



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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BURT LAZARIN
Chair

JESSE R. BODINE
District Manager

October 7, 2019

Sarah Carroll, Chair
Landmarks Preservation Commission
Municipal Building, 9th floor
One Centre Street New York, NY 10007

Re: Renovation of 418 West 20th Street

Dear Chair Carroll:

On the recommendation of its Chelsea Land Use Committee, following a duly noticed public hearing at the Committee's meeting on September 16, 2019, Manhattan Community Board 4 (CB4), at its regularly scheduled meeting on October 2, 2019, voted, by a vote of 28 in favor, 9 opposed, 0 abstaining, and 0 present but not eligible to vote, to recommend denial of the application.

The Board is concerned about the long-term preservation of Cushman Row and hopes that new generations of owners will be able to preserve them for the benefit of the community. We are supportive of proposals that would return the buildings to their original conditions, including to their original uses as single-family homes, as the current one does. We believe strongly, however, that this restoration must be sensitive to the historic natures of the buildings and must not come at the expense of their historic characteristics that define Cushman Row. We believe that some elements of the restoration proposed by the applicant deviate significantly from the nature of Cushman Row and from earlier findings by the Landmarks Preservation Commission (LPC) specific to this building.

Description of 418 West 20th Street and History of Earlier Proposals

418 West 20th Street is the westernmost of the seven houses comprising Cushman Row, built in 1840 by Don Alonzo Cushman, whose family would go on to develop much of Chelsea. It is

considered one of the finest Greek Revival rows in the nation and was called the “outstanding feature” of the Chelsea Historic District in its 1970 designation report.

- In 2006, the Landmarks Preservation Commission approved alterations including expansion into the rear yard of an historic “tea room” addition characteristic of mid-19th-century rowhouses. This expansion was built. LPC’s considerations in issuing its approval remain pertinent; the 2006 permit is attached for reference.
- In May of this year, representatives of #418’s new owner presented a proposal to CB4 for alterations to the front and rear of the house including demolition of its rear wall and further rear enlargement well beyond that which was approved by LPC in 2006 and subsequently built. In a May 7 letter, CB4 advised LPC against approving any such further enlargement; this letter is attached.
- On May 14 of this year, LPC conducted a public hearing on the proposal resulting in its decision to approve alterations to the front of the house and deny the proposed alterations to its rear. The Commission issued Findings related to this decision, which are attached.

Description of the Current Proposal

On September 4 of this year the owner presented a revised proposal to CB4. It is scheduled for an LPC public hearing on October 8. It revises proposed rear alterations in a way that only partially responds to the findings cited by the Commission as the basis of its earlier denial. It follows the findings in proposing to rebuild the existing basement- and first-floor-level rear addition with fenestration better matching adjacent historic tea-porch additions, but it contradicts the Commission’s findings in proposing to alter historic window openings above the addition on the main rear wall’s second and third floors. It also contradicts LPC’s objection to any further rear yard encroachment, instead calling for an addition extending as far into the rear yard as was proposed earlier this year and denied by LPC —7’-7” beyond the existing addition’s rear face.

The current proposal would also lower the existing cellar and extend it rearward about thirty feet from the existing main rear wall, beneath the addition and rear yard, to a point nineteen feet from the rear property line. The formerly- proposed rear extension of the second and third floors is no longer included in the project. The current submission adds to the previous scope of work by proposing reintroduction of historic iron newel posts matching an extant pair next door at #416 in Cushman Row. It also adds removal of an existing, non-original roof bulkhead.

Earlier LPC and CB4 Findings

A previous enlargement extended the house's historic basement-and-first-floor "tea porch" addition by 7'-0" toward the rear property line. (This is as shown on the application submission's sheet A-018 although the Commission's 2006 permit for this work describes it as "the extension of the existing two-story enclosed tea porch six feet into the rear yard.") LPC's 2006 permit for this enlargement found it appropriate because it would increase the tea porch's depth by an amount "only slightly perceptible from the street" and not exceeding the twelve-foot depth of the deepest neighboring addition, noting that it would "not further detract from the altered rear façade of the building or from Cushman Row."

