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October 3, 2019

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

Re: 418 West 20th Street – 9/4/19 Resubmission of Proposed Alterations

Dear Chair Carroll:

Save Chelsea opposes this application's proposal to further expand 418 West 20th Street's rear addition, alter its second- and third-floor window openings, and lower its cellar and extend it under the rear yard.

In May, the Commission denied a proposal to enlarge for a second time the house's enclosed rear tea porch, noting that it would extend farther into the rear yard than Cushman Row's existing rear additions. This reaffirmed the Commission's 2006 permit for the first enlargement, which limited it to a 12-foot projection from the row's main rear wall matching the deepest existing Cushman Row addition. The current proposal would enlarge the addition a further 7'-7"—every bit as far as earlier proposed and denied. It dismisses the Commission's repeated findings and their clear aim to protect the character-defining unity of both Cushman Row's architecture and its historic rear-yard context.

In denying other rear modifications submitted earlier this year, the Commission found that they would "alter the existing largely intact pattern of the punched masonry openings at the second and third floors . . . thereby diminishing the unity of the row." This too echoed the Commission's 2006 permit. In approving earlier rear-wall alterations, it found that they would respect the house's historic second- and third-floor window configurations. These windows are particularly sensitive; their atypical pattern expresses the location of interior stairs and gives the back of the row a distinctive, unifying rhythm. The current proposal would substitute a more conventional, non-original pattern of window openings at the second- and third-floor levels, again dismissing the Commission's repeated and sensible findings.

The current proposal for no. 418 would excavate and lower the cellar floor two feet and extend it nearly 30 feet behind the main rear wall of the house, well under the rear yard. We are very concerned that this might undermine the house's historic rear wall and its party wall with no. 416. The Commission would appear to have purview over this work in that it affects exterior rear-yard surfaces; the new cellar space excavated from the rear yard would displace plant-supporting, permeable soil. Its top would be the hard-surface floor of a basement areaway. The enlarged cellar is not vital to the house's function as a home. It might enhance resale value, but

its windowless space would not be deemed habitable by the building code. Approving it would complicate preservation of the rear wall and invite scenarios in which it is instead replaced and façadism prevails after all. We ask the Commission to ensure its preservation.

We fully support CB4's letter on this proposal, and ask the Commission to strike no compromise that compromises preservation.

Sincerely,

A handwritten signature in black ink that reads "Laurence Frommer". The signature is written in a cursive style with a large, sweeping initial "L" and a long horizontal stroke at the end.

Laurence Frommer
President
Save Chelsea

Cc: Mayor Bill de Blasio
City Council Speaker Corey Johnson
Manhattan Borough President Gale Brewer
Assembly Member Richard N. Gottfried
New York State Senator Brad Hoylman
Simeon Bankoff, Executive Director, Historic Districts Council