

**Testimony of Margery Perlmutter, Chair of the Board of Standards and Appeals  
New York City Council Committees on Governmental Operations and Land Use  
September 26, 2019**

Good morning, Chair Cabrera, Chair Salamanca, and members of the Governmental Operations and Land Use Committees. I am Margery Perlmutter, Chair of the New York City Board of Standards and Appeals. Thank you for the opportunity to testify today. We support Introduction Number 1723, which would require sworn testimony for all applications before the Board, because the Board already requires most applicants to provide sworn testimony at public hearings, so I would like to provide a brief background on the Board of Standards and Appeals and then take questions.

Since 1916, the Board has worked to administer zoning, building, and housing regulations in a fair and just manner to protect the City's interest in safeguarding the general welfare while balancing private property interests. In this role, the Board has frequently been called a "relief valve"—a protector of the City's regulations from constitutional challenge and a guardian of the urban fabric.

The Board is an independent agency that consists of five full-time commissioners with select skill sets—including experience in architecture, urban planning, and engineering—supported by a staff of 16 employees. Using their technical expertise and independent judgment, each commissioner scrutinizes every land-use application with the utmost of care. Commissioners' review frequently involves analyzing intricate construction documents, financial statements, testimony from other government agencies, and site conditions gleaned through visits to the properties and neighborhoods at issue.

The Board's staff of 16 employees currently manages 103 years of archives and 651 pending applications. Since 1998, the Board has had approximately 14,000 applications filed—an average of about 700 applications per year over the past two decades. Under the direction of the Board's executive director and deputy director, these 700 applications are reviewed by three full-time project managers, one part-time project manager, and one environmental officer.

Second, I would like to note the Board's implementation of recent legislation, which we discussed at the Governmental Operations Committee hearing on February 25, 2019. As you know, in 2017, the City Council passed nine bills relating to the Board of Standards and Appeals and its operations, which were signed into law on May 30, 2017. These bills addressed concerns relating to the Board's transparency, consideration of community comments, and the veracity of applicants' submissions and testimony. The Board has since undertaken a number of initiatives to ensure implementation of these bills as well as measures of its own to further promote transparency and community engagement.

Last, as I mentioned, we support Introduction Number 1723. The Board already requires applicants and their representatives to affirm their testimony under oath live at hearings for all cases—except interpretive appeals, General City Law and Multiple Dwelling Law waivers, and vested rights cases. Since the Board already requires applicants to be sworn in for these applications, we support Introduction Number 1723, which expands the scope of this requirement.

I am happy to take any questions and look forward to hearing ideas about improving the Board's processes. Thank you again for the opportunity to testify.

TESTIMONY OF THE NEW YORK CITY DEPARTMENT OF CITY PLANNING ON  
INTRODUCTION NOS. 1691, 1692, and 1701

September 26, 2019

Good morning Chair Cabrera, Chair Salamanca and members of the Governmental Operations and Land Use Committees. My name is Susan Amron and I am the General Counsel at the Department of City Planning. I am joined by Frank Ruchala, Director of the Department of City Planning's Zoning Division. Thank you for the opportunity to testify on Introduction Numbers 1691, 1692, and 1701. We appreciate the City Council's interest in zoning lots and zoning lot mergers.

The Department of City Planning, New York City's primary land use agency, is responsible for planning for the orderly growth and development of the City of New York. It administers the City's land use review process (ULURP), conducts planning studies, and collects statistical and other data that serve as the basis for land use planning recommendations. Department of City Planning staff also aid the City Planning Commission in all matters under its jurisdiction. The City Planning Commission holds regular public hearings and votes on applications concerning the use, development, and improvement of real property subject to City regulations.

I want to start out by discussing how zoning lots are formed, to frame our comments on the proposed legislation. As you know, the Zoning Resolution governs land development through specific use and bulk regulations applicable largely to zoning lots. For example, as a general matter, development rights are calculated based on the size of a zoning lot and the applicable zoning district's floor area ratio. At its simplest, a zoning lot is a tract of land, usually on one block, that is to be developed as a unit.

Today, the Zoning Resolution defines a "zoning lot" in four ways. The first definition is historical and effectively grandfathers any lot of record existing prior to 1961. The other three describe zoning lots formed through common ownership of contiguous lots at a specific point in time or through private agreements among owners of contiguous lots. Regardless of how they are formed, zoning lots generally allow the resulting floor area to be arranged anywhere on the zoning lot, in any manner consistent with applicable bulk regulations.

New zoning lots are created without the involvement of the City Planning Commission or the Department of City Planning. Indeed, the transactions among private parties that create new zoning lots are typically accomplished

as-of-right – that is, without discretionary approval of any City agency. City agencies may not know of a private agreement to create a new zoning lot until the landowners want to do something that depends on the establishment of a zoning lot – pulling a permit for a development, for instance, or engaging in certain types of property transactions. In that situation, when the owner wants a tract of land to be recognized as a new zoning lot, the owner records a Zoning Lot Declaration of Restrictions. And when a developer wants to develop or enlarge on such a zoning lot, the developer submits required documentation to DOB, all as required by the Zoning Resolution. Precisely when a new zoning lot is recorded is largely up to the developer. But no development that depends on the new zoning lot is possible until the developer does.

These public recordation requirements were added to the Zoning Resolution in 1977. Zoning lots formed prior to the 1977 amendment may or may not be supported by readily available documentation.

There is no comprehensive list of zoning lots for all zoned land in New York City. Sometimes identifying zoning lots is straightforward. Other times it can require weeks or months of fact-intensive historical research by title search

companies, lawyers, and other experts. Occasionally the available evidence for pre-1977 zoning lots is not definitive.

By conservative estimate, there are tens of thousands of lots in New York City for which an official zoning lot has never been established in the public record. These may be lots with buildings that predate zoning in 1916 or the introduction in 1938 of Certificates of Occupancy that list the metes and bounds of the relevant lot.

Because determinations of zoning lot status have legal force and can dramatically affect what an owner can do with a site, inquiries into zoning lot status must be thorough and accurate and zoning lots must be determined on an individualized basis.

Given the history of zoning lot creation, the lack of historical documentation, and the complicated and individualized nature of zoning lot determinations, the Department of City Planning believes it would not be possible to assign an identifying number to, create a comprehensive list of, or develop a map displaying, zoning lots for all zoned land in New York City.

With respect to Intro 1701, we generally support the Council's desire to bring transparency to the creation of new zoning lots and look forward to working the Council on this effort.

One final point: Intro 1691 seeks to amend section 191 of the Charter, which sets forth the powers of the Director of City Planning. Changes to the authority of the Director of City Planning in the Charter are subject to a referendum.

Thank you again for the opportunity to testify today. We look forward to continued dialogue with the Council on these proposed legislation.



**FOR THE RECORD**

THE COUNCIL  
OF  
THE CITY OF NEW YORK

June 5, 2018

Honorable Members of the Board  
Board of Standards and Appeals  
250 Broadway, 29th Floor  
New York, NY 10007

**RE: Cal. No. 2017-285A**  
**Premises: 200 Amsterdam Avenue, MN**

We urge the Board of Standards and Appeals to prohibit the use of gerrymandered zoning lots in New York City.

The use of gerrymandered lots has significant policy implications for the City. Most fundamentally, we are concerned that divorcing zoning lots from the tax lots on a block will make ensuring compliance with the Zoning Resolution dramatically more difficult. Rather than working from a set pool of building blocks, lot mergers could now include a nearly unlimited number of variations and without tax lot boundaries for reference.

Such gerrymandering also opens up new loopholes for skirting the provisions of the Zoning Resolution. Section 23-70, for instance, dictates minimum spacing requirements between two buildings on the same zoning lot, setting them at 40, 50, or 60 feet depending on windows. With the ability to gerrymander a new zoning lot irrespective of existing tax lots, this requirement can be avoided; a development site can simply be carved off from the existing structures onto a new zoning lot, by passing Section 23-70 entirely. Should gerrymandering be officially condoned, we fear that other such loopholes would be discovered.


The Department of Buildings itself has come to recognize that the public interest is best served by prohibiting such gerrymandering. It noted in its March 9th letter to the board that, "having zoning lot lines coincide with tax lot lines promotes clarity and transparency."

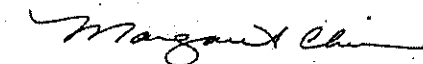


This particular proposal is in one Council district, but the implications of the Board's decision on the land use process will be felt citywide. The Board should not reverse the Department of Buildings' new interpretation. Rather, we urge you to uphold it and ensure a clearer and more transparent land use process going forward.