The permit also took into account that other proposed changes to the rear façade would help restore its historic character. These sensible considerations were invoked in CB4's May 7, 2019, advisory letter, which strongly opposed expanding the 2006 addition as then proposed. Our letter (attached) emphasized the importance of preventing any further expansion of 418 West 20th Street and of retaining its historic fabric and rear fenestration. It noted that "while the rear façade of no. 418 has been altered, it still retains most of its original brickwork, some original window openings and original lintels in other cases where sills have been raised." Our letter stated that:

All original rear wall fabric should be retained, including brickwork and surviving window openings and lintels. CB4 would welcome restoration of this rear wall above the addition to its original design. Previous changes to the rear elevation should not be allowed to justify more discordant changes or removing the wall altogether. The applicant cites structural deficiencies in the house's rear wall as a reason for removing it. Any real deficiencies should instead be repaired as part of the renovation, and not presented as justification for its unwarranted demolition.

In denying the proposed rear alterations to #418, LPC issued Commission Findings date May 14 of this year which stated in part:

the Commission DENIED the proposal in part, finding:

- that the proposed rear addition will alter the existing largely intact pattern of the punched masonry openings at the second and third floors of the rear façades at this row, thereby diminishing the unity of the row;
- that the addition will extend further into the central greenspace and be taller than the existing enclosed tea porches at the adjoining two houses, thereby overwhelming the neighboring houses and extant enclosed tea porches and detract from the row.

Analysis and Recommendations

While the proposal has been revised to rebuild the rear addition in accordance with LPC's concerns about its fenestration and height, it ignores the Commission's opposition to its further expansion into the central greenspace, leaving the addition's footprint unchanged from what was proposed earlier this year and denied by LPC. It also ignores the Commission's opposition to altering the pattern of punched masonry openings at the second and third floors. The applicant appears to have ignored matters decided by the Commission, arguing for a fallback position. Lest

LPC be swayed to consider compromising its findings, we note the following about the current proposal and arguments made in its support by the applicant's representatives.

Rear Extension

The current proposal would extend the very same distance into the central greenspace as the previously-denied proposal—and well beyond any existing Cushman Row addition. We note that LPC's 2006 permit for the earlier 7'-0" extension of the historic tea porch found that it would be "only slightly perceptible from the street." In contrast, the 14'-7" combined total of these modern extensions would certainly be more than slightly perceptible. While the current proposal eliminates upward expansion of the rear addition, we reiterate the position in our May letter specifically recommending against both upward and rearward extension. This was both the clear consensus of robust community input and the Commission's own findings. In reducing the height alone, the current proposal fails to answer our full concerns and seeks an inappropriate compromise.

Visibility

The applicant's representatives argued that public views of the project location are minimal. We disagree and, as stated in our earlier letter, we believe that views other than those from the public way should be considered as well. The project site is very openly visible to the many people who overlook it from their homes in neighboring market-rate apartments, public housing, and other Cushman Row houses. These New Yorkers are no less "the public" than those passing by on sidewalks. Several of these neighbors voiced their concerns at our committee meeting. The owner of 416 West 20th Street, #418's next-door neighbor in Cushman Row, stated that in renovating her house she voluntarily chose to keep her tea porch in alignment with the neighboring one at #414. The existing addition to #418 already extends well beyond these two porches. Other public speakers from neighboring buildings expressed concern about loss of natural rear yard environment and risk of property damage from adjacent construction.

Tea-Porch Precedents

The proposed rear addition, encompassing the original tea porch and two enlargements, would project nearly twenty feet from the main rear wall of the 21'-6"-wide rowhouse. Roughly square in plan, it would greatly exceed the historically shallow depth of a tea porch. The applicant's representatives stated that the rowhouse expert Charles Lockwood had told them there was no standard size for a tea porch. However, in his classic study, *Bricks and Brownstone: The New York Row House 1783-1929*, Lockwood writes that the typical New York rowhouse plan of the 1840s and '50s included "an eight- to ten-foot-deep 'tearoom' across the back of the house overlooking the yard." This dimension is consistent with all the tearoom illustrations in his book and with the two tea porches immediately east of #418, which also match Lockwood's description of this feature as "a wooden extension on the basement and first floors only."

