

The Real Estate Board of New York to

The Landmarks Preservation Commission

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY thanks the Landmarks Preservation Commission (LPC) for a chance to comment on the proposed amendments to Chapters 2,5,7 and 12 of Title 63 and new rule, Chapter 14.

REBNY supports the Landmarks Preservation Commission's proposed rule amendments, which aim to streamline application and review procedures for certain work inclusive of signage, storefronts, heating, venting, and air-conditioning equipment, along with solar panels. The proposed rules will speed up the application process for work that is typically approved by the Commission by allowing LPC staff to approve a variety of work. The rules will allow for greater efficiency by ensuring applicants do not have to go through the Certificate of Appropriateness public hearing process for work types that are typically approved by the Commission.

LPC is proposing to bring rules up to date with compliance and other governmental codes, such as energy codes and resiliency mandates. Additionally, the Commission is proposing to foster and support local businesses by adding flexibility to sign regulations. This is inclusive of adding flexibility to the use of banner signs, allowing for greater use of LED neon interior lighting, and allowing for slightly larger plaque signs, for example. These rules will add criteria to the list of installations that do not need a permit, all the while preserving the historic nature of the districts.

The amended rules will complement the Zoning for Zero Carbon text amendments, which are currently under public review, by increasing approval standards for solar panel installations and installation of new tree pits, planting areas and bioswales. These efforts will work toward climate resiliency efforts and increase energy efficiency within historic districts. For example, allowing for increased visibility of mechanical equipment systems on rooftops in some cases and increased solar panel installation on sloped roofs aligns with goals outlined in Zoning for Zero Carbon which seek to expand the universe of solar panels throughout the City, allowing more installations as-of-right.

REBNY commends LPC for aligning its proposed rules with the administration's goals, such as the "Get Stuff Built," and "City of Yes" text amendments, which seek to speed up approval processes and increase climate resiliency efforts, respectively. We encourage the Landmarks

Preservation Commission to bring the Commissions' rules up to date with energy codes and resiliency efforts as well as better aligning approval types with the Department of Buildings. The proposed rules increase support for a variety of New York businesses and expedite review processes and approvals for certain work within historic districts, all of which contribute to the vibrancy of NYC streetscapes.

Thank you.

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