Sincerely,

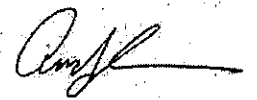
  
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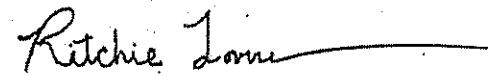
  
Hon. Ben Kallos  
Chair, Subcommittee on Planning,  
Dispositions, and Concessions

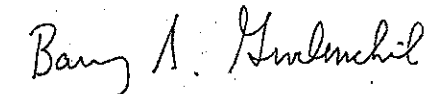
  
Hon. Margaret Chin

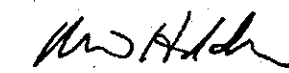
  
Hon. Keith Powers

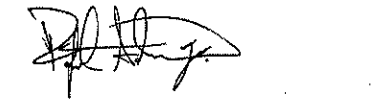
  
Hon. Diana Ayala

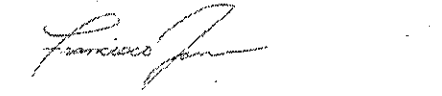
  
Hon. Andrew Cohen

  
Hon. Ritchie Torres

  
Hon. Barry Grodenchik

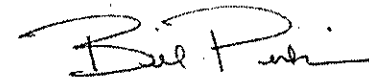
  
Hon. Robert Holden


  
Hon. Rafael Salamanca  
Chair, Committee on Land Use

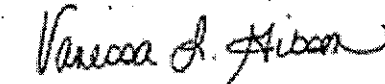
  
Hon. Francisco Moya  
Chair, Subcommittee on Zoning and  
Franchises


  
Hon. Carlina Rivera

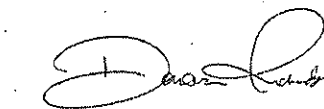
  
Hon. Mark Levine

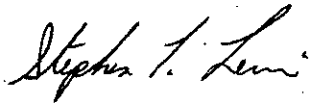
  
Hon. Bill Perkins

  
Hon. Andy King

  
Hon. Vanessa Gibson

  
Hon. Karen Koslowitz

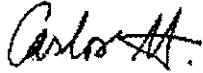
  
Hon. Donovan J. Richards



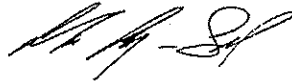
Hon. Stephen Levin



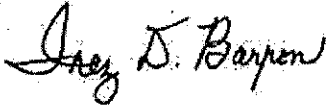
Hon. Antonio Reynoso



Hon. Carlos Menchaca



Hon. Alicka Ampry-Samuel



Hon. Inez Barron



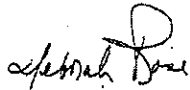
Hon. Justin Brannan



Hon. Mark Treyger



Hon. Chaim M. Deutsch



Hon. Deborah Rose



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Gale A. Brewer, Borough President

September 26, 2019

**Testimony of Manhattan Borough President Gale A. Brewer to the NYC Council  
Committee on Government Operations – Intro 1701 of 2019**

Thank you to Chair Cabrera and members of the Committee on Government Operations and Chair Salamanca Jr. and members of the Land Use Committee for considering these land use issues. I am Manhattan Borough President Gale Brewer and I am expressing support for Intro 1701 of 2019. I also thank Council Member Kallos for being the prime sponsor.

My office has seen developments crop up in residential neighborhoods—many of which are out-of-scale heights that destroy the community fabric. And oftentimes, the question is *how did this building get so big?* Leaving aside those developments that use zoning loopholes (which is another issue for another hearing), the answer is almost always that the developer purchased development rights (also known as air rights) from an adjacent property.

The legislation before you has a simple focus: it mandates that the local Community Board, Council Member, along with the Borough President and the Office of the Speaker are informed every time a transaction for the sale of development rights takes place. This change empowers communities. Too often developers purchase their development rights and their building plans are well underway by the time the community even becomes aware of the development. But when communities get an early sense of what developments are coming to their neighborhood, they have the opportunity to better engage the developers, ask them the right questions, and get them to understand what their concerns are. In essence, it gives communities an opportunity to shape what that development looks like. In the worst case scenarios, when a community feels it has to mount a challenge against a development—whether it is at the Department of Buildings or the Board of Standards and Appeals—advanced notice can be critical.

I have long advocated for community planning and a pre-ULURP effort in order to allow communities an opportunity to have an early say in how their neighborhoods grow and build. I believe that this legislation will offer an analogous benefit for as-of-right developments. I therefore urge this Committee to support it.

Thank you for your time and consideration.



## Community Board 12 - Manhattan Washington Heights & Inwood

530 West 166<sup>th</sup> St. 6<sup>th</sup> Floor, New York, NY 10032

Phone: (212) 568-8500, Fax: (212) 740-8197

Richard R. Lewis, Chairperson  
Ebenezer Smith, District Manager

September 25, 2019

Hon. Benjamin Kallos  
Council Member  
City Council District 5  
244 East 93rd Street  
New York, NY 10128

### **Re: Supporting Various Proposed Local Laws Concerning Community Notification of The Transfers of Development Rights And Other Related Land Use Matters**

Dear Speaker Johnson:

At the General Meeting on Tuesday, September 24, 2019, with a vote of 40 in favor, 0 opposed, 0 abstention, Community Board 12 Manhattan, passed a resolution supporting that anytime a transfer of a development rights is recorded with the city that a copy be provided within 5 days to the relevant Community Board, Council Member, and Borough President along with the Speaker of the City Council.

**Whereas:** On September 13, 2019 Community Board 12-Manhattan ("CB12M") received an email invitation from City Council Member Benjamin Kallos to a public oversight hearing (the "Hearing") to be held at 10:00 AM on Thursday, September 26, 2019 at which testimony concerning proposed legislation impacting the general operation of the Board of Standards and Appeals ("BSA") and zoning lot mergers will be heard. Since notice of the Hearing was received subsequent to the September 4<sup>th</sup> Land Use Committee meeting, the matter was considered by CB12M's Executive Committee at its September 16<sup>th</sup> meeting; and

**Whereas:** City Council Member Kallos introduced a proposed Local Law ("Intro. 1701 of 2019") to amend the Administrative Code of the City of New York in relation to requiring that any time a transfer of development rights is recorded with the City that a copy be provided within five (5) days to the relevant Community Board, Council Member, and Borough President along with the Speaker of the City Council; and

**Whereas:** City Council Member Kallos also introduced for pre-consideration a proposed Local Law ("Preconsidered Intro. T2019-5074") to amend the Charter of the City of New York to expand upon his previous initiative in 2017 to reform operations of the BSA to now require all testimony and submissions by applicants be sworn or affirmed under oath; and

**Whereas:** City Council Members Fernando Cabrera and Keith Powers introduced a proposed Local Law ("Intro. 1691 of 2019") to amend the Charter of the of the City of New York to require a unique identifying number be assigned to each zoning lot, as defined in the New York City Zoning Resolution, and for each unique identifying number to be amended to reflect any change to the metes and bounds of any zoning lot, including but not limited to the subdivision of any zoning lot, transfer of development rights from one zoning lot to another, and the aggregation of two or more zoning lots. This bill, if enacted, would require the addition of a new layer to ZOLA, New York City's zoning and land use map, to show zoning lots in addition to the existing layers that show tax lots and zoning districts; and

Hon. Benjamin Kallos

Re: Local Laws Concerning Community Notification Of The Transfers Of Development Rights

September 25, 2019

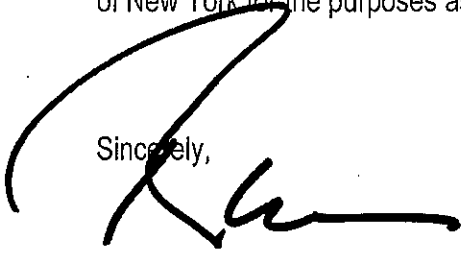
Page 2

**Whereas:** City Council Members Cabrera and Powers also introduced a proposed Local Law ("Intro. 1692 of 2019") to amend the Administrative Code of the City of New York to require the Department of City Planning to make available to the public an interactive map, maintained on a City website, displaying each zoning lot, as defined in the New York City Zoning Resolution, and to update the map not less than quarterly to reflect any subsequent changes to the metes and bounds of any zoning lot; and

**Whereas:** The proposed amendments to the New York City Administrative Code and City Charter will foster greater transparency; provide community boards with easy access to important information that will permit them to more thoroughly fulfill their duties and responsibilities with respect to land use planning matters; afford the public greater access to current information on potential and actual development projects in their communities, and encourage improved planning practices and development oversight. Now, therefore, be it

**Resolved:** Community Board 12-Manhattan supports passage of Introductions 1691, 1692 and 1701 and Preconsidered Introduction. T2019-5074 to amend the Charter and the Administrative Code of the City of New York for the purposes as discussed herein.

