

January 26, 2018

BY HAND

Hon. Marisa Lago Director, New York City Department of City Planning 120 Broadway, 31st Floor New York, New York 10271

Re: Statement in Support of Proposed Rule Providing for Paperless Filing

Dear Director Lago:

The New York City Bar Association ("<u>City Bar</u>"), through the Committee on Land Use Planning & Zoning (the "<u>LUPZ Committee</u>"), ¹ is writing to express its support for the proposed Department of City Planning ("<u>DCP</u>") rule modification to Chapters 1, 2, 3, 5, 6, 8, 9, and 10 of Title 62 of the Rules of the City of New York to facilitate the implementation of a paperless filing system by DCP (the "<u>Proposed Rule</u>").

A land use application can consist of dozens of printed pages, and current rules require the in-person filing of between five and 25 sets of each application. Different materials must be printed on different sizes of paper, complicating printing and assembly of applications. Architectural drawings, which are required for many types of land use applications, are particularly complicated to file, as they must be printed on full-size sheets (up to 42 x 30 inches), with each sheet folded to approximately 8.5 x 11 inches in size. The manual assembly and in-person filing of applications is time-consuming and costly for applicants and can lead to delays in filing.

With the proposed paperless filing system, official filings would be done digitally, with paper sets produced only on an as-needed basis (for instance, if requested by a reviewing community board). Paperless filing would ensure an efficient, uniform review process, saving paper, money, and time for practitioners, DCP staff, and all others involved in ULURP. The webbased interface that DCP is proposing would also increase transparency by allowing the public to more easily access applications.

We support the Proposed Rule as it would facilitate paperless filing, resulting in a more efficient, sustainable, and transparent filing system.

¹ Committee members employed by the City of New York did not participate in the decision whether to approve this letter.

Thank you for the opportunity to comment on the Proposed Rule.

Respectfully,

David Karnovsky

Chair, Committee on Land Use Planning & Zoning

Danil Kon

Contact: david.karnovsky@friedfrank.com

Stefanie Marazzi

Co-Chair, Subcommittee on the Department of City Planning, Committee on Land Use Planning &

Zoning

Contact: Smarazzi@slaterbeckerman.com

anse Flate h

Anne McCaughey

Co-Chair, Subcommittee on the Department of City Planning, Committee on Land Use Planning &

Zoning

Contact: amccaughey@herrick.com

cc: Anita Laremont, General Counsel, New York City Department of City Planning Dominick Answini, Assistant Counsel, New York City Department of City Planning David Parish, Director of Fiscal Improvement and Business Affairs, New York City Department of City Planning