



American Planning Association
New York Metro Chapter

Making Great Communities Happen

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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.