

Raynard Edwards
Director of Street Activity Permit Office
Mayor's Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Submitted via Email: saporules@cityhall.nyc.gov

Re: SAPO Proposed Rules re Permits for Open Culture Open Streets Programs Extension of Street Fair Moratorium

Dear Director Raynard,

I am a member of the [United Neighbors of Prospect Crown Heights](https://unpchs.org) (https://unpchs.org) association, a group of over 1,500 (and growing) neighbors who came together last Spring out of concern of how the Vanderbilt Open Street program and the Underhill Bike Conversion in Brooklyn were being managed.

Specifically relevant to these rule changes, the Prospect Height Development Council (PHNDC), and its current leadership, has been unaccountable to the local community when impacted people have voiced concerns over how it runs the Open Street program on Vanderbilt Avenue in Brooklyn. Based on lived experience, I am writing to request rule changes to the Open Culture events permits to allow for more community oversight, Open Street Partner accountability, and clear, quick, easy to initiate recourse available to the community for any abuse of permits.

Sec. 4. (g)

Sec. 4 (g) of the proposed regulations requires SAPO to notify the community board and the Open Street Partner of Open Street Event applications.

I applaud that the Community Board is included as a mandatory body to receive notice of Open Street Event applications. I encourage you to consider adding the relevant City Council member, and Precinct Community Officers as well to provide more accountability over the process. As noted, in our experience with the Vanderbilt Open Street events, the Open Street Partner has demonstrated its unwillingness to take seriously the concerns of the impacted community. **For that reason, as part of adding more accountability and pathways for the impacted community to have a voice, I urge you to add required notice to the City Council and Precinct community officers.**

Sec. 4 (i)

Sec. 4 (i) establishes that the OSP is the only entity required to recommend approval or denial of the Open Street Event applications. Due to the experience with the Open Street Partner for the Vanderbilt Open Street, it is critical that other bodies are also required to recommend approval or denial of Open Street Event applications to the SAPO. In the case of Vanderbilt, the PHNDC is a non-profit unaccountable to community concerns. Furthermore, PHNDC themselves submits permits for Open Street Events. **It is a conflict of interest for the PHNDC to propose Open**

Street Events and then be the only entity required to recommend approval or denial to the SAPO for SAPO final decision.

I urge SAPO to require the relevant City Council Member, Community Board and the Present Community Officers to this section as required entities to recommend approval or denial of Open Street Event applications to the SAPO to ensure that the local impacted community has accountable bodies involved in the process.

Sec. 4 (j)

Sec. 4 (j) requires that the Open Street Event application will be available for review via the Citywide Event Management Systems "CEMS" database.

Due to our experience with the Vanderbilt Avenue Open Street Partner that is unaccountable and often disdainful of locally impacted persons' concerns, it is important to provide a transparent mechanism to ensure oversight. If the CEMS is not publicly accessible, I urge you to include a mechanism for public transparency over Event applications. A possibility is to require the entities that receive notice of the OS Event application to be required to post them publicly and/or SAPO has a web page where they are publicly accessible.

Sec. 5 (a)

Sec. 5 (a) requires SAPO to consider recommendations or comments from a limited list of sources when making decisions regarding Open Street Event permits. Again, relying on our own experience with the Vanderbilt Open Streets, it is important that the locally impacted community themselves and locally accountable entities be involved in this process. **For that reason, I urge you to render mandatory for the SAPO to consider recommendations and comments from locally impacted persons, the relevant City Council representative, the relevant Community liaison officers, and the relevant NY state senator and assembly persons (who we have had to appeal to regarding Vanderbilt).**

Sec. 5 (c)

Sec. 5 (c)(1) states that the SAPO will take into consideration recommendations for approval or denial of Open Street Event permits only from the public agencies listed in this section that received a copy of a Street event permit application for comment, and has notified the Director of SAPO of its disapproval and the reasons.

I urge you to consider including locally impacted persons to this list. This suggestion also inherently means that the public must have a meaningful way to receive notice and provide recommendations to approval or denial.

Sec. 5 [(i)](h)

Sec. 5 [(i)](h) establishes 5 days for approval or denial of the complete application. What is not clear is the time period for recommendations for the entities to provide recommendations on approval or denial of the Open Street permits. **I urge you to provide at least 30 days for that process**, as the Community Board, City Council person, community affairs officers and the local impacted persons need a reasonable amount of time to review the application and comment.

Thank you for considering these comments.

Cathleen Caron

718-915-8977

cathleencaron@mac.com

Washington Ave, Brooklyn resident

United Neighbors of Prospect Crown Heights member