



February 7, 2024

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY ON THE GREEN FAST TRACK FOR HOUSING RULES, BEFORE THE CITY PLANNING COMMISSION (CEQR #: 24DCP065Y)

The New York Landmarks Conservancy is a 51-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods.

The Conservancy appreciates that the proposed Green Fast Track Rules respect state law regarding the protection of landmarks in environmental review. These reviews are critical in determining whether new construction will have adverse impacts on New York's cultural heritage, including historic built resources, scenic landmarks, and archaeological sites. The reviews also help identify those resources.

Therefore, we were glad to see that the proposal still requires the protection of landmarks and archaeological or prehistoric sites, as well as historic buildings, structures, facilities, sites, or districts.

The larger constellation of exemptions under the proposal does raise questions. The threshold for eliminating reviews under the Green Fast Track is that a project adds 175 or fewer units in R1-R4 Residence districts, or 250 or fewer units in R5-R10 districts. These will still be substantial buildings that will have significant impacts on their blocks and communities.

We are concerned about the other types of effects these developments might have, that would be recognized in an environmental review under current rules. If the Green Fast Track is approved, will there be any recourse if individual buildings cause unanticipated impacts? Will any benchmarks be established to measure how many units are in fact being created, if the time frame for pre-development is reduced, and if there are unintended consequences due to these changes?

Finally, we request an explanation: the proposed text of the new Rules calls out "actions that enable incremental development," which seems to reference rezonings. We would like to clarify whether rezonings would be exempt from CEQR, as well as the subsequent development resulting from rezonings.

Thank you for the opportunity to express the Conservancy's views.