

**Submission Regarding Certificate of Appropriateness for
375 Lafayette Street/20 Great Jones Street
LPC-26-07016**

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Village Preservation submits the following testimony regarding the Certificate of Appropriateness application for a new building at 375 Lafayette Street/20 Great Jones Street, to be heard on March 10. While we certainly believe construction on the site of this parking lot is appropriate, the scale of the proposed structure, the repetitiveness and monotony of the design, and the lack of detail and variation more typical of structures in this district means that the current application falls well short of the standard of “appropriateness” required for approval by the Landmarks Preservation Commission. We believe there are multiple serious deficiencies in the proposed design necessary to create a harmonious relationship between it and its surroundings which we urge the Commission to address. These include:

- **The scale of the proposed building, particularly on Great Jones Street.** Reaching about 220 feet to the top of the very substantial mechanical elements, the scale of the proposed building is almost entirely unprecedented within the NoHo Historic District, and especially within the extension within which this site lies. The applicant cites 770 Broadway as precedent, though that by contrast is a full block building bounded by three major thoroughfares (Broadway, 8th Street, and Fourth Avenue) and located adjacent to two subway stations and multiple subway lines on



***(Top to bottom):
Images of the four 4-
story rowhouses and
the 8-story loft building
which previously stood
on the Great Jones
Street portion of the lot;
an image of the 9-story
building which stood on
the Lafayette Street
portion of the lot with
the rowhouses on the
site to the right, with
the outline of the new
proposed building
superimposed on top.***



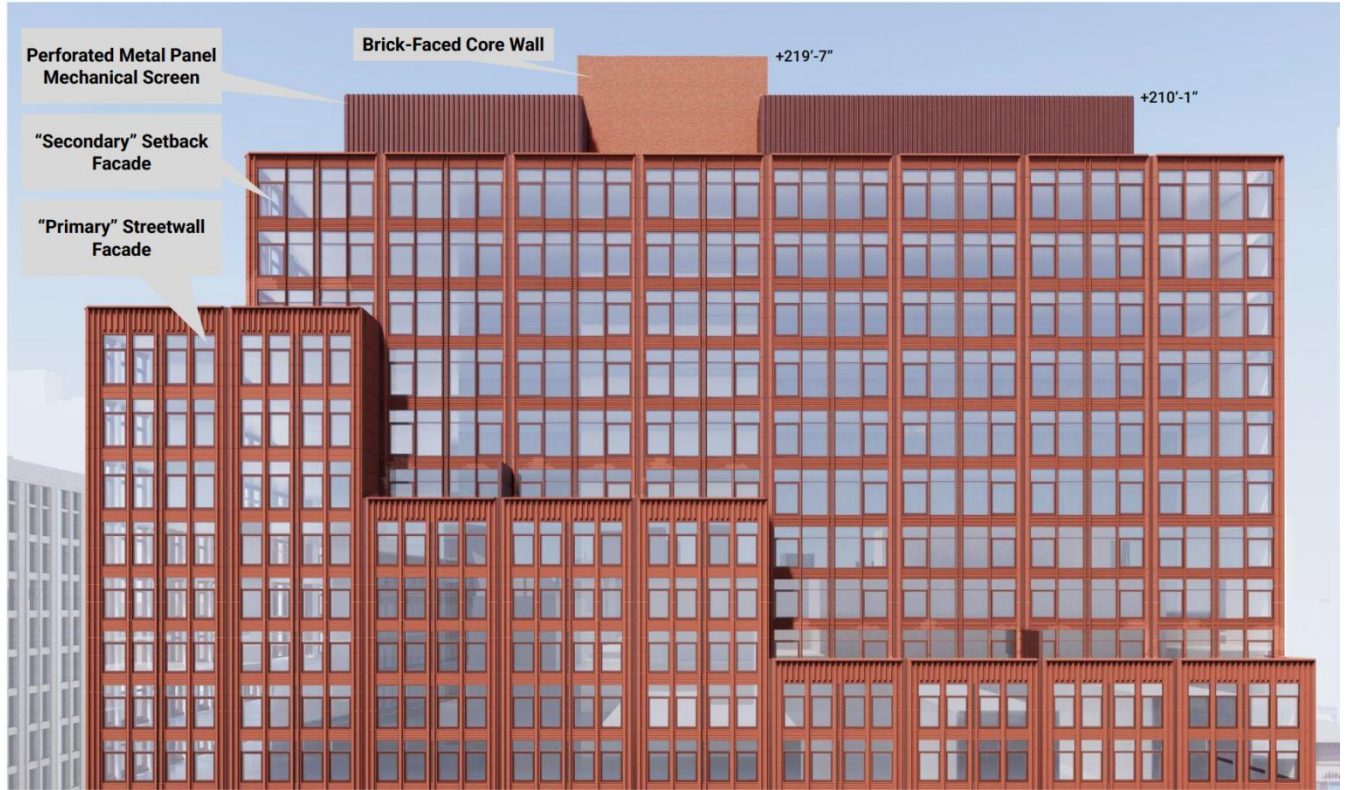
either side. The only other building within the historic district even approaching this height, the former “Merchant Building,” is located on Broadway (at no. 693) — a wide, major thoroughfare of a vastly different scale and character than Lafayette Street or Great Jones Street. But even on Broadway, a building of this height is an outlier, as within the Historic District the average building height along Broadway is closer to 100 feet. On Lafayette Street, within the historic district, the tallest building does not exceed about 160 feet, while most are between 45 and just over 100 feet tall. On Great Jones Street, where the proposed building would reach its full height, no building exceeds about 125 feet in height, and it should be noted that those rare exceptions are at the intersection of Broadway and Lafayette Street. Along most of Great Jones Street, including the section where most of the façade of this building would be found, few buildings exceed 80 or so feet in height, and most are substantially shorter.

