

**Re: Opposing Amended Intro. 775,  
Scheduled for Land Use Vote June 7,  
Stated Council Vote June 9**

Dear Council member,

We strongly urge you to vote against the amended Intro 775 unless substantial further changes, outlined below, are made. The bill, sponsored by Council members David Greenfield and Peter Koo, seeks to impose deadlines on the Landmarks Preservation Commission's ability to protect historic buildings. At its only public hearing last September, over 100 community groups, individuals and elected officials appeared in opposition to the proposal, expressing strong concerns that the bill would stifle community-driven preservation activity throughout the city and hamper rather than help agency decision-making. The only supporters of the bill represented business and real estate interests, and mostly spoke about the lack of transparency in the designation process. The changes which have been made do not adequately address the concerns raised at the hearing and by the public.

In its modified form, the proposal still contains provisions that would make existing problems with the landmark designation process worse. For example, the bill requires that the Landmarks Preservation Commission must make decisions on potential historic districts within two years or they will be automatically withdrawn from consideration. Rather than speed up the Commission's process, this would discourage the consideration of large, complicated or controversial districts.

Moreover, the bill does not include protection for properties under consideration nor has Council committed to expand the staff or funding of the Commission (the city's smallest agency charged with regulating more than 33,000 structures across all five boroughs). Intro. 775, therefore, presents an **unfunded mandate which would lead to the automatic denial of protection for historic properties**. By not providing the agency with any additional means to safeguard properties under consideration, Intro. 775 **creates new hurdles to protection**.

The Historic Districts Council has analyzed the Landmarks Commission's designation activities since 1965 and found that **40 out of 138 historic districts and extensions (approximately 30%) were under LPC's consideration longer than 2 years before being designated**. The following is a full list of designated historic districts, large and small, which would have been automatically disqualified under the proposed guidelines:

**Bronx:** Fieldston • Morris Avenue • Mott Haven • Riverdale

**Brooklyn:** Bedford • Bedford-Stuyvesant/Expanded Stuyvesant Heights • Boerum Hill • Carroll Gardens • Clinton Hill • Cobble Hill • Cobble Hill Extension • Crown Heights North Phase III • Park Slope • Park Slope Extension 2 • Stuyvesant Heights

**Manhattan:** Carnegie Hill • Central Park West - 76th Street • Chelsea • Expanded Carnegie Hill • Gramercy Park Extension • Greenwich Village • Hamilton Heights • Henderson Place • Ladies' Mile •

Mount Morris Park • Riverside Drive-West 105th Street • Riverside Drive-West End • Riverside- West End Extension II • SoHo-Cast Iron • St. Mark's • Tribeca East • Tribeca North • Tribeca South • Tribeca South Extension • Tudor City • Upper West Side/Central Park West • West 71st Street • West End - Collegiate Extension

**Queens:** Central Ridgewood • Jackson Heights

Please note that this list includes several neighborhoods outside of Manhattan in underserved communities and even includes a number of recent designated districts such as Bedford-Stuyvesant, Crown Heights North and Ridgewood.

In many instances these designations required time for the Landmarks Commission to inform and engage the widest possible community and perform the in-depth research necessary to properly regulate the area. Additionally, external schedules such as municipal elections and changes in city administrations affected the agency's ability to expeditiously consider designations. Landmark designation is a permanent change in legal status and there are many examples where allowing the agency extra time to complete its process (if necessary) makes sense in helping to ensure equitable and transparent decision-making.

We feel strongly that any bill revising the Landmarks Law must serve to strengthen it. This current proposal must be amended at the very least to allow the LPC to publicly vote for an extension period for additional consideration for individual landmarks and historic districts and to protect the public interest, this extension provision must not be subject to owner consent. Additionally, City Council should commit to drafting legislation to help protect those properties which are currently calendared and under consideration and pledge to ensure that the agency has enough resources to practically fulfill this new mandate. Anything less must be viewed for what it will be; a new roadblock to the efforts of communities trying to save their neighborhoods.

Sincerely,

Simeon Bankoff

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