Rear Context

The current submission misguidedly suggests that neighboring buildings outside Cushman Row justify expansion of the rear addition beyond any Cushman Row precedent. Pointing to the submission's Block Plans on Sheet A-003A, the applicant's representatives argued that the greater depth of 420 West 20th Street—the apartment building just west of #418—and the greater approved depth of 404 West 20th Street at the other end of Cushman Row create a bookend effect minimizing the impact of the proposed addition's rear-yard encroachment. Using the depth of either #420 or #404, neither of them a member of Cushman Row, to justify a new maximum depth for a Cushman Row addition is specious. The appropriate depth for Cushman Row houses should be determined solely by the row's current degree of uniformity and the historic rear-yard context within which the back of Cushman Row is publicly visible.

Rear Wall Sensitivity

Contradicting LPC's Findings, the current proposal would alter and regularize #418's rear window openings into the horizontally aligned rows nearly universal among rowhouse backs. This would violate the rare and distinctive window rhythm that repeats across Cushman Row and defines the specific character of its rear façade. The right-hand windows on the second and third floors of each house are lower than the two windows to their left, expressing the location of the interior stair. While some of these dropped windows at the four houses with rear additions have had their sills raised, the heads of the entire row's dropped second- and third-floor windows remain, save one at the third floor of #416. This creates a distinguishing, unifying, and highly legible rhythm across the row while demarcating individual houses and their domestic scale.

Together with the row's tea porches and private rear gardens, these windows contribute to an air of private informality complementing the dignified and public street face of the row. As Village Preservation's earlier testimony observed of the row's houses, "There is unity not only in their front facades, but to their rear facades as well, which are visible from the public right of way, allowing a unique glimpse into the rear of mid-19th century row house living." CB4 agrees with LPC's findings on the earlier proposal and recommends preservation of the existing pattern of punched masonry openings at the second and third floors.

Potential Rear Wall Demolition

Our stated concern for the preservation of the main rear wall's historic fabric has not been met with any assurances that it would be protected but only with a reference to an engineer's finding that much of the existing wall's brickwork is not original. This would come as no surprise, given that it was made taller, possibly had an exterior chimney added to it, and has had some window openings modified.

The wall is no less historically sensitive for these earlier modifications and should be preserved. A single note in the applicant's submission reads "protect existing brick wall to remain,"

appearing only in a detail drawing on sheet A-020. There is no other specific note indicating that the rear wall is to be retained. The building sections on sheets A-018 and A-019 distinguish the street façade with darker hatching as if only *it* may be retained, although this seems contradicted by the Existing Conditions / Selective Removals drawing on sheet A-019.

Rear elevation drawings refer to new windows “in existing / new openings” as if the surrounding brick wall will remain. However, in our experience, LPC approvals for altered rear window openings of rowhouses have led to wholesale rear wall replacement, especially when the interior is to be fully gutted as with #418. After LPC approved rear “additions” and “window alterations” for 438 and 440 West 20th Street, on the same block, only the street facades and party walls of these rowhouses were preserved. It was clearly cheaper to build their rear walls anew than protect and modify them.

As our earlier letter stated, previous changes to #418’s rear façade should not be allowed to justify more discordant changes or demolition. The applicant previously cited unspecified structural deficiencies in the rear wall. Any substantiated deficiencies should be repaired as part of the renovation. In-place structural remediation is a routine part of preservation for which technical expertise is readily at hand. It should be employed as needed.

Risks Posed by Cellar Expansion

The proposed lowering and rearward extension of the house’s cellar raises further concerns about the fate of the rear wall. CB4 continues to recommend approval of rearward extension of the cellar only far enough for it to serve as a foundation for the rear wall of the rebuilt addition above. The existing cellar support of the main rear wall should be retained, and reinforced if necessary. The currently-proposed building section on Sheet A-018 shows the cellar extending well past the proposed addition above. The addition’s rear wall and the historic main rear wall of the house appear entirely unsupported in this drawing, completely undercut by the lowered and enlarged cellar. By contrast, a segment of the existing cellar floor is retained under the front façade which will remain in place. No proposed cellar plan, which might show how the rear walls are to be supported, is included.

We ask the Commission to verify that a feasible plan is in place to preserve the historic rear façade and not to approve any cellar alterations that might threaten it. Cellar expansions are notorious for destabilizing the historic buildings above them as well as neighboring buildings. For this reason, they have been severely restricted in several of London’s heritage conservation districts, where the great value of added square footage in protected neighborhoods has been a destructive force.

