or other assistance to ensure that the Commission will always be able to complete a designation in the mandatory timeframe allotted.

While in a small percentage of cases consideration of landmark designation by the Commission can draw out over very long periods of time, Intro. 775's approach throws the baby out with the bathwater. More than half the city's current landmarks would not have been designated under the timeframes imposed by Intro 775, and might easily have been destroyed. By changing the law so that if the Commission does not act within a limited period of time a building or area is not landmarked and is off limits for consideration for landmark designation for five years, the bill would encourage developers to simply stall and try to "run out the clock." The bill would also do nothing to prevent cases where backlog or extensive research requirements legitimately keep a designation from moving ahead swiftly. But the result would be sites, buildings, or districts which might warrant consideration of designation automatically not being landmarked, prevented from being considered for landmark designation, and potentially being destroyed. The bill would have a chilling effect on designations, as the Commission would be discouraged from considering a site if they thought there was a chance that delays would result in their automatic non-landmarking.

Sincerely,  
Nina Felshin

## FOR THE RECORD

Attn: Helen Rosenthal:

I strongly oppose Intro. 775 as currently written. In the name of streamlining the landmarking process, the bill would actually encourage delays and stalling tactics, and result in sites which merit serious consideration for landmark designation being demolished. It would in essence create a "pocket veto" for landmark designations, and forces the Landmarks Preservation Commission to act on a "do or die" schedule, but does nothing to provide additional resources or other assistance to ensure that the Commission will always be able to complete a designation in the mandatory timeframe allotted.

While in a small percentage of cases consideration of landmark designation by the Commission can draw out over very long periods of time, Intro. 775's approach throws the baby out with the bathwater. More than half the city's current landmarks would not have been designated under the timeframes imposed by Intro 775, and might easily have been destroyed. By changing the law so that if the Commission does not act within a limited period of time a building or area is not landmarked and is off limits for consideration for landmark designation for five years, the bill would encourage developers to simply stall and try to "run out the clock," The bill would also do nothing to prevent cases where backlog or extensive research requirements legitimately keep a designation from moving ahead swiftly. But the result would be sites, buildings, or districts which might warrant consideration of designation automatically not being landmarked, prevented from being considered for landmark designation, and potentially being destroyed. The bill would have a chilling effect on designations, as the Commission would be discouraged from considering a site if they thought there was a chance that delays would result in their automatic non-landmarking.

Majda Kallab  
235 West 102 Street -15C  
NYC 10025

**FOR THE RECORD**

**Gene A. Norman**  
**Architecture Plus!**  
7 Fordham Hill Oval  
Suite 15D  
Bronx, New York 10468

**FOR THE RECORD**

**Statement Submitted to  
NYC Council Hearing for Intro 775 on September 9, 2015**

Good Morning Honorable Council Members, my name is Gene A. Norman and I appear before you this morning in opposition to Intro 775. I believe I am qualified to speak in opposition to this Bill because of my professional experience that includes:

- 57 years of employment in the Design and Construction Industry;
- 38 years as a Registered Architect;
- Six years as Chair of the Landmarks Preservation Commission in the Koch Administration;
- Two years as the Bronx Landmarks Commissioner in the Dinkins Administration; and

In addition, for the past 20 years I have been the Principal of my consulting firm, **Architecture Plus!**, allowing me to keep abreast of activities within the field of Historic Preservation.

Currently, I am also a member of **"Save Harlem Now!"** a preservation advocacy group representing the Harlem Community.

When I was appointed as Chair of the LPC in 1983 it was a time of escalating development pressures by new construction in various parts of the City, often close to existing undesignated Historic neighborhoods, very much like the same pressures being exerted today. Designations were needed to protect the historic fabric that was quickly disappearing. Rather than amending the Landmark Law we tackled this problem by demonstrating that changes from within the Commission and an increase in the budget was needed. The LPC staff was reorganized to better focus on identifying, more quickly, potential individual landmarks and historic districts. A small committee made up of Commissioners and Research staff was created that made recommendations to the full Commission for votes to calendar the most promising sites and Public Hearings were conducted, followed by the preparation of Designation Reports and votes taken on actual Designations on the most threatened sites. This approach was used to save buildings in the Union Square area and to justify additional staff and other resources to be added to the LPC budget. By obtaining additional funding the LPC was able to reduce its backlog from prior years and produce a majority of Designations in the time frame called for in Intro 775. A recent study by the Historic Districts Council revealed that only 10 percent of the LPC designations exceeded the deadline called for in Intro 775. An example of why this extra time was needed would be the important designations of a group of twenty Broadway Theaters that were opposed by their owners for a protracted period of several years. After much discussion and many meetings to solve their concerns they finally capitulated and began to cooperate with the LPC. Had Intro 775 been in force then these marvelous world renowned structures and interiors would not be the Landmark attractions that they are today.

New York City Designated Landmarks and Historic Districts are special and require time and skill to record their unique attributes, their wonderful history, their Cultural importance, their architectural details, and their role in the continuing story of the greatest city on planet Earth. Intro 775 if enacted does nothing to enhance the treasure that Landmarks provide. Intro 775 would lessen the number of future Landmarks due to deadlines being missed or owners using delaying tactics as the theater owners did. The City Council would do a great service to our City by insisting that the Landmark Preservation Commission is well funded to carry out its mission, rather than placing deadlines and moratoriums that only benefit a few and leave the many without a true sense of the past for future generations.



232 East 11th Street  
New York, NY 10008  
212 886 3742

[vicsoeny.org](http://vicsoeny.org)

The Victorian Society New York opposes Intro 775. Our organization is the founding chapter of the Victorian Society in America established in 1966 to preserve structures built in this country in the 19<sup>th</sup> and early 20<sup>th</sup> centuries. Designations by the New York City Landmarks Preservation Commission (LPC) are vital to our local efforts.

Intro 775 would seriously interfere with the designation work of the LPC by limiting the time allowed for research and deliberation. The proposal would prohibit landmark designation of any property under consideration by the LPC for more than a year or any historic district under consideration for more than two years without a final decision by the LPC. After automatically being jettisoned from consideration when that time has elapsed the property would not be eligible for reconsideration for five years. A lot can happen in five years—demolitions, inappropriate alterations, stripping of decorative elements.

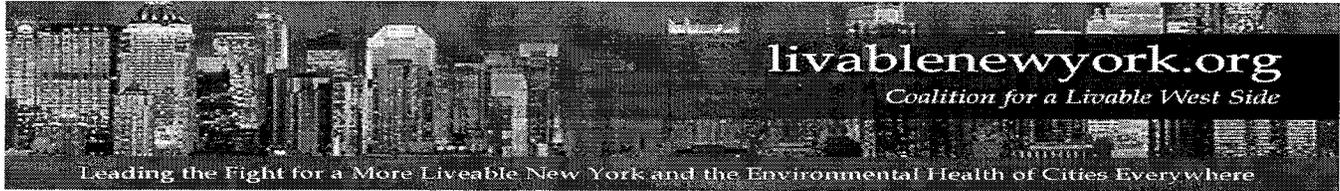
The rationale offered for Intro 775 is that it would ensure a predictable process within appropriate time frames. If such legislation had been in effect since the establishment of the LPC in 1965, nearly half of New York's individual landmarks and historic districts would not have been designated. How many of these historic properties might have been destroyed or inappropriately altered is anyone's guess.

Intro 775 does nothing to address contributing factors that prolong the process. It does not, for example, provide for more resources for the LPC, the city's smallest agency. With fewer staff members than any other agency, it is charged with evaluating potential landmarks throughout the entire city as well as having oversight responsibilities over more than 33,000 properties that are already designated. The research required to write the highly detailed designation reports for consideration by the LPC takes an unpredictable length of time. While providing no additional resources to ensure that the agency can with due diligence pursue the work required within the proposed firm time constraints, Intro 775 might discourage the LPC from taking on difficult designation requests for fear of not meeting the deadlines. Developers, on the other hand, might be encouraged to employ tactics to slow the agency's work and run out the clock.

Intro 775 should be rejected now and not sent to the full City Council.

Respectfully,

Hilda Regier, President  
Victorian Society New York



Coalition for A Livable West Side \* PO Box 230078 \* New York, New York 10023

Email : [livablenewyork@erols.com](mailto:livablenewyork@erols.com)

Phone: 1-212-874-3456

Website: [www.livablenewyork.org](http://www.livablenewyork.org)

September 9, 2015

Dear Councilmembers,

The Coalition For A Livable West Side cannot support Intro 0775-2015 as written. Coalition is a proud supporter of preservation in New York City. We are in favor of a timely and transparent landmarks process. However,

- The bill imposes an unnecessary, unrealistic, and retroactive 18-month timeframe in which to consider every property on its docket.
- The proposed timeframes for hearings and final votes are not reasonable for all cases, especially those which are complicated and controversial.
- It provides no additional resources to ensure that LPC can consider calendared sites or districts within the proposed timeframe.
- It does not allow LPC the option of continuing to consider a landmark or historic district after the deadline has been reached, regardless of the stage of consideration, negotiation, or discussion, or if new information has been introduced.
- The five year moratorium on the reconsideration of landmarks and historic districts would unduly hamper the LPC and is a blatant giveaway to the real estate industry. It gives a green light to owners and developers that they have five years to alter, demolish or develop their properties safe in the knowledge that there will be no oversight.
- Additionally, this proposed moratorium is not reflected in the regulatory frameworks of other city agencies.

**We respectfully request that any City Council member who has received campaign contributions from REBNY, REBNY LLC's, or developers and especially landlords of property being considered for landmark status, recuse themselves from voting on 0775-2015.**

Coalition urges you to vote no to Intro 0775-2015 as presently written.

Respectfully,

*Batya Lewton*, President

Our city's individual landmarks, our historic districts, our interior, scenic, and cultural landmarks represent the very best of who we are as a civilization; they represent a cross section of culture, ethnic and racial diversity, and architectural history for our city.

In this 50<sup>th</sup> anniversary year of the Landmarks Law, and the establishment of the New York City Landmarks Preservation Commission, it's important to remember that the impulse to protect both the masterpieces of the city's architecture such as Grand Central, together with the identifiable character of its brownstone-lined streets such as in Bedford Stuyvesant –came about as a result of "people power".

"The established right of the people to protect their heritage of history and architecture, to enjoy the democratic vistas of great landmarks and historic districts, free to be enjoyed by all, regardless of economic station, to visit the houses of inspiring figures from the past, and to know that some of New York's unique and irreplaceable old buildings and cityscape will be there for our descendants to enjoy –these rights are being threatened by the real estate industry seeking deregulation in order to maximize its stupendous profits."<sup>1</sup>

The proposed Intro 775 does nothing to further the aims of the people of New York. While the stated goals of this bill are a transparent and timely process, the reality is that that bill supplies neither; not only are there no requirements for public hearings or any public process in the latter portion of the bill, but the imposition of an arbitrary 18-month calendar-clearing deadline, the 5-year designation moratorium, combined with the lack of any increased staffing or funding to an already-overburdened agency will, when taken together, hamstring the Commission's ability to fulfill its mission to the people and set-up the Landmarks Commission for certain failure.

"We have a Landmarks Law which has in the past proved philosophically sound; having withstood court challenges, and which in practice, has served to designate and protect many worthy properties. We are now asked to believe that a successful law should be recast, in order to prod a Landmarks Commission [which under Chair Meenakshi Srinivasan's guidance is already addressing the backlog issue]."<sup>2</sup>

As written, Intro 775 reads more as a product of the Bloomberg Administration than it does a reflection of the will of the people that swept our mayor into office. "The public must ask whether [Intro 775] is indeed intended to fulfill the purposes of the Landmarks Law or, rather, to frustrate them."<sup>3</sup> The intent of the Landmarks Law is equity. We elected Bill de Blasio to protect the people's interests, not to fulfill the real estate industry's long-cherished fantasies of deregulation.

**Theodore Grunewald, Vice President, Committee to Save the New York Public Library**

---

<sup>1</sup> Village Views, Published by the Committee For the Architecture of the City, Volume V, Nos. 2 & 3, Spring-Summer 1988, p.35

<sup>2</sup> Ibid., p.38

<sup>3</sup> Ibid., p.38



184 BOWERY #4 NY, NY 10012  
WWW.BOWERYALLIANCE.ORG  
mulbd@yahoo.com  
631-901-5435

*President*  
David Mulkins

*Vice Presidents*  
Michele Campo  
Jean Standish

*Secretary*  
Sally Young

*Treasurer*  
Jean Standish

*Landmarks Chairperson*  
Mitchell Grubler

*Co-Founders*  
Anna L. Sawaryn  
David Mulkins

*Board of Advisors*

Simeon Bankoff  
*Executive Director*  
Historic Districts Council

Kent Barwick  
*President Emeritus*  
Municipal Art Society

Leo Blackman  
*Architect*

Kerri Culhane  
*Architectural Historian*

Doris Diether  
*Zoning Consultant*

Eric Ferrara  
*Director*  
Lower East Side History Project

Michael Geyer  
*Architect*

Margaret Halsey Gardiner  
*Executive Director*  
Merchant's House Museum

Bob Holman  
*Poet & Proprietor*  
Bowery Poetry Club

Keith McNally  
*Restaurateur*  
Balthazar/Cherche Midi

Joyce Mendelsohn  
*Historian/Writer/Educator*

Mick Moloney  
*Musician/Historian/Educator*

Victor Papa  
*President*  
Two Bridges Neighborhood Council

Luc Sante  
*Author/Historian*

**Date: September 8, 2015**

**To: New York City Council Members  
250 Broadway  
New York, NY 10007**

**Subject: Intro 775 should be rejected**

**Dear City Council Members,**

While many commentators have rightly concentrated on how difficult the bill would make the landmarking process and how it would open up additional ways to stall or derail landmark considerations, I would like to concentrate on the larger, precarious context in which historic buildings and neighborhoods have to exist in this town.

Unlike sensible cities like Paris or Prague, which do not allow high-rise towers in historic neighborhoods because they recognize the lucrative attractions those areas have for tourists, New York City's most historic areas have only spotty or partial protection, with some of its oldest, most important historic areas besieged by jarring towers of glass and steel.

Tourism is NYC's fastest growing industry and the areas tourists flock to for adventure, fun and fascination are the city's low-rise historic neighborhoods. But despite these areas' proven value to our economy, the city sits on its hands and allows them to be consumed and disrupted by international real estate developers. When they tear down historic buildings, they are invariably replaced by atrociously designed eyesores built to maximize height, bulk and profit.

The ferocious pace of real estate development in our oldest, most historically valuable neighborhoods should sound alarm bells with this Council and move them to preserve and protect more historic buildings and wider historic districts, and to make the process smooth, timeframe appropriate, and the staff and resources adequate to handle the workload of nominations.

In short, Intro 775 should be rejected as currently written.

Sincerely,

**David Mulkins, President  
Bowery Alliance of Neighbors  
184 Bowery, #4  
New York, NY 10012 631-901-5435**



**West End Preservation Society Statement before the New York City Council's Committee For Land Use in Opposition of Proposed Legislation Intro 0775-2015**

Sept 9, 2015

Good morning Chair Greenfield and Council Members,

My name is Josette Amato. I am the Executive Director of the West End Preservation Society (WEPS) a non-profit organization founded in 2007. Our mission is to preserve and protect Manhattan's West End Avenue.

The goal of a more definitive and transparent process in Landmarks designation is one we share. Intro. 837's database would be a welcome addition to available information. Without providing additional resources, this may be difficult to achieve within the time allotted.

Intro. 775 does not move preservation forward as it should. The backlog of properties is being addressed by the Landmarks Preservation Commission, the time limits stated are too narrow and provide no acceptable grounds for extension and it imposes a five year ban for failure to meet the target date. For these reasons, we cannot support it.

This bill treats all individual sites and all historic districts as equal. They are not. Had this law been in place, more than 50 historic districts, including our most recent historic district extensions, would not have made the cut. We could see future historic districts limited not by their merits but by their deadlines. According to the Council's own data, sites were not designated within this time frame. Should we not err on the side of caution to ensure more designations rather than cross our fingers and hope for the best?

The punitive provision is more dangerous. Should LPC miss this imposed deadline, sites remain off their radar for five years. In our historic districts, we would have lost a minimum of ten buildings during that waiting period. If owners view designation unfavorably, they now have five unfettered years to remove, replace or demolish that which made the property noteworthy.

Essential in this preservation process is community involvement. This ban will gut any momentum of support. It places a bottomless burden on those seeking designation. People will lose hope. That is not the purpose of legislation.

If New York is to be a world city that honors our history, culture and values preservation, we respectfully request you vote no on Intro. 775, as written.

Thank you for considering our comments.

**Testimony of Thomas H. Collins before the New York City Council Committee on Land Use  
September 9, 2015**

Good morning,

As a supporter of historic preservation, I feel compelled to testify in opposition to the proposed bill, Intro. 775.

At this very moment, heritage sites at home and abroad are being demolished with shocking impunity. The ongoing desecration of the Temple of Bel in Palmyra and Paul Rudolph's Orange County Government Center in Goshen ought to give this Council pause as it considers a bill which would cripple the very law responsible for saving New York City's most cherished buildings.

Regrettably, cultural vandalism is not confined to uncivilized places in Syria and upstate New York. The recent loss of the Bancroft Building, the Hoffman Auto Show Room, Lenox Lounge, and Rizzoli Bookstore ought to serve as a wake-up call to our city's elected officials. Yet, instead of passing reforms to prevent such travesties in the future, the prime sponsors of this bill are up in arms over a handful of properties on the Landmarks Preservation Commission's calendar. Thankfully, LPC has announced a public review process to clear its backlog. So why is this bill necessary?

Although it is laudable to seek greater accountability from any government agency, this bill would eviscerate LPC's ability to designate new landmarks. Imposing rigid deadlines would discourage calendaring properties that require extensive deliberation and negotiation. Not surprisingly, the usual anti-landmarking groups are elated over the idea of a five year moratorium. Rapacious developers, who already have a history of subverting the landmarking process, will not think twice about "running out the clock" to destroy landmark-worthy sites.