Sincerely,



Richard R. Lewis

Chairperson

cc: Hon. Gale Brewer, Manhattan Borough President  
Hon. Bill de Blasio, Mayor  
Hon. Jumaane Williams, Public Advocate  
Hon. Scott M. Stringer, Comptroller  
Hon. Brian Benjamin, State Senator  
Hon. Robert Jackson, State Senator

Hon. Al Taylor, Assembly Member  
Hon. Carmen De La Rosa, Assembly Member  
Hon. Ydanis Rodriguez, Council Member  
Hon. Mark Levine, Council Member

September 26, 2019

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**MAS Testimony to the New York City Council Committee on Governmental Operations and Committee on Land Use regarding Intro 1691-2019, Intro 1692-2019, Intro 1701-2019; T2019-5074, and T2019-5077**

The transfer of development rights (TDR) is a frequently used, yet clandestine as-of-right mechanism that has had a significant impact on development in New York City. Since 2013, when the Municipal Art Society (MAS) released its first *Accidental Skyline* report, over 300 million square feet of development rights have been used city-wide, the equivalent of nearly double the size of all planned development in Hudson Yards. However, the amount of TDRs used is not known because there is no way of tracking them.

Although individual development right transfers are currently recorded on the Department of Finance's Automated City Register Information System (ACRIS) website, this information can only be accessed if a user has a reason to look at a specific address or tax lot. There is no way to be notified of a recorded TDR agreement. Nor is it possible to find transfers on a map. Therefore, any comprehensive analysis of TDRs is virtually impossible. The timely series of bills (Intros 1691, 1692, 1701; T2018-5074, and T2019-5077) being introduced by the Council should go a long way towards bringing the TDR process into the light.

MAS has long advocated for increased transparency, accountability, and availability of public information in the city's as-of-right land use decisions. In our 2017 update of the *Accidental Skyline* report, we noted that existing resources are all too often deficient in informing the public of important real estate transactions and land use decisions until the development process has been completed.

As noted in our report, the City lacks an online platform that provides clear and comprehensive information about TDRs and zoning lot mergers. Even when information is provided, as it is on the ACRIS site, navigation is often an exercise in futility. In *Accidental Skyline*, MAS also pushed for the City to make all information pertaining to Zoning Lot Development Agreements (ZLDAs) and other real estate transactions accessible by notifying the local community boards and elected officials.

The bills being introduced represent a big step forward in addressing these deficiencies. Intro 1691 would assign a unique number to each zoning lot that would be amended based on future changes through transfers of development rights. Intro 1692 would create an interactive zoning lot map. Intro 1701 would require the City Register to notify affected Community Boards, Council Members, Borough Presidents, and the Speaker of the Council whenever a deed memorializing a TDR, or a zoning lot description recorded by an applicant for a DOB building permit is recorded.

While the bills are a step in the right direction, MAS believes they can be strengthened further. We recommend that the interactive zoning map under Intro 1692 should be a layer integrated on the City's Zoning and Land Use Map (ZOLA) and Department of Information Technology and Telecommunications (DOITT) map formats, not as a new stand-alone map.





Consistent with the recommendations in *Accidental Skyline* and MAS's recent CEQR report, *Tale of Two Rezoning's*, the City should update CEQR methodology to require the evaluation of an alternative development scenario that factors in the potential transfer of development rights in a rezoning area. This would provide a more accurate picture of the impacts of potential future development under large-scale rezonings.

The time is ripe for increased transparency in the TDR process. We commend the Council for the bills being introduced and look forward to more progress on this important issue.

## COMMITTEE FOR ENVIRONMENTALLY SOUND DEVELOPMENT

PO Box 2064 Columbus Circle Station NYC 10023  
212 877 877 4394 [elfreud@aol.com](mailto:elfreud@aol.com)

September 26, 2019

Testimony for the Joint Hearing of the Committee of Government Operations and the Committee on Land Use

Thank you so much for looking into the operations of the Board of Standards and Appeals and Zoning Lot Mergers. My organization, The Committee for Environmentally Sound Development, is in litigation over zoning lot mergers.

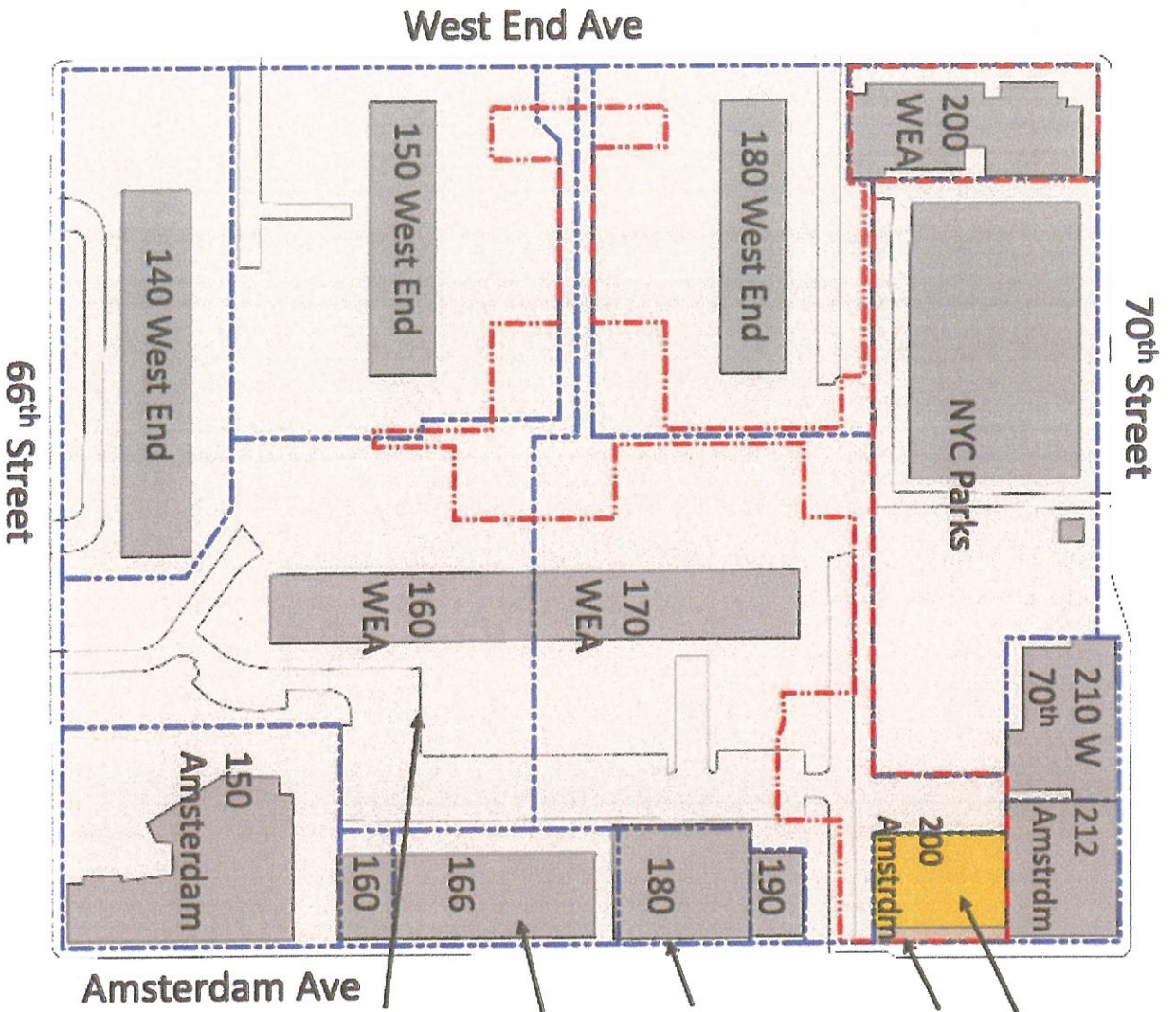
In contention is whether a zoning lot can consist of two or more tax lots or can consist of two or more tax lots plus parts of additional tax lots. The minority report of the BSA (in their June 25<sup>th</sup> decision) supports our contention that a zoning lot can only consist of two or more tax lots. This has never been a question before because mergers have always been of two or more tax lots.

