

October 25, 2018

Sarah Carroll, Chair
NYC Landmarks Preservation Commission
1 Centre Street, 9th Floor
New York, NY 10007

**Re: Ernest Flagg House, Gatehouse and Gate Development Proposal
Staten Island, NY**

Dear Ms. Carroll:

We write to inform you of our issues and concerns associated with the referenced proposal currently under review by the Landmark Preservation Commission (LPC). These include public safety, quality-of-life, property values and emergency response access concerns.

We understand the purpose of the Landmark Law and the responsibilities of the Commission.

It is our belief that the planned changes to the site may not be appropriate, given the character and style of the mansion and the surrounding community. We also believe that this proposal, with the new construction, has the potential to destabilize neighborhood property values and become a detriment to the community itself.

Further, public entry to the proposed driveway assumes vehicular access from existing substandard streets. Access from the northeast is from unmapped streets known as The Oval and Northentry Road. Both streets-of-record are 22'-25' in width and may not meet Fire Code requirements for access. The proposed 38' wide driveway situated on the southwest portion of the site can be accessed from Flagg Place, a 50' wide mapped street, which is only constructed to half its mapped width. The driveway continues northeast and connects to the aforementioned substandard record streets.

We believe that the Commission should not review this proposal until the New York City Fire Department (FDNY) has signed off on the access – which we believe to be sub-standard - currently being proposed. We also note that the proposal for the new buildings to be accessed from an unmapped driveway (assumed to be a street) to each proposed front entrance will be subject to General City Law §36 (GCL36). GCL36 compliance requires a mapping action or in the alternative, a New York City Board of Standards & Appeals (BSA) approval to obtain final certificates of occupancy. The applicant has acknowledged this requirement but plans to address it only after the LPC approval is obtained. We believe that review will be far too late once the Commission has decided on this proposal.

It is our understanding that an LPC hearing has been scheduled for October 30, 2018. The proposal to restore the previously landmark-designated Ernest Flagg House and reconstruct original components of the mansion is being considered, under this proposal, in conjunction with the construction of nineteen (19) new residential structures accessed from a new driveway on the related Landmark site of the Ernest Flagg House, Gatehouse and Gate. These new buildings will serve as the economic engine supporting the application.



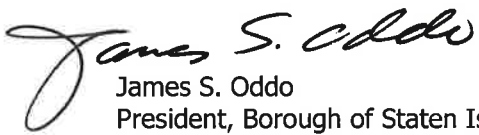
Therefore, we ask that the LPC wait until after the FDNY and Department of City Planning (DCP) has completed the review of an acceptable site plan before hearing this proposal. We also ask that the size and scale of each home be reviewed in the context of the other residences previously reviewed and constructed with LPC & DCP approvals on the Flagg site. In previous iterations of those LPC reviews, the site plan and size of the proposed structures was an important part of the review process.

We have an opportunity to get this right. An opportunity to find a balance that will protect and enhance a significant building and its site, while also providing the highest level of public safety, respecting the quality of life for existing residents and sending a clear message that the review processes of multiple agencies cannot be manipulated for a preferred outcome.

We are strongly opposed to this latest attempt to move forward with a project that has not been fully reviewed for compliance with all applicable rules. We hope we can count on the LPC to recognize these concerns.

Please accord this request every consideration consistent with your rules and regulations. Thank you for your kind attention regarding this important community issue.

Sincerely,


James S. Oddo
President, Borough of Staten Island


Steven Matteo
Minority Leader, New York City Council