Our city's landmarks are more than just a collection of beautiful old buildings. They are the deposit of social relationships whose material forms express the prevailing Kuntswollen of their eras. Our landmarks connect us to our past and enrich our lives. In *Invisible Cities*, Italo Calvino wrote that, "The city does not tell its past, but contains it like the lines of a hand, written in the corners of the streets, the gratings of the windows, the banisters of the steps, the antennae of the lightning rods, the poles of the flags, every segment marked in turn with scratches, indentations, scrolls."

At a time when our city desperately needs greater landmark designation in areas like Harlem, this bill would hinder community-led efforts to preserve the historic character of our neighborhoods. I implore you to consider other alternatives that would improve transparency at LPC while offering greater protections for our city's rich cultural heritage.

Thank you,

Thomas H. Collins  
78 Post Ave Apt. K  
New York, NY 10034



PO Box 1315 Old Chelsea Station New York, NY 10113-1315  
website: [www.savechelseany.org](http://www.savechelseany.org) email: [savechelseanyc@gmail.com](mailto:savechelseanyc@gmail.com)

September 9<sup>th</sup>, 2015

To: City Council Land Use Committee

From: Save Chelsea

Re: Opposition to Intro. 775

Save Chelsea strongly opposed to Intro. 775, a bill that would establish a maximum period of time for the Landmarks Preservation Commission (LPC) to take action on any item calendared for consideration of landmark status. As we know, it often takes a great deal of time and effort to get buildings and sites or areas officially designated.

Chelsea, a neighborhood now enduring massive over-development, without it's three historic districts; Chelsea, West Chelsea, and Lamartine Place, would have, over time, have lost many significant historic sites and buildings throughout the area. Many historic Sites and buildings, greatly contributing to making Chelsea such a popular destination today. This includes classic Greek Revival row houses from the 19th century, the recently designated Hopper-Gibbons House, a rare Manhattan stop on the Underground Rail Road, as well as the famed Starrett-Lehigh and Terminal Warehouse buildings, only landmarked as of 2008, and standing virtually in the shadow of the impending Hudson Yards development just to the north.

The Intro 775 bill would prohibit the landmark designation of any property under consideration by the LPC for more than a year or any district under consideration for more than two years. Under this legislation, if the LPC misses the deadline, the property in question would be barred from reconsideration of landmark status for a period of 5 years – giving building owners and developers ample time to demolish the property.

The far better investment would be to bolster the resources of the existing NYC LPC, which is one of the city's smallest agencies. Especially as it is now celebrating 50 incredibly productive years, hampering the LPC by approving this bill would represent nothing more than a misguided effort on the part of City Council Land Use Committee and the Council as a whole. Please do not support this potentially harmful bill. Thank you for your consideration of this letter.

Sincerely,

Lesley Doyel & Michael Bhagwandin. Co-Presidents  
and The Board of Trustees of *Save Chelsea*

North Shore Waterfront Greenway  
West Brighton Restoration Society  
Preservation League of Staten Island  
Richmond Terrace Conservancy

NYC City Council Landuse Committee Hearing  
Intro 775 City Hall September 9, 2015  
Landmarks

Landmarks is crucial to the present and future success and economy of New York City. Our city and country were born out of the age of enlightenment and the idea that people have inalienable rights and in their communities and in their lives and future. People come to New York City from all over the world to see it and be a part of it. We are a city of historic neighborhoods where people have come to fulfill their hopes and dreams; they have built this city and we must preserve it

Sadly Intro 775 would destroy Landmarks and the New York City that people come to visit and live in. Under Intro 775 approximately 54% of all the Landmarked buildings now protected, more than 17,800 historic buildings would NOT be designated and no doubt these buildings and neighborhoods would have been destroyed.

One of these extraordinary places is Greenwich Village, one of the greatest places to visit and to live in the world; also Chelsea, Park Slope, Boerum Hill, Central Park West, Tribeca, Carroll Gardens, Radio City Music Hall, Grand Central Station, great historic neighborhoods in all the boroughs.etc. etc.

Parts of our city are now unrecognizable; unattractive refrigerator like buildings blocking air and light, dangerously loaded with glass which would be extremely dangerous if we had a tremor etc.

Intro 775 is totally unnecessary. If it was supposed to deal with the buildings that were not Landmarked for 5 years; these will be heard by 2016.

This does nothing to deal with the real problem which is that Landmarks is the most underfunded agency in NYC. It needs funding. Its excellent Research Dept. does a great job under difficult circumstances.

Intro 775 would encourage and enable unscrupulous owner/developers to prevent Landmarks designation until the many deadlines unrealistically imposed would be passed. This is totally wrong and unnecessary.

It was the small owners who saved New York by rescuing and restoring historic houses and neighborhoods by restoring them themselves. These became the beautiful neighborhoods we have today. This has restored NYC and brought thousands of small businesses in response to the need for goods and services. This is what creates a great economy sustainable in any market, not draining NYC with all property in the hands of a few billionaire developers who would destroy historic neighborhoods and buildings to build too tall structures that pose a threat to health and the economy ultimately.

Let us work together to save New York City called the greatest city in the world, and our economy so that we can have a magnificent future and save our great historic buildings and sites that people come to see from all over the world, both for ourselves and for future generations. Please do not pass intro 775. and, instead, save our city which is what people want and need.

Thank you very much.

Linda Eskenas



## THE CITY CLUB OF NEW YORK

September 9, 2015

Testimony before the Land Use Committee of the City Council regarding Intro 775

My name is Jeffrey Kroessler. I am the chair of the Preservation Committee of the City Club of New York. We heartily second the heartfelt statements from the dozens of preservation organizations and neighborhood groups opposing this ill-considered piece of legislation.

The City Club was founded in 1892 to champion the cause of “good government.” We continue that mission in our testimony here today. Where did this bill originate? The purported inspiration was the backlog of calendared or heard-but-not-designated items at the Landmarks Preservation Commission. But the Commission suggested a plan of action, and the preservation community, together with Manhattan Borough President Gale Brewer, negotiated a revised plan. That, we suggest, was an example of “good government.”

Intro 775, by contrast, is not. Was there a question about the functioning of the LPC? Has the LPC ever refused an owner’s request for a decision on one of the backlog properties? Was the agency’s procedure broken? If so, the appropriate answer was for the City Council to hold an oversight hearing, whereby this body could question the LPC chair and staff directly and interested parties could air complaints and compliments. Based on that testimony, that *public testimony*, the City Council could then consider whether legislation was needed.

In this case, the bill appeared full-grown, like Athena bursting from the head of Zeus. But unlike Athena, this bill is no symbol of wisdom. The goal of this legislation is not to improve the LPC, but to limit its effectiveness, to limit its ability to designate. If that is not the stated purpose, it most assuredly will be the effect. And our city will be poorer for it, and the residents of would-be historic districts will see their quality of life diminish. And who will this bill benefit financially? The assumption is that designation proceeds against the will of the public. That is not the case. If a designation fails because the time limit is exceeded, those hurt will be the members of the community. The City Club was founded in the Progressive Era, and we expect the city to protect the citizenry from the interests, not adjust inconvenient laws to benefit the interests. Intro 775 is the opposite of progressive.

New York City’s landmarks law is being celebrated for its fifty years of protecting the city New Yorkers love. But not in these halls, sad to say. Here, this most successful law is being accused of all manner of sins, its virtues recast as vices. Rather than raise all the city to the standards of our designated historic places, this bill would drag aspiring neighborhoods down into the thoughtless and rushed banalities of unbridled development. And no, it is not a matter of opinion. Our historic neighborhoods are of higher quality than what the build-fast-now developers are putting up in Williamsburg and along Fourth Avenue in Brooklyn.

Why, during the 50<sup>th</sup> anniversary of the law that saved this city from its own worst tendencies in 1965, are we being told “ENOUGH”? Intro 775 is a bad bill. It is not “good government.”

Jeffrey Kroessler  
Chair, Preservation Committee

# HAL BROMM ART & DESIGN

90 WEST BROADWAY NEW YORK 10007 (212) 732 6196

I stand in opposition to Intro. 775.

Intro 775 would refute the underlying law that requires the Commission to identify, preserve and protect New York City's historic resources for the benefit of the city and its residents. In fact, more than half the city's current landmarks would not have been designated under the timeframes imposed by Intro 775, and might easily have been destroyed. Is that what you want for the future of our city's historic resources?

As we have seen in the 50 years since that law was created, the Commission is far from complete in its work. Having been involved with historic preservation in New York City for decades, it is clear that the Commission will not only be unable to increase the speed of designations without proper funding, but will steadily fall further behind in even identifying our city's historic resources. It is folly to imagine that the mandatory timeframe under 775 will improve this situation.

Rather than streamlining the process of designating historic structures, the proposed bill would encourage delays and stalling tactics, resulting in structures or districts that might warrant designation automatically not even being considered by the Commission. Such resources would then face potential defacement or demolition.

The proposal would in essence create a "pocket veto" for landmark designations, forcing the under-funded and under-staffed Landmarks Preservation Commission to act on a "do or die" schedule.

Rather than tinkering with the landmarks law, the council should accept - and act upon - the reality that the commission, operating with a miniscule budget, must be provided with additional funding and staffing resources to effectively do its work.

Hal Bromm  
September 8, 2015  
Testimony before the NY City Council

September 9, 2015

**Ivan Mrakovcic RA**  
**President, Richmond Hill Historical Society**  
**Director, RAND Engineering & Architecture DPC**

85-03 114<sup>th</sup> Street  
Richmond Hill, NY 11418  
(917) 440-1478

Dear Council Members:

As President of the Richmond Hill Historical Society and as an Architect, I can speak first-hand about how difficult and unduly prolonged the Landmarking process already is. The introduction of Intro 775 (a proposed further limitation) is unwelcome and counterintuitive if we value the preservation of worthy portions of New York City history.

Landmarks and landmarked districts are a vital part of what makes NYC an attractive place to visit and to live in. A failure to foster further landmarks plays into the special interests of developers while reducing the streetscapes and fabric that make NYC so special.

I urge you to reject this Proposal and work towards the strengthening, rather than <sup>weakening</sup> ~~wakening~~, the hard-fought intent of the Landmarks Law.

Sincerely,



Ivan Mrakovcic RA



## THE SOCIETY FOR THE ARCHITECTURE OF THE CITY

### **Int 0775-2015 Establishing a maximum period of time for the Landmarks Preservation Commission to take action**

**Testimony before the City Council Committee on Land Use, September 9, 2015**

The Society for the Architecture of the City is a small all-volunteer historic preservation advocacy group. We have been monitoring the proceedings of the Landmarks Preservation Commission since 1983, and we oppose this legislation, having watched the real estate industry's multiple previous attempts to gut the landmarks law, including REBNY's proposals to Charter Revision Commission in 1989, the industry-fueled reports of the Cooper Committee, the Historic City Committee, and Mayor Koch's proposals known as "The Mayor's Initiatives." All these attempts failed in the face of widespread and passionate public opposition. "Save the law that saves landmarks!" was the slogan.

Harmon Goldstone, the second Chairman of the LPC, noted in an interview that the industry originally tempered its opposition to enactment of any landmarks law because major players believed the law was unconstitutional and would be overturned. The Supreme Court thought otherwise, and the law was validated by the *Penn Central* decision. After that, the Council wisely felt free to repeal the section of the 1965 law that had required alternating periods when designation was permitted or prohibited under a moratorium (though this was not tied to arbitrary administrative deadlines). The provision had been included originally as the result of negotiations with the real estate industry. (*Village Views*, Vol. IV, No. 3, p. 40.)

The provision in 0775 preventing the LPC from designating a property for five years if it misses an arbitrary deadline is an industry favorite that, zombie-like, returns once again in the current proposal, despite numerous past defeats.

In the midst of the incredible boom in property values and real estate investment in New York City today, it is amazing that the industry still continues to argue that landmarks preservation creates conditions in which it cannot thrive. We urge the Council to abandon 0775: it is a misguided attempt to institute changes that have been found unnecessary again and again over decades of civic, legislative and judicial review.

*Christabel Gough,*  
*Secretary*

45 CHRISTOPHER STREET APT. 2E, NEW YORK, N.Y. 10014 (212) 741-2628

Ronald Kopnicki, President • Matt McGhee, Treasurer • Christabel Gough, Secretary

The Society for the Architecture of the City, Inc. publishes the review, *Village Views*

**HISTORIC PARK AVENUE  
POST OFFICE BOX 286232  
NEW YORK, NEW YORK 10128  
E-MAIL: [historicparkavenue@gmail.com](mailto:historicparkavenue@gmail.com)**

**September 9, 2015 Testimony on Intro #775**

Good Morning Chair Greenfield and Council Members.

My name is Michele Birnbaum, and I am President of *Historic Park Avenue*, the entity that filed the Request for Evaluation to have Park Avenue from 79<sup>th</sup> Street to 86<sup>th</sup> Street become an historic district. The RFE was filed in 2010, and the designation was made in April 2014. Had Intro 775 been enacted at that time, these streets on Park Avenue would not be protected today.

The community outreach effort prior to the RFE filing took four years starting in 2006. Community meetings and flyers and letters of notification seeking support were hand delivered to every resident of every building within those blocks. Application to have Park Avenue listed on the State and National Registers of Historic Places took additional intense effort.

Intro 775, which would establish a maximum period of time for the LPC to address filings could possibly make sense if the Commission was large enough to accommodate such a demand. Overseeing more than 33,000 properties, the LPC is the city's smallest agency with the fewest resources and smallest staff.

To make a time demand of this kind without increasing the number of Commissioners, and the number of hearings per week, and without increasing the support and research staff, is implying that the reason the LPC has a backlog is because the Commissioners and staff are not working quickly enough or are inefficient

We all know that this is not the case. And even with its current staff, the Commission hears at least 80% of its applications within your time-frame.

There is an enormous amount of research, paperwork and community outreach that goes in to each Request for Evaluation, and once filed, there is an enormous amount of additional research and clerical work that the Commission undertakes during the consideration process. With the current number of Commissioners and the current size of the support staff and only one hearing day a week, it makes it impossible for the LPC to consistently meet the time demands of this bill. Therefore, it would be more than likely that significant, meritorious districts and properties would be lost.

This bill would give the LPC 18 months to deal with the entire backlog, but any backlogged items not addressed during that time period would be automatically de-calendared, and if the commission fails to designate property, be it a landmark or a historic district, the property in question would be barred from reconsideration for five years.

With no oversight for five years, we can be sure that there would be significant alteration and likely demolition of worthy sights. I'm sure it is not the intent of the Council to insure violation or destruction.

The ability to stall and run out the clock would put properties needing protection in serious jeopardy. This is punishing the property for the system's failings.

The negative repercussions of enacting this bill would far outweigh any benefit that it might yield, and in fact, it would assure the destruction of many properties worthy of landmark status and protection.

Property is so valuable these days, that everyone is "pushing the envelope" with respect to potential development sites. This is a very serious time as decisions are being made that will dramatically impact our city's preservation future - architecturally and historically and its livability quotient and quality of life.

We have an agency formed for the purpose of protecting those sites that are vulnerable to destruction, but worthy of protection. How does it make sense that this government agency gets its hands tied, rather than being given a helping hand in the performance of its duties?

Please do not support this legislation.

Thank you !

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Birnbaum", with a long horizontal flourish extending to the right.

Michele Birnbaum  
President

September 9th, 2015

Testimony from Chelsea Reform Democratic Club (CRDC) regarding Intro. 775

The Chelsea Reform Democratic Club, or CRDC, is dedicated to smart development in our neighborhood. But we are equally committed to protecting Chelsea's architectural heritage. To highlight just a few of our preservation causes, we gave early support to landmarking the High Line and the Hopper-Gibbons House and stood in strong opposition to the General Theological Seminary's plan to erect on its campus a jarring out-of-context building. And even though Midtown East was merely on the borderline of our catchment district, we took strong issue with Mayor Bloomberg's scheme to both upzone that area and to do so without proper public review.

We were particularly struck by the fact that ours was among those neighborhoods that likely would not have earned historic district status had the timeframe proposed by Intro 775 been in place when Chelsea was first considered for designation. It's difficult to imagine this neighborhood without its historic streets. We doubt that the Chelsea that would have emerged without landmark protection would have inspired the civic dedication that creates a High Line Park or, for that matter, fuels groups like CRDC.

As a Democratic political club we are concerned with labor and workplace issues. There is something profoundly disrespectful toward the researchers, historians, archivists, lawyers, and others who work with such dedication for the Landmarks Commission when we treat them as recalcitrant teenagers who need artificial deadlines in order to function. And please consider this: had those folks had been featherbedding, why then would virtually every preservation group in the city be in opposition to the proposed deadlines?

But let's be honest: This bill could not possibly advance the cause of preservation. Instead, whether through faulty thinking or design, it in fact strengthens the hand of Big Real Estate, the player in our city that already holds most of the cards.

We stand with our local preservation group, Save Chelsea, and its many counterparts throughout New York, in asking you to vote "no" on Intro. 775.



American Planning Association  
**New York Metro Chapter**

*Making Great Communities Happen*

**APA New York Metro Chapter**  
Grand Central Station  
450 Lexington Avenue, Suite 1802  
New York, NY 100163-1802  
Phone: (646) 963-9229  
Email: [office@nyplanning.org](mailto:office@nyplanning.org)

Good Morning. My name is James Rausse and I am the President of the NY Metro Chapter of the American Planning Association. With me this morning is Michael Levine who is the Vice President for Intergovernmental Affairs. The Metro Chapter is a professional, educational, and advocacy organization representing over 1,400 planners and policy makers in and around New York City. We are part of a national association with a membership of 41,000 professionals and students who are engaged in programs and projects related to the physical, social and economic environment. In our role as a professional advocacy organization, we offer insights and recommendations on policy matters affecting issues such as housing, transportation and the environment.

We take particular interest in the proposal before you today to limit the time period for which a landmark application may be considered. We have watched over the past few years as studies and reports have circulated claiming that the increasing number of designated landmarks and landmark districts has caused a shortage of affordable housing. We disagree with this position and believe that landmarking has been greatly beneficial to the preservation of neighborhoods. We believe that the shortage of affordable housing is attributable to other factors.