The Developer of 200 Amsterdam Avenue submitted a brand new interpretation of mergers which led to the 39 sided zoning lot shown on page two. The red lines delineate pieces of 5 tax lots, merged to form what is known as a "gerrymandered tax lot." We cannot allow this to set a precedent, allowing our parks and green areas to be used as parts of mergers. The language has been clear to all developers until now. This is your opportunity to erase all ambiguity in the zoning regulations.

Zoning regulations have to be a factor in determining the height of buildings. We would also like to make the point that manipulating zoning regulations allows for increased height and bulk of buildings, to the detriment of the surrounding neighborhood.

Olive Freud, President





- Proposed building**
- Red line = zoning lot
- Blue line = existing tax lots
- Gray = existing buildings (with addresses)
- Thin black lines = paved areas

September 26, 2019

**STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE THE NEW YORK CITY COUNCIL COMMITTEE ON LAND USE AND THE COMMITTEE ON GOVERNMENTAL OPERATIONS REGARDING INT. NO. 1701, COMMUNITY NOTIFICATION FOR TRANSFERS OF DEVELOPMENT RIGHTS**

Good day Chairs Salamanca and Cabrero, and Council members. I am Andrea Goldwyn, speaking for the New York Landmarks Conservancy. For nearly five decades, the Conservancy has been dedicated to preserving, revitalizing, and reusing New York's buildings and neighborhoods.

The Conservancy supports Int. 1701. This bill will increase transparency in real estate transactions and give fair warning to elected officials and residents when unused development rights are being assembled.

For too long, owners have been able to subvert the intentions of the Zoning Resolution and use loopholes to create out-of-scale, out-of-context towers. The Department of City Planning has started to address the problem of mammoth mechanical voids, but there is more work to do there. We've seen absurdly small lots used to evade contextual building envelope requirements. We've seen developers pull together FAR from stray, unbuildable lots to create zoning lot polygons that defy planning logic.

Int. 1701 will not solve all of these problems, but it is an important step in the right direction. New York will always grow and change, but the process should be fair and equitable.

We thank the Council members who have sponsored this bill in conjunction with the Manhattan Borough President. While the Administration has been slow to respond to these issues, we are glad to see another branch of government take them up, and we urge you to vote in favor of this legislation.

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



THE COMMITTEE TO PRESERVE THE UPPER WEST SIDE

**Testimony of LANDMARK WEST!  
Regarding Introduction 1701 of 2019  
Before the City Council of New York City  
City Hall  
September 26, 2019**

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

LANDMARK WEST! wishes to comment on pending legislation, Introduction 1701 of 2019 by Council Member Kallos. This legislation would require that anytime after a transfer of development rights is recorded with the city that a copy be provided within 5-days to the relevant Community Board, Council Member, and Borough President along with the Speaker of the City Council.

LANDMARK WEST! finds the proposed legislation to daylight the transfer of development rights a welcome change to an unnecessarily opaque procedure—one that too often a neighborhood only learns of when a development creeps far above its surrounding context, months and sometimes years into the construction process.

By altering the impacted community within five days, this legislation will bolster transparency and allow communities to make informed decisions on how to best pool, save and expend their resources—or in other words, triage and plan in the absence of an organized City-lead approach to planning and zoning which results in the haphazard skyline defining our city today.

It will also provide opportunity for neighbors to evaluate “comparable sales” of TDRs when in negotiation with a developer who is Hoovering unused rights from any given block, assuring them a level footing for fair negotiations.

Further, sharing this information will then make individual community boards stewards of the record so they are better able to trace and track any future movement of sold or air rights to make sure they are not realized and resold again elsewhere.

Ascribing a simple “forward” is a nominal expense of time, and in a digital age, comes at no cost of postage. There is no hardship imposed by this legislation on any party but rather a pure benefit to the public.

Added breadth to the legislation would impose a penalty for non-compliance, a feature that in current form is undefined.

LANDMARK WEST! supports Introduction 1701 of 2019.





TESTIMONY IN SUPPORT OF  
Intro. 1701-2019  
September 26, 2019

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My name is Harry Bubbins and I am representing Village Preservation, also known as the Greenwich Village Society for Historic Preservation. We are the largest membership organization in Greenwich Village, the East Village, and NoHo. I am here today to express my strong support for the bill introduced by Councilmember Ben Kallos regarding community notification requirements for transfers of development rights.

We feel this legislation could be incredibly helpful, and is unfortunately quite necessary. There is nothing inherently wrong with transferring development rights. However, too frequently the stacking of development rights from multiple lots is used to facilitate the construction of supertall towers or other structures which are woefully out-of-scale or -character with their surroundings. This too is not necessarily illegal or unethical. However, with alarming frequency such projects involve some sort of zoning chicanery and manipulation which should not withstand the scrutiny of the light of day.

By giving communities notification of these plans as early in the process as possible, this legislation allows them to give these plans the thorough review they often do not get from city agencies, and pursue challenges when necessary. It's a potentially important tool in the ongoing fight of New Yorkers to protect the character of their neighborhoods and prevent both overdevelopment and the abuse of zoning regulations. Were city agencies like the Department of Buildings, the Department of City Planning, and the Board of Standards and Appeals doing their job and ensuring that plans which bend or break the rules are not allowed to move forward, such a measure might not be necessary. But as Justice Brandeis said, sunlight is the best of disinfectants, and this bill would shine much needed sunlight upon this process.

We therefore strongly urge you to approve this bill as soon as possible.

**Sheila Kendrick**

**SCPNYC Testimony TDR's Public Notice/Interactive**

**Maps/**

SCPNYC works with advocacy groups City wide as we face challenges that impact Central Park and other precious open spaces.

Many are startled when plans are finally released to find that proposed towers are completely contrary to what was expected and out of context with their neighborhoods.

This bill, requiring public notice of TDR's within 5 days, is long over due. Whether you are an advocacy group, a property owner, a potential buyer, a resident or a developer -- all should have access to this information that will allow for informed decisions. It will further limit the secret transactions that have been all too frequent in real estate development to date.

Numbering zoning "tax lots of record" and providing interactive maps of available air rights will also provide clarity and transparency to all stakeholders.

September 26<sup>th</sup>, 2019

September 26, 2019

GEORGE M.  
JANES &  
ASSOCIATES

Testimony of George M. Janes, AICP on Introduction 1691, 1692 and 1701 of 2019

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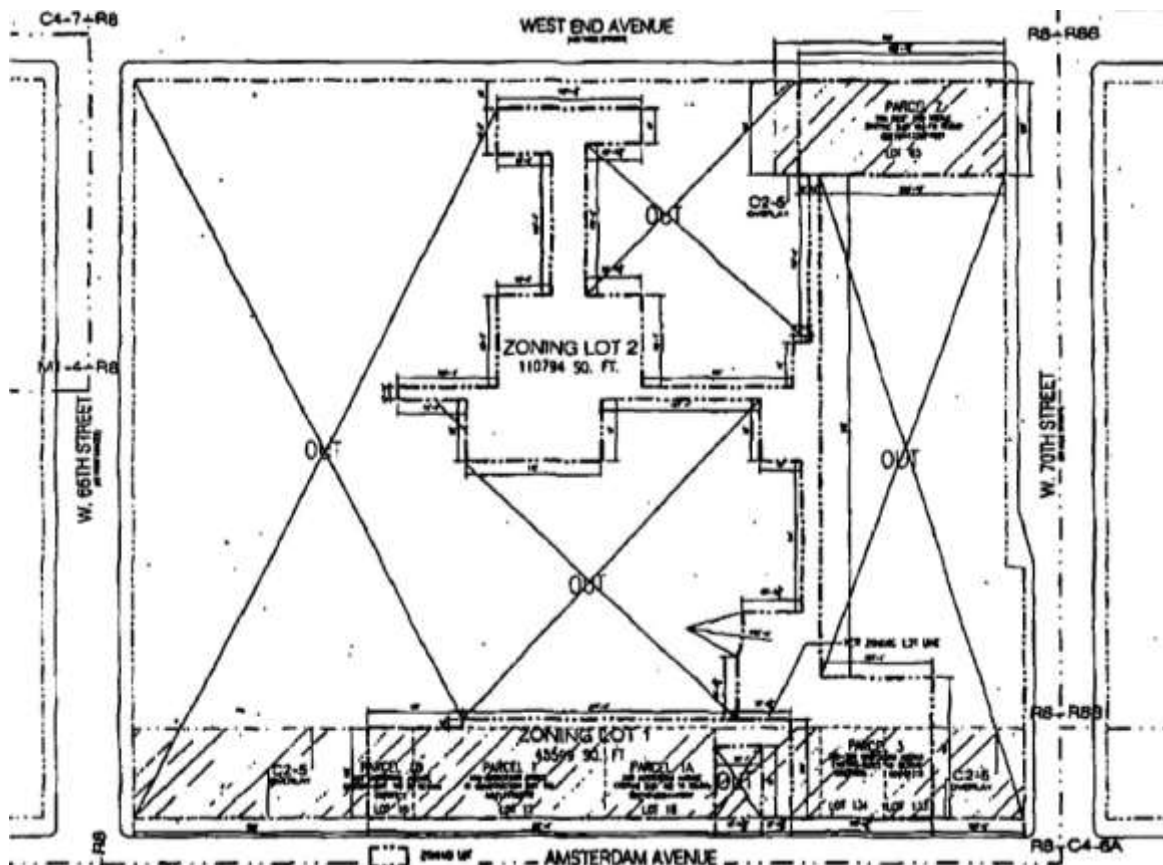
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My name is George Janes; I'm an urban planner who does a lot of work with and in communities on zoning and development. I'm here to speak in support of the bills that would require the City to maintain a database of zoning lots, a geographic interface of those zoning lots, and notification of merged zoning lots to elected officials and Community Boards.

