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Commissioner

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July 8, 2005

Kate Wood  
Executive Director  
Landmark West!  
45 West 67<sup>th</sup> Street  
New York, NY 10023

RE: Comments on Draft National Register Nomination  
2 Columbus Circle  
New York County, NY

Dear Ms. Wood:

I want to thank you and John Kriskiewicz for sending the draft National Register nomination and accompanying maps, plans, and digital photos for 2 Columbus Circle (2 CC). These were received electronically and logged in on March 28<sup>th</sup>.

While your draft nomination begins to raise many important points about the potential significance of the building and its architect, Edward Durell Stone, it does not meet National Register documentation requirements. It is the opinion of the State Historic Preservation Office that the document does not successfully argue for the exceptional significance of the building. I have closely reviewed the nomination and supporting documentation and offer the following comments.

### **Section 7. Description**

#### *Materials*

Please add red granite under "Other."

#### *Paragraph 16*

Please note the ceiling heights of the main galleries and those of the secondary galleries.

#### *Paragraph 20*

While you note that floors six and seven were devoted to storage and museum offices you need to add a brief description of the floor plan and materials. Also note whether or not these floors have undergone any major changes.

#### *Paragraph 22*

This paragraph offers a rather general comment on integrity issues at the interior. As you describe each floor of the building please provide more specifics on what remains of the original materials versus new materials, and alterations and their dates. For example, are

the original wall finishes of the main galleries intact or are there areas where the paneling has been removed? What remains of Abe Feder's original lighting scheme and fixtures? Have any of the original spaces been partitioned into smaller spaces?

### **Section 8. Significance**

I found your draft for Section 8 to be a bit disjointed making your arguments hard to follow. This is the part of the nomination that is the most challenging especially because 2 CC is less than 50 years of age. As you know, properties that have achieved significance within the last 50 years must prove to be of exceptional importance to be considered for listing.

In your introductory paragraph you note that the building was designed by American master architect Edward Durell Stone. While it is true that Stone was certainly a significant, prolific, and sometimes controversial twentieth century architect you did not provide critical analysis and context to back up your argument for Stone as a "master."

You mention that Stone was influenced by Frank Lloyd Wright especially after his visit to Taliesin "that solidified his ties to Wrightian design philosophy" but you give no in-depth explanation of how Wright affected Stone. How was Stone inspired by Wright's designs?

The section on Stone's work, especially the post World War II buildings, needs to be expanded. While you discuss Stone's use of ornamental screens, very little is said of his interest in arcades. I agree with your statement that 2 CC was designed to be complementary to its urban context and that it exhibits qualities of good urbanism rare for its time. Was this typical of Stone's post-war designs or an anomaly?

I agree with your thesis that 2 CC "is a pivotal work which questioned the orthodoxy of the Modern Movement." This may indeed be one of the key arguments for 2 CC's exceptional importance but it should not be treated as self-explanatory. If this argument is to be made it needs to be put into the proper historic context. Context refers to all of those historic circumstances and factors from which the property emerged. Knowledge of the context permits us to understand the relative importance of the resource in question. The nomination must make a persuasive, direct case that the property is exceptionally significant within the post-war context. More background needs to be given on what was happening in American architecture in the mid-1950s to early 1960s that caused Stone to question and challenge the purity of modernism.

The contemporary critical analysis that you provide is not used to its best advantage by simply quoting from the critics. You need to offer an analysis of both the contemporary criticism and the retrospective criticism. One of the important aspects about the criticism is that the building appears to have caused a debate both at the time of its construction and today. It is not essential that the building be universally loved by the critics but was it seen as something that represented a new direction in post-war design? Is this building exceptionally important because it challenged the modernist orthodoxy? Just how provocative is 2 CC? This question cannot be answered without an

understanding of the context of Stone's work with that of other architects at the time such as Saarinen, Johnson, Rudolph, and Yamasaki. What do the periodicals of the mid-1950s have to say about this movement away from the austerity of Modernism and the embracing of more enriched and even playful, historicist based forms? Stone's own writings speak volumes to his interest in monuments of the past.