While we agree that a landmark application should not encumber a property indefinitely, one year is often not enough time to properly consider the merits. Many of the City's most renowned historic buildings, the Empire State Building among them, took more than a year to complete the landmarking process. If enacted, the one-year limit could incentivize property owners to drag out the process so that the one-year clock expires.

We do not find the legislation necessary and believe such revisions to the landmarking process are best left to the Landmarks Preservation Commission. If the City Council is to move forward, however, a possible alternative to consider is a two-year time limit with a "pre-certification" phase analogous to the ULURP process, by which an application is reviewed for completeness before the time clock has started. Allocating additional staff and resources to the Commission would also serve to expedite the process and ensure that reviews were conducted within reasonable timeframes.

The Chapter would like offer our technical expertise on the matter and thank you for this opportunity to comment.



Wednesday, September 9<sup>th</sup>, 2015

**Written testimony respectfully submitted to NYC Council Committee on Land Use by Melissa Chapman, Senior Vice President for Public Affairs at the Brooklyn Chamber of Commerce, in Support of Intro. 775**

Hon. David G. Greenfield, Chair

Good Morning Chair Greenfield, other members of the NYC Council Committee on Land Use and guests.

I'm Melissa Chapman and I serve as the Senior Vice President for Public Affairs at the Brooklyn Chamber of Commerce (BCC). I am delivering testimony on behalf of Carlo A. Scissura, President and CEO of the BCC.

BCC is a membership-based business assistance organization which represents the interests of over 2,100 member businesses as well as other businesses across the borough of Brooklyn. The Brooklyn Alliance is the not-for-profit economic development organization of the Chamber, which works to address the needs of businesses through direct business assistance programs.

We support Intro. 775 in relation to establishing a maximum period of time for the Landmarks Preservation Commission (LPC) to take action on any item calendared for consideration for landmark status. This is a common sense piece of legislation that will add predictability to the landmarking process and prevent backlog, which can prove very costly and burdensome to business and home owners alike.

This proposed legislation would require LPC to eliminate its backlog of buildings that have been calendared for a hearing but have not yet had a vote within 18 months of when the bill is enacted. Further, if the LPC chooses not to designate the building, Intro. 775 proposes the institution of a five-year moratorium on re-calendaring the property. We believe that this is a fair approach to the issue and would allow the property owner to make changes that can positively impact their business and/or quality of life within that time-period; on the other hand LPC can re-visit the case in the event that they were ready to make a decision on designation of the building.

In July, 2015, the LPC released a plan to address the agency's backlog of buildings and sites that were under consideration for designation and were not acted upon, many of which have been on the Commission's calendar since the 1960s. The plan allows public notice/comment on backlog properties and an efficient public hearing process that will ensure timely decisions on the backlog items. Intro. 775 would memorialize LPC's current practice into law and ensure that future mayoral administrations continue to act in a timely manner.

Calendaring a building for review indefinitely places significant and costly burdens on building owners, and a streamlined, predictable landmarking process is needed. In the case of the business owner, this type of stagnation could prevent them from making necessary changes to improve the location in which they conduct business, and creating an appealing interior/exterior that is more reflective of their individual brand and mission.

Thank you for providing us with the opportunity to testify on this issue.



# Council of New York Cooperatives & Condominiums

## INFORMATION, EDUCATION AND ADVOCACY

250 West 57 Street • Suite 730 • New York, NY 10107-0700

### TESTIMONY BEFORE THE CITY COUNCIL COMMITTEE ON LAND USE IN SUPPORT OF INT. 775

#### Establishing Time Frames for Landmark Designation

September 9, 2015

Good Morning, Chairman Greenfield and members of the Committee. My name is Mary Ann Rothman and I am the executive director of the Council of New York Cooperatives & Condominiums (CNYC), a membership organization providing education and advocacy for the boards and residents of housing cooperatives and condominiums located throughout the City and beyond. Our members span every rung of the economic spectrum. They are important contributors to their neighborhoods and to our City.

Cooperators and condo unit owners take pride in our homes and seek to maintain them in the best condition that we can afford. We strongly support preservation of structures and areas that are magnificent or unique, or ones that are sterling representatives of eras past. We are justifiably proud when our homes are designated as landmarks – or calendared for prospective designation – although designated buildings and districts incur additional costs in time, in stress and in dollars as the Landmarks Preservation Commission must review any work to be done – whether it is facade work to comply with Local Law 11 or new windows to improve energy efficiency, sidewalk replacement or a request to renovate a unit inside the building. In fact, compliance with landmarking requirements essentially begins from the moment of calendaring as the Landmarks Preservation Commission then has review powers over any request for a DoB permit – a practice not to be found in any other public process in our City. And some buildings have lingered in ‘Calendared’ status, not for months or even years, but for decades.

We are optimistic that this level of delay and uncertainty is becoming a phenomenon of the past. The current Landmarks Preservation Commission is making great strides in clearing the enormous backlog on its calendar. It has established logical and viable procedures designed to simplify and streamline the landmarking process. The passage of Intro.775 will codify these procedures as a guide for future administrations.

Clear time frames will be of great help to our members – those who wish to have their homes landmarked as well as those who might oppose the inclusion of their building in a proposed landmarked district. Intro 775 outlines opportunities for all views to be presented and provides for a date certain by which a clear determination will be made.

As a charter member of the Reasonable Landmarking Coalition, CNYC strongly urges the City Council to pass this helpful and practical legislation.

Because of the additional cost of alterations in landmarked buildings and districts, we urge the City Council to take a new look at the J-51 program with a view to expanding the very practical special provisions that it has regarding improvements in landmarked buildings and landmarked districts.

Thank you for this opportunity to express our views.

Mary Ann Rothman  
Executive Director

Phone 212 496-7400 • Fax 212 580-7801 • e-mail [info@CNYC.coop](mailto:info@CNYC.coop) • Website: [www.CNYC.coop](http://www.CNYC.coop)

**ERIC PALATNIK, P.C.**

ATTORNEY AT LAW  
32 BROADWAY, SUITE 114  
NEW YORK, NEW YORK 10004

(212) 425-4343  
FAX (212) 968-7129  
E-MAIL ERIC@ERICPALATNIKPC.COM

September 9, 2015

Good Morning,

**We provide this testimony in support of Int. No. 775 and on behalf of eleven out of seventeen homeowners whose homes are located in the proposed Douglaston Historic District Extension, which has been held in calendared status since 2008.**

At the time of the original proposal in 2008, those in favor and opposed to the designation focused on the substantive issues, such as whether the historical significance of the district outweighed the homeowner's desire to maintain full autonomy over his home. Since then however, the bone of contention has shifted. The issue is no longer about whether Douglaston's Historic District should be expanded. Rather, it has evolved into whether Landmarks has been fair to these homeowners by imposing a ubiquitous cloud of uncertainty over the future of their homes - their livelihood - for over six years. We respectfully contend that it has not.

On March 18, 2008 the Landmarks Preservation Commission voted in favor of a motion to calendar the proposed Douglaston Historic District Expansion. Subsequently, on May 5, 2008 Community Board 11 conducted a public hearing in which several speakers testified both in favor and in opposition to the proposal. The Community Board eventually rejected the proposal noting that the residents' wishes outweighed any historical benefit to this city.

After six years of calls, emails, and visits to Landmarks, the status of these homes remains ambiguous. Therefore, in 2014 these homeowners submitted a petition to the Landmark Preservation Commission to further document not only their opposition to their home's designation but to, and I quote, "*release these properties from bondage despite the opposition of a solid majority of the affected homeowners, community board 11, and Councilman Vallone who all empathetically on record oppose to the landmarking proposal.*"

The homeowner's choice of words - *as being held in bondage* - exudes a lasting sting that no government or citizen should ever feel. It is unfair that these homeowners have had to live with so much anxiety and insecurity over their homes, where they live, eat, breathe, and raise a family, for over six years. While this was certainly not the intention of the proposal, it remains the result.

Today is September 9, 2015, which is more than six years after the designation by LPC and the Community Board's rejection. Homeowners are restless and discouraged. The discontent however is no longer about the landmarking itself. Instead the homeowners feel that their most valuable asset, their home, has been stuck in a game of limbo at the mercy of the City.

## **ERIC PALATNIK**

If Intro. 775 had been enacted, the Commission would have had held a public hearing within one year immediately following the date that the item was calendared. As previously mentioned, we are on year six and moving on to year seven.

Even though Intro 775 did not exist at the time of Landmark's motion to calendar the district, it would still benefit Douglaston homeowners as the Commission would have eighteen months to relieve them from this perpetual uncertainty. We believe this bill can only create a more transparent and fair process.

### **Conclusion**

It is therefore respectfully contended that City Council pass Int. No. 775 in all fairness to not only Douglaston, but the litany of other backlogged cases that have been interminably held in calendared status for far too long. This bill would finally provide these homeowners with some clarity over the status and quiet enjoyment of their properties. This bill would give these homeowners the fairness they deserve.

Respectfully Submitted,

Eric Palatnik, Esq.

# FRIENDS

of the UPPER EAST SIDE  
HISTORIC DISTRICTS

## Board of Directors

Franny Eberhart  
PRESIDENT

Rita C. Chu  
David I. Karabell  
Patricia F. Sullivan  
VICE PRESIDENTS

O. Kelley Anderson  
TREASURER

Alice McG. Concagh  
SECRETARY

Peter deF. Millard  
ADVISORY SEAT

Sarah Chu  
Christina R. Davis  
Lionel Goldfrank III  
Erin Gray  
Thomas Jayne  
E. William Judson  
Rev. John A. Kamas  
Christian Keesee  
David W. Levinson  
Mimi Levitt  
Hermes Mallea  
Joyce Matz  
Frederic S. Papert  
Judith Price  
Robert C. Quinlan  
Genie Rice  
Gretchen Siebel  
Andrew P. Steffan  
Daniel B. Strickler, Jr.  
Margot Wellington  
Ronda Wist

## Board of Advisors

Kent L. Barwick  
Andrew S. Dolkart  
Annie MacRae  
Anthony C. Wood

Tara Kelly  
EXECUTIVE DIRECTOR

September 9, 2015

### The New York City Council Committee on Land Use Public Hearing Testimony by Tara Kelly

#### Re: Intro. 775

Preservation of our city's landmarks and historic districts is of utmost importance to the vitality and stability of New York City's great neighborhoods. Historic preservation is an essential part of our economy, providing jobs for skilled laborers, increasing property values and enticing tourists from around the world.

The bill before you today has been proposed to resolve concerns about the efficiency and transparency of the Landmarks Preservation Commission. We, ourselves, have shared these concerns. However, we fear that setting strict timelines and instituting a moratorium on reconsideration will only prevent the Commission from performing its mission.

While the Council's own dataset shows that only 10% of historic districts have exceeded the threshold of 24 months from calendaring to designation since 1998, a look back to the creation of the Landmarks Law 50 years ago demonstrates that nearly one third of all districts would not have made it through the proposed timeline. This percentage rises to 43% on the Upper East Side. If the timelines had been in place, three of our seven historic districts would not have been designated (Carnegie Hill, Henderson Place and the Upper East Side), but more critically, 1,372 buildings -- or 83% of the Upper East Side's historic structures would not be protected.

Even in the best of circumstances, when the LPC performs as efficiently as the Council's recent data shows, there are still several important reasons while all proposed items cannot meet a hard deadline. The calendaring and designation of an individual landmark or historic district is an incredibly thoughtful process. Considerable research must be completed, engagement of property owners must take place, and public support must be garnered -- all this done with extremely limited resources. There are any number of exceptional circumstances that may cause the process to be delayed. Indeed, the LPC works almost exclusively with exceptions -- these buildings are unique by their very definition.

Reasonable timelines can provide predictability for property owners and preservation advocates alike, ensuring a expeditious process and preventing items from languishing on the calendar for decades. However, these timelines do not need to be established by

# FRIENDS

of the UPPER EAST SIDE  
HISTORIC DISTRICTS

## Board of Directors

Franny Eberhart  
PRESIDENT

Rita C. Chu  
David I. Karabell  
Patricia F. Sullivan  
VICE PRESIDENTS

O. Kelley Anderson  
TREASURER

Alice McG. Concagh  
SECRETARY

Peter deF. Millard  
ADVISORY SEAT

Sarah Chu  
Christina R. Davis  
Lionel Goldfrank III  
Erin Gray  
Thomas Jayne  
E. William Judson  
Rev. John A. Kamas  
Christian Keesee  
David W. Levinson  
Mimi Levitt  
Hermes Mallea  
Joyce Matz  
Frederic S. Papert  
Judith Price  
Robert C. Quinlan  
Genie Rice  
Gretchen Siebel  
Andrew P. Steffan  
Daniel B. Strickler, Jr.  
Margot Wellington  
Ronda Wist

## Board of Advisors

Kent L. Barwick  
Andrew S. Dolkart  
Annie MacRae  
Anthony C. Wood

Tara Kelly  
EXECUTIVE DIRECTOR

altering the law. Furthermore, any timeline, no matter the duration or mechanism, must include an option for reconsideration.

In a letter to Council Member Arthur Katzman on the subject of an LPC Oversight Hearing dated June 17, 1987, our founding president, Halina Rosenthal wrote:

...please do not let anyone tamper with the landmarks law. It has withstood the test of time and has been tested in the courts. It is good and it is flexible, furthermore it is a law which works... Were it not for the creation of the landmarks law, we would have continued losing our most precious architectural treasures, and would fast become Houston on the Hudson...

...we believe that all that is needed are some administrative in house changes and that better and more generous financing be forthcoming. Where would our governmental process be, if laws were altered where such minor measures will do?

Now, nearly 30 years later we request the same. Do not tamper with the Landmarks Law. Instead, allow the LPC to fulfill its mission and support this important work by allocating additional funds.

Thank you.

## FOR THE RECORD

**Testimony of Andrew S. Hollweck  
Vice President, New York Building Congress  
New York City Council Committee on Land Use  
September 9, 2015**



Good afternoon, Chairman and Members of the Committee. My name is Andrew Hollweck, Vice President at the New York Building Congress, a membership organization drawn from the City's design, construction and real estate industry.

The Building Congress supports Intro 775, because it creates a clearly defined timeline for identifying and designating landmarks in New York City.

For fifty years, the landmarking process has ensured the City's culturally significant buildings are protected and will help define the City's character for generations to come. At the same time, the process used to designate landmarks is deeply flawed.

Without firm time limits, the landmarks review process leaves thousands of properties in legal limbo, encumbering them with a semi-permanent designation that prevents their improvement.

For example, according to the Real Estate Board, in 2014, the LPC had a backlog of over 3,400 calendared properties before it undertook a major initiative to reduce this backlog, cutting it in half. Several properties have been on the LPC calendar for years without resolution. While the de Blasio Administration's efforts to address this are admirable, this could easily be undone by a future administration with different priorities.

Once a building is simply placed on the LPC calendar, it also increases the administrative hurdles to making even modest changes and improvements to the structure. Improvements must be reviewed and approved by both the LPC *and* the Department of Buildings, adding cost and delaying necessary upgrades.

The Building Congress also supports Intro 837 for similar reasons: by creating a searchable public database, the bill will offer transparency to a process that has historically lacked a formal, publicly-available list of properties under LPC's purview and their status.

With this said, we hope this is the beginning and not the end of a process to carefully review and improve upon the City's historic preservation laws. We can still protect the City's important historic structures and neighborhoods, but we should do so in a way that gives building owners more certainty, encourages development and ensures the City's ongoing economic vitality.

Thank you for the opportunity to testify.

# Queens Preservation Council

204-05 43<sup>rd</sup> Avenue  
Bayside, New York 11361

**Testimony before NYC Council Land Use committee, September 9, 2015  
Regarding Intro 775 Delivered by Mitchell Grubler, Chair**

We, in Queens, are not only proud of our landmarks and historic districts, but the Queens Preservation Council surveys our historic buildings and neighborhoods and formulates lists of potential designations because we want more of them. While we recognize, the interest on the part of the Council to make the Landmarks Law better and make the agency operate more efficiently, this bill, in its current form will result in the opposite effect.

With the input of a united preservation community, the agency has taken the appropriate steps to correct, with public hearings, the backlog of properties awaiting decisions on designation. This is being appropriately done on the agency level and does not require Council legislation. We all want to see the Commission make decisions in as timely a manner as possible but by their very nature, each historic building and district is unique with special merits and challenges. Sometimes research and investigations, writing the legally-required designation reports, and political wrangling involved in getting a designation done takes time. To prohibit the commission from taking action for years afterward if they do not act quickly enough is a backdoor way to block designations and take a big step backward. The landmarks law has served the city well for 50 years and preserved many of our most beloved neighborhoods and buildings – please leave it alone.



# **BUILDING & CONSTRUCTION TRADES COUNCIL OF GREATER NEW YORK**

**GARY LaBARBERA**  
PRESIDENT

AFFILIATED WITH THE  
BUILDING CONSTRUCTION TRADES DEPARTMENT  
OF WASHINGTON D.C.  
—  
BUILDING AND CONSTRUCTION TRADES COUNCIL  
OF NEW YORK STATE  
—  
AMERICAN FEDERATION OF LABOR OF CONGRESS  
OF INDUSTRIAL ORGANIZATION

Building and Construction Trades Council  
Land Use Committee  
September 9<sup>th</sup>, 2015

My name is John Wund and I am speaking on behalf of the Building & Construction Trades Council of Greater New York, an organization consisting of local affiliates of 15 national and international unions representing 100,000 working men and women in the New York City.

I want to start by thanking the Land Use Committee members and Chair Councilmember Greenfield, for this hearing regarding Intro 775 which would ensure a more effective Landmarks Preservation Commission.

This legislation would create sensible timelines that would make sure that the LPC is consistently making decisions on individual landmarks and historic districts. In the past ten years 90% of the historic district designations were completed in the time provided under the new guidelines. This bill would prevent the loss of good jobs, lost from the 10% falling through the cracks of the commission and would expect the same level of efficiency it currently operates under regardless of the mayoral administration in charge.

This legislation would also prevent the landmarking process to be misused as a way to stop alterations of buildings that aren't truly landmarks. This prevents minor repairs and causes costly delays.

