



**Greenwich  
Village  
Society for  
Historic  
Preservation**

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December 20, 2006

Christopher Santulli, P.E.  
Manhattan Borough Commissioner, Department of Buildings  
270 Broadway, 3<sup>rd</sup> fl.  
New York, NY 10007  
via e-mail to [christophers@buildings.nyc.gov](mailto:christophers@buildings.nyc.gov)

**Re: 246 Spring Street**

Dear Commissioner Santulli:

I am in receipt of your letter from earlier today regarding the Department's decision to lift the stop-work order for this site. I appreciate the information you have provided. However, I must register my strong objections to the Department's decision, which does not conform to the guidelines prescribed by the State Environmental Quality Review Act (SEQRA) and the City Environmental Quality Review (CEQR).

The Department's plan as outlined in your letter does not include several key steps which would be required by SEQRA/CEQR. There should be a formal evaluation of the significance of the archaeological resources on this site, (in this case a historic burial ground) which would inform how those remains would be treated, including the possibility that the project would have to be redesigned in order not to disturb the archaeological site. No such evaluation has yet been given, or shared with the public. Further, the Department has not presented any evidence that other potential archaeological resources such as any connection to the Underground Railroad have been researched and evaluated.

As you know, had this developer been required to apply for a zoning change for this site, as the Greenwich Village Society for Historic Preservation and scores of other groups from across New York City have urged, the archaeological resources would have been discovered before work had begun, they would not have been disturbed and possibly destroyed as they have been in this case, and work would not be allowed to continue until and unless all resources were fully evaluated and a plan for their preservation on-site, or relocation in a manner commensurate with their historic significance off-site, were implemented. It is a shame that this has not taken place in this case and, according to your letter will not be taking place. As a result, the historic significance of this burial ground will not be fully evaluated, and the strong possibility of other archaeological resources on-site will not be explored, the possible consequences of which cannot be measured.

I strongly urge the department to reconsider yet another decision which will so highly favor this developer at the expense of the public interest and the public processes which were intended to protect it.

Sincerely,

Andrew Berman  
Executive Director

Cc: City Planning Commission Chair Amanda Burden  
Department of Buildings Commissioner Patricia Lancaster  
Landmarks Preservation Commission Chair Robert Tierney  
New York State Historic Preservation Office  
Office of Lieutenant Governor-elect David Patterson  
City Council Speaker Christine Quinn  
Manhattan Borough President Scott Stringer  
Congressman Jerrold Nadler  
State Senator Tom Duane  
Assemblymember Deborah Glick  
State Senator-elect Bill Perkins  
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National Trust for Historic Preservation  
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Municipal Art Society  
New York Landmarks Conservancy  
Historic Districts Council  
Schomburg Center for Research in Black Culture  
African Burial Ground  
Weeksville Society  
Christopher Owens