



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

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February 6, 2023

Chair Sarah Carroll  
Landmarks Preservation Commission  
1 Centre Street  
New York, NY, 10007

Re: Demolition of Landmarks

Dear Chair Carroll,

As a follow-up to the December 2022 press conference we held with advocates across the city, and our recent meeting with you and other staff of the Landmarks Preservation Commission, the Historic Districts Council is today presenting in writing our initial recommendations to help improve the current practices and policies in place for safeguarding designated buildings, which we believe are insufficient given the sharp increase in demolitions of landmarked structures over the past year.

We appreciate the list of proposed changes to processes, rules, and training that you presented to us on January 26th. We are excited to see these changes come to fruition, and are hopeful that our recent meeting was just the first step in ongoing communication between HDC and LPC around this issue, and ways the LPC is improving systems to stop future demolitions.

Now, we'd like to share more details of some of the policy recommendations we mentioned in our meeting. We welcome any questions you have about these proposals, and look forward to further discussion about how they can be implemented.

- *Increased, more formal, and more transparent communication between agencies, especially the Department of Buildings and Landmarks Preservation Commission.*
  - An independent engineering expert retained by LPC should inspect any landmark site where demolition is being considered, and should make a determination regarding whether the structure can be preserved, before any decision about demolition is made. This decision should be shared with local elected officials if possible.
  - An administrative rule change that would allow the LPC Chair to have a formal say in demolition actions, while understanding that public safety will always be paramount.
  - Better notation in the DOB system and explanation of the process for emergency declarations, including how community boards and elected officials can be notified earlier in the process to help create better outcomes.

- *More oversight on complex construction and renovation projects which could lead to undermining of landmarks, including neighboring construction.*
  - Specifically: LPC and DOB should jointly require all excavations at landmarked properties to be monitored by special inspectors paid by 3rd Parties. See more about special inspections here: <https://www.nyc.gov/site/buildings/codes/special-inspections.page>
  - A possible 90ft. buffer around landmarks requiring additional monitoring and review, if that doesn't conflict with existing regulations LPC mentioned. This and other possible tools were included in a recent City of Philadelphia law. See that bill at: <https://phila.legistar.com/LegislationDetail.aspx?ID=4928068&GUID=C171BABC-4312-48A3-8464-3C3FCD304E00&Options=ID|Text|&Search=210389>
  
- *More public notice on possible demolitions and buildings at risk to give community members and elected officials more time to respond and help save landmarks.*
  - Specifically: LPC and DOB should maintain a database of neglected buildings, which neighborhood advocates can contribute to and/or respond to.
  - Increased penalties should be levied on property owners who are unwilling to maintain their buildings or are willfully destroying them through demolition by neglect. Both from LPC and DOB.

Regarding a database of neglected buildings, HDC has already reached out to our community partners to compile a preliminary list of Buildings at Risk. Our partners identified individual landmarks, interior landmarks, and buildings within historic districts that stand out as causes for concern. We have attached a detailed list of their responses here as a PDF.

We greatly look forward to regular communication on this issue.

Thank you,



Frampton Tolbert  
Executive Director

## HDC Buildings At Risk Survey Results

### Landmarked - Individual

- Duffield Street Houses - 182 to 188 Duffield Street, Brooklyn. Designated 4/24/2001
- Wyckoff/Bennett/Mont House: 1669 E 22nd St, Brooklyn. Designated 1/17/1968
- William and Rosamond Clark House: 51 Market Street, Manhattan. Designated 10/14/1965
- John King Vanderbilt House: 1197 Clove Road, Staten Island. Designated 10/06/1987
- Seaman's Retreat: 131 Bay Street / 75 Vanderbilt Ave., Staten Island, NY. Designated 04/09/1985
- McFarlane-Bredt House: 30 Hylan Blvd., Staten Island, NY. Designated 10/12/1982
- Manee-Seguine Homestead: 509 Seguine Avenue, Staten Island, NY. Designated 09/11/1984
- Metro Theater (formerly Midtown Theater): 2626 Broadway, Manhattan. Designated 07/11/1989
- Old P.S. 64: 605 East 9th Street, Manhattan. Designated 06/20/2006
- St. James Roman Catholic Church: 32 James Street, Manhattan. Designated 01/18/1966
- Loew's Canal Street Theater: 31 Canal Street, Manhattan. Designated 09/14/2010
- Scheffel Hall: 190 3rd Avenue, Manhattan. Designated 06/24/1997
- RKO Hamilton Theater: 3560-3568 Broadway, Manhattan. Designated 02/08/2000

### Landmarked - Interior

- Lane Theater: 168 New Dorp Lane, Staten Island. Designated 11/01/1988.

### Landmarked - Historic District

- National City Bank of New York: 418 Broadway, Manhattan. Part of the Tribeca East Historic District. Designated 12/08/1992.
- Kingston Lounge: 120 Kingston Avenue, Brooklyn. Part of Crown Heights Historic District. Designated 04/24/2007

- 1 Monroe Place, Brooklyn. Part of Brooklyn Heights Historic District. Designated 11/23/1965
- 28 7th Avenue. Part of Park Slope Historic District. Designated 7/17/73
- New York City Farm Colony-Seaview Hospital. Part of New York City Farm Colony- Seaview Hospital Historic District. Designated March 26, 1985
- 210 East 62nd Street, Manhattan. Part of Treadwell Farm Historic District. Designated 12/13/1967
- Walton House Condominium: 264 Water Street, Manhattan. Part of South Street Seaport Historic District. Designated 07/11/1989
- 46 Dover Street, Manhattan. Part of South Street Seaport Historic District. Designated 07/11/1989
- 424 Atlantic Avenue, Brooklyn. Part of Boerum Hill Historic District Extension. Designated 06/26/2018
- 194 Columbia Heights, Brooklyn. Part of Brooklyn Heights Historic District. Designated 11/23/1965
- Row on corner of 6th Avenue & West 10th Street (101-109 West 10th Street): Part of Greenwich Village Historic District. Designated 04/29/1969
- 175 Stratford Road, Brooklyn. Part of Prospect Park South Historic District. Designated 02/08/1979
- 1000 Ocean Avenue, Brooklyn. Part of Ditmas Park Historic District. Designated 7/28/1981
- 139 Greene Street, Manhattan. Part of Soho Cast-Iron Historic District. Designated 7/14/1973
- St. Luke's Evangelical Lutheran Church: 259 Washington Avenue, Brooklyn. Part of Clinton Hill Historic District. Designated 11/10/1981