



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

JUN 26 2007

Re: Nurses' Residence, Seaview Hospital, 460 Brielle Avenue, Staten Island, NY
Project Number: 18357
Taxpayer's Identification Number:

Dear

My review of your appeal of the decision of Technical Preservation Services, National Park Service, denying certification of the rehabilitation of the property cited above is concluded. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank you and your representatives, for conferring with me on May 7, 2007, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Nurses' Residence at Seaview Hospital is not consistent with the historic character of the property and the historic district in which it is located, and that the project does not meet Standards 2 and 5 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on February 21, 2007, by Technical Preservation Services (TPS) is hereby affirmed. However, I have further determined that the project could be brought into conformance with the Standards, and thereby be certified, if the corrective measures described below -- including those you proposed at the appeal in response to the denial letter -- are undertaken.

The Nurses' Residence was constructed in two stages, the western section in 1912 and the rest in 1932. It is a three-story masonry structure with a hipped roof and shingled dormers, smooth walls, wood double-hung windows, and reserved detailing throughout. On the interior, the building features long, double-loaded corridors, with a distinctive pattern of many dormitory rooms opening into the corridors, and various communal spaces on the ground floor level. Wood panel doors, transoms, plaster walls and hardwood floors are found throughout the interior. At the time of the rehabilitation the building was abandoned and deteriorated, but much of the historic material survived. In 2006 the building was certified as contributing to the Seaview Hospital Historic District in the National Register of Historic Places.

The project called for converting the entire structure into senior apartments, including adding apartment units to the basement and attic of the historic building. On the north elevation, the proposed work included excavating three below-grade terraces between the wings on the north elevation, introducing new doors and windows, enlarging some existing window openings, the creation of a new primary entrance and footbridge over the center terrace, and new railings on the porches. Proposed work on the south elevation included the creation of below grade terraces, a new entrance, connecting four pairs of dormers to increase the usable space in the attic, and the infill of a number of existing windows with spandrel glass and drywall. On the interior, the rehabilitation proposed to remove four staircases, relocate and reuse paneled doors in other locations, and alter the floor plans throughout. According to TPS, the proposed rehabilitation, as described in the Part 2 application, would result in the unacceptable loss of character-defining features and finishes described in the preceding paragraph.

At our meeting on May 7, 2007 you presented several revisions to the original proposal designed to address TPS concerns and to bring the project further toward meeting the Standards. The changes are described on page 9 of the packet submitted at the appeal. Exterior changes include removal of skylights from the project and retention of window trim along the perimeter wall. Other changes described below make unnecessary the lengthening of window openings to become door openings, and construction of the north elevation bridge. Changes to the proposed interior plan will render the spandrel glass window infill unnecessary.

I find that your revised proposal to eliminate the center below-grade terrace on the north elevation and to reconfigure the floor plans of the terrace level and first floor is an acceptable approach that addresses TPS concerns about changes to the historic window openings, introduction of a bridge, and alterations to the historic floor plans. Your revised proposal includes relocating the primary entrance to the south elevation beneath a new, modestly finished, drop-off porch. The revised proposal also reduces the amount of alteration to the floor plans by eliminating the need to create a large public entrance space, and permits the retention of the "Rumpus Room" in the 1912 section as an unpartitioned space.

I find that the railing design (drawing dated May 23, 2007) proposed for the terrace retaining walls matches the historic areaway railings that exist on the site today and are minimally intrusive. For these reasons I find that they are acceptable and in keeping with the standards. The landscaping proposal including hedgerow plantings along the terrace retaining wall described in your May 23, 2007 submission (sheets A1-12a and L-4) maintain the character of the site and help to screen the new terrace features and therefore are in keeping with the standards.

I find that the changes proposed to the first floor interior corridors will retain the historic character of the space as a residential dormitory with small individual rooms. Proposed work includes widening door openings where necessary to meet accessibility code requirements, with the new fire-rated doors to match the appearance of the historic doors but painted to differentiate them from the historic doors, the retention of historic doors (moved to the corridor side of the door stops and made inoperable, with the doorknobs and escutcheons replaced with a simple escutcheon), the introduction of continuous safety railings along both sides of the corridors and across the inoperable doors, as well as the retention of the historic transoms and trim throughout the corridors.

The revised proposal for the treatment of the Nurses' Residence that you presented at the appeal meeting left several issues included in the TPS denial letter unchanged. My decision in respect to three of these issues differs from the TPS decision. While TPS called for retaining all interior staircases, I find that the staircases were simple and utilitarian and not significant character-defining features. Thus, keeping two of the four staircases will be sufficient to indicate the historic configuration and appearance of the circulation plan between floors. Therefore I find in this instance that the removal of two staircases to be a minimally acceptable treatment. TPS also considered the addition of new railings at the porches to be contrary to the Secretary of the Interior's Standards. While the porch roofs will not be made into outdoor living spaces, I find that the introduction of a modest metal railing to meet New York code requirements will not change the character of these features to an unacceptable degree and will not cause the project to fail to meet the Standards. Lastly, I find acceptable the proposed plan to connect four pairs of the historic dormers with new construction, which TPS considered an inappropriate alteration of the roof, to be acceptable. Several pairs of dormers are already configured in this manner and, if undertaken as described in the project proposal, the change to the character of the roof will be minimal.

Though you have made substantial changes to the original proposal in order to address the concerns of TPS, and though I have found unchanged aspects of your project to be in keeping with the Secretary of the Interior's Standards, there remains one treatment in the proposed project that fails to meet the Secretary of the Interior's Standards for Rehabilitation. Your current proposed treatment for the historic corridors on floors two and three calls for removing historic doors, trim, and other detailing, and replace these features with new doors located only at the positions necessary to access new apartment configurations behind the corridor walls. I find that the loss of all dormitory room partitions behind the corridors is already a considerable concession by TPS that is only minimally acceptable. The additional loss of historic corridor features, including surviving materials and the regular rhythm of door openings along the corridor (which reveals much about the historic function of the building) would cause an unacceptable loss of historic appearance and character in these spaces. A visitor to these upper floors would have no sense that they were in a historic building. For these reasons I find that the currently proposed treatment for the second and third floor corridors, fails to meet Standard 2 and Standard 5. Standard 2 states, "*The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*" Standard 5 states, "*Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*"

While the project as proposed cannot be approved, I have further determined that the project can be brought into conformance with the Standards, and thereby achieve the requested certification, if corrective measures are undertaken to preserve significant portions of the second and third floor corridor features. Historic panel doors, transoms, and moldings should be retained throughout the corridors. Specifically, the corridors on floors two and three should receive the same rehabilitation treatment as is currently proposed for the first floor, as reflected in the drawing submitted on May 23, 2007, marked "ID-2."

If you choose to proceed with the corrective measures described above and to undertake all other work as described in the appeal materials and follow up submissions, you may apply for certification of the rehabilitation by filling out the enclosed Request for Certification of Completed Work and submitting it with photographs of the completed work to Technical Preservation Services, attention National Park Service. Note that this project will not become a "certified rehabilitation" eligible for the tax incentives until it is so designated by the NPS.

As Department of the Interior regulations state, my decision is the final administrative decision regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

Enclosure Part 3 Application

cc: SHPO- NY
IRS