In addition, the proposed cellar expansion would displace half of the rear yard’s surface potential for soil, planting, and water permeability. In altering the rear yard’s surfacing and north-south sectional profile, as shown on the application submission’s sheet A-018, the cellar modifications

would have publicly visible impacts and fall under the Commission's purview. Given the risks and drawbacks, we recommend that the Commission not approve any cellar modifications other than structural reinforcement.

Conclusion

CB4 recommends denial of the current application. We urge that the applicant submit a new proposal fully responsive to LPC's earlier findings. We welcome the currently proposed reintroduction of front newel posts and removal of the non-original roof bulkhead. These scope items should be reincorporated.

Sincerely,



Burt Lazarin
Chair
Manhattan Community Board 4



Lee Compton
Co-Chair
Chelsea Land Use Committee



Betty Mackintosh
Co-Chair
Chelsea Land Use Committee

Enclosure:

May 14, 2019, LPC Commission Findings for 418 W. 20th St.

May 7, 2019, CB4 Letter re 418 W. 20th St.

October 17, 2006, LPC Permit for 418 W. 20th St.

cc: Hon. Corey Johnson, Speaker, City Council
Hon. Gale Brewer, Manhattan Borough President
Owners/Representatives of 418 West 20th Street



Date: 5/14/2019
LPC Docket #: LPC-19-37020
LPC Action: Approved in part/Denied in part
Action required by other agencies: DOB
Permit Type: CERTIFICATE OF APPROPRIATENESS

Address: 418 West 20th Street

Borough: Manhattan

Block: 717 **Lot:** 53

Historic District: Chelsea Historic District

Description: A Greek Revival style rowhouse built in 1839-40. Application is to alter the areaway, and construct rear yard and rooftop additions.

COMMISSION FINDINGS

The Commission NOTED that the building is part of a row of buildings known as Cushman Row; and that the building's style, scale, materials, and details are among the features that contribute to the special architectural and historic character of the Chelsea Historic District. The Commission also NOTED that the top story of the rear of the house was raised from an attic to a full height fourth floor prior to the designation of the historic district; and that Certificate of Appropriateness 07-2882 approved the extension of a two-story enclosed tea porch six feet into the rear yard, maintaining the multi-light parlor floor fenestration pattern; the construction of a rooftop addition, which would recall the appearance of a historic artists' studio window; constructing a rear deck, stairs and roof dormers; modifying masonry openings; and replacing infill. The Commission further NOTED that a rooftop bulkhead, deck and rail was built, instead of the addition, and the two-story enclosed tea porch was extended, with new infill which does not match the historic multi-light infill, in noncompliance with Certificate of Appropriateness 07-2883; and that Warning Letter 19-0373 was issued for the "installation of windows at rear addition and rooftop addition in noncompliance with Certificate of Appropriateness 07-2883 (LPC 07-2578) issued October 17, 2006" and Warning Letter 19-0382 was issued for the "removal of newel posts without permit(s)."

Pursuant to Section 25-307 of the Administrative Code of the City of New York, the Commission APPROVED the proposal in part, finding:

- that the proposed lowering of a limited section of the areaway, reconfiguration of the steps, and installation of an integrated planter and refuse enclosure will utilize a historic paving material and will maintain a simple and unified composition as seen from the sidewalk through the existing areaway fence;
- and that the areaway work will maintain the level of the historic areaway paving in areas that are closest to the sidewalk and adjoining areaways, and at the planting bed.

Pursuant to Section 25-307 of the Administrative Code of the City of New York, the Commission DENIED the proposal in part, finding:

- that the proposed rear addition will alter the existing largely intact pattern of the punched masonry openings at the second and third floors of the rear facades at this row, thereby diminishing the unity of the row;
- that the addition will extend further into the central greenspace and be taller than the existing enclosed tea porches at the adjoining two houses, thereby overwhelming the neighboring houses and extant enclosed tea porches and detract from the row;
- that the proposed massing, size of the masonry openings and large expanses of glazing at the addition will not relate well to the simpler massing, smaller punched openings, and more articulated windows, typically found at secondary facades at this row and surrounding properties;
- that the fenestration of the lower portion of the addition will not replicate or recall the historic fenestration of the enclosed tea porch, which was extant when the historic district was designated and was required to be replicated by Certificate of Appropriateness 07-2882;
- that the addition will be highly visible, in context with the row, from public thoroughfares and will, thereby, detract from streetscape views;
- that the top floor of the rear façade is highly visible from public thoroughfares, within the context of neighboring houses in the row, which feature window and door assemblies that recall the character of studio windows at the immediate neighbors and the historic punched windows at other houses;



