



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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District Manager

March 14, 2018

Hon. Meenakshi Srinivasan, Chair
Landmarks Preservation Commission
Municipal Building, 9th floor
One Centre Street New York, NY 10007

Re: Landmarks Preservation Commission: Proposed New Rules

Dear Chair Srinivasan:

On the recommendation of its Chelsea Land Use Committee, following a duly noticed public hearing at the Committee's meeting on February 20, 2018, Manhattan Community Board 4 (CB4), at its regularly scheduled meeting on March 7, 2018, voted, by a vote of 34 in favor, 1 opposed, 0 abstaining and 0 present but not eligible to vote, to recommend against the Landmarks Preservation Commission's proposed new rules which would allow staff approval of certain rooftop and rear additions without public input.

CB4 has a large number of historic row houses in its district and regularly reviews proposals for rooftop or rear additions to row houses, many of which could be reviewed and approved by LPC staff without public review under the new rules if adopted. These are major alterations that could be approved without benefit of a public hearing or CB4's input. This possibility places at great risk the fundamental character of those Historic Districts which are largely comprised of row houses.

The Board has witnessed in recent years that approvals for even modest additions to row houses now typically result in their wholesale replacement, leaving only their street facades and party walls. Applications for additions are effectively applications to demolish all but these elements and build a new structure filling the original house's envelope plus that of the proposed "addition." Examples of this in the Chelsea Historic District alone include 460 West 22nd Street, 438 and 440 West 19th Street, and the oldest house in the District, 404 West 20th Street. Tellingly, the Commission's Certificate of Appropriateness for 404's demolition, except for its brick street façade, and its replacement with a new house double the area, entirely above a newly excavated cellar, reads "application is to construct additions and excavate the rear yard."

As if in response to an increase in areas of New York protected by historic district designation, an understanding has become institutionalized that only street facades within these districts must be preserved. As blocks have been added to historic districts, the protected footprint of houses

within those districts has shrunk to their outer one-foot deep perimeter. The interiors of these blocks are being systematically rebuilt with modern steel and concrete construction in a novel profile, with rooftop additions rising toward the rear of each house leaving the open inner core of the blocks both reduced in footprint and deprived of sky exposure and sunlight. This emerging block typology is shaped directly by the Landmarks Preservation Commission's regular practice of approving new construction not visible from the street.

Not only is this policy transforming the cross sections of whole historic district blocks, but it is closer to the discredited developer expedient of façadism than to meaningful preservation. When facades alone are preserved, they no longer have any connection with the brick-and-timber construction technology of the era that produced and makes sense of them, or the typical pattern of more gracious, less dense rear yards that were a character-defining aspect of them.

The disengaged facades left behind are souvenir masks retained for nostalgia or tourist appeal. Preservation itself is disengaged from historic districts, whose blocks are losing the relationship of interior to exterior that gives any architecture, new or old, integrity. Even the one-to-one correspondence of individual row house façade to dwelling may be lost, where whole sections of historic district row house blocks are gutted and combined into modern apartment buildings, as in the case of the Whitney Townhouses development in the Upper East Side Historic District. Such projects fail both as preservation and architecture, denying new buildings the exterior legibility that is an architectural article of faith across styles and eras.

This is not an unreasonably alarmist view; the market forces acting to hollow out historic district blocks are enormous and growing.

460 West 22nd Street was bought in 2012 for \$4.6 million by a new owner who gutted and enlarged the row house, claiming he planned to make it his home. Upon completion of his Commission-approved alterations, he sold the house for \$16 million just two years after buying it. The underlying dollar value of a Chelsea row house lot's buildable floor area – if executed in new construction to modern luxury-condominium standards – is now so high that for a buyer to instead preserve the existing house is to turn down a fortune. When approval of significant rooftop and rear yard additions can be considered automatic - as delegation to Commission staff seems to advertise - the increase in potential profits calculated by speculators will only add to the inevitability of destruction. Given the smaller households of our day, it doesn't make sense that these additions are needed for family habitation. Short-term investors, not homeowners, will continue to plow up the centers of historic district blocks and leave behind a new urban fabric drawn up on spreadsheets.

The Commission would better serve true preservation by more assertively, conservatively and strategically exercising its purview over all building surfaces and, by extension, block profiles. This would deter predatory speculation and in many cases could make interior preservation a more sensible option, leveraging the Commission's exterior purview for broader influence in a way that was likely envisioned at the time of its creation. For example, if the Commission had exercised its right to rule that the oldest house in Chelsea could not be enlarged, it is much more likely that the owner would have voluntarily restored its largely original interior. Instead, he was allowed to replace the existing house with one twice its size, guaranteeing "the obliteration of a landmark," in dissenting Commissioner Michael Devonshire's words.

The proposed new rules are contrary to the need for greater commissioner and public involvement. They lower the bar for approval of additions in general and remove much of the transformation of historic district block centers from meaningful public scrutiny and make approval appear automatic. We ask that the Commission revise its practices to address real preservation rather than solipsistic consistency in its determinations.

CB4 strongly believes that LPC has an important role to play in the continuing development and redevelopment of the City. We have included a request for increased funding for LPC in our Annual Statement of District Needs for years, and we have welcomed improvements such as making plans available on-line. At the same time we have been greatly distressed by some inexplicable and, we believe, indefensible actions such as the approval of the effective razing of 404 West 20th Street as “additions,” the type of actions proposed to be delegated to staff and removed from public view.

CB4 reaffirms its support for LPC’s mission, but we recommend that the proposed rule changes be revised to provide greater public involvement in decisions that significantly affect historic row houses.

Sincerely,



Burt Lazarin
Chair
Manhattan Community Board 4



John Lee Compton, Co-Chair
Chelsea Land Use Committee



Betty Mackintosh, Co-Chair
Chelsea Land Use Committee



Jean-Daniel Noland
Chair
Clinton/Hell’s Kitchen Land Use Committee

- cc: Hon. Bill de Blasio, Mayor
Hon. Corey Johnson, Speaker, City Council
Hon. Gale A. Brewer, Manhattan Borough President
Hon. Brad Hoylman, New York State Senate
Hon. Richard Gottfried, New York State Assembly