The National Register criteria specify that buildings must be significant at either the national, state or local levels. I recommend that you explore 2 CC's potential significance at the local level of significance by comparing it with other post-war buildings in New York City. Does it fit into any kind of stylistic group of buildings being built in New York at the time?

You make references to Modernism and Post-Modernism without offering any definitions or explanations of these movements. For example, if you say Stone's design for 2 CC challenged Modernism you need to explain to the reader what Modernism was and in what ways 2 CC departed from it.

A comparison of 2 CC with MoMA, the Guggenheim, and the Whitney might be an interesting avenue to explore. Was Stone creating something completely new in museum design for New York City? The use of wood paneled walls, parquet floors, and comfortable furniture gave the interior a much more home-like atmosphere. Specific information should be added on Huntington Hartford's art collection and how it was installed at the museum. When did Hartford become a patron of the arts? Are there other artistic endeavors he was involved in prior to his Gallery of Modern Art? How did Stone's design complement Hartford's collection of representational art? Did Hartford's Gallery of Modern Art create controversy by attacking the formalist aesthetic of MoMA as Stone's architectural design may have questioned the austerity of Modernism?

Delete the entire paragraph that discusses the Hartford's family involvement in preservation projects (Carnegie Hall and 2 CC). I also recommend that you delete "Building History Part IV – The Preservation Movement (1998-2005)" but you should include the pertinent retrospective criticism that has come out of this struggle.

### **Black and White Photographs**

I recommend that the following current-day photographs be used for the nomination: 1, 2, 3, 5, 6, 7, 8, 10, 11, 14, 19, 20.

In addition, there are a few views of the building that should also be photographed and included with the nomination:

- East façade
- South façade
- Detail of circular motif in sidewalk paving
- Overall view of lobby space showing elevator and stair
- Overall views of each gallery floor (floors 2-5)
- Overall views of storage floors (floors 6 and 7)

- Overall view of floor 8 showing bar/lounge space.

Two sets of black and white photographs are required (one for SHPO and one for NPS).

Photographs must be:

- Unmounted
- At least 3-1/2 x 5 inches
- Properly processed and thoroughly washed
- Labeled in pencil or photo-labeling pen.

Photographs should be labeled on the backs with the name of the property, county and state, and photo number. On a nomination continuation sheet list the name of the photographer, date of the photographs, location of the original negatives, photo number, and a description of the view indicating direction of the camera.

In addition to photographs showing the current day views of the building, you may include prints of historic photographs such as PH 9 and 18. These will need to be properly labeled and their source noted as well.

### **Maps, Plans and Sections**

Please provide hard copies of all of the maps, plans and sections, and indicate the source of the map or drawing, scale, north arrow, and date. Please note on the current day Sanborn map the nomination boundary with a dark line. Exclude from the Sanborn your notation "project site" and the arrow.

As discussed, our office will provide the USGS map and the UTM points.

### **Property Owner Info**

Please fill in the property owner information on the form including a contact, address and phone number.

### **Letters of Support**

Letters of support for the nomination of 2 CC to the Registers should be included with the document.

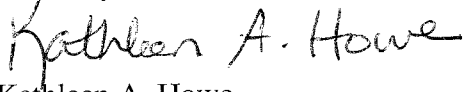
### **Formatting**

As you make revisions to the nomination please check the formatting. When I printed out your draft an extraneous header appeared at or near the bottom of each page. You can delete this header since the document is already set up with a header indicating the section and page number and the name of the resource.

I believe that I previously sent you copies of the Whitney Museum and Guggenheim Museum nominations which serve as useful models of organization for you to follow as you begin to edit the nomination. Let me know if you don't have these and I'll send them along to you.

I hope that you find our comments on the draft helpful and that they provide some guidance on how best to proceed. Please give me a call at 518-237-8643 extension 3266 if you need any additional clarification.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen A. Howe". The signature is written in black ink and is positioned above the printed name.

Kathleen A. Howe  
Historic Preservation Specialist

cc: John Kriskiewicz