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May 28, 2018

Chairperson Meenakshi Srinivasan  
NYC Landmarks Preservation Commission  
David N. Dinkins Municipal Building  
1 Centre Street, 9<sup>th</sup> Floor  
New York, NY 10007

Re: Frick Collection Proposed Expansion

Dear Chairperson Srinivasan,

I own the townhouse building located at 9 East 71<sup>st</sup> Street. I write to express my vigorous opposition to the Frick Collection's current application, which seeks to gratuitously and unnecessarily expand the size and scope of the existing appropriately-scaled complex of buildings. The proposed expansion, and the resulting new behemoth complex of mis-matched structures, is not at all consistent with the scale, style, character and historical integrity of the Frick Collection's existing mansion, gardens, grounds and other structures. The Landmarks Preservation Commission very mission and existence is to ensure that such a travesty never takes place within any of the City's many historically designated areas, much less in one of New York City's most unique, prized and cherished institutions and architectural treasures as the Frick Collection.

From its inception in the mid-1930's, the Frick Collection has always been conceived of as an intimate "House Museum" for the display of the Frick family's personal art collection in its original historical home setting. The original mansion and the associated "library" building have co-existed with their carefully-designed historical and architectural integrity intact since that time. Together with the Russell Page "viewing" Garden (added in the 1970's), this intimate complex of buildings, grounds and other architectural features have existed in elegant harmony and have been preserved and protected by prior LPC administrations. It now falls to this LPC Commission to ensure that the Frick Collection's historical integrity is not irreparably marred, destroyed and/or lost forever as a result of the current proposal.

The application should be rejected by the Commission for at least the following reasons:

- The Landmarks Committee (the "Landmarks Committee") of the New York City Community Board 8 (the "Community Board") has recommended disapproval for multiple reasons. They include:
  - The Frick Collection application provided hardly and details, such as actual proposed dimensions, site line studies and mock-ups of the proposed enlargements and instead consisted only of glossy drawings and carefully tailored "PR" pieces largely camouflaging the many legitimate

questions about the appropriateness of and necessity for the proposed expansions. Without such information, it is virtually impossible to meaningfully understand the true extent to which the proposed expansion will conform to the historical integrity of the landmarked properties;

- The Frick Collection’s programmatic needs (allegedly the need for additional gallery space and educational spaces) could be met through other alternatives that either involve no alteration to the landmarked buildings or substantially less dramatic alterations;
  - The proposed additions “are too large and not in scale with the landmark mansion or the Russell Page designed garden;”
  - The Russell Page Garden will not be fully preserved. Notably, the planting of trees across the north wall of the garden (an integral component of Page’s original design which not only shields the gardens from the structures behind it to the north, but also provides critical depth and color) is proposed to be eliminated. Additionally, the niches and trellises in the north wall are proposed to be replaced with windows. The entire look and feel of the garden will be irreparably changed, for no good reason.
  - While the existing one-story structure connecting the historical mansion to the more institutional library behind it to the east “does not detract from the mansion, the [proposed] two-story addition over the Music Room is very visible and extends the more institutional scale and character of the library into the sector of the mansion;
  - The proposed additions also “change[] the scale of the pavilion, and eliminate[] the high copper roof with its fan-like termination that was more in the family of the mansions roofs than the proposed shallow copper roof”; and
  - “The expansion of the mansion from the exterior is of a large house, [whereas] the proposed enlargements will change the character of the mansion and detract from the experience of the Frick Collection as a House Museum;” and
- Identifying precisely the same issues as those cited by the Landmark Committee, the full Community Board was similarly unable to pass a resolution recommending approval.
  - To my knowledge, the applicant has done nothing since mid-May (when the Landmarks Committee and the full Community Board took their actions) to address the concerns identified by those advisory bodies. The LPC should therefore reach the same conclusions.

- The Historic Districts Council has expressed similar concern over the proposed changes to the Russel Page Garden in its Testimony for LPC Hearing on May 29, 2018.
- The Frick Collection's proffered reasons for its massive expansion – the supposed need for additional gallery space and educational space – is very likely pretextual. In reality, the Frick Collection is looking to transform what has been historically preserved as an intimate “House Museum” into a massive commercial museum. Evidence of this intention can be seen in the proposal to include a professional food-preparation kitchen and café as well as the inclusion of a 220-seat auditorium. There is every reason to fear that the Frick Collection has intentions to host large-scale galas and events in the newly expanded space after museum hours. Not only would that materially change the character of this institution, it would also carry with it the attendant changes to the surrounding community with increased noise, congestion and nuisance.
- Even assuming the Frick Collection's claimed need for new gallery and educational space were sincere, there are existing alternatives to accomplish those goals without modifying the landmarked buildings. The second floor of the original mansion could be repurposed for gallery space by simply relocating the office and administrative functions to another off-site location, as is customarily done with museums. In fact, the building at 11 East 70<sup>th</sup> Street is currently vacant and on the market. It is tailor-made for this purpose. Similarly, additional space could be opened through below-grade excavation, without the need to alter and destroy the existing historically landmarked elements which make the Frick Collection what it is today.
- These (and other) alternative proposals have been clearly outlined in a design alternative put forward by Unite to Save the Frick, which worked with award-winning architect David Helpen. The LPC should challenge the Frick Collection to explain why its alleged programmatic objectives cannot be achieved without such massive and irreparable alterations to historically landmarked buildings.
- The proposed construction of a nearly 80-foot structure above the Music Room will materially destroy the view and obscure the light source for those viewing the property from 71<sup>st</sup> Street looking southward (and those from 70<sup>th</sup> street looking northward). Making matters worse, the new structure will clash architecturally with the original historic mansion to the west and the original institutional design of the Library to the east, with a resulting amalgamation that is as offensive to view as it is inconsistent with the scale and design of the historical landmarked complex.
- There has not been sufficient time, nor sufficiently detailed information from the applicant, for members of the public or members of the LPC to meaningfully evaluate the application. In fact, there has been *hardly any* meaningful community outreach. Instead, and alarmingly, the Frick Collection has proceeded with deliberate opacity in an attempt to steamroll its current proposal before

impacted members of the public can fully understand all of the details of the proposal and provide meaningful input to the LPC to assist it to make a fully informed and reasoned decision.

- The application was not filed until April 24, 2018, and yet less than a month later the application is scheduled for a public hearing on May 29, 2018. That is simply insufficient time for anyone (the LPC or the affected public alike) to rationally and deliberately vet the proposal. One must ask: what is the rush?

For all of these reasons, I believe that the LPC cannot possibly act on the Frick Collection's application at this time. It should, instead, demand that the applicant first fully respond to the concerns outlined in this letter and all other concerns raised at the May 29, 2018 public hearing. Until it does so, and until the affected public has the full opportunity to receive and react to the previously un-provided details, the public hearing should be "held open" and rescheduled for one or more future public hearings at which time these (and possibly other) issues can be intelligently vetted in a deliberative and transparent manner. That will ensure the LPC's ability to make a truly informed and sound decision while also ensuring that the public can have faith in a fair, transparent and interactive process.

Sincerely,

Jeffrey Epstein