Date: 5/14/2019
LPC Docket #: LPC-19-37020
LPC Action: Approved in part/Denied in part
Action required by other agencies: DOB
Permit Type: CERTIFICATE OF APPROPRIATENESS

-that the proportions and size of the proposed top floor window and door assembly will be atypical and not recall the character of historic punched or studio windows;
-and that the elevated placement of the roof deck and railings will draw undue attention to the installations.

VOTE:

Present: Sarah Carroll, Diana Chapin, Michael Devonshire, John Gustafsson, Kim Vauss, Anne Holford Smith

6-0-0

In Favor = S.Carroll, D.Chapin, M.Devonshire, J.Gustafsson, K.Vauss, A.Holford Smith

Oppose =

Abstain =

Recuse =

Please note that these "Commission Findings" are a summary of the findings related to the application. This is NOT a permit or approval to commence any work. No work may occur until the Commission has issued a Certificate of Appropriateness, which requires review and approval of Department of Buildings filing drawings and/or other construction drawings related to the approved work. In addition, no work may occur until the work has been reviewed and approved by other City agencies, such as the Department of Buildings, as required by law



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May 7, 2019

Sarah Carroll, Chair
Landmarks Preservation Commission
Municipal Building, 9th floor
One Centre Street New York, NY 10007

Re: Renovation of 418 West 20th Street

Dear Chair Carroll:

On the unanimous recommendation of its Chelsea Land Use Committee, following a duly noticed public hearing at the Committee's meeting on April 15, 2019, Manhattan Community Board 4, at its regularly scheduled meeting on May 1, 2019, voted, by a vote of 37 in favor, 0 opposed, 2 abstaining, and 0 present but not eligible to vote, to recommend denial of the application unless alterations are limited to restoration of the building's façade, removal of its non-original roof bulkhead, alteration without enlargement of the previously permitted basement and first-floor rear addition, and rearward extension of the existing cellar only to the rear face of this addition.

Description of the Proposal

418 West 20th Street is the westernmost of the seven houses comprising Cushman Row, built in 1840 by Don Alonzo Cushman, whose family would go on to develop much of Chelsea. It is considered one of the finest Greek Revival rows in the nation.

The proposed project would demolish all but the façade and front roof slope of the building, replacing the existing construction behind with a significantly larger new structure. The front fire escape would be removed in concert with change from multiple dwelling to single-family use. Restoration of the street façade would include paint removal and introduction of historically compatible replacement windows. The fenced front yard space would be altered, with part of it depressed to accommodate trash storage.

A previous enlargement, deemed contextual with neighboring ones in Cushman Row by CB4's advisory letter at the time and approved by LPC in 2006, extended the basement and first floor levels about six feet toward the rear of the property. Under the current proposal a new, lower cellar would extend over 29 feet to the rear beyond the existing cellar; new basement and first floor levels would extend to the rear about 7 1/2 feet beyond the existing basement and first floor addition, or about 13 1/2 feet beyond the original basement and first floor; new second and third floor levels would extend to the rear 10 feet beyond the existing, original second and third floors. Only the new fourth floor would retain the footprint of the existing fourth floor.

Historic Context

Cushman Row is one of New York's most revered and significant architectural treasures. The 1970 Chelsea Historic District Designation Report calls it "the outstanding feature" of the district. It is considered one of the finest Greek Revival rows in the nation, second in New York only to the row on Washington Square North. As described by Paul Goldberger in *The City Observed, New York: a Guide to the Architecture of Manhattan*, "The feeling of these houses is more delicate than at Washington Square; everything is a bit smaller and a bit less formal. . . . Here, it becomes clear that destruction or loss of one house destroys all—the lesson of the *tout ensemble* is irrefutable."