The BCTC of Greater New York stands behind this common sense legislation and hope that the committee and City Council guarantee the continued productivity of this important commission.

71 WEST 23rd STREET • SUITE 501-03 • NEW YORK, NEW YORK 10010  
TEL. (212) 647-0700 • FAX (212) 647-0705





SERVICE EMPLOYEES  
INTERNATIONAL UNION  
CTW, CLC

**HÉCTOR J. FIGUEROA**  
President

**LARRY ENGELSTEIN**  
Executive Vice President

**KYLE BRAGG**  
Secretary Treasurer

**LENORE FRIEDLAENDER**  
Assistant to the President

**VICE PRESIDENTS**

SHIRLEY ALDEBOL  
KEVIN BROWN  
JAIME CONTRERAS  
ROB HILL  
DENIS JOHNSTON  
GABE MORGAN  
ROXANA RIVERA  
JOHN SANTOS  
JOHN THACKER

**Capital Area District**

Washington 202.387.3211  
Baltimore 410.244.5970  
Virginia 703.845.7760

**Connecticut District**

Hartford 860.560.8674  
Stamford 203.602.6615

**District 1201**

215.923.5488

**Florida District**

305.672.7071

**Hudson Valley District**

914.328.3492

**Mid-Atlantic District**

215.226.3600

**National Conference of  
Firemen and Oilers**

606.324.3445

**New England District 615**

617.523.6150

**New Jersey District**

973.824.3225

**Western Pennsylvania District**

412.471.0690

[www.seiu32bj.org](http://www.seiu32bj.org)

## Testimony of David Cohen, SEIU 32BJ

### Before the Committee on Land Use, New York City Council

September 9, 2015

Good morning Chairman Greenfield and Committee members. Thank you for the opportunity to testify today. My name is David Cohen, and I am the Political Organizer for SEIU 32BJ in New York City.

SEIU 32BJ represents over 145,000 men and women in 11 states along the East Coast, as well as Washington, DC. We have over 70,000 members in New York City and Long Island. Our members are the backbone of the property industry – building workers, security officers and office, school, theatre, stadium and window cleaners. Our membership is a microcosm of America, hailing from 64 different countries and speaking 28 different languages.

32BJ supports the efforts of the property industry to increase employment, economic growth and the expansion of affordable housing in New York City. We also recognize the importance of safeguarding the historic and cultural value of the City's buildings through the Landmarks Preservation Commission.

We support the legislation before the Committee. It provides a commonsense approach to ensuring predictability and timeliness in the landmarking process.

By formalizing current practices the legislation will strengthen the accountability of the system without proposing any new or excessive burdens on the Commission.

Including timeframes for public hearings and designations within legislation gives all parties confidence that administrations, both present and future, will act in a timely manner.

The inclusion of a 5 year moratorium following a decision of the Commission to not designate a property gives building owners a clear window to make improvements to their properties.

We applaud the current administration's efforts to significantly reduce the backlog of calendared properties and are encouraged to hear that the Commission has a plan to deal with a major portion the remaining individual landmarks over the coming 12-24 months.

In addition to this, an analysis by the Historic Districts Council shows that over the last 10 years, 90% of Historic District designations were completed in two years or less. This result, combined with the proactive approach taken by the administration, demonstrates that the timeframes contained in the legislation are realistic and achievable.



**Testimony from the Real Estate Board of New York  
to the New York City Council Committee on Land Use in support of Intro 837**

The Real Estate Board of New York, Inc. (REBNY) is a broadly based trade association representing nearly 17,000 owners, developers, brokers, managers and real estate professionals active throughout New York City. We have been long time advocates for needed reforms to the landmarking process that would standardize the designation process and improve transparency.

REBNY is pleased to testify in support of Intro 837, a bill that would require the Landmarks Preservation Commission to make available a database of all items designated or under consideration for designation. However, we believe that the bill's definition of properties "under consideration" is too broad. While it may be important for the public to know if LPC has considered a property for landmark status but has decided that it does not merit designation—and we would like to have these decisions included—some of the other categories contemplated by the proposed law are impractical for a public database of this type.

For this information to be helpful for all parties, it should be provided in a way that is useful. Since LPC's research is likely to be voluminous, we should work to find a way to make compliance workable, and we would strongly support any requests by LPC for additional resources to accomplish this goal. Greater transparency will enhance the performance of LPC for the benefit of all New Yorkers.

We commend the administration and the Council for its recent efforts to address chronic issues and improve the transparency of the landmarking process.

FOR THE R

Daniel McCalla, President,  
Linda Eskenas, Vice President Staten Island,  
*Preservation League of Staten Island*  
Judith Guttman, Vice President Queens  
*Rego-Forest Preservation Council*  
Ed Jaworski, Vice President Brooklyn  
*Madison Marine Park Civic Association*  
Howard Yourow, Vice President Bronx,  
Lewis Greenstein, Treasurer  
*Duffield Street Block Association*  
Patricia Sherwood, Assistant Treasurer  
*Parkway Village Historical Society*

**Directors**

James Trent, President  
*Queens County Farm Museum*  
*Queens Civic Congress*  
Mitchell Grubler  
*Queens Preservation Council*  
Steve Lavine  
Steven Kaye  
*South Canarsie Civic Association*  
Kathy Jaworski  
*Madison Marine Park Civic Association*  
Joy Chatel in memorial  
*Friends of 227 Duffield Street,*  
Teresa Noonan  
Judith Guttman  
*Parkway Village Historical Society*  
Joseph Hellman in Memorial  
*Douglaston Civic Association*

**Members**

Steve Barrison  
*Bay Improvement Group*  
Mary Mattner  
*Carroll Gardens Association*  
Mary Ann Sulestro  
*South Canarsie Civic Association*  
Hannah Bloch & Jerry Snowwhite  
*South Williamsburg Historical Society*  
Henry Euler  
*Auburndale Improvement Association*

## FOUR BOROUGH NEIGHBORHOOD PRESERVATION ALLIANCE CORPORATION

Neighborhood Preservation Center  
232 East 11<sup>th</sup> Street,  
New York, NY 10003  
September 9<sup>th</sup> 2015

New York City Council Zoning Committee  
City Hall  
New York, N.Y. 10007

Dear Chairmen

My name is Daniel McCalla, President of the Four Borough Neighborhood Preservation Alliance Corporation. I am here to offer my opposition to Intro 775.

The Landmarks Preservation Commission is one of the most underfunded government agencies in New York City. Intro 0775 does not provide credible solutions to the backlog of applications, over the past two decades. If you buy a Landmark property, you buy the value and the headaches of government oversight. I see Skyscrapers in Downtown Brooklyn, Extensions into back yards In landmark districts. Air Rights are allowed to be transferred between properties to build taller buildings. Development is flourishing in this city.

I recommend the City Council seek past legislative Introductions to clean up the permit-landmarks process. Solutions of past City Council Legislation include reintroduction of the following bills.

Intro 0020 (2010) concerning building permits for landmarked properties  
Intro 0683 (2008) construction near landmark properties  
Intro 1034 (2009) hearing at city council for landmark properties.  
Intro 0317 (2004) landmark building and demolition permits

Thank you for your time, God Bless and good luck.

Sincerely,

  
Daniel McCalla

Four Borough Neighborhood Preservation Alliance Corporation



## **NAACP New York State Conference**

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

### **Statement of Hazel Dukes before New York City Council Regarding Intro 775**

**Dr. Hazel N. Dukes**

**President, NAACP New York State Conference**

**HAZEL N. DUKES**  
President

**September 9, 2015**

**FOR THE RECORD**

Good morning Chairperson Greenfield and members of the Committee on Land Use. My name is Hazel Dukes, and I am the President of the NAACP New York State Conference and a member of the NAACP National Board of Directors. The NAACP New York State Conference has been a vital strategic component of the National Association for the Advancement of Colored People for nearly 80 years, and in my capacity as its President, I am honored to have this opportunity to testify in support of Intro 775.

I believe that Intro 775 is a fair and reasonable bill that would offer predictability for owners and help to standardize the landmarking process. First, the bill would require the Landmark Preservation Commission to deal with its backlog of buildings that have been “calendared” for consideration as potential landmarks in a timely but realistic way. In the past year, LPC has shown progress by taking a backlog of over 3,400 calendared properties and cutting that number in half. They’ve also developed an 18-month initiative to make decisions on 95 proposed individual landmarks, the vast majority of which have been calendared for over 20 years without a vote. I applaud LPC for these steps in the right direction, but they leave out the other 1700 property owners—including 800 property owners in Bedford Stuyvesant in the proposed Bedford Historic District that was calendared over four years ago—who also have a right to a decision. This bill would ensure that LPC addresses its full backlog in a timeframe that they have shown to be reasonable, given their actions over the past year.

Second, the bill would put achievable timeframes on LPC’s consideration of proposed landmarks and historic districts. Keeping districts and buildings on the review calendar for an indefinite amount of time is also unfair to affected business and home owners. As soon as a building is calendared, it’s flagged in DOB’s permitting system, and repairs and renovations to it are subjected to an additional layer of review by LPC, which can be costly and time consuming for owners, many of whom are struggling to make ends meet. Owners should have the right to an up or down vote by LPC within a reasonable time frame—which this bill would provide—so they can either be given a set of rules for what is and isn’t allowed on their property, or once again have the flexibility to upgrade and maintain their property as they see fit.

Finally, if a property isn’t designated as a landmark, Intro 775 would give owners a much-needed five year reprieve from the more intensive permit reviews required for properties being considered for landmarking. If LPC decides that a property does not merit landmarking at a given time, owners should feel confident that they will be allowed a real opportunity to upgrade and renovate their property in a less burdensome way. LPC would still have the ability to re-calendar the property at a later date if standards changed or new information comes to light, but owners wouldn’t have to fear getting trapped in an indefinite revolving door of LPC designation review.

Intro 775 is a common sense measure that adds predictability to the landmarking process, and ensures that the efficiency recently shown by LPC will be continued in the future. It will also prevent a backlog of any magnitude from ever accumulating again, and spare hardworking home and business owners from having their properties repeatedly placed under review without the courtesy of a decision.

Thank you again for allowing me to speak on this topic, and thank you to Council Members Koo and Greenfield for introducing this legislation, which will help home and business owners for years to come. I welcome any questions, and am once again grateful to have received this opportunity to speak on Intro 775.

**FOR THE RECORD**



**HEARING TESTIMONY FROM  
THE BUILDING OWNERS AND MANAGERS ASSOCIATION OF GREATER NEW  
YORK:**

**A LOCAL LAW TO AMEND THE ADMINISTRATIVE CODE OF NEW YORK, IN  
RELATION TO ESTABLISHING A MAXIMUM PERIOD OF TIME FOR THE  
LANDMARKS PRESERVATION COMMISSION TO TAKE ACTION ON ANY ITEM  
CALENDARED FOR CONSIDERATION OF LANDMARK STATUS.**

Good morning Chair Greenfield and the esteemed members of the Committee on Land Use. My name is Daniel Avery, and I am the Director of Legislative Affairs for the Building Owners and Managers Association of Greater New York (BOMA/NY). I thank you all for affording me the opportunity to offer testimony on legislation before you today that would set reasonable timelines for designating various landmarks and historic districts.

First, a little background on BOMA/NY. We represent more than 750 owners, property managers, and building professionals who either own or manage 400 million square feet of commercial space. We are responsible for the safety of over 3 million tenants, generate more than \$1.5 billion in tax revenue, and oversee annual budgets of more than \$4 billion. BOMA/NY is the largest Association in the BOMA International Federation, the world's largest trade organization.

BOMA/NY recognizes that identifying and protecting historically important resources is critical to maintaining a beautiful and diverse urban landscape, and we support the city's efforts to do so. But the current system for proposing and designating landmarks and historic districts is vague, open-ended, and can be unduly disruptive. The legislation under consideration would help to give structure to that process and thereby improve transparency and certainty. Therefore, we strongly support the intent of the proposed bill, and would be happy to continue to work with the Council on the legislations specifics, as needed.

Once again, thank you for allowing me to testify today.



**PARTNERSHIP**  
for New York City

**FOR THE RECORD**

WRITTEN COMMENTS FOR THE LAND USE COMMITTEE  
OF THE NEW YORK CITY COUNCIL

**HEARING ON INT. 775 - STREAMLINED LANDMARKING PROCESS**

**WEDNESDAY, SEPTEMBER 9, 2015**

The Partnership for New York City is a nonprofit organization working to enhance the economy of the five boroughs of New York City and maintain the city's position as the pre-eminent global center of commerce, innovation and economic opportunity.

We support Intro. 775, which will bolster the city's economy by ensuring New York strikes the right balance between historic preservation and new development.

There is no doubt that New York City is full of historic and iconic buildings of note that should be preserved. But landmarking has become a highly political process that can leave building owners in limbo for years, potentially resulting in deterioration of the very properties that advocates are seeking to protect. Intro. 775 would impose some discipline on the Landmarks Commission that is only fair and reasonable, notably by setting timetables to consider a building for landmark status.

Development already takes a very long time in New York City and requires a huge up-front investment. Making the landmarking process less political and offering greater certainty to developers will prime the area for the investment and modern redevelopment that is critical to our competitive future.

We urge the City Council to pass Intro. 775. Thank you.



FOR THE RECORD

---

RENT STABILIZATION ASSOCIATION • 123 William Street • New York, NY 10038

---

## MEMORANDUM IN SUPPORT

### Intro. 775

The Rent Stabilization Association (RSA) represents over 25,000 owners and managers that collectively own or manage over 1 million units of housing in their buildings. Proper management of buildings in NYC requires certainty when planning for building maintenance or upgrades.

Intro. 775 provides a degree of certainty for owners as it relates to the landmarking process. Refinancing and major building upgrades can be severely impacted in a negative way when the rules and regulations that apply to a building are in limbo for years with no closure in sight. Intro. 775 would impose reasonable timeframes on the Landmarks Preservation Commission to review and determine a buildings eligibility as a landmark.

There is no other city or state agency that initiates a process that can have such a major impact on a building where the process can drag out for years with no definitive resolution. The financial impact of this process can lead to deferred maintenance which just increases costs later.

For the above reason's RSA supports Intro. 775.

**FOR THE RECORD**

Dear Hon. Councilmembers:

I ask you to vote against Intro. 775. I believe this is the wrong approach to eliminating the Landmarks Preservation Commission backlog.

While recognizing that our city changes over time, our history - in the form of its deserving historic buildings and districts – must be preserved.

I agree that a large number of backlogged sites is not desirable, but feel that the solution to a backlog is to provide more resources to LPC, not to impose a draconian timeframe and long period before re-consideration.

Please vote NO on Intro 775.

Sincerely,

Terri L. Cude

Board Member, 77 Bleecker Street – a building in the NoHo Historic District, designated in 1999.



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

232 East 11<sup>th</sup> Street New York NY 10003  
tel (212) 614-9107 fax (212) 614-9127 email hdc@hdc.org

Statement Regarding Intro 775  
City Council Land Use Committee  
The Historic Districts Council  
September 9, 2015

The Historic Districts Council is the citywide advocate for New York's historic buildings and neighborhoods. For the past 45 years, we have worked with local community groups to preserve, protect and enhance the historic buildings of New York City. As part of our work, HDC has decades-long experience with the New York City Landmarks Preservation Commission; attending hearings, reviewing proposals and advocating for specific actions, seeking resources for the agency and proposing enhancements to the NYC Landmarks Law to better enable the agency to perform its chartered mission.

No one on any side of the issue is pleased with the circumstances of the agency backlog which led to this hearing. However, this bill, as currently written, is an extreme threat to the continued functioning of the agency as part of city government. It creates untenable conditions for the Landmarks Commission to properly function, rewards bureaucratic inaction and risks undermining popular community-driven campaigns.

### **The Proposed Moratorium on Agency Action is Damaging**

Placing a moratorium on designation activities once a timeline is exceeded is punitive. It creates an impediment to positive, forward agency activity and prevents the Landmarks Preservation Commission from using a valuable resource, time, in their consideration of the merit of a proposal. This has the net effect of creating an unfunded mandate – without the resource of having time to study and consider a decision; the agency must allocate resources to fit its consideration within a set window. Where will these resources come from?

Furthermore, is a moratorium good governmental practice? Imagine the effects of a similar moratorium on another city review process; for example, a restaurant inspection by the Department of Health. If DOH did not inspect a restaurant within a specific time of its opening, should that establishment then be exempt from inspection for five years? What about a building inspection? More analogously, if the Department of City Planning did not respond to a community request for a rezoning within a certain period, does five years need to pass before that idea is revisited? What if DCP does not adhere to Uniform Land Use

Review Procedure timeline and their proposal is rejected? Can the proposal be revisited when the agency is decides, or does the agency need to wait 5 years? What demonstrable public good comes from erecting barriers to an agency's actions in this way?

We speak from real experience when we say that New Yorkers want more landmarks and historic districts. When communities call out for reform of the Landmarks designation process, they are asking for a streamlined process which will result in more designations and more protected properties, not less. The reality is the majority of property owners, especially within historic districts, desire landmark protections.

This might seem counter-intuitive if one gives credence to the hyperbole of property-rights activists, but the actual political reality is that the Landmarks Preservation Commission will rarely act to designate a historic district if the majority – or even a visible majority – of property owners are in opposition. There have been a minute number where this has been the case, but in the vast majority of instances where there has been visible majority opposition, historic district efforts have failed or stalled, sometimes during the official LPC process. What this bill, as currently written, provides is an opportunity for opponents of preservation to intentionally delay proceedings and run out the clock, rendering the LPC powerless to act on a project for 5 years and leaving community advocates unable to even access a municipal process designed to fulfill their shared goal.

### **Calendaring Does Not Deter Property Development**

One potential reason for this bill is the idea that being placed on the Landmarks Commission's calendar somehow impedes property development and deprives property owners of their basic rights. This is not the case.