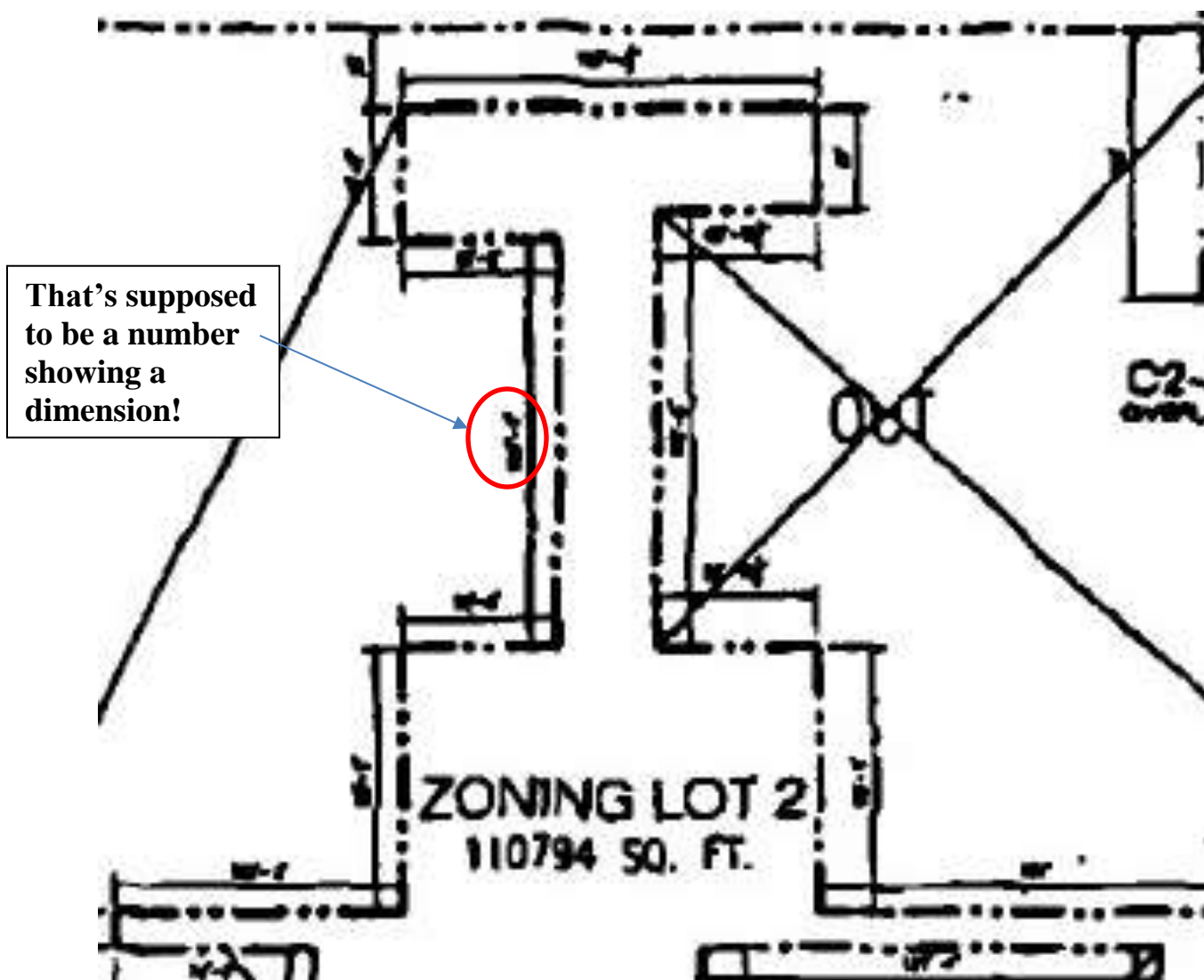
Let's be frank. The fact that we don't have a database of zoning lots is ridiculous. We've been able to muddle along, poorly, without a database is because zoning lots are usually made up of one or more tax lots. So if we already knew there was a zoning lot merger, we could at least piece it together from the tax lots.

But then came 200 Amsterdam: A 40-sided zoning lot gerrymandered over bits and pieces of different tax lots. It had to be assembled from filings and zoning lot description because it was not made up of whole tax lots.

This is a reproduction of the certified zoning lot for 200 Amsterdam that was filed with the City.



When you zoom in, the numbers are smudges.



In ACRIS, these diagrams are accompanied by metes and bounds descriptions. When dealing with a 40-side zoning lot, this is just ridiculous.<sup>1</sup> If the documents don't have to be legible, they certainly don't have to be query-able, geographically referenced, or intelligent. This lack of transparency does not benefit the public and your bills will go a long way to shining a light on what is an opaque process.

<sup>1</sup> Here are the metes and bounds of the first five sides of 200 Amsterdam's zoning lot:  
 "Beginning at a point on the westerly side of Amsterdam Avenue distant 100' 5" southerly from the corner formed by the intersection of the westerly side of Amsterdam Avenue and the southerly side of West 70<sup>th</sup> Street  
 Running thence southerly along the westerly side of Amsterdam Avenue 152' 8";  
 Thence westerly 110';  
 Thence southerly 58' 8";  
 Thence westerly along the arc of a circle bearing to the left having a radius of 63' 9" . . ."

On the requirement for notice of new zoning lot formation, I only ask that you consider how notice would work with the database. If the database of zoning lots was updated in real-time, when new zoning lots were filed, then the notice is just a link to the zoning lot in the database that was updated, altering folks there was an update. That way the data is immediately available to everyone.

I have some other suggestions of the other bills that will be in my written testimony. I hope you consider them and this moves forward. Thank you.

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Specifically consider the wording of Intro. 1691:

Assign a unique identifying number to each zoning lot, as defined in section 12-10 of the New York city zoning resolution, in the city, and subsequently amend each such unique identifying zoning lot number to reflect any changes to the metes and bounds of any zoning lot, including, but not limited to the subdivision of any zoning lot, **the transfer of development rights from one zoning lot to another zoning lot** and the aggregation of two or more zoning lots declared to be a tract of land to be treated as one zoning lot pursuant to paragraph (d) of the definition of “zoning lot” in section 12-10 of the New York city zoning resolution. [emphasis added in bold]

I’m not sure “the transfer of development rights from one zoning lot to another” is what the Council intends here. Most development rights are transferred from one *tax lot* to another *tax lot* within a single *zoning lot*, which is how zoning lot mergers work. Development rights are only transferred from one zoning lot to another in limited situations, like floor area transfers from landmarks across streets. Such transfers are usually not a part of a zoning lot merger recorded on ACRIS. Instead, they are found with CPC special permits that allow the transfer. And while we also do a terrible job of keeping track of special permit floor area transfers, I think Council intended to write “floor area transfers within zoning lots,” not between zoning lots.

I want to caution, however, an accounting of floor area within a zoning lot is an enormous amount of work to implement. That work could delay the availability of a database and map of zoning lots, which is much more important than how the floor area within a zoning lot is allocated.