Cushman Row's modest scale and outsized impact are its first aspects described in the Designation Report: "The key to the impressive quality of this row is the ten-foot depth of the front yards. This setback enabled the designer to produce a monumental effect for the doorway and stoop on buildings only twenty-one feet wide." The report also notes that "changes in the row are so few as to constitute a miracle in ever-changing New York." As a result, the original unity of the group continues to exert its architectural power. Scale, unity and intactness are clearly character-defining aspects of Cushman Row worth preserving.

Analysis and Recommendations

The proposed restoration of the front façade would make both no. 418 and the entire row more attractive. We support this part of the applicant's proposal.

While the rear façade of no. 418 has been altered, it still retains most of its original brickwork, some original window openings and original lintels in other cases where sills have been raised. Critically, the bulk of its rear wall plane aligns with that of the rest of the row. Its coplanar continuation of the material, texture, and much of the fenestration pattern of the row's back contributes to a still-strong overall reading of the whole as a unified mass. The current rear addition is consistent in modest height and projection with the rear additions of the next three houses to the east in the row, further adding to this sense of unity.

The Commission's 2006 permit covering the current rear addition (COFA-07-2883) noted "that the building's style, scale, materials, and details, are among the features which contribute to the special architectural and historic character of the Chelsea Historic District." It found the addition appropriate to the district for retaining a pre-existing tea porch's fenestration, increasing the

earlier porch's depth by an amount "only slightly perceptible from the street" and not exceeding the twelve-foot depth of the deepest neighboring tea porch, noting that it would "not further detract from the altered rear façade of the building or from Cushman Row." The permit also took into account that other changes to the rear façade would help restore its historic character.

The consistent tea-porch character of Cushman Row's rear additions, together with the shared wall plane above, creates a rear ensemble effect echoing that of the row's front. This would be worth preserving even if the back of Cushman Row were not highly visible from the public way on 19th Street and the intersection of 19th Street and Ninth Avenue. These views are across open spaces among New York City Housing Authority buildings which are unlikely to be filled in the foreseeable future.

Given the particular sensitivity of Cushman Row, CB4 recommends that the Commission preserve the existing front, roof and rear of 418 West 20th, allowing only the proposed removal of the roof bulkhead, rebuilding of the existing rear addition within its existing profile and footprint, and rearward extension of the cellar at its current depth no farther than the rear of the already-built addition to provide a foundation for its in-place reconstruction. All original rear-wall fabric should be retained, including brickwork and surviving window openings and lintels. CB4 would welcome restoration of this rear wall above the addition to its original design. Previous changes to the rear elevation should not be allowed to justify more discordant changes or removing the wall altogether.

The applicant cites structural deficiencies in the house's rear wall as a reason for removing it. Any real deficiencies should instead be repaired as part of the renovation, and not presented as justification for its unwarranted demolition. We do not support the proposed change to the front yard surface; it would create a unique deviation from all the other yards in the row and is not justified by the trash-storage concern, which might be solved by other means. We support the proposed front façade restoration, window replacement, and introduction of an enlarged front skylight.

Façadism and Establishing Precedent

A May 10, 2017, *Wall Street Journal* article, "Gutting New York Landmarks to Preserve Them," quotes the prominent preservation scholar and educator Andrew S. Dolkart as saying that façadism "has become the biggest issue in Greenwich Village and Chelsea, where early houses are being completely destroyed with interiors gutted, roof lines expanded and rear yards removed." Having found a reliable end-run around expanding historic districts, developers now routinely refer to "landmarked facades." Behind these, anachronistically modern replacement buildings enlarge upon their predecessors, divorcing facades not only from their authentic underlying fabric and structure, but their very building scale and the light and air of their historic inner-block contexts. Much of the character, quality, and environmental benefit of rowhouse-dominated historic districts lies in the open space at their center, which is legally protected by designation. It is only the established practice of the Commission that has left this space and the rear facades defining it typically unpreserved. These are nonetheless experienced from their homes by countless New Yorkers who are as much "the public" as tourists whose views from the

sidewalk have arbitrarily become the standard for what must be saved. As well as pedestrians, many residents of public housing have clear views of Cushman Row's rear face and the open center of its block.

