



May 24, 2018

Hon. Meenakshi Srinivasan, Chair
New York City Landmarks Preservation Commission
One Centre Street, 9th Floor
New York, NY 10007

Re: LPC-19-25099; 1 East 70th Street and 10 East 71st Street; The Frick Collection

Dear Chair Srinivasan,

I write on behalf of The Cultural Landscape Foundation (TCLF) in response to the current proposal to expand the landmarked Frick Collection and Frick Art Reference Library (FARL) buildings located within the Upper East Side Historic District. While the current proposal is a tremendous step forward from the previous proposal of 2014, having reviewed the relevant plans and renderings that are now before the New York City Landmarks Preservation Commission (LPC), it is clear that some aspects of the expansion would adversely affect the integrity of the Russell Page-designed viewing garden on East 70th Street, a rare public commission undertaken by Page and his only design in New York City.

TCLF has long been active in advocating for the Page garden's stewardship, having played a key role in efforts to save the garden in 2014-15, when plans to demolish it were successfully averted in the wake of a public outcry. Now, once again, this significant garden by the influential British landscape architect—one of his “most important works,” according to the *New York Times*—is the subject of heated debate, and before considering any treatment of the garden, its significance and historical integrity must be fully ascertained.

First and foremost, TCLF believes that the Frick's Page garden is a strong candidate for National Historic Landmark (NHL) designation with significance in landscape architecture (one notes that of the 2,800 NHLs in the United States, fewer than 70 are designated for significance in landscape architecture). As a potential NHL-caliber work of landscape architecture, the highest standards of historic preservation should be applied to the garden, which is the design of a master practitioner nested within an already existing NHL-designated property.

To take such a careful approach, one must ask: Should the period of significance for the Frick property be revised to include an important and iconic landscape that still possesses a high degree of integrity, as part of the current expansion plans? And as those plans come before the LPC, can the stewards guarantee that, after the treatment work is done, and the garden occupies an enhanced, central position within the property (seen from the overlook in the gift shop, entrance, and café), it will still possess its historic integrity? Will it still be NHL-eligible, or will alterations to the garden or the removal of some features mean that it no longer possesses sufficient integrity relating to the period of significance, which serves as a baseline for any effort to prescribe Reconstruction as a proposed treatment?

In an [article published](#) on May 17, 2018, TCLF highlighted the particular threat posed by the expansion to key contributing features of the garden's design, namely the several elements along the garden's northern perimeter that together form a display of unusual genius. When faced with the small dimensions of the constricted plot (54' x 76'), Page created an innovative composition of living and non-materials to defy the landscape's physical strictures. The wall along the northern perimeter of the garden was furnished with four blind windows and a door, creating the illusion of a space beyond the enclosed area. Page then placed an elevated planting box above

and behind the wall to contain tall trees and other plantings, effectively screening the towering façade of the FARL to the north and adding to the illusion of depth by implying a green space farther in the distance.

This inventive layering of trees, plants, and faux architectural elements together form a living *trompe l'oeil* that is unquestionably a significant feature of the garden's original design. Its historicity is confirmed by the 1977 press release issued by the museum when the garden opened, which noted that "A staggering row of Bradford pear trees and shrubs has been set in an elevated planting box installed behind the garden's north wall in order to screen the rear wall of the Frick Art Reference Library, which rises above 71st Street." Moreover, in a 1978 essay in *House & Garden* titled "The Shaping of a Garden," Page wrote with characteristic modesty about his solution to the fundamental problem posed by the site: "...a flat formal pattern would produce a sunbaked room furnished solely with a carpet, when what was intended was to distract attention from the high buildings to the north. So first I set a planter 60 feet long; 5 feet wide, and 4 ½ feet deep, on steel framework behind the top of the north wall."

In a recent [letter to the Frick's Board of Trustees](#), the esteemed landscape architect, educator, and National Medal of Arts winner Laurie Olin advised that any action to alter or remove these key features along the northern perimeter of the garden would be "a grave mistake" and would "destroy the design composition." Further noting the garden's special attributes and its status as an exemplary teaching tool, Olin wrote unequivocally that these key features of Page's original design "are not expendable."

The current proposal to expand the Frick's facilities would remove the elevated planter and incorporate the FARL into Page's north garden wall. The fenestrated façade of the new building would reveal the presence of people and objects in the near distance, destroying the *trompe l'oeil* effect of the original design. Such a dramatic change to the illusory qualities of the space would be magnified by the reflection of the new façade in the garden's singular, central water feature.

As stated earlier in this letter, the potential adverse effects of the proposed expansion underscore the fundamental need to revise the Frick Collection's National Historic Landmark designation (2008) to recognize the garden's importance and expand the property's classification to reflect significance in landscape architecture. The current NHL listing for the Frick ignores the garden entirely, citing 1914, 1919, and 1935 as the only significant dates associated with the property. But if, as TCLF asserts, the Page Garden currently retains a high degree of design integrity and is eligible to be listed as a contributing feature in the Frick's 2008 NHL designation, the only way to guarantee its continued eligibility after the proposed expansion is to establish a formal period of significance for the garden itself. The expanded period of significance for the overall property should include the design of the garden in the 1970s, as well as Page's continuing involvement with the garden and his subsequent influence on it.

Only when armed with further knowledge and a definitive period of significance for the garden could efforts to reconstruct it proceed in a responsible manner. Such efforts must align with the "Standards for Reconstruction and Guidelines for Reconstructing Cultural Landscapes," as outlined in the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Those stringent standards alone govern the aspects of a treatment necessary to "re-create an entire non-surviving landscape with new material."

In his July 30, 2014, article “The Case Against a Mammoth Frick Collection Addition,” *New York Times* architecture critic Michael Kimmelman wrote that “Great public places and works of landscape architecture deserve to be treated like great buildings.” If that is true, then any plans to expand the Frick’s facilities must be highly attentive to the Russell Page-designed garden in the museum’s care, and the LPC must be highly vigilant in its oversight of those plans.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'C' followed by a smaller 'B' and a long horizontal line extending to the right.

Charles A. Birnbaum, FASLA, FAAR, President, CEO, and Founder
The Cultural Landscape Foundation