It should be noted that the structures which historically stood on this site were a 9-story building at the corner of Lafayette Street, a narrow 8-story building directly east of it, and four 4-story row houses to its east along Great Jones Street. That range of heights and variation of forms is typical of the district, especially along Lafayette Street and Great Jones Street. The proposed building would turn that on its head, visually creating a single massive building of more than double that height along Lafayette Street, and of more than quadruple that height along Great Jones Street.

When the Landmarks Preservation Commission designated the NoHo Historic District Extension, it quite intentionally included this future development site to ensure that the Commission had oversight over its design, to guarantee its compatibility with the broader historic district. While the zoning for the site may have changed in 2021, the Commission’s obligation to oversee development of the site and be certain of its appropriateness for the historic district remains unchanged. That responsibility includes ensuring that the scale, as well as the materials, fenestration, and other details of the exterior are compatible with their surroundings. The current proposal has a long way to go before it can meet that standard.

We recommend a significant reduction in the height of the building along Lafayette Street, and an even more significant reduction along Great Jones Street, especially as the building extends east to meet the much lower-scaled existing structures within the district on the north side of the street. This includes the individually landmarked Engine Company 33 at 42 Great Jones Street (1899, Ernest Flagg), and the much lower-scaled existing structures within the historic district the new structure will face on the south side of the street. **A stepping down of the building along Great Jones Street would help address many of these issues.**

- **Monotony of Primary Facade Designs and Lack of Appropriate Detail.** The problems of the overwhelming scale of the proposed building are compounded by repetitiveness and lack of necessary detail and variation in the design. The proposed design appears monotonous, and lacks the variation in color, detail, texture, fenestration, depth, and



