

March 27, 2018

Honorable Meenakshi Srinivasan, Chair
New York City Landmarks Preservation Commission
One Centre Street, 9th floor
New York, NY 10007

Re: Proposed Amendments to the Landmarks Preservation Commission Rules

DOCOMOMO New York/Tri-State is a local chapter of an international organization working in over 60 countries to document and preserve buildings, sites and neighborhoods of the Modern Movement.

We understand and support the goals of reducing the burden placed upon volunteer commissioners and of streamlining the approvals process for alterations and maintenance. However, in general we are concerned that the proposed changes would result in the reduction of both opportunities for public input and the transparency of the approvals process. Of particular concern to our organization, the proposed changes may, intentionally or unintentionally, put buildings of the Modern Movement at a disadvantage in terms of regulation.

We have serious concerns about the LPC's use of "contributing", "non-contributing", and "no style" language. Examples include on page 30, Section 2-11 (iii) D (e) (1), and on page 53, Section 2-14 (b) "Definitions". Specifically with the definition on page 53: "Noncontributing building means a building that is identified or characterized in the designation report as having no architectural style and or otherwise is not a building for which the historic district or landmark was designated."

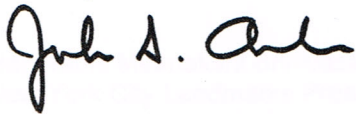
Thanks to our friends at the Historic Districts Council, we know that 717 buildings within all existing historic districts are listed as "no-style" or "non-contributing". Possibly solely because of their age at the time of designation, many buildings of the Modern Movement were given these terms in the district designation reports. Prominent examples include 923 Fifth Avenue (1949-51, Sylvan Bien), 700 Park Avenue (1959, Kahn & Jacobs), 711 West End Avenue (1950-52, Horace Ginsbern & Associates), 65 West 11th Street, part of the New School for Social Research (1955-60, Mayer Whittlesey & Glass), and Public School No. 41 (1955, Michael Radoslovich). Despite the way these buildings have been misidentified, they are clearly Modern, they are often relatively rare examples of that style within their districts, and some were designed by firms well known as committed Modernists.

Further enshrining "no-style" and "non-contributing" into the rules will allow these buildings and dozens of others like them to possibly be inappropriately altered with no public input. Permitting the Commissioners and organizations such as DOCOMOMO to weigh in allows for participation by those with expertise and knowledge of buildings of the Modern Movement, their defining characteristics, and their materials.

Within the rules, we also identified problematic language featured in reference to additions or enlargements on Section 2-15 starting on page 68 and in reference to fire escapes on Section 2-22 starting on page 108, with the phrase "Characteristic of the Specific Historic District". As New York City has unfortunately yet to designate a district for its Modern architecture, this language, especially as it is not defined, puts buildings of a Modern style on unequal footing with styles which may be more prevalent in the district. We'd like to see this language defined, or better yet removed.

DOCOMOMO US New York/Tri-State respectfully requests that the proposed rules changes be revised to address the issues we have identified so that New York City's Modern landmarks will continue to receive the protection they well deserve.

Sincerely,



John Shreve Arbuckle
President
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