Placing a property on the agency's calendar to be considered does not grant the agency any protective powers and this current legislation does not remedy that. There is no reason which property cannot be bought or sold when calendared, and there is no demonstrable proof that being calendared impacts property value or the ability of new property owners to alter their property as they see fit. A real-world example is the 18<sup>th</sup>-century Lady Moody House in Gravesend, Brooklyn. Originally heard by the Landmarks Preservation Commission in 1966, the Lady Moody House was brought forward again for consideration as an individual landmark in 2004. At that time, the owner objected because of her concerns that landmark designation would interfere with her sale of the property. The LPC declined to act because of this and the property was sold in 2006 for \$600,000. According to recent media reports, the property is once again currently on the market, and the asking price is \$869,000. It would seem that calendaring has not negatively impacted its property values after all.

Other examples of calendaring not affecting property values or transactions are in Bedford-Stuyvesant and Crown Heights North in Brooklyn. Large swathes of both areas remained under consideration by the Landmarks Preservation Commission for years; in the case of Bed-Stuy, for decades. Yet these are both

neighborhoods where home prices have dramatically risen, to the extent that justifiable fears of gentrification and displacement are very high on the list of community concerns. How can this evidence be reconciled with the notion that calendaring depresses property values and impedes the transfer and development of an area? Frankly put, placing a property or neighborhood on the LPC's calendar seems to have negligible effect on property development.

Currently, properties which are calendared are marked with a "C" in the Buildings Information System – which causes an application for a Buildings Permit to be passed along to the Landmarks Commission before being approved. The LPC then has 40 days from the permit's application date to perform the necessary Public Notifications for a Public Hearing, Hear the property (or historic district) and vote on its designation – or the Buildings permit is issued. By any standard, this is not a hardship – the Buildings Department has a 40-day window in which to issue a permit and this practice does not impact that timeline.

Based upon decades of observation since this interagency agreement was created in 1988, this system has seemed to have led to the emergency designation of two separate properties in underserved communities in North Brooklyn, both of which were under imminent threat of demolition due to questionably-financed speculative development. Both properties have subsequently been changed owners a number of times, with appreciable profits made in each transaction. Other instances of this "protection" have not resulted, to our knowledge, in any changes to proposed building projects.

### **The Proposed Timelines Are Inadequate**

Analysis of Landmarks Preservation Commission designation practices shows that the proposed timelines of 6 months for a Public Hearing and 6 months for a designation vote for individual landmarks and 1 year for a Public Hearing and 1 year for a designation vote for historic districts are inadequate, especially when seen in the light of a moratorium on agency activity.

While analysis of designations during the Bloomberg era shows that the agency can and generally does adhere to the proposed timelines in most circumstances, the historic districts which are exceptions – Bedford-Stuyvesant, Central Ridgewood, Crown Heights North and West End Avenue – are remarkable neighborhoods well-worth preserving. They are all also large areas, encompassing hundreds of buildings. In the course of their due diligence, the Landmarks Preservation Commission analyzes and documents all the properties within a proposed historic district in order to properly regulate them with the appropriate familiarity and knowledge. Removing the resource of necessary research time to the designation process risks upending the consideration criteria – the question for the agency might become not "is it worthy?", but "can we properly document this area in time?"

Additionally, an analysis of designation activities over the 50 years of the LPC's existence tells a different story. Between 1965 and 2015, only 1 historic district (Fiske Terrace/Midwood Park) took longer than 12 months from being calendared to having a hearing but 53 historic districts (approximately 38% of all

historic districts) took more than 12 months for a designation vote to be held after their first hearing. Research indicates that the average time between the first public hearing and a designation vote for historic districts is actually 19.68 months, over 7 months longer than the timeline currently proposed in the bill.

The reasons for this seemingly-long period are numerous. Between 1965 and 1973, the Landmarks Preservation Commission only had a narrow window to hold hearings every three years – an absurdly-weak situation which this bill would essentially return the agency to. Looking closer into the historic record, one discovers numerous instances where the LPC held several hearings on properties under consideration to better accommodate community stakeholders such as property owners, experts and elected officials to register their objections and support for the proposed designation action. These additional hearings resulted in modified historic district boundaries and revised building descriptions. Indeed, public testimony at hearings is a valuable source of specific information about properties; many times information about a property otherwise unattainable by researchers can be brought forward at a public hearing by a building's owner or community resident. This can become part of a property's official history and can greatly affect how the LPC regulates it. However, this process takes time; time to ensure all community stakeholders have the opportunity to participate, time to incorporate comments into the official record and time to verify new information which is discovered.

It should be noted that the Landmarks Commission does not only consider one building property or historic district at a time but instead attempts to respond in a timely manner to the hundreds of Requests for Evaluation which the agency receives every year, to say nothing of new or inherited internal agency priorities.

The bill as currently written, especially when combined with the proposed moratorium on agency consideration if the timeline is exceeded, is setting the Landmarks Preservation Commission up to fail and may have the unintended consequence of the agency choosing not to act rather than risk performing an inadequate review of properties proposed for designation or wasting scant agency resources by discarding projects-in-progress.

### **This Policy Would Strain Resources and Encourage Inequity**

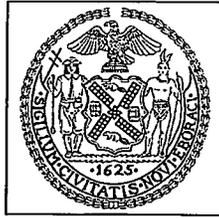
The Landmarks Preservation Commission is one of New York City's smallest municipal agencies, with a budget of \$5 million and a staff under 70. The agency is responsible for the oversight of over 31,000 properties and issues over 13,000 permits annually. Placing mandatory timelines on an already-overburdened agency could potentially lead to a cessation of positive activity.

The proposed timelines, combined with the proposed moratorium, encourages the agency to be extremely cautious in choosing properties to consider for designation, since there is a disincentive for the agency to begin to act. This could potentially lead to the otherwise preventable loss of historic buildings in those rare emergency instances where rapid action is required. More importantly, rather than increasing transparency in decision-making, it could negatively impact community support for landmark designation as the agency

might reasonably be less willing to respond to community requests since it would be shackled to a set timeframe. Whereas currently the Landmarks Commission might calendar a property as a means to assure a community that their requests are on the agency's agenda, under the proposed guidelines, the LPC will only begin the process if they feel there are resources enough to finish the project within a narrow timeframe. Certainty from a city agency is a good goal, but municipal projects take time – often longer than originally projected and during the gestation period of a project, other competing interests can emerge which can further delay actions. With a doomsday clock like the proposed moratorium hanging over the designation process, the Landmarks Commission might decide on an organizational level that a policy of inaction is better than failure.

By imposing these timeframes on the designation process, the Council is placing the Landmarks Commission in the uncomfortable situation of having to weigh community requests in a competitive manner which could have unintentional consequences. Obviously, more sophisticated community requests with professional photography and research will be more attractive to an agency straining to conform to strict timelines with limited resources. Similarly, neighborhoods with the resources to place into projects will be that much more desirable to an agency without resources. This has the potential to create a “pay to play” scenario which is the exact opposite to our city's goal to battle economic inequity.

It should be noted that organizations such as the Historic Districts Council work to correct this kind of imbalance and give community groups the tools they need to preserve their neighborhoods, but the imposition of the proposed restraints this bill places on the Landmarks Commission may very well be beyond the civic community's ability to correct.



## COMMUNITY BOARD NO. 2, MANHATTAN

3 WASHINGTON SQUARE VILLAGE

NEW YORK, NY 10012-1899

[www.cb2manhattan.org](http://www.cb2manhattan.org)

P: 212-979-2272 F: 212-254-5102 E: [info@cb2manhattan.org](mailto:info@cb2manhattan.org)

Greenwich Village ✦ Little Italy ✦ SoHo ✦ NoHo ✦ Hudson Square ✦ Chinatown ✦ Gansevoort Market

**A resolution from Community Board 2, Manhattan opposing New York City Council Intro 775**, which imposes constraints on the Landmarks Preservation Commission process for review of proposals for individual landmarks, interior landmarks, open areas and historic districts and imposes a 5-year prohibition of further consideration for proposals when review and action are not completed in the allotted time.

Whereas,

1. Proposals for landmark designation should be carefully researched and deliberated with due consideration to the views of Community Boards, interested organizations, and the public;
2. In order to lessen the likelihood of destruction or improper alteration of a proposed property or area, we encourage the LPC to consider the worthiness of any potential or proposed landmark and to calendar it (if so determined) with urgent dispatch.
3. The time between the calendaring of a potential landmark and definitive action by the Commission should be as brief as possible, while ensuring that there is sufficient time for research and deliberations;
4. The existing backlog of proposals before the Commission should be considered with dispatch;

5. The proposed bill places unnecessary and punitive time restraints on the process for determining the consideration of a proposed property for designation and will create unnecessary burdens and pressure on limited LPC staff and members of the Commission and would replace careful deliberation with a decision based on meeting an arbitrary deadline and the pressure to make a decision in the face of losing any opportunity to reconsider the proposed property within five years;

6. Over 90 percent of proposals to the LPC are concluded within two years, therefore there is no pressing need for the proposed schedule of action nor for the five year hiatus provided for in the proposed bill;

7. The five-year limit on reconsidering serves no useful purpose and invites destruction or alteration of possible worthy properties while they are ineligible for reconsideration;

**Therefore be it resolved that Community Board 2, Manhattan, after a careful examination and extensive deliberation, opposes City Council Intro 775.**

Vote: unanimous, 38 Board members in favor

May 21, 2015



George Fernandez, Jr., Chairman  
Ebenezer Smith, District Manager

## Community Board 12M

530 West 166<sup>th</sup> Street, 6<sup>th</sup> Floor – New York, NY 10032  
Phone (212) 568-8500 Fax (212) 740-8197  
[ebsmith@cb.nyc.gov](mailto:ebsmith@cb.nyc.gov) / [www.cb12manhattan@cb.nyc.gov](http://www.cb12manhattan@cb.nyc.gov)

---

September 8, 2015

Hon. Ydanis Rodriguez  
City Council Member  
10<sup>th</sup> Councilmanic District  
250 Broadway, Suite 1763  
New York, NY 10007

Hon. Mark D. Levine  
City Council Member  
7<sup>th</sup> Councilmanic District  
250 Broadway, Suite 1816  
New York, NY 10007

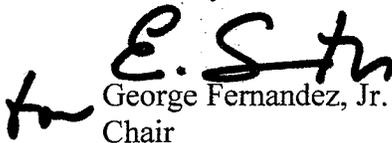
**RE:** City Council's Proposed Bill Intro 775

Dear Councilman Rodriguez and Councilman Levine:

This is to advise that, at the duly called meeting of the Executive Committee of Community Board 12-Manhattan (CB12M) held on Tuesday, September 8, 2015, the Executive Committee voted to support, by a vote of 11 in favor, 0 in opposition and with 1 abstention, the Historic Districts Council's opposition to Intro 775 as outlined in its memorandum of August 26, 2015 (copy attached) as well as to support Manhattan Borough President Gale Brewer's call for the City Council, in its consideration of options for improving the historic designation process, ensure that it follows a fair, balanced and transparent process that seeks to encourage not hinder designation and is informed by meaningful input from historic preservation stakeholders.

We ask that CB12M's opposition to Intro 775 be read into the record at the Public Hearing to be held on Wednesday, September 9, 2015 to consider various bills moving through the City Council regarding the Landmarks Preservation Commission and the process by which buildings and districts are considered for designation.

Sincerely,

  
George Fernandez, Jr.  
Chair

Cc: Hon. Bill de Blasio, Mayor  
Hon. Gale Brewer, Manhattan Borough President  
Hon. Letitia James, Public Advocate  
Hon. Scott Stringer, Comptroller  
Wayne Benjamin, Chair, Land Use, CB12-M



## HISTORIC DISTRICTS COUNCIL

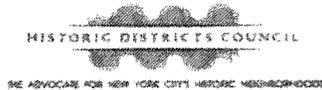
THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

# Why City Council's Proposed Bill Intro 775 is Detrimental to Landmarks

Below is a memo in opposition to Intro 775, the bill which aims to halt landmarks designations. There will be a hearing on **Wednesday, September 9<sup>th</sup> at 11am in the City Council Chambers at City Hall**. We urge you to attend and testify on this bill as it has the potential to affect all future designation activities of the LPC.

In the memo is the latest list of those groups who have signed on in opposition – including our colleagues at the National Trust for Historic Preservation. If you have responded and do not see your organization named, my apologies – please respond to this email and I will correct the list. If you want to add your organization's name to the list, please respond to this email and tell me – we are listing only organizations only at this time.

**BE SURE TO SCROLL DOWN OR CLICK HERE TO LEARN WHICH HISTORIC DISTRICTS MIGHT NOT EXIST IF THIS BILL WERE ALREADY LAW.**



August 26, 2015

Re: **Intro. 775**

Dear Council Member,

We write to express our serious concerns about Intro. 775. We share the desire for a swift, predictable and transparent landmark designation process and have given much consideration to how the current process could be improved to accomplish those goals. However, the bill as currently written would achieve the exact opposite. It would discourage the consideration of complicated or controversial sites and encourage obstruction rather than designation. In fact, if the provisions of Intro. 775 had been part of the Landmarks Law, some of our city's most cherished and valued landmarks and historic districts would not have been designated (see below). Furthermore, the Landmarks Preservation Commission (LPC) would have been prohibited from considering them again for a period of five years, during which time they would likely have been compromised or destroyed.

**Intro. 775 is unnecessary.**

The impetus for this bill appears to be the 95 sites currently on the LPC's backlog which were calendared more than five years ago without a final decision yet rendered by the Commission. The LPC has committed to a plan to hear and make final decisions on all of these sites by the end of 2016, thus making this bill superfluous.

Our research shows that the LPC has a solid track record of timely designation, if not within the strict limits described by Intro. 775, then nonetheless within a reasonable period of time.

**Intro. 775 makes an existing problem worse.**

In the instances where LPC has failed to act within the proposed limits, this failure has been in part a result of the Commission's limited resources. Designations require heavy investment of staff time towards extensive research, in-depth examination of boundaries, a full airing of all information and viewpoints on a subject, and the production of highly-detailed reports.

Intro. 775 would do nothing to expand the resources of the Commission, New York City's smallest agency charged with regulating more than 33,000 structures. Nor would it make complicated designation proposals easier or less time-consuming to vet. Instead, it would force LPC to make decisions about boundaries before they have fully considered all issues. It would prevent LPC from dedicating adequate time to complete the highly-detailed designation reports requested by property owners. At minimum, it would force LPC to make decisions before all information has been contemplated and all discussions have taken place. Far worse, LPC may simply avoid considering sites with complicating factors that might not allow a final decision within the prescribed timeframes.

**Intro. 775 creates a new problem.**

Intro. 775 would also encourage an owner who is strongly opposed to designation to seek delays in the process in the hopes of "running out the clock" and avoiding landmark designation. The owners of some of our city's most prized landmarks, from Grand Central Terminal to the interior of Radio City Music Hall, opposed designation and likely would have exploited this "do or die" timeframe.

In summary, Intro. 775 as currently written should not be approved because:

The bill imposes an unnecessary, unrealistic, and retroactive 18-month timeframe in which to consider every property on its docket.

The proposed timeframes for hearings and final votes are not reasonable for all cases, especially those which are complicated and controversial.

It provides no additional resources to ensure that LPC can consider calendared sites or districts within the proposed timeframe.

It does not allow LPC the option of continuing to consider a landmark or historic district after the deadline has been reached, regardless of the stage of consideration, negotiation, or discussion, or if new information has been introduced.

The five year moratorium on the reconsideration of landmarks and historic districts would unduly hamper LPC and is not reflected in the regulatory frameworks of other city agencies.

Sincerely, (signed) LIST IN FORMATION

FRIENDS of the Upper East Side Historic Districts

Greenwich Village Society for Historic Preservation

Historic Districts Council

LANDMARK WEST!

29th Street Neighborhood Association

Bay Improvement Group

Beachside Bungalows Preservation Association

Bowery Alliance of Neighbors

Brooklyn Heights Association

Carnegie Hill Neighbors

Citizens Emergency Committee to Preserve Preservation

Coalition for a Livable West Side

Defenders of the Historic Upper East Side

- 0. East Harlem Preservation, Inc.
- 1. East Village Community Coalition
- 2. Fiske Terrace-Midwood Park Historic District
- 3. Four Borough Neighborhood Preservation Alliance
- 4. Friends of Brook Park
- 5. Friends of Petrosino Square
- 3. Friends of Steinway Mansion
- 7. Friends of Terra Cotta
- 3. Friends of the Lower East Side
- 3. Greater Astoria Historical Society
- 0. Greenwich Village Community Task Force
- 1. Historic Park Avenue
- 2. Jackson Heights Garden City Society
- 3. Kew Gardens Civic Association
- 4. Lower East Side Preservation Initiative
- 3. Morningside Heights Historic District Committee
- 3. National Trust for Historic Preservation
- 7. New York Preservation Alliance
- 3. Park Slope Civic Council
- 3. Preservation Greenpoint
- 0. Queens Preservation Council
- 1. Save Chelsea
- 2. Save Harlem Now!
- 3. Senator Street Historic District
- 4. Society for the Architecture of the City
- 5. Sunnyside Gardens Preservation Alliance
- 3. Tribeca Trust
- 7. Victorian Society of New York
- 3. West End Preservation Society

# Analysis of the Effects of Intro. 775 on Landmark Designation

As proposed, Intro. 775 mandates for the consideration of historic districts the LPC has:

- 12 months from a vote to calendar to hold a public hearing
- 12 months from the public hearing to vote to designate

**or the district cannot be acted upon for five years.**

While the City Council's own dataset shows that only 20% of historic districts have exceeded the thresholds proposed by Intro. 775 since 1998, a look back to the creation of the Landmarks Law 50 years ago demonstrates that more than one third (38%) of all districts would not have made it through the proposed timeline. Particularly troubling is the breadth and diversity of the historic districts which would have been rejected – or, at best, deferred for five years.

