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**MAS Comments on the Proposed Rule Changes to the National Register of Historic Places Nominations**

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The Municipal Art Society of New York (MAS) strongly opposes the changes to regulations governing the listing of properties in the National Register of Historic Places as proposed by the National Park Service (NPS). MAS is a non-profit organization dedicated to creating a more livable city by advocating for thoughtful urban planning, design, and preservation for more than 125 years. MAS has played an integral role in New York City's preservation history, helping to establish the Landmarks Preservation Commission, saving Grand Central Terminal, restoring more than 50 works of public art, and founding the New York Landmarks Conservancy, the Historic Districts Council, Friends of the Upper East Side Historic Districts and several other organizations committed to protecting New York City's history.

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MAS echoes the concerns articulated by the National Trust for Historic Preservation, especially those regarding the proposed changes to the "Owner Objections to Nominations." These revisions would allow owners of a "majority of the land" in a proposed historic district to object to, and effectively prevent, the inclusion of a historic district on the National Register. MAS is troubled by the lack of methodology as to how these "majority of the land" determinations are to be calculated. Will floor area ratios, or some other metric be considered for these determinations? Because of this disquieting ambiguity, MAS encourages NPS to entirely reconsider this rule-making to ensure that the fundamental, democratic principle of one person, one vote is maintained throughout the National Register listing process.

MAS also objects to the scope of the proposed rule changes, which extend well beyond the requirements of the 2016 Amendments to the National Historic Preservation Act. More specifically, the proposed revisions silence the voices of crucial stakeholders, like local communities, tribes, and state historic preservation offices from nominating a property to the National Register, allowing only relevant federal agencies to do so. This proposed change is an egregious limitation on public participation, and the process will be profoundly altered if the proposed changes to the regulations remain as written.

MAS strongly urges NPS to reconsider these proposed revisions, and welcomes the opportunity to participate further in the process.