The amount of floor area transferred between zoning lots is not always clear, as it is often buried in legal documents known as Zoning Lot Development Agreements (ZLDAs), which can be quite complex, long and require specialized expertise. It will certainly require time to generate these data. Conversely, Zoning lot boundaries, with exceptions like 200 Amsterdam, are usually described fairly clearly and can be more easily captured. I would hate to see a zoning lot



map delayed by the difficulty of determining how much floor area each of the tax lots retains.

That's not to say that an accounting of the floor area is not important. I believe that it is, but it is an order of magnitude harder to implement than a database of zoning lots.

Let me provide an example to illustrate. In 2018, neighbors of a large zoning lot contacted me because they were convinced that an addition to a building on the zoning lot would be too large. It was the most complex zoning lot I have seen, as it was made and remade at least three times with changing parties facilitating different developments. There were *hundreds of pages* describing the zoning lot development agreements (ZLDA), and buried on page 71 of the last ZLDA was a critical bit of information that showed my clients' suspicions were right. This information showed that one of the existing tax lots on the zoning lot retained a portion of its development rights to use at a later date, though it sold most of its development rights.

The developer, however, built out the zoning lot entirely, including the development rights retained by the existing building. The documents were so complex that it's likely the architect who designed the building didn't even realize that these rights had been retained and could not be built. It took me days to interpret the documents, relate them to the building plans (which cost hundreds of dollars to obtain), and then determine that while the lot was not overbuilt now, it likely would be one day, when the seller used their reserved development rights.

After I made my findings, which I am attaching to my testimony, we were advised by counsel that the DOB would not take any enforcement action as the development on the zoning lot was not overbuilt and it was not DOB's job to enforce the terms of a ZLDA. It would be on the owner that had their development rights used to proactively take legal action against the developer as a private matter between two parties.

I know that most zoning lot mergers are not so complex, but the documents that describe them are bespoke, so they have to be read carefully. It could take years to build a database of this accounting, which would be out of date when the parties choose to alter them, or when there are upzonings or downzonings. Such research should not delay the database of zoning lots, as for most planning purposes the distribution of floor area within a zoning lot hardly matters.

Finally, since we're studying this topic, I want to make a plea for an accounting of pre-1977 development rights transfers. Before zoning lot mergers as we know them were codified in Section (d) of 12-10 in 1977, that section allowed the transfer of development rights under long-term lease agreements.<sup>2</sup> They were uncommon but, between 1961 and 1977, such development rights transfers did

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<sup>2</sup> The 1961 ZR read "a lease of not less than 50 years duration, with an option to renew such lease so as to provide total lease of not less than 75 years duration."

occur. Yet there is no accounting of them and they are often forgotten because they are uncommon, old, and private agreements that were not always properly registered and were so different than how we do them today.

Zoning required a lease with a 50 year minimum term, and these are already starting to expire. Are they being renewed? Or are owners just not bothering and just using that floor area again in a new building on the granting site? We have no idea because we don't know where they are!

Again, let me use an example, in the recent zoning text amendment for Sutton Place, one of the few "soft sites" analyzed as a development site in the DEIS<sup>3</sup> turned out to be a granting site from a pre-1977 zoning lot merger. The zoning action was certified as complete, underwent public review, and had its environmental impacts analyzed with a 492 foot tower on that site, even though it sold all its development rights in a long-term lease about 50 years prior.

What's going on with these sites? Are we policing renewals? I can say that we can't because we don't know where these sites are and we don't know anything about the terms of the lease agreements. I'm not even sure if NYC has the authority to do anything about these or require renewals. But we should know where they are.

### **Close**

I've been asking for the map and database of zoning lots for years, but just last year I was invited to brief City Council staff on Gerrymandered zoning lots. During that talk I said the lack of a zoning lot database was a very serious problem. While I have no idea if there was any relationship, these bills make me feel like I've been heard by a responsive government. Credit needs to be given to City Council, the Speaker, and the bills' sponsors for taking action. We all want the City to work better, and in my little corner of the City, this will do just that. Thank you!

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<sup>3</sup> 417 East 55<sup>th</sup> Street.

MEMORANDUM

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Date: July 24, 2018  
To: Client  
From: George M. Janes, AICP  
Marie Winfield  
**RE: 250 West 26<sup>th</sup> Street Analysis**

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You have asked my firm to review the Zoning Lot Development Agreements filed with the Department of Finance along with the ZD1s and the Z-series plans filed with the Department of Buildings. The goal is to gain an understanding of how the development rights for the new building at 250 West 26<sup>th</sup> Street were acquired, if they were acquired in accordance with the requirements of zoning, if any floor area was double-counted, or if there are actionable zoning issues revealed.

**Summary of findings**

The accounting of development rights on this parcel is extremely complex, vastly more complex than typical. The DOB filings have a number of minor errors, which are documented herein, but which are likely not actionable.

The Zoning Lot Development Agreement that allows the development at 250 West 26<sup>th</sup> Street includes floor area that is retained by the owners of other buildings. When this retained floor area is added to the existing and permitted buildings, the maximum permitted floor area is exceeded by about 4,000 SF. I believe this is likely enough for the DOB to take action if we are able to get their attention.

At this stage, it is unlikely that a zoning challenge, if filed, will be answered. We can discuss this finding with your attorney to determine the best course of action moving forward.

**Terms used in this memo**

**Zoning floor area:** Building floor area that counts for the purposes of zoning. Wherever this document refers to Square Feet (SF) it means zoning floor area, not gross floor area.

**Floor area ratio, or FAR:** the ratio of lot size to building size. For example, a lot of 10,000 SF that has a 100,000 SF building on it has an FAR of 10 because the size of the building is 10 times the size of the lot.

**Zoning lot:** a lot for the purposes of zoning. Not necessarily a tax lot.

**Zoning lot development agreement (ZLDA):** The legal agreement between parties of interest that describes the terms and conditions of a zoning lot merger.

**Zoning lot merger:** the act combining two or more tax lots so that they are considered one lot for the purposes of zoning. This is how the development rights were sold from one tax lot to another on these developments.

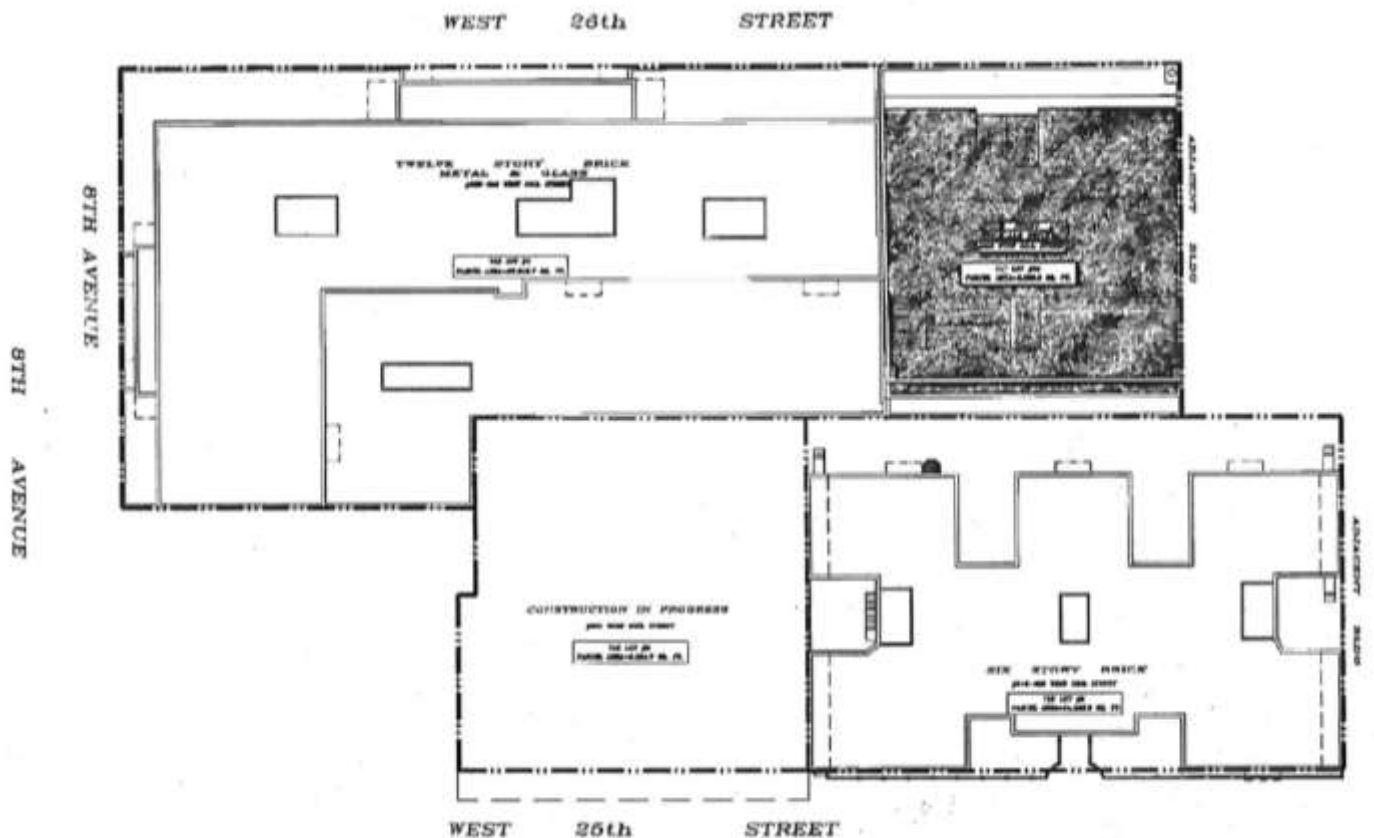
**Maximum FAR:** the maximum FAR allowed by the zoning district. This only applies to zoning lots and not tax lots.

