

SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY

In the Matter of an Article 78 Proceeding
CITIZENS EMERGENCY COMMITTEE
TO PRESERVE PRESERVATION,

Index No. 118023/06

Petitioners,
-against-

MICHAEL R. BLOOMBERG, Mayor of the City of
New York,

Respondent.

AFFIDAVIT OF CHARLES A. PLATT

State of New York)
).ss.:
County of New York)

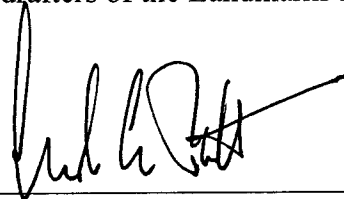
Charles A. Platt, being sworn, deposes and says:

1. I am a practicing architect and a partner in the architectural firm of Platt Byard Dovell White Architects, LLP, whose office is located at 20 West 22nd Street in New York City. I served as a Commissioner on the New York City Landmarks Preservation Commission from 1979 to 1984.
2. I make this affidavit to supply background information on the purpose and intent behind the statutory enactment providing for the appointment of members of the Landmarks Preservation Commission to three year staggered terms.
3. During the early and mid-1960s I worked in the office of William & Geoffrey Platt, Architects. During that period I worked closely with my uncle Geoffrey Platt, founding Chairman of the New York City Landmarks Preservation Commission. As I was a member of a somewhat younger architectural generation he frequently consulted me for my perspective on plans for the establishment of the permanent Landmarks Preservation Commission, subsequently created by vote of the New York City Council on April 6, 1965 and signed into law by Mayor Wagner on April 19, 1965. One of his principal concerns was finding a way to insulate the Commission and its members from political pressures and interference and to guarantee their independence as commissioners so they could act in the public interest without being subjected to demands by politicians and major political contributors,
4. I remember specifically Geoffrey's great satisfaction with the idea of staggered three-year terms for Commissioner appointments as that would insulate and protect the

Commission from a Mayor being able to influence and control it by replacing a majority of the Commission members in any one year.

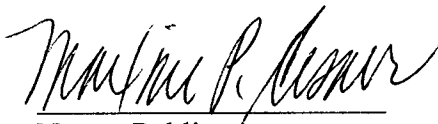
5. The fact that the existing Commission has a majority of unfilled vacancies has created precisely the danger that Geoffrey and, as he told me, Harmon Goldstone and James Felt sought to avoid.

7. In the spirit of those who worked so long and unselfishly to protect and preserve New York City's heritage, I urge the Court to issue a writ of mandamus directing the Mayor to fill the existing and future vacancies on the Landmarks Preservation Commission with staggered terms in order to fulfill the wise intent of the drafters of the Landmarks law.



Charles A. Platt

Sworn to before me
this 21st day of December, 2006



Notary Public

MAXINE P. EISNER
NOTARY PUBLIC, State of New York
No. 31-4896506
Qualified in New York County
Commission Expires, 6/1/07