



April 25, 2024

New York City Department of Consumer and
Worker Protection,
42 Broadway #4,
New York, NY 10004

To Whom It May Concern:



My name is Tom Harris, and I am President of the Times Square Alliance, the business improvement district that works to improve and promote Times Square. I wanted to take this opportunity to offer comments related to the proposed new rules for the ownership and siting of newsstands, with particular attention to how this may impact Times Square, the world's most iconic neighborhood and an always bustling gathering place for hundreds of thousands of New Yorkers and visitors alike.

Under an agreement with DOT, the Times Square Alliance manages and maintains the Broadway Pedestrian Plazas between 41st Street and 47th Street. Created in 2009, these plazas were the first, and most ambitious, of the city's now citywide public pedestrian plazas. Broadway's ambitious pedestrianization manifested largely in response to dangerously overcrowded streets and sidewalks. To illustrate, pedestrian counts in the district have reached a high of over 460,000 persons in a single day. Beyond these safety considerations, Times Square – one of the world's great attractions – lacked anywhere near sufficient public space where visitors could enjoy this remarkable place.

City agencies, including DOT, DDC, and the NYPD, along with the Alliance, collaborated to ensure that the permanent design of the plazas both prioritized pedestrian safety and mobility, and resulted in a great public space. One of the key tenets of our design process was flexibility – plazas needed to be as uncluttered as possible to allow for to safe and comfortable pedestrian flow and maximize open areas available for diverse public programming. In order to achieve these objectives, we purposefully minimized permanent, unmovable infrastructure.

We are concerned, therefore, about the possible placement of additional newsstands in pedestrian plazas, as described in the new proposed siting rules. When the plazas were deemed permanent in 2011, DOT assured us that newsstands and other non-critical infrastructure would not be allowed in pedestrian plazas (though, due to legal constraints, four existing newsstands were allowed to remain in their locations after construction on a grandfathered basis.) We strongly believe allowing new newsstands in Times Square would increase crowding, and permanently occupy space much needed for flexible public programming. It is our hope that siting rules regarding level of service and preservation of public programming areas will hinder the placement of additional newsstands in our public

plazas. However, we would urge you to consider prohibiting newsstands in all DOT pedestrian plazas to eliminate any ambiguity going forward.

Thank you for your consideration.

Respectfully,

Tom Harris
President
Times Square Alliance