



**Greenwich  
Village  
Society for  
Historic  
Preservation**

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*Founded in 1980, the  
Society fights to protect  
the architectural heritage  
and cultural history  
of the Village.*

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April 18, 2006

Hon. Robert Tierney  
Chair, New York City Landmarks Preservation Commission  
One Centre Street, 9<sup>th</sup> floor  
New York, NY 10007

**Re: 122 Greenwich Avenue**

Dear Chair Tierney:

I write to express the grave concerns of the Greenwich Village Society for Historic Preservation regarding the impending approval of a design for an 11-story undulating glass building in the Greenwich Village Historic District, and to urge the Commission to re-think such a decision. We are extremely concerned about the impact of approval of an only minimally changed design upon the integrity of the Greenwich Village Historic District, upon the integrity of the Landmarks Law, and upon support for landmarks regulations by owners in this district and throughout the city.

As expressed in our testimony on this item before the Commission in March, we have deep concerns about the lack of connection between this proposed design and any apparent characteristics of the Greenwich Village Historic District. While the massing follows the underlying zoning for the site, the design in all other respects is inconsistent with the historic district's character. In our testimony, we and many others raised essential questions about how this design can be reconciled with the clear intent and language of the original Greenwich Village Historic District designation regarding standards of appropriateness for new development and its relationship to the clearly defined character of the district, questions which are yet to be addressed by the Commission.

In general, it remains quite difficult to see what about this design is appropriate to the Greenwich Village Historic District in the eyes of the Commission, and what objective criteria was used to make this decision. We are also concerned that approval of this design cannot help but lead to allowing other similar designs within the Greenwich Village Historic District, where many other "soft sites" upon which the Commission might conceivably allow new development such as this do exist. The Landmarks Preservation Commission has always expressed a desire to follow consistent criteria to preserve the character and qualities of designated historic districts. However, it is hard to imagine how this was done in this case, and how the logic applied to this site would not allow further changes to this district which would vastly change its character and diminish what have been understood to be its protected qualities.

Like the Commission, GVSHP understands that for the system of regulating landmarks in New York City to work, there must be confidence in the system and an investment in its goals by affected property owners. We fear that approving the design of 122 Greenwich Avenue with only inconsequential changes will reduce such confidence and investment. We have heard from many residents and property owners in the Greenwich Village Historic District who are baffled by the possibility of such a decision, and the degree to which it runs contrary to the commonly-held understanding of the purpose of historic district designation. We have also consistently heard from owners who have cited the considerable time, difficulty, and expense involved in ensuring that they meet all requirements of landmarks regulations for their properties, down to details as small as the appropriate color for grout when repointing the facades of buildings from the 1960's (an actual case of a building directly facing the 122 Greenwich Avenue site). Most owners are willing to accept this burden because of their belief in and understanding of the goals of maintaining a historically appropriate appearance in landmark districts. However, many of these same owners have questioned how the Commission could be so meticulous in its demands upon them for maintaining historically appropriate details to this small degree when at the same time the developer of 122 Greenwich Avenue is allowed to construct a building with no connection whatsoever in its materials, detailing, or form to the historic character of the neighborhood. As an organization which often pushes for maintaining that same precise level of historic detail which the Commission sometimes requires of owners, we fear that our efforts as well as yours will be significantly hampered by a decision which seems so blatantly at odds with and inconsistent with this goal.

Like the Commission, we are often asked, "what does landmark designation mean?" It must mean more than simply that changes to a building or site have to be approved by an eleven-member body appointed by the Mayor. There must be relatively objective criteria and consistent standards that one can anticipate and understand. The decision the Commission seemingly committed itself to today leaves little sense of objective, consistent, or even identifiable standards, other than the tastes of the eleven individual Commissioners. To maintain a workable system, considerably more than that is necessary, and we fear that today's decision may seriously undermine that goal.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Berman", with a long horizontal flourish extending to the right.

Andrew Berman  
Executive Director

Cc: Borough President Scott Stringer  
City Council Speaker Christine Quinn  
State Senator Tom Duane  
Assemblymember Deborah Glick