



NEW YORK  
CITY BAR

**COMMITTEE ON LAND USE  
PLANNING AND ZONING**

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Hon. Meenakshi Srinivasan, Chair  
New York City Landmarks Preservation Commission  
1 Centre Street, 9th Floor North  
New York, NY 10007

**Re: Statement in Support of Proposed LPC Rules Amendments**

Dear Chair Srinivasan:

The New York City Bar Association (“City Bar”), through the Committee on Land Use Planning & Zoning (the “LUPZ Committee”), is writing to express its support for the proposed Landmarks Preservation Commission (“LPC” or the “Commission”) rules amendments to Chapters 2, 5, 7 and 11 of Title 63 of the Rules of the City of New York (the “RCNY”).

LPC has proposed new rules and amendments to existing rules, primarily in RCNY Chapter 2, which is proposed to be re-titled “Approval of Proposed Work on Designated Buildings and Structures.” The rules in Chapter 2 would be re-organized, and rules in the existing Chapter 3 regarding repair and replacement of windows would be amended and moved into Chapter 2. Amendments are also proposed for Chapters 5 (Historic Preservation Grant Program), 7 (proposed to be re-titled Permit Duration, Renewal and Revocation), and 11 (Administrative Enforcement).

We understand that the general goals of the proposed LPC rules amendments are to make the rules more intuitive, practical and user-friendly; codify longstanding LPC staff practices and criteria; authorize LPC staff to approve certain types of work without public hearing; and revise criteria for Expedited Certificates of No Effect and permit duration, renewal and revocation. As

practitioners who regularly appear before LPC, our experience has been that the matters proposed by the rules amendments to be delegated to LPC staff are (1) subject to clearly defined guidelines/standards and (2) have been consistently approved by LPC. Under the proposed rules, the guidelines and standards for such delegated staff approvals will be even more clearly defined, thereby ensuring that such matters may be approved at the staff level without compromising the integrity of the landmark approval process. There is no need for owners to incur the additional time and cost of a public hearing when such matters are so routine as to be ministerial in nature.

The LUPZ Committee commends LPC for taking this significant step towards streamlining the approval process for work on designated properties. As you know, there are over 36,000 designated properties in the City of New York, and the LPC approval process can sometimes be a burden on property owners and businesses seeking to do repairs or alteration work on designated buildings. We support the proposed rule amendments because they have the potential, if implemented, to save time and decrease costs for property owners and businesses seeking routine approvals from LPC, which would in turn likely ensure that more work done on designated properties is performed in compliance with the Landmarks Law.

The LUPZ Committee agrees that LPC can achieve greater efficiency through delegation to staff approval of certain routine matters, while maintaining its mandate to protect New York City's architecturally, historically, and culturally significant buildings and sites. The anticipated reduction in items on the public hearing calendar resulting from these changes would allow the Commission to focus its attention and resources on more consequential matters, while similarly reducing approval time for these matters. We further commend LPC for the amendments that modernize the rules to address accessibility, energy equipment, and flood resiliency measures.

Thank you for the opportunity to comment on the proposed LPC rule amendments.

Respectfully,



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