



CITY OF NEW YORK  
**MANHATTAN COMMUNITY BOARD FOUR**

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**JESSICA CHAIT**  
Chair

**JESSE R. BODINE**  
District Manager

June 12, 2024

Sarah Carroll, Chair  
Landmarks Preservation Commission  
David N. Dinkins Municipal Building, 9th Floor North  
1 Centre Street  
New York, NY 10007

Re: Proposed redevelopment of 413-415 West 22nd Street

Dear Chair Carroll:

Manhattan Community Board 4 (MCB4), at its regularly scheduled meeting on June 5, 2024, voted, by a vote of 38 in favor, 0 opposed, 02 abstaining, and 0 present but not eligible to vote, to **recommend denial of a Certificate of Appropriateness to The Landmarks Preservation Committee (LPC) for proposed alterations to 413-415 West 22nd Street in the Chelsea Historic District. MCB4 recommends a new application—to be submitted to MCB4—with no rooftop extension, the retention of the historic party wall, and any rear yard addition to both retain historic fabric and not impede on the light and air of the adjacent building at 411 West 22<sup>nd</sup> Street. The proposal’s effective replacement of two historic rowhouses with taller and deeper replacement construction would perpetuate and further encourage treatment of such buildings as teardowns for new construction—a destructive trend that has already ravaged much of the Chelsea Historic District. The proposed renovation of the rowhouse façades is welcomed by MCB4 and should be retained in the revised proposal.**

### **Background**

413 and 415 West 22<sup>nd</sup> Street are 15-foot wide, four-story-plus-basement Anglo-Italianate rowhouses in the Chelsea Historic District Extension, which was designated in 1981. According to the district’s designation report: “They were built in 1856 for John Gregory, a tin and coppersmith, who served as a vestryman at St. Peter’s Church.” Until recently, #413 contained eight apartments, and #415 contained ten apartments.

## **The proposal**

The proposal seeks to remove the two houses' roofs, nearly intact original rear walls, and shared party wall.<sup>1</sup> The party wall would be replaced by an open steel superstructure claimed to allow retention of some historic timber floor joists, but this would be a token gesture, especially given the loss of the rowhouses' character-defining structural logic. The owner has no obligation to follow through on this difficult salvage as interiors are not under the Commission's purview. What at first appears in the proposal to be a retained section of top-floor rear façade would be new brickwork in the plane of the existing rear wall with windows "to be reconstructed to match existing on front façade." Large vertical openings inside the combined houses would create ceiling heights of over twenty feet that would be visible from the street, introducing huge voids and squandering square footage. This loss of usable area emphasizes the unnecessary nature of the proposed rooftop addition which would degrade neighbors' views, light, and property values.

## **Community impacts**

### **Loss of historic fabric and embedded energy**

That rowhouse interiors are not under LPC's purview is no reason for it to perpetuate a policy that encourages their destruction. In this case housing units and neighborhood character are lost along with historic fabric, including a historic party wall. The more of a rowhouse exterior the Commission allows to be altered, the more it makes sense for an owner to gut the house, including its timber framing. This is especially true of rooftop additions, which typically entail roof removal that exposes a house's interior to the elements. Rooftop additions like this one, are also most often accompanied by the introduction of an elevator, which in turn often triggers a stairwell relocation. Rather than reframe historic timber floor joists to accommodate new elevator-shaft and stair openings, owners inevitably opt to fully replace all historic framing. This temporary hollowing out also makes protection of the interior upon roof removal less of a concern. Embedded energy is wasted along with the destruction of historic fabric, an increasingly important consideration in our time of climate crisis.

### **Diminishment of neighbors' quality of life and property value**

This proposal will block natural light to, and views from, neighboring buildings that are both adjacent to the property and through the donut hole on 23<sup>rd</sup> Street, impacting quality of life and property values. Its extensive structural modifications have the potential to destabilize neighboring historic properties. Residents of these buildings testified in force against the proposal for these reasons at MCB4's

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<sup>1</sup> LPC oversight of party walls was confirmed by LPC General Counsel Mark Silberman in a 2020 public meeting on the project including the rowhouses at Ninth Avenue and 14th Street in the Gansevoort Market Historic District.

Chelsea Land Use Committee meeting on May 20th. If the Commission were to approve this proposal without a true basis in preservation principles, it would be arbitrarily enhancing one person's quality of life at the expense of others.

### **Loss of housing and neighborhood character**

As Chelsea became an increasingly working-class neighborhood in the Twentieth Century, the historic district's originally single-family homes were converted into boarding houses and apartments. Today, these subdivided rowhouses contain much of the neighborhood's housing stock. This is as much a part of these buildings' history and tradition as the genteel, single-family use for which they were first built when Chelsea was a much less dense village on New York's periphery. In approving proposals that treat historic rowhouses as teardowns for new development like the current one, the Commission contributes to the loss of the neighborhood's affordable housing stock and social character. The current project will replace 18 apartments with a single home. In hearings on similar projects in Greenwich Village in particular, LPC's commissioners have publicly lamented the kind of social change they cause but voted as if they felt compelled to approve them. This seems to be in direct opposition to The Mayor's City of Yes Housing initiative.

### **MCB4's recommendations**

The historic rear wall on the upper floors should be retained and only door-sized openings be allowed through the shared party wall, which should continue its structural role. The rooftop addition infringes on the light and air on neighboring buildings, as does the proposed rear extension. Any rear-yard addition should minimize impact on the light and air at the adjacent building and not extend above the parlor level. MCB4 repeatedly asked the applicant to consult with their neighbors about the proposals effect on the structural stability of adjacent buildings. To date, they have not done so. To disregard the stability of adjacent landmarked buildings in order to create a 7,000 square foot mansion simply because the applicant proposes retaining a historic façade is outrageous.

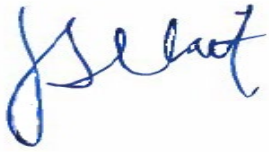
The precedents for rooftop additions or backyard encroachments cited in applications are used to validate them. This practice should be stopped as it creates an illusion of incremental change. Instead, we are consistently left with larger new buildings which in time will replace the entire substance of the Chelsea Historic District. Ever more critical housing is inexorably lost in the process, along with historic fabric, embedded energy, neighborhood character, and quality of life for neighbors.

Some of these concerns are not technically the Commission's purview, but preservation *is*. Transformative alterations are justified when adaptive re-use is crucial to keeping historic buildings vitally used and cared for, but that principle does not apply to rowhouses like 413 and 415 West 22<sup>nd</sup> Street. They were built as generous single-family homes with ten- to twelve-foot ceilings and would—without transformative alterations that harm the

community—be highly sought after and maintained for either their original purpose or their later use as multiple dwellings generating rental income.

MCB4 looks forward to reviewing a new and improved application that actually preserves these landmarked buildings.

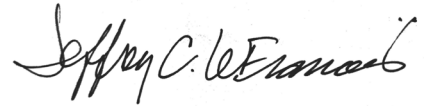
Sincerely,



Jessica Chair  
Chair  
Manhattan  
Community Board 4



Kerry Keenen  
Co-Chair  
Chelsea  
Land Use Committee



Jeffrey LeFrancois  
Co-Chair  
Chelsea  
Land Use Committee