

May 2, 2018

Margery Perlmutter, RA, Esq., Chair  
NYC Board of Standards and Appeals  
250 Broadway, 29th Floor  
New York, NY 10007

**Re: BSA Cal #2017-596-BZ  
1321 Richmond Road  
Staten Island, NY**

Dear Chair Perlmutter:

We write in opposition to the variance request filed under BSA Cal #2017-56-BZ for the referenced location. We have received a great deal of vocal and written opposition to this project from the local community, and a considerable number of inquiries about potential negative impacts from neighbors who travel along Richmond Road, which is an arterial street, on a daily basis to and from their workplace.

The steep-sloped site is zoned R1-2, with topography rising from Richmond Road up to the rear property line. It is worth noting that it has become commonplace for property owners to file for variances to deviate from the permitted uses, building types and density along the base of steep slopes. We are concerned that by continually granting variances where "practical difficulties" or "unnecessary hardships" are alleged, we are creating adverse conditions for the surrounding community, and ultimately altering the essential character of the neighborhood.

The efficient processing of vehicles along Richmond Road is essential in maintaining the neighborhood's character. The approval of multiple applications along this corridor affects vehicle throughput, impairs the appropriate development of neighboring properties and creates a trend that is detrimental to public welfare.

Despite the fact that the topography and unique underlying soil conditions are somewhat consistent from the top of the slope to the base, it seems we only see variance requests for the base locations. When the steep slope is accessed from the top, the owner preserves the slope and constructs a complying use. However, when access is from the base, the owner proposes a variance citing practical difficulties in constructing the same complying residence that is built at the top of the slope. I believe that it is only logical to treat both areas the same way. In most instances, the same one-family detached home could be constructed, with minimal impact to the natural features, whether it is at the top or bottom of the slope.



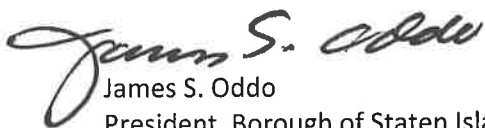
We believe that a conservation-focused approach to development of steeply-sloped sites is indeed challenging, but certainly not unique, narrow, shallow or peculiar to the Borough's Mid-Island Escarpment Areas. We also believe that the R1 zoning district regulations offer the most predictability for the surrounding community. Just because a property is accessed from the base of a slope shouldn't change the rules or predictability relied upon by the community to protect their quality of life and their investment. Some of the highest valued properties in our borough have been developed without the need for use or bulk variances along all sides of the escarpment spine. For these reasons we oppose a variance that will permit any other building typology beyond the permitted one family detached dwelling.

The community has never supported a variance at the top of the slope and the same community has clearly articulated its opposition to this filing at the base. To that end, we will continue to identify and oppose projects like this, projects that will further erode our quality of life, compromise public safety and handicap the preservation of our dwindling natural features throughout Staten Island. We hope that the Board recognizes these quality of life concerns, the ongoing capital improvements along arterial streets, and the limitations of nearby substandard streets.

We ask that you and your Board accord our request every consideration consistent with your rules and regulations, while also clearly speaking for the people of Staten Island.

Thank you for your continued attention regarding this very important community issue.

Sincerely,



James S. Oddo  
President, Borough of Staten Island



Steven Matteo  
Minority Leader, District 50