**ZD1, Zoning Diagram:** a two-page document filed with the Department of Buildings (DOB) that demonstrates the basics of zoning compliance. This document is posted publicly when the DOB gives zoning approval.

**Z-series plans:** Detailed building plans that demonstrate zoning compliance. These are not posted publicly but can be obtained from the DOB by engaging an expediter.

### Project description

250 West 26<sup>th</sup> Street is a commercial addition on top of an existing building on tax lot 64 of block 775. Tax lot 64 is part of a large zoning lot that includes tax lots 4, 5 and 9.<sup>1</sup> Lots 4 and 5 are improved with new buildings that were constructed using zoning lot mergers. Diagrams of the zoning lot and buildings on the zoning lot that appear in the applicant's filings are shown below:



<sup>1</sup> This document uses the lot numbers identified in the ZD1 for 250 West 26<sup>th</sup> Street. Lot 4 is also known as lot 7502. Lot 5 was previously known as lot 8 and later known as lot 7503. The “75” prefix on a 4 digit lot number tells us that the building is now a condominium.



Lot 5 would be 66,171 SF and the existing building on lot 9 was 62,088 for a total 5.25 FAR.

***Commercial addition on lot 64***

On or about April 13, 2016, a ZD1 for a commercial addition proposed on Lot 64 (250 West 26<sup>th</sup> Street) was posted showing zoning approval. This drawing shows a merger of lots 4, 5, 9 and 64 into a single zoning lot. Similar to lot 4, the ZD1 does not show all the buildings on the zoning lot in the floor area schedule. This ZD1 shows that the existing building is 29,674 SF and the addition is 19,510 SF for a total of 49,184 SF. Unexplained, this total is different from the Z-series drawings, which shows the building to be 49,263 SF. The ZD1 does show the total floor area of all the buildings on the zoning lot to be **355,902 SF**.

For the commercial addition on lot 64, we also acquired the Z-series plans. On the first page of these drawings, there is a table with 38 columns and 20 rows which detail floor area by use, by building. This table shows us that the total floor area on the zoning lot is **356,073 SF**, which does not match the totals in the ZD1 for the same building, being off by 171 SF.

Further, if the building totals from the previous ZD1s are summed together, we get a third number **355,958 SF**, with residential uses accounting for 290,515 SF, commercial uses 64,830 SF and community facility uses 613 SF. This 613 SF of community facility space, while fundamental to obtaining 6.5 FAR is only detailed on the 2011 ZD1 for lot 4. It is not itemized in the ZD1 for 250 West 26<sup>th</sup> Street nor the Z-series, which is another error in these drawings. Such errors, however, are not exceptional. In fact, they are common and the mere existence of differences in plans or omissions of figures are likely not enough to get the DOB to take any kind of action against this building, especially if it does not appear that correcting these errors would trigger a non-compliance.

**The ZLDA**

There have been many documents filed with the City on the tax lots involved in the transaction to create the zoning lot. We have created a Dropbox folder with the most relevant files:

[https://www.dropbox.com/sh/1sykphvv9u2z1eo/AAAoUk\\_WQAhwgRiLVDAZiGkXa?dl=0](https://www.dropbox.com/sh/1sykphvv9u2z1eo/AAAoUk_WQAhwgRiLVDAZiGkXa?dl=0)

We have not related each of these back to the ZD1s to ensure that they all match, but rather focused on the one that describes how 250 W 26<sup>th</sup> Street obtained their development rights and what rights each party of interest have retained.

The 80 page 2014 ZLDA between all the parties involved appears to be most relevant and current regarding the rights and obligations of each of the parties. This document can be found here:

[https://www.dropbox.com/sh/1sykphvv9u2z1eo/AAAoUk\\_WQAhwgRiLVDAZiGkXa?dl=0&preview=2015+Block+775+assemblage+ZLDA\\_Easement.pdf](https://www.dropbox.com/sh/1sykphvv9u2z1eo/AAAoUk_WQAhwgRiLVDAZiGkXa?dl=0&preview=2015+Block+775+assemblage+ZLDA_Easement.pdf)

Page 71 of this document contains the following table:

A Property	B Lot Area	C Max. FA			D Allocated FA			E % Allocated FA	
		CF	Comm	Res'd	CF	Comm	Res'd	Comm	Res
245 W.25th St. Block 775, Lot 9	14,936.0	97,084	0	89,914.72	0	0	62,088.5 (U) 2,500 (R) 64,588.5	0%	21.12%
261 West 25th St. Block 775, Lot 5	9,504.7	61,780.55	0	57,218.29	0	0	66,170.8 (U) 374.21 (R) 66,545.01	0%	21.76%
308 8th Avenue Block 775, Lot 4	23,819.7	154,828.05	142,918.2	143,394.59	610	15,514.97 (U) (16,000)(S)	161,910.13 (U) 12,780.04 (R) 174,690.17	25.36	57.12%
250 West 26 <sup>th</sup> St. Block 775, Lot 64	8,296.90	53,929.85	49,781.4	49,947.34	0	29,673.8 (U) 16,000 (S) 45,673.8	(16,000)(S)	74.64%	0%
<b>Total</b>	<b>56,557.3</b>	<b>367,622.45</b>	<b>192,699.6</b>	<b>340,474.94</b>	<b>610</b>	<b>61,188.77</b>	<b>305,823.68</b>	<b>100%</b>	<b>100%</b>
% of Total					0.17%	16.64%	83.19%		

(U) = Used

(R) = Retained

(S) = "Swap" – 16,000 square feet of residential development rights transferred from Lot 5 to Lot 64, then "swapped" with commercial development rights from Lot 4 to be used for commercial use on Lot 64.

A copy of this document was also filed with the Department of Buildings and can be found in the job folder for 250 West 26<sup>th</sup> Street.<sup>2</sup> This document needs to be consistent with the DOB drawings and the floor area used in those buildings.

The following table shows the floor area for all buildings on the zoning lot from the ZD1s for the project. They are summed together to show the total as-built or as-permitted floor area.

	As built from ZD1s				Total as-built	FAR
	Lot Size	Res ZFA	Comm ZFA	CF ZFA		
<b>Lot 4</b>	23,819.7	162,256	15,646	613	178,515	7.494
<b>Lot 64</b>	8,296.9		49,184		49,184	5.928
<b>Lot 5</b>	9,504.7	66,171			66,171	6.962
<b>Lot 9</b>	14,935.9	62,088			62,088	4.157
<b>Total</b>	<b>56,557.2</b>	<b>290,515</b>	<b>64,830</b>	<b>613</b>	<b>355,958</b>	<b>6.294</b>

This table shows that the development is less than the 6.5 maximum allowed on the zoning lot. The ZLDA, however, shows that the other owners on the zoning lot "retained" development rights above and beyond the buildings on their lot.<sup>3</sup>

<sup>2</sup> <http://a810-bisweb.nyc.gov/bisweb/BScanJobDocumentServlet?requestid=4&passjobnumber=122389316&passdocnumber=06&allbin=1014206&scancode=ESHS4576956>

<sup>3</sup> The "swapped" area in the ZLDA is omitted from this table, as this is simply moving uses around on the lot.

