

December 3, 2004

Commissioner Jonathan Greenspun
Community Assistance Unit
100 Gold Street, 2nd Floor
New York, NY 10038

Re: Comment on proposed rule changes relating to street activity permits to impose one-year moratorium on new events

Dear Commissioner Greenspun:

We hereby submit the follow comments regarding the proposed rule changes relating to street activity permits, which would impose a one-year moratorium on new multi-street and multi-day events. We recommend that the Community Assistance Unit adopt more nuanced guidelines for granting street activity permits rather than placing a blanket moratorium on all multi-street and multi-day street activities permits.

Manhattan Community Board No. 4 shares the Community Assistance Unit's concern regarding the amount of police resources required for the nearly three hundred street events that occur each year. However, street activities come in a wide variety of types that place different demands on the Police, Sanitation, Transportation, and Health departments and on the MTA.

The City and Community Boards would be able to make better, informed decisions on the allocation of resources if the costs of an event were known and could be balanced with the community, city-wide, cultural, and/or sponsor benefits. In contrast, simply establishing a blanket moratorium is arbitrary and inefficient, attempting to preserve City resources without knowing where they might be most effectively deployed.

We appreciate the opportunity to comment on the proposed moratorium on multi-street and multi-day street activity permits and look forward to working with the CAU and other City agencies to devise guidelines for these permits that includes consideration of costs and other factors.

Sincerely,



Walter Mankoff
Chair
Manhattan Community Board No. 4

Jay Marcus
Chair
Transportation Planning Committee

Cc: Local Elected Officials
M. Duran, Sapo
NYPD
DOS
DOT
DOHMH
MTA