**Under Intro. 775, the following historic districts could not have been designated when originally proposed:**

1. Bedford-Stuyvesant /Expanded Stuyvesant Heights
2. Bertine Block
3. Boerum Hill
4. Carnegie Hill
5. Carnegie Hill Expansion
6. Carroll Gardens
7. Central Park West - 76th Street
8. Central Ridgewood
9. Chelsea
10. Clay Avenue
11. Clinton Hill
12. Cobble Hill Extension
13. Crown Heights North Phase III
14. Fieldston
15. Fiske Terrace/Midwood Park
16. Gramercy Park
17. Gramercy Park Extension
18. Grand Concourse
19. Greenpoint
20. Greenwich Village
21. Hamilton Heights
22. Henderson Place
23. Hunters Point
24. Jackson Heights
25. Ladies' Mile
26. MacDougal-Sullivan Gardens
27. Morris Avenue
28. Morris High School
29. Mott Haven
30. Mott Haven East
31. Mount Morris Park
32. Park Slope
33. Ridgewood South
34. Riverdale
35. Riverside Drive-West 80th- 81st Street
36. Riverside Drive-West 105th Street
37. Riverside Drive-West End

38. Riverside Drive-West End Extension I
39. Riverside Drive-West End II
40. SoHo-Cast Iron
41. South Street Seaport Extension
42. St. Mark's
43. St. Mark's Extension
44. Stuyvesant Heights
45. Tribeca East
46. Tribeca North
47. Tribeca South
48. Tribeca South Extension
49. Tribeca West
50. Tudor City
51. Upper East Side
52. Upper West Side/Central Park West West 71st Street
53. West End - Collegiate Extension

Further analysis suggests that larger, more expansive historic districts take the longest for the LPC to consider for designation as they require more community education, architectural research and consensus-building. **These 53 historic districts encompass more than 17,900 buildings, approximately 54% of the total number of buildings currently protected by the Landmarks Law.**

**If Intro. 775 had been in effect since 1965, half of New York City's landmark properties would not be protected and New York City would be infinitely poorer for it.**

**CONTACT YOUR COUNCIL MEMBER ABOUT INTRO. 775:**

<http://council.nyc.gov/html/members/members.shtml>

**TESTIFY ON WEDNESDAY, SEPTEMBER 9th AT 11:00 A.M.**



# CARNEGIE HILL NEIGHBORS

**INTRO 775: LIMITING THE TIME FOR THE LANDMARKS  
PRESERVATION COMMISSION TO ACT ON PROPOSED DESIGNATIONS  
STATEMENT TO THE CITY COUNCIL LAND USE COMMITTEE  
BY LO VAN DER VALK, PRESIDENT, CARNEGIE HILL NEIGHBORS  
(September 9, 2015)**

I want to thank the Chair and Committee Members for allowing this opportunity to address our concerns about Intro 775 and our reasons for asking the City Council to oppose its implementation.

**A few words about Carnegie Hill Neighbors:** We are a preservation and community organization encompassing a small part of the Upper East Side (from 86th to 98th Street; between Fifth and Third Avenues). We were formed in 1970 to make our residential community more livable with the twin objectives of opposing tall buildings and fostering historic preservation. As a result we played a role along with other civic organizations in the 1980s in revising the zoning laws to limit tall buildings on certain avenues and introduce contextual zoning for the mid-blocks and also in the creation of the Carnegie Hill Historic District. In 1980 we pioneered the annual funding for the planting and upkeep of the Park Avenue Malls from 86th to 96th Streets made possible by private contributions on a sustainable basis; this was quickly replicated by another organization for the blocks on Park Avenue south of 86th Street.

**Our experience with creating historic districts:** The creation of the Carnegie Hill Historic District occurred in two stages, and both took a long time. The first district consisted of only a few mid-blocks flanking Madison Avenue from 90<sup>th</sup> to 94<sup>th</sup> Streets, but it nevertheless took several years to finally materialize in 1974. The major expansion of the district took much longer; work on it started in the early 1980s, but it did not receive Landmarks designation until 1993. If this proposed law had been in effect, the creation and expansion of our district would have been in doubt.

Our community has benefitted immensely from these and other historic designations, most recently in 2014 with the designation of the Park Avenue Historic District made possible by the help of our Council Member Daniel Garodnick. Our residents are grateful to live in a community with its historic character largely preserved and protected by the oversight of the Landmarks Commission, and over the years so many properties have been upgraded, enhancing the community and the city's tax base.

**Our reasons for opposing Intro 775:** The proposed Intro 775 in its current form would greatly limit the ability of the Commission to act effectively. Its newly proposed tight time constraints threatening to jeopardize its effectiveness, and for this reason we urge the City Council to reject this proposal. We are in agreement with (and have signed onto) the more detailed positions outlined in the joint letter, produced by the Historic Districts Council, the Greenwich Village Society for Historic Preservation, Friends of the Upper East Side Historic Districts and Landmarks West. [OVER]

New designations that come before the Commission will vary in their scope and complexity, the time needed for assessing community consensus, and the amount of research they will require. All this adds to the time frame needed for proper consideration. Shortening that timeframe may jeopardize many designations that otherwise could succeed.

**Why the need for Intro 775 may no longer apply with the same force:** We understand that the likely motivation for the introduction of this bill is the large backlog of the 95 calendared properties that have been allowed to languish without resolution over the years. But for more than a year now the new Commission chair, Meenakshi Srinivasan has sought – in consultation with the preservation community and elected officials, especially Manhattan Borough President Gayle Brewer – to devise a plan to work down that inventory in an expeditious manner. That plan is currently being implemented. We note that the initiation of that plan occurred many months before Intro 775 was proposed.

**Funding for the Landmarks Preservation Commission should be increased:** While we urge the rejection of the current proposal, we would suggest, as has been suggested so often, that funding for the Landmarks Commission be increased. This would help to speed up the process of designation, since the needed research takes so much time, also it will help the Commission to manage the supervision and requests for alterations for the growing body of landmarked properties. We note that the Landmarks budget relative to other city agencies is miniscule.

**Conclusion:** We urge that the City Council not approve Intro 775. The backlog of the 95 calendared properties is being worked on expeditiously. Finally, let us not lose sight of the immense contribution that the Commission, enabled by the Landmarks Law introduced 50 years ago, has made to create a more livable, and historically authentic, city. We believe that the role that landmarks designations have played over the last 50 years is one of the key building blocks that has made New York a city where people want to live, work and visit.

Thank you for your consideration.

RICHARD ORKIN FREEDMAN, C.F.A.

332 BLEEKER STREET  
NEW YORK, N.Y. 10014, U.S.A.

---

TELEPHONE AND FACSIMILE: (212) 255-0875

Chenault Spence, Co-chair Landmarks Committee Community Board 2 Manhattan

Our district is the heart and soul of landmarks. A large part of the district is landmarked, and there are a number of individual landmarks, some of which are somewhat redundantly located within the designated neighborhoods.

In the Greenwich Village historic district, its several additions and pending additions, there are town houses - elegant and modest - and tenements, some with detailing from an era when such multiple dwellings were treated with the respect of, often fanciful, decoration. In contrast to this beautifully preserved area stands the Far West Village - unprotected by landmarks and out of date zoning where development has eradicated its soul.

The once gritty [but no more] meat packing district is a comfortable amalgamation of the old and the new - the ultimate new being the Whitney museum.

SoHo and NoHo are guardians of a tribute to light manufacturing and the distinctive cast iron facades built for the ages.

The beauty of the neighborhoods, the quality of life, and the high property values attest to the strength of Landmark designation.

The very reason that all of this exists is the - to varying degrees - timely designations of these neighborhoods.

We therefore urge that Intro 775 not be agreed to.

# CATHOLIC COMMUNITY RELATIONS COUNCIL

---

**Testimony of Joseph Rosenberg, Director, Catholic Community Relations Council  
Before the New York City Council Committee on Land Use on Intro. 775  
September 9<sup>th</sup>, 2015 11:00 a.m.**

Good morning Chairman Greenfield, Chairman Koo and Members of the City Council Land Use Committee. I am Joseph Rosenberg, Director of the Catholic Community Relations Council (“CCRC”) representing the Archdiocese of New York and the Diocese of Brooklyn on local legislative and policy matters. I am pleased to be here to testify regarding Intro. 775, which establishes a period of time for the New York City Landmarks Preservation Commission (“LPC”) to calendar and designate landmarks in New York City.

This legislation would reduce uncertainty regarding the landmarking of properties and bring clarity to a process that currently is, at times, vague and amorphous. Passage of this legislation would create a definitive time frame for certain aspects of the LPC process, thereby improving upon the existing system. The details of these modifications to the existing practice are, however, best left to those with the most experience and expertise with these issues, namely the LPC, the City Council and important stakeholders. We would support whatever procedural enhancements that result from such a collaboration and where the City, as a whole, would be a beneficiary.

That being said, it is important to make several points regarding the landmarking of church properties. As the owner of more than 100 buildings either designated individually as landmarks or located within designated historic districts, the Diocese of Brooklyn and the Archdiocese of New York are tremendously affected by landmarks’ laws and regulations. Such designation imposes substantial costs on owners, but is a particular struggle for religious institutions that are forced to maintain seriously obsolete or underutilized buildings. No significant source of public or private funding exists to address the increased costs imposed on the church to meet the requirements of landmark status.

Church architecture, in particular, incorporates carved stone work and stained glass that is extremely costly to maintain and repair. Such costs are borne exclusively by the strained resources of the parish. With the additional extraordinary maintenance costs of these now landmarked buildings, the parishes are financially hard pressed to operate their core charitable and social mission serving their communities.

Mechanisms to provide financial flexibility for landmarked buildings have been provided in a few areas of the City, notably the Theatre District and around Grand Central Terminal, where unused development rights can be transferred across a wide geographic zone, enabling owners to realize some value for their excess air rights. This approach may be incorporated into a possible rezoning for East Midtown. But there are thousands of landmarked buildings which would benefit from a City-wide application of such transfer rights, and we encourage the City and the Council to advance these much-needed legislative improvements.

We do support the implementation of reforms to the landmarking process, many of them contained in the bill before you. We also applaud LPC's current initiative to reduce the backlog of properties on their calendar. Both plans include important and vital reforms that can begin to address the challenges confronting religious institutions when their properties are facing landmark designation.

Testimony of Christy MacLear  
Municipal Art Society of New York  
Intro 775  
Wednesday, September 9, 2015

Thank you for the opportunity to testify today on a bill that we believe will have a lasting negative impact on our city. I am Christy MacLear, member of the Municipal Art Society Board of Directors and Chair of the organization's Preservation Committee. MAS is a non-profit membership organization that advocates for intelligent urban planning, design, and preservation. I am joined by architects Judith Saltzman and Charles Platt who have over 75 years combined expertise building and restoring landmark buildings.

The 120 year-old Municipal Art Society was the organization that led the charge to create the Landmarks Preservation Commission in the 1960s, one of the most far reaching in the nation, after the devastating loss of Penn Station. We are a group of civic leaders and proud New Yorkers who want to ensure that we will continue to protect buildings and districts that are of value to our great city.

MAS supports efforts to bring greater transparency and accountability to LPC's work, but we do not support the legislation being discussed today.

To understand the proposal being discussed today, one must first understand the existing landmarking process: LPC staff reviews applications and decides whether to "calendar" a proposal. The act of "calendar" indicates that the LPC has evaluated a building or site, and determined it to be eligible for landmark designation. Calendar also triggers a public hearing and a vote by the commissioners of the LPC. Over the years, LPC has calendared items, but not proceeded with a designation decision, leaving properties in limbo for years. For example, LPC currently has 96 properties that have been calendared for 5 years or longer.

Intro 775 would impose time limits for review of applications before the Landmark Preservation Commission (LPC). It would require LPC to hold a public hearing within 180 days for individual buildings that have been calendared, and another 180 to make a final decision about the designation, effectively putting a one-year time limit on LPC review of applications. Historic districts would have to be reviewed and designated or dismissed within two years. If no action is taken, then the application would be automatically dismissed. In all cases, properties that were not designated would receive a 5-year ban where resubmission would not be allowed. All items calendared at the time the law goes into effect must be designated or dismissed within 18 months.

While we have concerns about many elements of the bill, *the most dangerous section is the proposed five-year moratorium on reconsiderations of potential landmarks.* The original 1965 version of the landmarks law had a moratorium provision which Ada Louise Huxtable, in a *New York Times* editorial, called the law's "weakness" and "an extraordinary joker in the final revision." She goes on to say:

***“...this extremely questionable solution is no more than an ironic guarantee of speculative destruction as usual – under protection of the preservation law itself.”***

In 1973 the City Council itself recognized that the moratorium was antithetical to the ideals of the Landmarks Preservation Commission, and amended the law, and the moratorium provision was eliminated. Inserting a new moratorium into the law today will only go backwards in time and endanger the very intent law. *We strongly advise you to remove the moratorium provision from consideration.*

*As you move forward, we urge the Council to consider a set of agency rules, rather than legislation, to improve transparency and move applications more swiftly through LPC. Or, you could draft legislation that sets a framework for new LPC policy, rather than dictating the policy itself.*

We look forward to working with the Council and LPC on such a set of rules, and hope they will consider the following recommendations as conversations continue:

*The deadlines in the bill are too short. LPC should be given two years or longer to review and designate or dismiss individual applications, rather than a year, and specific time periods of 6 months for each step of the designation process are unnecessary. For historic districts, LPC should have at least 3 years for review of historic districts. In fact, an analysis by Landmarks West showed that nearly 40 districts would not have been designated with the language in the proposed legislation.*

*We believe that automatically dismissing properties if no action is taken undermines the Landmarks Law, and should be withdrawn from consideration. This dangerous proposal could allow property to “run out the clock” on applications. MAS is equally opposed to a five year ban if a property is not designated. In fact, we believe this is a dangerous step backwards, since the Landmarks Law used to allow dismissal with prejudice.*

*MAS opposed LPC’s proposal to clear its backlog of calendared items without holding public hearings, and we are pleased that the agency will now review the applications through a series of public hearings. We have reviewed all the proposals and look forward to commenting in more detail at the hearings.*

*We urge the Committee to work with LPC to continue to improve its website. We applaud for the changes LPC made over the past year to bring greater transparency to its website, and hope more changes are on the way. For example, application presentations should be online at least two weeks before a hearing is held and agendas for each meeting should link directly to presentation materials.*

*Regarding Intro 837, an online database seems like a fine idea, but we ask that the Council work with LPC to ensure that the database is not too far reaching, and doesn’t impose an undue burden on the agency.*

Thank you for the opportunity to testify today.

**THE NEW YORK  
LANDMARKS  
CONSERVANCY**

September 9, 2015

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE THE NEW YORK CITY  
COUNCIL LAND USE COMMITTEE REGARDING PROPOSED BILLS INT. 775 AND INT. 837**

Good morning Chair Greenfield, Chair Koo, and members of the City Council. I am Andrea Goldwyn, speaking on behalf of the New York Landmarks Conservancy. Thank you for the opportunity to speak about policies and procedures at the Landmarks Preservation Commission. We share your interest in a landmarks designation process that is transparent and predictable; however we have some suggestions we feel would achieve these goals while providing the agency the flexibility necessary to execute its mission.

We do not oppose timelines, but believe that those in the bill be extended and should include exceptions for unforeseen events. We suggest you consider adding at least a year to both individual and district deadlines, and that the bill be amended to allow LPC to use the time as it sees fit—for instance, calendaring earlier to leave more time for research and hearings.

We are concerned that the deadlines in Intro. 775 may result in an equity problem in what the Commission chooses to pursue. While neighborhoods of all demographics across the City are interested in historic district designation, some are able to raise funds and hire consultants to start the extensive research process. Many other communities are not able to do this. So the Commission may prioritize areas where this research has been initiated. Neighborhoods that are not as wealthy or organized could fall back in the queue.

We believe exceptions are necessary due to unexpected circumstances that cannot be avoided: more community outreach may be needed, a building owner could fall ill, a new Councilmember may want time to study the proposal, new architectural or historic details could emerge that require additional research, such as the discovery that a building was an underground railroad site, or another Superstorm may require LPC to put its resources into damage assistance.

The short timeframes and lack of exceptions would limit LPC's ability to designate: we would not have historic districts in Mott Haven, Bedford-Stuyvesant, Hamilton Heights or Jackson Heights under the proposed bill.

We do not support the five-year moratorium. We believe it could create incentives for delay and disruption of the clear and transparent process that is the underlying goal of this legislation. If it is enacted the Council would be preventing an agency from fulfilling one of its core missions.

As you know, LPC has put forth a transparent plan for public hearings and votes on all sites that have been on the heard but not designated list for over five years. We fear that 18 months is too short a period to address these 95 and the remaining backlog. We all want to see the entire backlog cleared, so we encourage you to listen to LPC and expand the deadline to a time they suggest that would allow them to complete this objective. The bill should stipulate that the public process be applied to the entire backlog.

Regarding Intro. 837, we believe a public database would take a great step forward in adding transparency to the designation process. The LPC's website features individual landmarks and historic districts, and

other agency websites, such as the Department of Buildings', have fields that display whether a building is calendared. One comprehensive database would a valuable tool for building owners, advocates, and public officials. However, we are concerned that requiring completion of this task in a short 60-day timeframe without allocating additional resources would be an onerous burden for an agency that is already underfunded. We understand that that there are changes to the bill and request additional time to review them.

Thank you for the opportunity to present the Conservancy's views.

September 9, 2015

Good morning, Council Member Koo, Council Member Greenfield, and members of the City Council Committee on Land Use. My name is David Burney, and I am the Interim Executive Director of the American Institute of Architects New York Chapter (AIANY). I am here to offer testimony on Intro. 775 on behalf of AIANY, AIA Bronx, AIA Brooklyn, AIA Queens, and AIA Staten Island.

New York City's five AIA chapters represent over 5,900 registered architects and associated design and construction professionals. Our mission is to advocate for laws that allow New York City to remain the premier global city for architecture and an exemplar of progressive urbanism, while ensuring the economic welfare of our professional class.

Intro. 775 seeks to make reforms to the processes and protocols that govern the City's Landmarks Preservation Commission. We applaud the bill's intentions to make the designation processes more efficient, consistent, and predictable, in recognition that real estate development and construction contribute to the economy of our city through new projects and adaptive reuse and restoration of historic structures. However, we believe that some of the provisions will have grave and unintended consequences that will hinder the Commission from properly upholding its mission. With the Department of City Planning's zoning proposal, which we believe will help to increase affordable housing development citywide and provide architects greater flexibility in design, LPC's role as an essential force that ensures the quality and character of our physical city will become more important than ever. The bill, as written, will compromise our City's seminal Landmarks Law that so greatly contributes to the uniqueness of our urban realm, gives definition to communities, and increases the value of real estate.