The following is the above table with column from the ZLDA showing the amount of development rights retained for each lot:

	As built from ZD1s				Total as-built	FAR	"Retained" from ZLDA	Total including retained	FAR
	Lot Size	Res ZFA	Comm ZFA	CF ZFA					
<b>Lot 4</b>	23,819.7	162,256	15,646	613	178,515	7.494	12,780	<b>191,303</b>	8.031
<b>Lot 64</b>	8,296.9		49,184		49,184	5.928		<b>49,190</b>	5.929
<b>Lot 5</b>	9,504.7	66,171			66,171	6.962	374	<b>66,552</b>	7.002
<b>Lot 9</b>	14,935.9	62,088			62,088	4.157	2,500	<b>64,592</b>	4.325
<b>Total</b>	<b>56,557.2</b>	<b>290,515</b>	<b>64,830</b>	<b>613</b>	<b>355,958</b>	<b>6.294</b>	<b>15,654</b>	<b>371,619</b>	<b>6.571</b>

When retained development rights are added back in, the total floor area exceeds the 6.5 FAR maximum permitted in this district. While 0.071 FAR might seem like a rounding error, it amounts to a significant 4,000 SF of floor area, which I think is enough for the DOB to pay attention. I speculate that the ZLDA was negotiated first and the limitations that keep the building to 45,673.8 SF were never communicated to the designer, who instead designed a building that nearly matched the max commercial FAR of the tax lot. The DOB did not notice because retained floor area is not a part of the plans that were filed or approved. The retained floor area just appears in the ZLDA (on page 71!).

This problem is curable, however. The developer of 250 West 26<sup>th</sup> Street could purchase the retained development rights from one or more of the other owners on the lot and then file a revised ZLDA documenting the transfer. Such a purchase, however, would take time and would be uncertain because the other parties have no obligation to sell. It is unlikely a zoning challenge filed without political support would be considered. A lawsuit, or simply an elected official, pushing the issue may require the DOB's attention.

I am happy to discuss with you and/or your attorney the best way to get the DOB to take action on this project.

#### **Final note**

I have removed a complicated, esoteric, partially finished and likely much worse zoning argument from this analysis. The best way to challenge this building is described above. If you or your attorney, however, would like to explore another way forward, we can look at expanding and finishing that argument.

Please let me know your questions.



September 27, 2019

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Follow-up testimony of George M. Janes, AICP on Introduction 1691 & 1692

Susan Amron, the General Counsel of the Department of City Planning, said something extraordinary in her testimony to City Council yesterday.

She said that building a database of zoning lots was not a matter of resources but that it would be “impossible.” Not “extremely difficult,” or “not practical,” but “impossible.” Since lots and land are finite, it was an extraordinary thing to say.

Did she really mean “impossible”? After some thought, I think I understand what she meant. From a narrow legal perspective, she is probably right but, from a practical perspective, I believe the distinction she is making is meaningless.

Before zoning compliance can be assessed, a zoning lot must be declared and described. In most of NYC, this has never been done because most buildings predate the 1961 concept of a zoning lot. But, as a practical matter, in most cases when a zoning lot is declared, it will be co-terminus with a single tax lot unless it has been subject to a zoning lot merger.

Currently, we have an excellent database of tax lots. However, if there has never been a zoning lot declared on a tax lot, the zoning lot does not exist and mapping it would be “impossible.” So Ms. Amron is technically correct; DCP cannot map what does not exist.

Perhaps, instead of requiring a database of zoning lots, the City Council should require a database of declared and undeclared zoning lots. Declared zoning lots are clearly not impossible to describe and map; these are all on ACRIS filed as zoning lot descriptions. For areas where zoning lots have never been declared, the map should assume the tax lot is an “undeclared zoning lot.” This would be consistent with practice and guidance provided by DCP in the Zoning Handbook, which defines “Zoning Lots” as “[a] track of land typically comprising a single tax lot or two or more adjacent tax lots.”

That database would clearly not be impossible to build and it would provide City Council what it wants in Intros 1691 and 1692. It would also be really useful to everyone who cares about these issues, both inside and outside of government.

September 27, 2019

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Before zoning compliance can be assessed, a zoning lot must be declared and described. In most of NYC, this has never been done because most buildings predate the 1961 concept of a zoning lot. But, as a practical matter, in most cases when a zoning lot is declared, it will be co-terminus with a single tax lot unless it has been subject to a zoning lot merger.

Currently, we have an excellent database of tax lots. However, if there has never been a zoning lot declared on a tax lot, the zoning lot does not exist and mapping it would be “impossible.” So Ms. Amron is technically correct; DCP cannot map what does not exist.

Perhaps, instead of requiring a database of zoning lots, the City Council should require a database of declared and undeclared zoning lots. Declared zoning lots are clearly not impossible to describe and map; these are all on ACRIS filed as zoning lot descriptions. For areas where zoning lots have never been declared, the map should assume the tax lot is an “undeclared zoning lot.” This would be consistent with practice and guidance provided by DCP in the Zoning Handbook, which defines “Zoning Lots” as “[a] track of land typically comprising a single tax lot or two or more adjacent tax lots.”

That database would clearly not be impossible to build and it would provide City Council what it wants in Intros 1691 and 1692. It would also be really useful to everyone who cares about these issues, both inside and outside of government.

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1723 Res. No. \_\_\_\_\_

in favor  in opposition

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

(PLEASE PRINT)

Name: Olive Freund

Address: 303 W 72

I represent: Committee for Enormously Small Realty

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

*Please complete this card and return to the* **THE COUNCIL** *Sergeant-at-Arms*  
**THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/26/19

(PLEASE PRINT)

Name: Aale Brewer

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

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

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

*Please complete this card and return to the* **THE COUNCIL** *Sergeant-at-Arms*  
**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: GEORGE JAMES

Address: 250 E 87TH ST #5C

I represent: N/A

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. 122 Res. No. \_\_\_\_\_

in favor  in opposition

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

(PLEASE PRINT)

Name: ROBERTO LEWIS / BOBARD CHAIR

Address: 530 W. 116 ST - CA / C1512, M  
NEW YORK NY - 10032

I represent: BOBARD CHAIR, C1512, M

Address: 530 W. 116 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. 1723-2019 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/26/19

(PLEASE PRINT)

Name: Sheela Kendra

Address: 10 W 66th

I represent: Save Central Park NYC

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. 1691-1001 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/26/19

(PLEASE PRINT)

Name: THOMAS DEWANEY

Address: 488 MADISON AVE

I represent: MUNICIPAL ART SOCIETY

Address: SAMS

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. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/28/19

(PLEASE PRINT)

Name: Andrea Goldwyn

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

I represent: NY Landmarks Conservancy

Address: 1 Wintchael St - NYC 10009

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 8/26

(PLEASE PRINT)

Name: Stacey Shub

Address: 100 Beekman St

I represent: myself

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: \_\_\_\_\_

(PLEASE PRINT)

Name: ANNETTE HILL

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

I represent: CITY REGISTER, DOF

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. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

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

(PLEASE PRINT)

Name: MARGERY PERLMUTTER

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

I represent: BSA

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: \_\_\_\_\_

(PLEASE PRINT)

Name: SUSAN AMRON

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

I represent: DCP

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: \_\_\_\_\_

(PLEASE PRINT)

Name: MONA SEHGAL

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

I represent: DOB

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. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/26/19

(PLEASE PRINT)

Name: Harry Bubbins

Address: VILLAGE PRESERVATION

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

Address: 232 East 11th St.

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**THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: September 26, 2019

(PLEASE PRINT)

Name: Alida Camp

Address: 114 East 84 Street

I represent: Community Board 8

Address: Rm

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**THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1701 Res. No. \_\_\_\_\_

in favor  in opposition

Date: 9/26/2019

(PLEASE PRINT)

Name: SEAN KHORSANDI

Address: 45 WEST 67TH ST

I represent: LANDMARK WEST!

Address: 45 WEST 67TH ST

*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: 9/26/11

(PLEASE PRINT)

Name: GEOFFREY ELKIND

Address: 5922 Woodbine St, Ridgewood NY

I represent: Ridgewood Property Owners Assoc

Address: Same as above

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: \_\_\_\_\_

(PLEASE PRINT)

Name: Ray Rogers

Address: 2110 First Ave NYC 10029

I represent: Corporate Campaign Inc

Address: Couper StA POB 1002 NYC 10276

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