So established has the policy of protecting just street facades become that even the oldest house in Chelsea, although publicly visible on three sides, fell victim to it. For the time being, it still stands at 404 West 20th Street, immediately east of Cushman Row. In 2016, the Commission issued a permit allowing demolition of all but its brick street façade, and construction behind it of a replacement building twice the size of the original. The permit also allows excavation of the house's site to create a cellar level extending nearly the depth of the lot, above which a cascade of new construction will project into former rear yard space, creating terraces with French doors. Drawing A-024B in the applicant's proposal for no. 418 shows the unbuilt but approved design for no. 404 looking like a matched bookend of the proposal for no. 418. The applicant's cover letter to CB4 clearly refers to it: "The rear of the townhouse will be expanded to provide additional living space as well as terraces in a manner that is *similar to many other townhouse renovations* in the West [sic] Chelsea Historic District. In addition, a portion of the rear garden will be excavated to provide additional living space below ground."

Rather than a validating precedent, CB4 views approval of the design for no. 404 as an unfortunate misstep by the Commission and a threat to the district in its uncharacteristic scale, impact on open space within the block, destruction of exterior historic fabric, and façadism. As our initial 2016 letter to LPC regarding no. 404 stated: "CB4 is concerned that the proposed demolition of the oldest house in the Chelsea Historic District will set a precedent for the gutting of other rowhouses in the district including Cushman Row, reducing the district's blocks to a false front of historic façades." If Cushman Row itself suffers the same fate, what can the future hold for the city's historic districts?

Conclusions

418 West 20th Street presumably was purchased with full knowledge of the building's history, its location in the Chelsea Historic District and its importance to the community. We recognize that the Commission must balance the interests of preservation with the legitimate interests and needs of building owners, but it is difficult to understand how a 5,500 square foot single-family house isn't already big enough and why an individual owner's desire for surplus space should outweigh the value to the public of an intact major landmark.

We also understand that the Commission has no purview over the interior of a non-public residential landmark. We believe, however, that its oversight of such a building's entire exterior envelope can strongly influence the likelihood that its interior will be preserved in part or whole, securing a level of historic integrity. If speculative buyers were less confident that the Commission will approve very substantial additions, they would be deterred from buying landmarks as potential teardowns for replacement with bigger, entirely modern buildings behind preserved façades. To the extent that a landmark is contained to its historic envelope, it will have more value if renovated for interior authenticity. The establishment of better-considered precedents will passively serve preservation.

The Commission's decision on as prominent a landmark as 418 West 20th Street will surely be watched. We therefore urge the Commission to use our recommendations listed above to preserve not only this building but to serve as notice that our historic past, as recognized in the designation of historic districts, will be respected.

Sincerely,



Burt Lazarin
Chair
Manhattan Community Board 4



Lee Compton
Co-Chair
Chelsea Land Use Committee



Betty Mackintosh
Co-Chair
Chelsea Land Use Committee

cc: Hon Jerrold Nadler, U.S. Congress
Hon. Brad Hoylman, New York State Senator
Hon. Richard Gottfried, New York State Assembly
Hon. Corey Johnson, Speaker, City Council
Hon. Gale Brewer, Manhattan Borough President
Owners, 418 West 20 Street



THE NEW YORK CITY LANDMARKS PRESERVATION COMMISSION
 1 CENTRE STREET 9TH FLOOR NORTH NEW YORK NY 10007
 TEL: 212 669-7700 FAX: 212 669-7780



PERMIT CERTIFICATE OF APPROPRIATENESS

ISSUE DATE: 10/17/06	EXPIRATION DATE: 7/18/2012	DOCKET #: LPC-07-2578	COFA COFA-07-2883
ADDRESS: 418 WEST 20TH STREET		BOROUGH: Manhattan	BLOCK/LOT: 717 / 53
Chelsea Historic District			

Display This Permit While Work Is In Progress

ISSUED TO:

Lubomir Chmelar
Domov, LLC
410 West 20th Street, Apt. 1
New York, NY 10011

Pursuant to Section 25-307 of the Administrative Code of the City of New York, the Landmarks Preservation Commission, at the Public Meeting of July 18, 2006, following the Public Meeting of June 13, 2006, following the Public Hearing and Public Meeting of April 11, 2006, voted to approve a proposal to construct a rooftop and rear yard addition; as put forward in your application completed on July 18, 2006.