We are sympathetic to the desire of the Council to focus on the protocols of the LPC, but we would prefer if the LPC would propose and adopt its own reforms. We note that in response to popular criticism, LPC recently put forward a sensible and implementable plan to address backlogged properties on the agenda. Should legislative action be inevitable, we urge you to consider the following proposed changes to the bill that would strike a proper balance between procedural efficiency and preserving NYC's architectural heritage:

- Remove moratoriums that prevent the Commission from exercising its discretion;
- Consult with LPC to determine if the stipulated time limit on judgements is reasonable. In many instances, the time limits proposed are too strict to allow for the nuanced consideration, community engagement, and scholarly research necessary to properly make appropriate judgments;
- Allow exceptions to the determined timelines of up to one year, as additional research or outreach is often necessary, particularly in the review of Historic District designations;
- At the end of the predetermined time limits, there should be an action on the part of the Commission to designate, de-calendar, or issue a no-action determination. The cut-off should not be used to stall potential designations;
- Under certain circumstances, LPC should be allowed to revisit projects that were previously not designated within a reasonable timeframe;
- If LPC is held to provide judgements more expeditiously, we urge that the Council consider the work required, and, in consultation with LPC, determine if more funding is necessary to achieve the goals of the bill;
- LPC should consider a special process (perhaps a staff-level review) for expediting the least controversial projects, thereby freeing up the full Commission to focus exclusively on the most challenging and pressing applications.



We recognize that there are procedural difficulties at LPC and believe that the designation process should be more efficient and consistent. If the above changes are made to the bill, we think it would create legislation that does not diminish the hallmark Landmarks Law (the 50<sup>th</sup> anniversary of which we celebrate this year).

We have had the opportunity to meet with some of you and your staff to discuss this bill already, and we are excited to continue to work with you, the Landmarks Preservation Commission, and other stakeholders on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "David Burney".

David Burney, FAIA  
Interim Executive Director, AIANY

## COMMITTEE ON OPEN GOVERNMENT

STATE OF NEW YORK  
DEPARTMENT OF STATE  
ONE COMMERCE PLAZA  
99 WASHINGTON AVENUE  
ALBANY, NY 12231-0001  
TELEPHONE: (518) 474-2518  
FAX: (518) 474-1927  
WWW.DOS.NY.GOV

### COMMITTEE MEMBERS

ROANN M. DESTITO  
PETER D. GRIMM  
M. JEAN HILL  
KATHY HOCHUL  
HADLEY HARRIGAN  
COLLEEN KAVANAGH  
MARY BETH LABATE  
CESAR A. PERALES  
DAVID A. SCHULZ  
FRANKLIN H. STONE  
STEPHEN B. WATERS

EXECUTIVE DIRECTOR  
ROBERT J. FREEMAN

April 7, 2015

### E-Mail

TO: Jacob Morris (blackorchidxl@gmail.com)

FROM: Robert J. Freeman, Executive Director *RJK*

CC: Landmarks Preservation Commission

The staff of the Committee on Open Government is authorized to issue advisory opinions. The ensuing staff advisory opinion is based solely upon the facts presented in your correspondence.

Dear Mr. Morris:

I have received your correspondence and hope that you will accept my apologies for the delay in response.

You have raised a series of issues relating to the functions of the New York City Landmarks Preservation Commission relating to requests to designate the Rose Reading Room in the New York Public Library as a landmark. Your inquiry involves the Commission's "process of calendaring items for placement on their agenda", "whether there is a requirement that the Commission formally vote to delegate this authority to the Chair, and that there be transparency in the process of item placement."

In this regard, I offer the following comments.

First, the Open Meetings Law is silent with respect to the preparation, content or function of an agenda. In short, there is no obligation to prepare an agenda. Moreover, if an agenda is prepared, there is no requirement in the Open Meetings Law that a public body abide by it.

Second, in my view, the chair of a public body does not have unilateral or unfettered authority to determine which issues may or must be discussed by the entity that he/she leads. Rather, based on §41 of the General Construction Law entitled "Quorum and majority", the entity, by means of a majority vote of its total membership possesses the authority to do so. The cited provision states that:

"Whenever three or more public officers are given any power or authority, or three or more persons are charged with any public duty to be performed or exercised by them jointly or as a board



Department  
of State

April 7, 2015

Page 2

or similar body, a majority of the whole number of such persons or officers, gathered together in the presence of each other or through the use of videoconferencing, at a meeting duly held at a time fixed by law, or by any by-law duly adopted by such board of body, or at any duly adjourned meeting of such meeting, or at any meeting duly held upon reasonable notice to all of them, shall constitute a quorum and not less than a majority of the whole number may perform and exercise such power, authority or duty. For the purpose of this provision the words 'whole number' shall be construed to mean the total number which the board, commission, body or other group of persons or officers would have were there no vacancies and were none of the persons or officers disqualified from acting."

Based upon the language quoted above, a quorum is a majority of the total membership of a public body, notwithstanding absences or vacancies. Further, in order to carry a motion or take action, there must be an affirmative vote of a majority of the total membership.

As suggested earlier, §41 requires that an action reflective of a rule, procedure or policy must be approved by a majority of the members of the Commission. The Chair, in my view, is not empowered to establish rules, procedures or policies on his/her own. Only the Commission may do so in the manner described above.

Lastly, the Open Meetings Law is based on a presumption of openness. Stated differently, meetings of public bodies must be conducted open to the public, unless there is a basis for entry into an executive session, which is a portion of an open meeting during which the public may be excluded. From my perspective, a discussion regarding "calendarizing", policies, procedures and the like must occur in public, for none of the grounds for conducting an executive session could validly be asserted.

I hope that I have been of assistance. Should additional questions arise involving the interpretation or application of the Open Meetings Law, please feel free to contact me.

RJF: paf



THE COMMITTEE TO PRESERVE THE UPPER WESTSIDE

**Testimony of LANDMARK WEST!  
Before the Land Use Committee of the New York City Council  
Re: Intro. 775  
September 9, 2015**

LANDMARK WEST! is a not-for-profit community organization committed to the preservation of the architectural heritage of the Upper West Side.

We wish to comment on proposed legislation (Intro. 775) that seeks to impose an arbitrary timeline on the designation of landmarks, interior landmarks, scenic landmarks, and historic districts. Intro. 775 would also require the Landmarks Preservation Commission (LPC) to make a determination on whether to designate items currently on the calendar within 18 months of the effective date of the local law. If LPC disapproves or fails to designate any item, the property in question would be barred from reconsideration of landmark status for a period of 5 years.

On behalf of our Upper West Side constituents living and working in the neighborhood from 59th to 110th Street, Central Park to Riverside Park, and the millions who visit this area each year from across the globe, LW! strongly opposes this bill. It would strip the Landmarks Preservation Commission of the authority and discretion it needs to fulfill its mandated purpose – namely, “the protection, enhancement, perpetuation and use of [sites] of special character or special historical or aesthetic interest or value.”

The New York City Administrative Code discusses the precarious circumstances that necessitated the creation of the LPC in 1965 as follows: **“It is the sense of the council that the standing of this city as a world wide tourist center and world capital of business, culture and government cannot be maintained or enhanced by disregarding the historical and architectural heritage and by countenancing the destruction of that heritage.”** The Council viewed the establishment of the LPC for the purpose of preservation as **“a public necessity required in the interest of the health, prosperity, safety and welfare of the people of New York.”**

The Administrative Code goes on to explain the purpose of landmarks preservation to:

- Stabilize and improve property values
- Foster civic pride in the beauty and noble accomplishments of the past
- Protect and enhance the city’s attractions to tourists and visitors and the support and stimulus to business and industry thereby provided
- Strengthen the economy of the city
- Promote the use of landmarks for the education, pleasure and welfare of the people of the city

The Landmarks Law has been phenomenally successful in the last 50 years. The City enjoys a diversity of architectural, cultural and scenic treasures unmatched anywhere in the United States

and perhaps the world. This success has been aided, in no small part, by the prescient decision of your predecessors in 1973 when they recognized the danger of an arbitrary moratorium on designations and ended it. Intro 775 is poised to turn the clock back 40 years. Don't let it happen.

LW! is actively pursuing the designation of more than a dozen Upper West Side sites. Several of those sites have been heard by the LPC and have not been acted on for decades. Are we frustrated? Yes. Are there valid reasons for the LPC's inaction? In our experience, no. The obstacles holding these designations back boil down to owner opposition and political pressure. For example, the former IRT Powerhouse, a colossal structure that commands an entire city block, designed by the same architects as the celebrated original Pennsylvania Station. The owner, Con Edison, has blocked designation for more than 30 years. If Intro. 775 had been in place when this majestic building was first calendared, it would be gone—along with Grand Central Terminal and Radio City Music Hall. Significant losses, we think you would agree.

LW! agrees that significant reform is definitely needed to make the landmarks process transparent and effective. For example, New Yorkers deserve Commissioners who are not serving on expired terms, a situation that compromises their political independence. New Yorkers deserve an adequately funded LPC, not one forced to endlessly “streamline,” lower its standards, and shut down public engagement. Intro. 775 does nothing to correct these and other significant flaws in the LPC's current procedures and practices.

Laws that penalize the public and shut down public input while rewarding obstructionists do not constitute reform. Intro. 775 as currently written – specifically, the removal of items from the calendar if the LPC fails to act and the subsequent five-year moratorium – guarantees neither transparency nor predictability. Passage will guarantee that the public will lose its ability to participate in a process created to protect the City's architectural and scenic treasures from destruction. Its passage will guarantee a return to the bad old days, **50 years ago**, when buildings like Penn Station were lost to both the present and the future.

Please protect our cultural and architectural history. Our landmarks connect us to the places that make up our rich and diverse past. Our landmarks will guide and enrich our future. Don't countenance this weakening of the Landmarks law. Reject Intro. 775.



THE COMMITTEE TO PRESERVE THE UPPER WESTSIDE

**Testimony of LANDMARK WEST!  
Before the Land Use Committee of the New York City Council  
Re: Intro. 837  
September 9, 2015**

LANDMARK WEST! is a not-for-profit community organization committed to the preservation of the architectural heritage of the Upper West Side.

We wish to comment on proposed legislation (Intro. 837) to require the New York City Landmarks Preservation Commission (LPC) to publish a database online that provides information on all properties that are designated as landmarks or historic districts, or under consideration for such designation.

LW! strongly supports the purpose of this bill: to increase transparency and public access to vital information about our City's landmarks. As advocates and owners of landmark properties, we agree that the landmarks process is too often characterized by obscurity that prevents it from fulfilling its mandate under the law—specifically, “to promote the use of landmarks for the education, pleasure and welfare of the people of the city.”

Landmarks preservation is a quintessentially public activity. One agency cannot do it alone. The successful protection of our City's landmarks relies on collaboration between effective government and informed citizen participation, including landmark owners and neighborhood watchdog organizations such as LW!. For this collaboration to work, the public needs access to as much information about our landmarks as possible. In this day and age—given the state of data technology and cultural emphasis on information sharing—we have every right to expect it. The current lack of publicly accessible information about landmarks can only be construed as poor government or, worse, a deliberate attempt to keep the public out of the process.

We understand that such a database already exists in-house at the LPC and recognize that costs associated with making it user-friendly for the public may be significant. We urge the Council to pass legislation and allocate funds to make this project a reality in the best interests of your constituents and the landmarks we cherish.



Greenwich  
Village  
Society for  
Historic  
Preservation

252 East 11th Street  
New York, New York 10003

(212) 475-9585  
fax: (212) 475-9582  
www.gvshp.org

*Executive Director*  
Andrew Berman

*President of the Board*  
Arthur Levin

*Vice-President*  
Kate Bostock Shefferman

*Secretary / Treasurer*  
Allan G. Sperling

*Trustees*  
Mary Ann Arisman  
Penelope Bateau  
Tom Birchard  
Richard Blodgett  
Kyung Choi Bordes  
Tom Cooper  
Elizabeth Ely  
Cassie Glover  
Anita Isoia  
Justine Leguizamo  
Leslie Mason  
Ruth McCoy  
Andrew S. Paul  
Cynthia Penney  
Robert Rogers  
Katherine Schoonover  
Trevor Stewart  
Marilyn Sobel  
Judith Stonehill  
Linda Yowell  
F. Anthony Zunino III

*Advisors*

Kent Barwick  
Joan K. Davidson  
Christopher Forbes  
Margaret Halsey Gardiner  
Elizabeth Gilmore  
Carol Greitzer  
Tony Hiss  
Martin Hutner  
James Stewart Polshek  
Martica Sawin Fitch  
Anne-Marie Sumner  
Calvin Trillin  
Jean-Claude van Itallie  
George Vellonakis  
Vicki Weiner  
Anthony C. Wood

**TESTIMONY OF THE GREENWICH VILLAGE SOCIETY  
FOR HISTORIC PRESERVATION  
IN OPPOSITION TO INTRO. 775  
NYC COUNCIL LAND USE COMMITTEE  
September 9, 2015**

I am Andrew Berman, Executive Director of the Greenwich Village Society for Historic Preservation, the largest membership organization in Greenwich Village, the East Village, and NoHo. We firmly oppose Intro. 775, an unnecessary bill granting enormous advantage to demolition-minded developers, while restricting efforts to preserve and protect New York's historic landmarks and neighborhoods.

A few key points to consider about Intro. 775:

- Had the bill been in effect over the last fifty years, more than half our city's landmarked structures would not have met its deadlines and might easily have been destroyed, including Grand Central Station, the Woolworth Building, Rockefeller Center, and historic districts in Greenwich Village, the Grand Concourse, Bedford Stuyvesant, West Harlem, Jackson Heights, and Park Slope.
- The problem of proposed landmarks languishing for years without final votes currently affects 95 structures or 0.3% of all buildings ever considered for landmarking in New York City. This is now being addressed by the Landmarks Preservation Commission, making the bill's rationale moot. By contrast, the number of worthy landmarked structures which 775 would have kept from being designated is over 17,000, or more than 170 times greater than the tiny problem this bill purports to solve.
- Intro. 775 provides no additional resources to the Landmarks Preservation Commission to meet its new requirements, but imposes a five-year moratorium on reconsideration if deadlines are not met, during which time demolitions can proceed.
- Rather than promoting speedy action or predictable timelines, Intro. 775 encourages obstruction and delay by resistant developers, for the first time enabling them to "run out the clock."
- The slowest designations are typically larger districts or more controversial sites, often in underserved communities. Rather than promoting careful consideration or consensus-building in these cases, Intro. 775 will likely discourage the Commission from taking up such proposals that don't easily meet the strict new deadlines.

In reality, very few buildings remain under consideration for landmarking for extended periods of time without designation; the few which have will soon be decided by the LPC. And the burden these properties bear is quite minor -- buildings permits might take slightly longer to secure while the LPC reviews those applications for no more than 40 days.

But these twin boogey-men of huge backlogs and overburdened property owners are being used to justify a draconian, overreaching measure which will gut one of New York's most successful laws—one which helps stabilize neighborhoods, promote investment, and preserve and protect what many love most about New York. Don't throw the baby out with the bathwater; vote no on Intro. 775.



**Testimony from the Real Estate Board of New York  
to the New York City Council Committee on Land Use in Support of Intro 775**

September 9, 2015

The Real Estate Board of New York, Inc. (REBNY) is a broadly based trade association representing nearly 17,000 owners, developers, brokers, managers and real estate professionals active throughout New York City. We have been long time advocates for needed reforms to the landmarking process that would standardize the designation process and address a decades' long backlog of buildings left in limbo. Intro 775 is a reasonable bill that proposes common-sense reforms that will standardize the process and help home and business owners with improved predictability.

Department of Buildings records show that there are currently over 1,600 calendared properties, and LPC's records show that 61 properties have been calendared for over 20 years, with 26 properties having been calendared since the 1960s. Calendared status significantly hamstrings an owner's ability to make even minor repairs, as they are subject to burdensome and costly delay and review at the DOB and LPC. This administration and its commissioner have rightfully acknowledged this long-standing problem and have taken significant steps to cut the list of over 3000 calendared buildings in half, primarily through designation. Intro 775 would formalize this existing endeavor by requiring that LPC address its backlog of calendared items within 18 months of its passage.

In addition to promptly addressing a backlog of calendared buildings, the new LPC administration has considered and designated properties and historic districts in an expeditious, yet reasonable, manner. As examples, the Park Avenue and Chester Court Historic Districts were designated within 6 months of being calendared. Further, 90% of the 40 Historic District designations over the past 10 years have taken a total of 2 years or less to complete. This bill would standardize a timeline of one year on the consideration of individual landmarks, and two years on the consideration of historic districts. Given the restrictions put on properties while they are being considered for landmarking, it is good public policy to ensure that LPC makes a timely decision whether or not a property merits permanent protection. This bill would simply codify what has been an established and best practice.

The final proposal in Intro 775 would offer some regulatory relief to property owners whose buildings the LPC opts not to designate by placing a five-year moratorium on reconsideration as a landmark. This would restore to owners the opportunity to improve their properties without the costly delays associated with a calendared property, while still allowing LPC the chance to re-calendar a property at a later date if standards changed or if new information emerges. Under current practice, it is rare for a proposed landmark to be voted down, or even removed from

consideration, once it has been calendared. This indefinite stay as a calendared property is unfair to owners, and a reasonable timeline for review is long overdue.

Finally, as the number of buildings under the purview of the LPC continues to rise, we believe it would be prudent that agency funding increase accordingly.

Once again, we commend the administration for its recent efforts to address chronic issues and improve the efficiency of the landmarking process. Intro 775 proposes sensible measures that standardizes the process, improves predictability for owners, and ensures LPC's recent efforts will carry on into the future. We thank Council Members Koo and Greenfield for introducing this common-sense and much needed legislation.