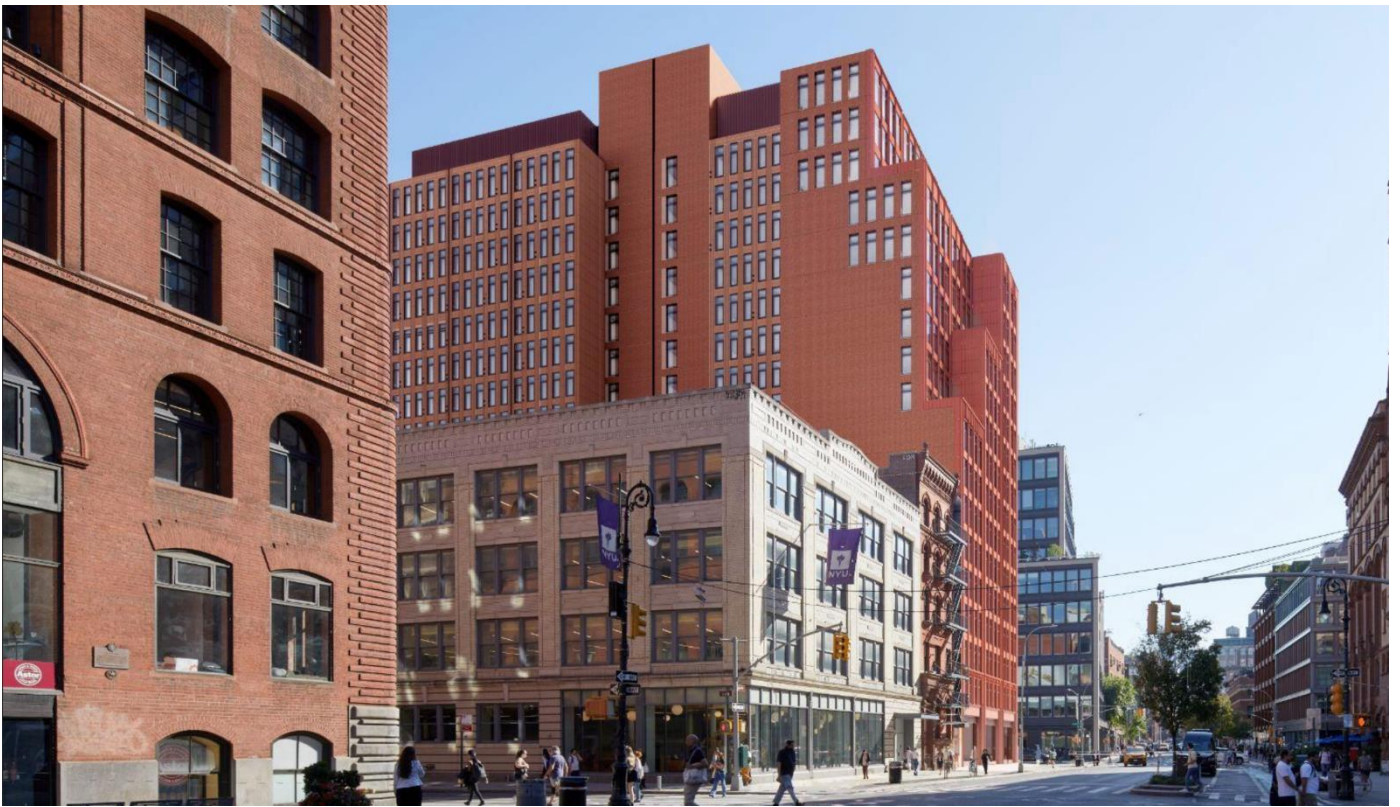
36 nearly identical window bays



rhythm of elements that typify buildings in the district. For example, the use of 36 nearly identical bays of windows along Great Jones Street creates an overwhelming sense of monotony and exacerbates the problems of the scale of the building.

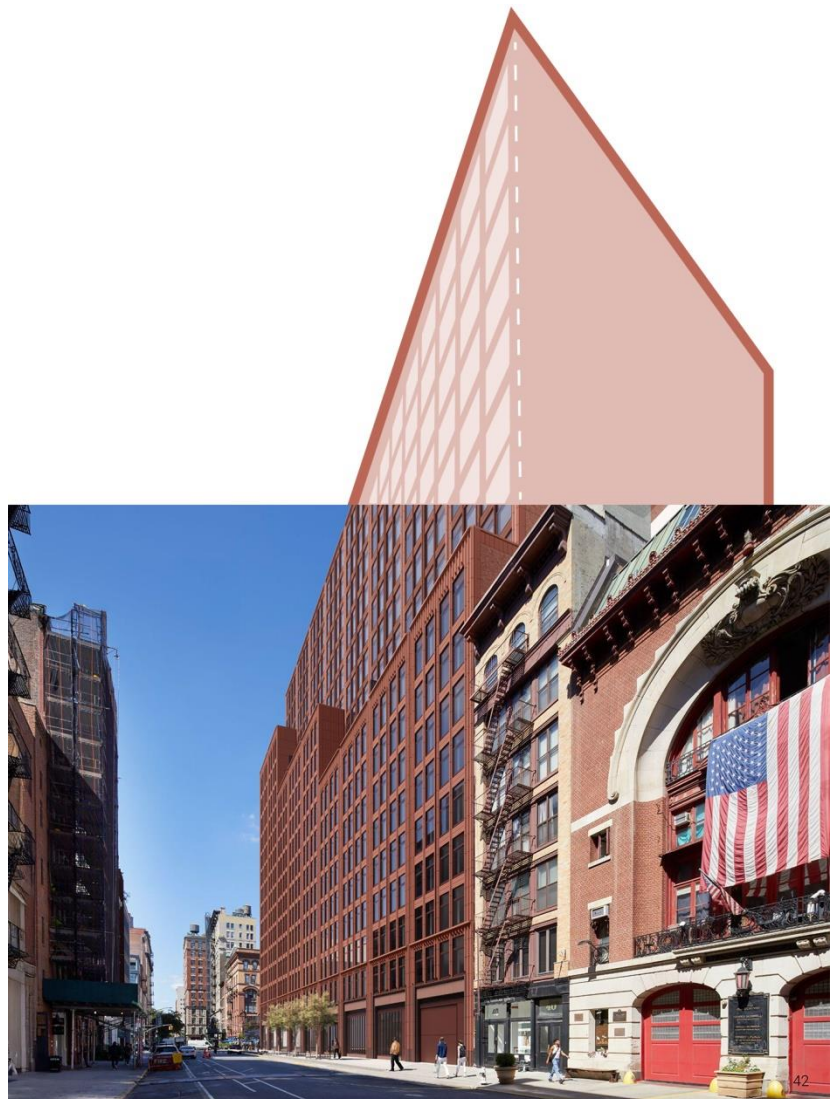
There is no lack of ways in which this problem could be addressed, but we would point to a few possibilities that should be considered:

- The proposed design lacks a real cornice, though the applicant regularly refers to there being one. Its existence is barely perceptible. A robust cornice element at the top, as well as potentially at other key elevations of the facade, would help break up the facade and allow it to meet the sky in a more appropriate and visually satisfying way.
- This is actually two buildings (so split to avoid wage requirements for laborers employed on constructing buildings over a certain size) masquerading as a single, enormous building, with a 228' frontage along Great Jones Street. Ironically, the design would benefit enormously from being broken up into two or more pieces along Great Jones Street, to help reduce the scale and add the variation needed but lacking here. Whether that is done by actually making the development appear to be two or more separate structures, or simply to more clearly differentiate sections of the facades, that long facade should read as if it has multiple clear sections. Larger buildings in the district consistently do so, and the multiple smaller, narrower buildings found on streets in the district read this way when viewed as part of a visual sweep as broad as a site such as this.
- The lack of variation in color, materials, and depth of the facade is completely atypical for larger buildings in the district, and contributes to its sense of overwhelming, monotonous, unrelieved mass. The minimal variation from base to the top of the building is also a weakness, and the design would benefit from greater distinction between sections as the facade rises. It's entirely unprecedented to have a building in this district, particularly of this scale, where the color, materials, fenestrations, depth, and window arrangements are so unvaried throughout the facade.
- **Highly visible and problematic rear facade.** While simpler and more utilitarian rear facades are quite common in this district and throughout New York, few would be as visible as this one, due to the low-rise buildings directly to the north of the site, and few would be as troubling in their oppressive visual presence. The rear facade of the building looks institutional at best, resembling a large hospital, with a monolithic quality and lack of detail that makes the main facade seem joyous and varied by comparison. The utter lack of detail or variation on this facade that will be visible for some distance to the north on Lafayette Street, as well as along East 4th Street, does a great disservice to the district, and should be addressed.



Top: Renderings of the rear façade of the proposed building from the application.

Bottom: Rendering of the view of the proposed building from the east, as shown in the application, with the missing outline of the side wall of the building superimposed.



- **Lack of details on or rendering of highly visible east wall of building.** The application offers no details on, and provides no renderings to show, the east wall of the building, which will rise about 120 feet above 40 Great Jones Street to its east, and be highly visible from within the historic district along Great Jones Street looking west, including above the individually landmarked Engine 33 at 42 Great Jones Street. This will either be an entirely or nearly windowless wall, as it adjoins the neighboring lot and has no arrangement allowing for lot line windows. While blank or nearly windowless walls are not unprecedented in this district or elsewhere, the scale of the wall is highly unusual, and its visual impact no doubt will be profound. The lack of any detail on its treatment is troubling, especially as any blank wall here would almost certainly be an unwelcome visual intrusion into the district. **For these and other reasons outlined above, we strongly urge the Commission to consider requiring the new building to step down considerably as it moves east, to reduce the size and visibility of this wall, as well as to make the scale of the building more compatible with its neighbors on Great Jones Street.**

We also wish to make sure that the Commission is aware of several important factors regarding the planned housing for the site, since while technically outside of the purview of the Commission, these elements are nevertheless being used by supporters of the plan to demand approval of the proposed project unchanged. First, the amount of housing included in the proposed building is significantly greater than the amount projected in the Environmental Review for the SoHo/NoHo rezoning. Thus this could be a significantly smaller building (including with less generous floor to ceiling heights) while still providing all the housing projected for the site in the city's rezoning analysis. Second, while 25% of the residential square footage of the building will be set aside for what it calls "affordable" units, it's important to understand what that actually means. Those units will require occupants to have incomes that are 60% of Area Median Income, or AMI, and the rents will be calibrated as "affordable" to those income levels. However, 60% of AMI is higher than the median income for NYC renters, who will be occupying these rental units, meaning they will be unaffordable, and off limits, to the majority of New York City renters. **So while those 25% of units will certainly be cheaper than the ultra-expensive units which found in the other 75% of the building, they will still be unaffordable and inaccessible to most NYC renter households, the exact population they are supposed to serve.**

In conclusion, construction at 375 Lafayette Street/20 Great Jones Street will no doubt be the single most impactful development in the NoHo Historic District and District Extension throughout its existence. It's critical that it be done right. We strongly urge you to consider major changes to the proposed scale and design of the development here to ensure that they achieve harmony and compatibility with their historically designated surroundings.