The proposal, as approved, consists of the construction of two dormers at the roof of the front facade, featuring multi-pane wood casement windows; the removal of masonry at an existing window opening at the third floor rear elevation to create a doorway, and the installation of French doors and balconette featuring iron railings; the modification of non-historic window openings at the fourth floor rear elevation to create three new window openings, and the installation of six-over-six, double-hung wood windows; the extension of the existing two-story enclosed tea porch six feet into the rear yard, maintaining the parlor floor fenestration with new wood casement windows and wood door, and installing six wood casement windows at the basement level bays; the construction of a deck and stair at the parlor floor rear elevation; removing the rear slope of the roof to construct a metal and glass rooftop addition; and interior alterations including changes to partition walls, finishes, and plumbing, electrical, and mechanical systems. The proposal was shown on presentation boards labeled LPC-011b, dated March 30, 2006, LPC-002b, LPC-006b, and LPC-010b, dated June 30, 2006, and LPC-004b, dated July 18, 2006, prepared by James Vincent Czajka, R.A. The proposal, as initially presented, included a larger rectangular rooftop addition that surpassed the height

of the rear parapet wall and roofline, and did not include the installation of new windows at the fourth floor; as shown on presentation boards LPC-001 through LPC-011, dated March 30, 2006.

In reviewing this application, the Commission notes that the Chelsea Historic District designation report describes 418 West 20th Street as one of a row of Greek Revival style rowhouses built in 1839-40 known as Cushman Row. The Commission also noted that the building's style, scale, materials, and details, are among the features which contribute to the special architectural and historic character of the Chelsea Historic District.

With regard to this proposal, the Commission found that the presence of dormers is a common alteration in Cushman Row, and that the proposed dormers will match the configuration, details, scale, materials, and finish of the dormers on the adjacent buildings; that the proposed French doors and iron balcony will match the doors and ironwork below, creating consistent fenestration at the second and third floors of the rear façade; that the window alterations at the fourth floor of the rear façade will eliminate a condition which differs from the historic character, and will bring order to the rear façade, and that the proposed windows will match the configuration, details, and materials, of the historic windows at the second and third floors; that the existing tea porch is in poor condition and requires extensive repairs; that the proposal calls for the retention of the historic tea porch fenestration and that the extension of the structure will be only slightly perceptible from the street; that the depth of the new tea porch will match the tea porch at 412 West 20th Street which has also been extended to reach twelve feet into the rear yard; that the configuration and materials of the proposed rooftop addition distinguish the structure as a modern addition; that the addition will be seen in the context of two adjacent altered rear façades; that the addition will recall the historic north facing artists' studio windows often added historically to 19th century rowhouses; and that the addition will not further detract from the altered rear façade of the building or from Cushman Row. Based on these findings, the Commission determined the proposed work to be appropriate to the Chelsea Historic District and voted to approve it.

However, in voting to approve this proposal, the Commission required that two complete sets of signed and sealed Department of Buildings filing drawings be submitted for review and approval by the staff of the Commission. Subsequently, on October 2, 2006, the staff received drawings labeled DOB-001 through DOB-006, dated revised September 22, 2006, prepared by James V. Czajka, R.A. Accordingly, the staff reviewed these drawings and determined that the proposal approved by the Commission has been maintained. Based on this and the above findings, the drawings have been marked approved by the Landmarks Preservation Commission with a perforated seal, and this Certificate of Appropriateness is being issued.

This permit is issued on the basis of the building and site conditions described in the application and disclosed during the review process. By accepting this permit, the applicant agrees to notify the Commission if the actual building or site conditions vary or if original or historic building fabric is discovered. The Commission reserves the right to amend or revoke this permit, upon written notice to the applicant, in the event that the actual building or site conditions are materially different from those described in the application or disclosed during the review process.

All approved drawings are marked approved by the Commission with a perforated seal indicating the date of the approval. The work is limited to what is contained in the perforated document. Other work or amendments to this filing must be reviewed and approved separately. The applicant is hereby put on notice that performing or maintaining any work not explicitly authorized by this permit may make the applicant liable for criminal and/or civil penalties, including imprisonment and fine. This letter constitutes the permit; a copy must be prominently displayed at the site while work is in progress. Please direct inquiries to Carly

Bond.

Robert B. Tierney
Chair

PLEASE NOTE: PERFORATED DRAWINGS AND A COPY OF THIS PERMIT HAVE BEEN SENT TO:
James Czajka

cc: Jared Knowles, Deputy Director of Preservation