NEW YORK STATE ASSOCIATION FOR AFFORDABLE HOUSING

**Testimony before the New York City Council Committee on Land Use  
September 9<sup>th</sup>, 2015**

*Introduction 775 – In relation to establishing a maximum period of time for the Landmarks Preservation Commission to take action on any item calendared for consideration of landmark status*

My name is Alexandra Hanson, Policy Director for the New York State Association for Affordable Housing (NYSFAH). As the trade association for New York's affordable housing industry, our 400 members include developers, lenders, investors, attorneys, architects and others active in the financing, construction, and operation of affordable housing. On behalf of NYSFAH, I would like to thank Chair Greenfield and the members of the Committee on Land Use for the opportunity to submit comments today on Int. 775.

NYSFAH supports measures to facilitate the development and preservation of affordable housing through smart public investment and planning. Int. 775 is a sensible reform that will prevent buildings from languishing for years or decades in the backlog of properties being considered for landmark status by the Landmarks Preservation Commission (LPC).

Int. 775 is necessary because there is currently no requirement for LPC to review proposed landmarks or districts in a timely manner, and although LPC has recently been issuing landmarking decisions more efficiently, they have not always done so in the past. To minimize their existing backlog, LPC is already putting a plan in place to deal with a significant portion of its backlog of proposed individual landmarks, while an analysis by the Historic Districts Council showed that from 2004–2015, 90% of Historic District designations were completed in two years or less. This legislation would simply memorialize LPC's current practice into law and ensure that future commissions are held to today's standards.

Landmarking serves an important function in protecting New York City's architecturally, historically, and culturally significant buildings and areas. However, analysis by the Real Estate Board of New York has shown that housing production, particularly affordable housing production, is drastically lower in landmarked areas. From 2003-2012, 17% of the over 200,000 housing units constructed in the City were affordable. However, only 0.29% of the affordable units were built on landmarked property. Of the 100 affordable units constructed on landmarked properties during this time period, 95 of them were in one highly subsidized project in the Bronx, with land being provided by the City for development at a deeply discounted rate. The remaining five were in a separate City-sponsored project in Manhattan.

It is essential that New York City balance the need to preserve its culturally and historically significant sites with the ability to meet the demands of its continued growth, including the need for affordable housing. Int. 775 helps do just that – the legislation preserves the ability of LPC to continue to confer landmark status on buildings and districts that meet the requirements for

landmark designation, while also allowing properties that do not meet that threshold to potentially become available for other uses, such as affordable housing for low-, moderate- and middle-income New Yorkers.

The clear and rational timeline outlined in Int. 775 would provide clarity and predictability for building owners. The five year moratorium on re-calendaring a property if LPC chooses not to designate it will also help prevent the landmarks process from being used as a back-door zoning mechanism to stop otherwise allowable development, including the development of much-needed affordable housing.

In summary, NYSFAFH supports the provisions set forth in Int. 775. I would like to again thank Chair Greenfield and the Committee on Land Use for the opportunity to testify today and for your consideration of NYSFAFH's comments.

**Contact:** Alexandra Hanson, Policy Director, (646) 473-1209 [alexandra@nysafah.org](mailto:alexandra@nysafah.org)

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

Name: Ann McDermott (PLEASE PRINT)

Address: 225 E 62nd St Apt NY NY 10020

I represent: New York City - M. 95th

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

Name: Andrew Holweck (PLEASE PRINT)

Address: 44 W 28th St

I represent: NY Building Congress

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

Name: Handsome Omar (PLEASE PRINT)

Address: 341 Smith St

I represent: NYS Assembly member

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Valerie Jo Bradley

Address: 144 W. 120TH ST.

I represent: Save Harlem Now!

Address: 144 W. 120TH ST.

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: ARLENE SIMON

Address: 45 W 67th ST

I represent: LANDMARK WEST

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. IFUO-775 Res. No. Landmark West Change

in favor  in opposition

Date: 09/09/15

(PLEASE PRINT)

Name: Michael D.D. White

Address: 62 Montague Street

I represent: Citizens Defending Libraries/NNY

Address: 62 Montague St. Brooklyn NY 11201

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

After 12pm

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Manhattan Borough Pres. Gale Brewer

Address: 1 Centre Street

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 715 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9 Sept 2015

(PLEASE PRINT)

Name: Leslie Jill Hanson

Address: 100 W. 117th St. # 2A NY NY 10026

I represent: Save Harlem ~~Now!~~ Now!

Address: NA

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Dale Dobson

Address: 730 Riverside Drive

I represent: Self

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Alexandra Hanson

Address: 242 W 36th St 3rd Fl.

I represent: NY SAFAH

Address: same

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/8/15

(PLEASE PRINT)

Name: JUDITH SALTZMAN

Address: 2 HORATIO ST 17S NY, NY

I represent: SELF

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/2/15

(PLEASE PRINT)

Name: Ebenezer Smith 10032

Address: 530 W 166th St. 6th Fl NYC

I represent: CB12, M

Address: 530 W 166th St. 6th Fl NYC 10032

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 475 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/8/15

(PLEASE PRINT)

Name: Anita Isola

Address: 70 E. 10 St. NY, NY.

I represent: Greenwich Village Society

Address: for Historic Preservation

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Denise Katzman

Address: 100 CPS

I represent: 20 Years of Historic

Address: 100 CPS Preservation

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: CHRISTABEL GOUGH

Address: 45 TOWN CITY PLACE NY NY 10017

I represent: SOCIETY FOR THE ARCHITECTURE OF THE CITY

Address: 45 CHRISTOPHER ST NY NY 10014

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: Sept. 9 2015

(PLEASE PRINT)

Name: IVAN MRAKOVIC RA

Address: 85-03 114 street

I represent: Richmond Hill Hist. Soc. & RAND

Address: IVAN.MRAKOVIC@GMAIL.COM

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: DAVID A. HARDCASTLE

Address: 101 W. 12<sup>th</sup> St., Apt. 25

I represent: self

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Cynthia Bismar

Address: 101 W. 12<sup>th</sup> St

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: LESLIE HENDRIX

Address: 50 WEST 29th ST. 11W 10001

I represent: 29th ST. NEIGHBORHOOD ASSCN.

Address: 50 WEST 29th ST 2W 10001

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Tim Hartung

Address: 320 W. 13th St.

I represent: Ennead Architects

Address: same

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Caroline Beauvauiste

Address: 125 W. 12th St #4B NYC

I represent: X

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9 Sept 2015

(PLEASE PRINT)

Name: Chevrolet SPENCE

Address: 200 WEST 100th, 10014

I represent: Council Board 2, Manhattan

Address: Wichita Square Village

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: David Burney

Address: 536 La Guardia Place, NY, NY 10012

I represent: The American Institute of Architects

Address: New York Chapter

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: KIRSTEN THEODOS

Address: 333 E. 14th APT 17K

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9-9-15

(PLEASE PRINT)

Name: JEFFREY KROESSLER

Address: 39-24 46th St, Sunnyside 1104

I represent: CITY CLUB ON NEW YORK

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: LESLEY DOYFL

Address: 790 RIVERSIDE DRIVE 7K

I represent: SAVE CHELSEA

Address: PO Box 1315 OLD CHELSEA STATION  
NYC 10011

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Joseph Rosenberg

Address: 80 Maiden Lane

I represent: Catholic Community Relations Council

Address: Archdiocese of NY / Diocese of Brooklyn

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)  
Name: Ann C. McDermott

Address: 225 East 82nd Street, U.A. NY NY 10028

I represent: Takoback NYC

Address: Seneca

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)  
Name: Tara Kelly

Address: \_\_\_\_\_

I represent: Friends of the Upper East Side

Address: Historic Districts

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)  
Name: Melissa Chapman

Address: 335 Adams St., Suite 2700

I represent: Brooklyn Chamber of Commerce

Address: n

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Andrew Berman

Address: 232 East 11th Street

I represent: Greenwich Village Society for Historic

Address: Preservation

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: Sept 11, 2015

(PLEASE PRINT)

Name: KENT BARWICK

Address: 256 Mott St

I represent: Green L.P.C. CHAIR

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Michele Bronbaum

Address: 1035 Park Ave NYC 10028

I represent: Historic PARK AVENUE

Address: P.O. Box 286232 NYC 10128

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Batya Lewton

Address: 315 W. 86 St

I represent: COALITION FOR A LIVABLE WEST SIDE

Address: PO BOX 230078, NY 10023

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/8/2015

(PLEASE PRINT)

Name: Christy Maclear

Address: 488 Madison

I represent: Municipal Art Society

Address: 488 Maccl

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: ~~10~~ 9-9-15

(PLEASE PRINT)

Name: JAMES RAUSSE

Address: 450 LEXINGTON AVENUE, NY, NY 10016

I represent: AMERICAN PLANNING ASSOCIATION

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Josette Amato

Address: 508 W END Ave #3B, NY 10024

I represent: West End Preservation Society

Address: 514 W END Ave, NY, NY 10024

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: Sept 11, 2015

(PLEASE PRINT)

Name: David Mulkins

Address: ~~84 Bowery~~ 239 E. 5th

I represent: Bowery Alliance of Neighbors

Address: 184 Bowery, #4 10012

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: PETER L. BRAY

Address: 237 GARFIELD PL BROOKLYN 11215

I represent: BROOKLYN HEIGHTS ASSOC.

Address: 55 PIERREPONT ST BKLYN 11201

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Gene Narman

Address: 1155 E. 85th St. Bronx

I represent: James LPC Chair

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 9.9.15

(PLEASE PRINT)

Name: Andrea Goldwyn

Address: 1 Whitwell St NYC 10004

I represent: NY Landmarks Conservancy

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Simon Bankoff

Address: 232 East 11 St NY NY 10003

I represent: Historic Districts Council

Address: 11

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Kelly Carroll

Address: 232 E. 11 St NY NY 10003

I represent: Historic Districts Council

Address: "

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. 775

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: MARCIA IKONOMPOULOS

Address: 280 Broome Street NYC

I represent: LESPI

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: JOYCE MENDEL SOHN

Address: 155 E 34th St NYC 10016

I represent: Friends of the Lower East Side

Address: 155 E 34th St NYC 10016

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Daniel J. Allen

Address: 232 E. 11 St NY NY 10003

I represent: Historic Districts Council

Address: 11

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 795 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Hilda Regier

Address: 325 W. 2nd St., NYC 10011

I represent: Victorian Society New York

Address: 232 W. 11th St. NYC 10003

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 09/09/2015

(PLEASE PRINT)

Name: Thomas H. Collins

Address: 78 Post Ave Apt K

I represent: SAVE NYPL

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Barbara Zay

Address: 232 E. 11 St NY NY 10003

I represent: Historic Districts Council

Address: 71

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Michelle Arbulu

Address: 232 E. 11 St NY NY 10003

I represent: Historic Districts Council

Address: 11

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 0775 Res. No. \_\_\_\_\_

in favor  in opposition (BOTH)

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: JACOB MORRIS

Address: \_\_\_\_\_

I represent: HARBENET HISTORICAL SOCIETY

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: September 9, 2015

(PLEASE PRINT)

Name: Brice Peyre  
Address: 242 W. 27th St., New York, NY 10001  
I represent: Assembly Member Richard Gottfried  
Address: 242 West 27th St., NY, NY 10001

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Roberta Nusim  
Address: 400 E. 56 St  
I represent: ART DECO SOCIETY 9 NY  
Address: 400 E. 56 St

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Intro 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Lo van der Valk  
Address: \_\_\_\_\_  
I represent: Carnegie Hill Neighbors  
Address: 170 E 91st St. NY NY 10128

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 09.09.15

Name: Theodore Grunewald (PLEASE PRINT)

Address: E Neighborhood Preservation Ctr. E 11<sup>TH</sup>

I represent: self ST.

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: SEPTEMBER 29<sup>TH</sup> 2015

Name: PAUL GRAZIANO (PLEASE PRINT)

Address: 196-2A 32ND AVENUE

I represent: SELF

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

Name: FAITH STEINBERG (PLEASE PRINT)

Address: 153 W. 75<sup>TH</sup> ST.

I represent: INDEPENDENT

Address: W. 75<sup>TH</sup> ST. NYC

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: September 10, 1975

(PLEASE PRINT)

Name: Michael Henry Adams

Address: 41 Convent Avenue

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: CAROL CRUMP

Address: 44-78 23rd St.

I represent: EAST VILLAGE COMMUNITY

Address: 143 Ave B COALITION

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 + 837 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Meenakshir Srinivasan

Address: Chair, LPC

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775,837 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Sarah Carroll

Address: Executive Director, LPL

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775+837 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Mark Silberman

Address: General Counsel, LPL

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: FRANKLIN LOWE

Address: 363 W 19th St. N.Y. 10011

I represent: SELF & FAMILY

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Judy Kichheimer

Address: 2415 W 22nd St

I represent: Chelsea Reform Democrat

Address: Chelsea, NYC

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Eric Palatnik

Address: 32 Broadway, Suite 119

I represent: Homeowners in Douglas's proposed historic district

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775+837 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9-9-15

(PLEASE PRINT)

Name: Michael Slattery

Address: 570 Livingston Ave, NY NY 10022

I represent: Real Estate Board of NY (REBNY)

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Claudette Brady

Address: 182 Hancock St

I represent: Bedford Stuyvesant Society

Address: 182 Hancock St NYC

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9-9-15

(PLEASE PRINT)

Name: Mary Ann Rothman

Address: 110 Riverside Drive, NY 10024

I represent: CNYC - Council of NYC Coops & Condos

Address: 250 W. 57 St NYC 10107

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 8/9/15

(PLEASE PRINT)

Name: GERARIS CORSINI

Address: 433 W. 21<sup>st</sup> St NYC

I represent: me

Address: 11

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: MARK DILLER

Address: 171 W 79 ST

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Jared Odessky

Address: 322 8th Ave, Suite 1700, New York, NY 10001

I represent: State Senator Brad Hoylman

Address: 322 8th Ave, Suite 1700, New York, NY 10001

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. 775

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Linda Esbrian

Address: 1107 1/2 Richmond Terrace St. NY

I represent: North Shore Greenway Preservation League of SI

Address: West Brighton Restoration  
Richmond Terrace Conservancy Terr

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Lyan Ellsworth

Address: 165 DUANE NYC

I represent: TRIBECA TRUST

Address: Box 1180, Canal St Station  
10013

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Hal Bromm

Address: 90 West Broadway

I represent: Tribeca Community Assoc.

Address: 90 W. Bway NYC

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Barnett Shepherd

Address: 455 Fillmore St

I represent: Preservation League of Staten Island

Address: 455 Fillmore

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: BRIAN WEBER

Address: 348 W. 36<sup>th</sup> St NY, NY

I represent: ~~No 75 10700 775~~

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: September 9, 2015

(PLEASE PRINT)

Name: MITCHELL GRUBER

Address: \_\_\_\_\_

I represent: Queens Preservation Council

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. 837

in favor  in opposition

Date: 9.9.15

(PLEASE PRINT)

Name: Denise Ketzman

Address: 100 CPS

I represent: 20 yrs of Historic Preservation

Address: 100 CPS

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9.9.15

(PLEASE PRINT)

Name: Denise Katzman

Address: 100 CPS

I represent: 20475 of Historic Preservation

Address: 100 CPS

w/chrstophe  
mactee

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Judith ~~Saltzman~~ Platt

Address: 488 Madison

I represent: Municipal Art Society

Address: 488 Madison

w/chrstophe  
mactee  
w/chrstophe  
mactee

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Judith ~~Saltzman~~ Saltzman

Address: 488 Madison

I represent: Municipal Art Society

Address: 488 Madison

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: Lauren Snetiker

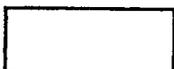
Address: \_\_\_\_\_

I represent: CVSHIP

Address: 232 E 11th St NY NY 10003

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: SEAN KHOLSANDI

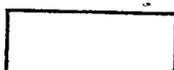
Address: 45 W 67th St

I represent: LANDMARK WEST!

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: NOAH PETERSON

Address: 30 E. 12th St

I represent: UNIVERSITY NEWS COOP

Address: SAME

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)  
Name: ALAN WASHINGTON  
Address: 1 MTC Brooklyn, NY 11201  
I represent: Downtown Brooklyn Partnership  
Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. 7-75 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 4 September 2015

(PLEASE PRINT)  
Name: Eileen Herman  
Address: 366 Broadway apt  
I represent: Trbeea  
Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 9.9.15

(PLEASE PRINT)  
Name: Dr. David Yee  
Address: 711 West 11th  
I represent: 4th Ward  
Address: 211 11th Ave

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. 77  
 in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: NANCI FLOEGER c/o MCC

Address: 1375 BROADWAY

I represent: MANHATTAN CHAMBER

Address: 1375 BROADWAY

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 9/9/2015

(PLEASE PRINT)

Name: Sarah Bean Apmann

Address: 232 E. 11<sup>th</sup> St

I represent: GVSHIP

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_  
 in favor  in opposition

Date: 9/9/15

(PLEASE PRINT)

Name: KATE WOOD

Address: 250 CARRINI BVD NYC 10033

I represent: LANDMARK WEST

Address: 845 W. 167<sup>th</sup> St NYC 10023

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Bruce Rosen

Address: 600 West End Ave #121, NYC 10024

I represent: Self-citizen

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Assembly member Deborah Glick

Address: \_\_\_\_\_

I represent: Am Glick

Address: 863 Broadway, Suite 2007

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Michael Sgarbi

Address: 142-24 38th St Fl 4/4116

I represent: Cherps

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

Name: David Cohen (PLEASE PRINT)

Address: #25 West 18<sup>th</sup> Street, N.Y., N.Y.

I represent: 32 BJ. SEIU

Address: 25 West 18<sup>th</sup> Street N.Y.

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

Name: John Wund (PLEASE PRINT)

Address: 71 West 23<sup>rd</sup> St.

I represent: N.Y.C. Building TRADES

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 775 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/9/15

Name: HARRY SCHWARZ (PLEASE PRINT)

Address: 50 MORNINGSIDE DR NY NY 10071

I represent: MORNINGSIDE HEIGHTS HISTORIC DISTRICT COMMITTEE

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms