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June 27, 2011

Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, NY 10007-1216

Att: Robert Dobruskin, AICP, Director

**RE: CEQR No. 10DCP003M
Proposed St. Vincent's Campus Redevelopment Project
Comments on Revised Draft Scope of Work Dated May 23, 2011**

Dear Mr. Dobruskin:

Community Board No. 2, Manhattan ("CB 2") submits the following comments on the revised Draft Scope of Work in connection with the ULURP application for the creation of a primarily residential development and new publicly accessible open space by RSV, LLC ("RSV"), and the development of a comprehensive health care facility to be owned and operated by North-Shore Long Island Jewish Health System ("NSLIJ"). CB 2 held a public hearing on the Draft Scope of Work on June 8, 2011. These comments are based on information received at this meeting and deliberations among the members of the CB 2 St. Vincent's Omnibus Committee, which is charged to review this project, and addresses points in each of the impact areas for environmental review under CEQR.

CB 2 points out that it is on record supporting the establishment of a full-service hospital to replace St. Vincent's, not a free-standing emergency department as proposed by NSLIJ, and although we are providing comments to this Draft Scope of Work, this in no way should be interpreted as an endorsement of the proposals by NSLIJ or RSV.

Thank you for your consideration of our concerns.

I. Project Description

- No comment

II. Land Use, Zoning, and Public Policy

- *Large Scale General Development Special Permit Details* - The Draft Scoping Document notes that the “special permit would allow for modification of height and setback and court regulations for additions to the existing buildings and for certain of the proposed buildings on the zoning lot.” Please provide complete details for these modifications.
- *Zoning Resolution Text Amendments* – The applicant is seeking a text amendment pursuant to ZR 74-743(a)(4) that allows a reduction in open space ratio requirements for LSGD’s in Manhattan Community Board 7, to be extended to include LSGD’s in our district. It is essential that a complete analysis be conducted for potential wide-ranging impacts in the entirety of CB2.
- *Expand Study Area Boundaries* – The impact of this project, the largest to be proposed in the history of the Greenwich Village Historic District, extends far beyond the ¼ mile perimeter for the Land Use, Socioeconomic, Historic Resources/Urban Design study areas and the ½ mile perimeter for the Schools and Open Space study area. We request that DCP expand the study area boundary to cover all or most of the Greenwich Village Historic District.
- *Concern about Completion Date* - According to RSV, the entire project will not be completed for four years (RSV states that the free Center for Comprehensive Care would be completed by 2014; the residential portion of the project would be completed by 2015 and the Triangle Site in late 2014). CB 2 is concerned that the completion date of 2015 is unrealistic for a project of this scale and that many of the conditions being examined in the Scope of Work have the potential to change significantly during if there are delays and requests that DCP take this into consideration.
- *Park Design, Open Space Design, Maintenance and Security* – CB 2 requests that the applicant examine the feasibility of the Park design and open space design, along with the maintenance and security of these spaces, being included and approved as part of the Special Permit and the Restrictive Declaration.
- *Unused Development Rights at O’Toole* - Under this proposal there will be significant unused development rights available at the O’Toole site. Please provide an analysis of environmental impacts that assumes a full build out under the current zoning at this site.
- *Public Policy* – CB 2 notes that the Historic Districts constitutes Public Policy. Our concerns are addressed below under “Historic and Cultural Resources.”
- *Concern about Future Projects in the Area* – NYC Transit is proceeding with the construction of an emergency ventilation fan plant in the Mulry Square area (Greenwich Avenue, W. 11th Street, and Seventh Avenue South) where the Seventh and Eighth Avenue subway lines intersect. This project could result in several years of construction, including street closings. The impact of this project alone on local residents, small businesses, traffic and the environment will be tremendous. CB 2 requests that DCP examine this project in connection with the Center for Comprehensive Care and residential complex and consider ways that their combined impacts on the community could be mitigated. Other major projects in the area that should be studied include: NYU 2031 Plan, new New School building at 65 Fifth Avenue, the Whitney museum’s future building at Washington and Gansevoort Streets, water tunnel project on Hudson Street, condominium conversion of Greenwich Village Nursing Home at Hudson and West 12th Street, the new GEM Hotel project at 52 West 13th St., and Spectra Energy’s proposed natural gas pipeline between Jersey City and the West Village.
- *Pending Zoning Actions* – NYU 2031 Plan.

III. Socioeconomic Conditions

- *Preliminary Assessment* – CB 2 is concerned about the impact of the addition of up to 450 units of luxury (market rate) housing to the area. One of the elements of the environmental review is to see if the project will bring "substantial new population with different socio-economic characteristics". The scoping documents rightfully acknowledge the potential for "significant adverse impacts" on residential and business displacement, and must provide a detailed analysis if the preliminary assessment indicates a need.
- *Lack of Affordable Housing* – Our foremost concern is indirect residential displacement of our most vulnerable populations. Already, there is a severe shortage of affordable housing in the CB 2 area, and the addition of a substantial number of market rate units will continue to put more pressure on this limited affordable housing stock, which we think has the potential to result in residential displacement, and therefore will substantially impact on the SES of the neighborhood. What is being proposed suggests a luxury compound, instead of playing an active supporting role in maintaining an appropriate balance of housing stock in a community renowned for its diversity. We ask that there be a specific analysis of the socio-economic impact of an alternative that includes 30 percent of the housing designated as affordable, which should be defined as in the bottom fifth of incomes in CB2, or the bottom fifth of incomes in New York City.

IV. Community Facilities and Services

- *Assessment of Service Delivery of Proposed New Health Care Facility* - St. Vincent's Hospital and its emergency room played a critical role in providing health care not just to the Greenwich Village community, but to neighboring communities as well. Therefore, it is essential that this study include a full analysis of how this project affects the meeting of the community's health care (including emergency health care) needs. Such a study should include whether these needs can be addressed on the St. Vincent's site (including O'Toole) or in another reasonably nearby location. While those urging the position that a new full service hospital be part of the overall St. Vincent's plan have not identified to CB 2 any entity willing to operate such a hospital, the Department of City Planning, with its resources, should undertake an effort to see if any such entity can be identified.
- *Increase Estimate of School Students* - The Draft Scope of Work projects the introduction of approximately 80 elementary, 27 middle, and 40 high school students for 450 units of housing. CB 2 thinks this projection is far too low, notwithstanding the student generation ratios provided in the *CEQR Technical Manual*. It is widely acknowledged that DOE consistently underestimates the need for school seats. For the past three years, both local elementary schools in the immediate area have had wait lists for kindergarten, and it should be noted that there are currently no middle or high schools. An Educational Needs Assessment being planned by CB 2 will help us better understand the real situation.
- *Mitigation for School Needs* - We commend RSV for their efforts two years ago to use their influence to broker a new 500+ seat elementary school in the Foundling Hospital, scheduled to open in 2017. It must be noted that this school is now in the NYC DOE capital plan, and is fully funded by the SCA. This does not qualify as mitigation for this project. Therefore, we ask that the applicant study the possibility of supporting our district's education needs, such as the acquisition and renovation of the State-owned facility at 75 Morton Street for a school.

- *Day-care are and Preschool* - CB 2 requests that DCP examine the impact of the project on pre-school and day-care seats (public and private) given the current critical shortage in the area.
- *Relocation of Physicians' Offices* – CB 2 is concerned about the impact to the local community of the relocation of the ambulatory care facilities and physicians' offices that are currently located in the O'Toole Building.
- *Impact on Police and Fire Facilities* – CB 2 requests an assessment of the impact on fire and police facilities. The addition of up to 450 units of housing will create a greater need for fire and police services in the community, as will the lengthy period of construction.
- *Impact on Libraries* – CB 2 is concerned about the potential impact on public libraries, even though the applicant has previously stated that the CEQR threshold for such examination has not been triggered. Only one library serves the central Greenwich Village neighborhood and the close proximity of the proposed residential complex to this library suggests that it will be utilized to a great degree.
- *Impact on Recreation* – CB 2 has a lack of recreational space and is concerned about the impact of the proposed new project on existing facilities.

V. Open Space

Because play spaces for children in the neighborhood are already overcrowded and there are very few ball fiends and courts serving residents, CB2 requests that DCP require an analysis of the project's indirect impact on active open space.

- *Residential Open Space* – CB 2 is concerned about the impact on the residential user population, but as noted above, believes the study area should be extended, especially given the lack of open space in the Greenwich Village area. In addition, while the applicant has previously stated that the proposed project would result in a net reduction of workers coming to the project site (and therefore an assessment on the worker population is not called for), CB 2 believes the proposed St. Vincent's triangle open space could serve primarily as an amenity to the occupants of the proposed residential buildings and employees of the Comprehensive Care Center given its proximity next to these projects, and therefore requires examination. The interior green space of the residential complex further siloes its dwellers from the texture of the neighborhood in which they will be living.
- *Playgrounds and Athletic Fields* – CB 2 requests that DCP include an analysis of current usage of existing open spaces, particularly children's playgrounds and athletic fields, together with the impacts of any incremental increases in use/demand resulting from the new residential impact. This should include toddler facilities and after-school programs.
- *Materials Handling Facility and Triangle Site* - It has been indicated that the applicant is agreeable to increasing the size of the anticipated community park at the Triangle site from 7,300 to 15,000 square feet, which would be achieved by eliminating the materials handling facility. CB2 urges that this option be studied to both enhance the urban design context and provide sorely needed open space in a neighborhood that severely falls short of the 2.5 acres of open space per thousand people that is considered a minimal requirement. In addition, CB 2 requests that the applicant study removing the oxygen tanks altogether from the Triangle site and placing them in another location, possibly underground. Does NSLIJ require all of the oxygen tanks that the new hospital was going to use, even though the NSLIJ freestanding emergency department is a much smaller facility?

VI. Shadows

- *Concern about Study Area for Shadows* – As mentioned above, CB 2 is concerned that the study area will not encompass all of the portions of the local area impacted by shadows cast by the proposed new residential buildings, including the potential for loss of sunlight and/or shadows on all the affected buildings on 11th Street, 12th Street and 7th Avenue.
- *Methodology of Shadow Study* – Shadow studies at a minimum should be run for the existing condition and the proposed condition showing shadows on an hour-by-hour basis for the winter and summer solstices and equinoxes. Depending on the results of these studies, monthly studies may be necessary.

VII. Historic and Cultural Resources

- *Impact on Historic Structures* – CB 2 urges DCP to take into consideration the number of old houses that are part of the Greenwich Village Historic District that will be affected by this project. These impacts are not only “visual and contextual,” but include potential structural risks flowing from the demolition/construction process. The subsurface conditions at both the O’Toole Building and the East Campus need to be examined to evaluate the impact of excavation, as well as the underground environment for the new facilities.
- *State Office of Historic Preservation (SHPO)* – The EIS should include SHPO’s views on historic resources in the neighborhood, including its views of the project’s impacts on the Greenwich Village Historic District, notwithstanding the 2008 decision by the NYC Landmarks Preservation Commission to permit the applicant to demolish the Coleman, Link, Reiss and Cronin Buildings
- *Consideration of Coleman and Link Buildings* – A local gay and lesbian historic association, the Queer History Archives, is in the process of nominating the St. Vincent’s campus, specifically the Coleman and Link Buildings which housed the most important AIDS ward in the country, to the State and National Register of Historic Places based on their indelible association with AIDS history and the significant contribution that events at the sites made to that history. In the absence of this formal designation, because of their exceptional importance to both New York State and national history, these buildings should properly be considered “potential historic resources” as defined in the draft scope (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements) and be studied as such in the EIS. Demolition of the Coleman and Link buildings will cause significant adverse impacts to the importance of the site which must be properly mitigated.

VIII. Urban Design and Visual Resources

- *Modeling of View Corridors* – CB 2 endorses the idea that the existing and proposed building bulk should be modeled from every view corridor, and at a minimum, with viewing locations starting at the project edge and moving away at a distance of 100 feet, half a block, and then one block intervals, until neither the existing or proposed buildings are visible. Each pair of views (existing and proposed) should extend sufficiently vertically to show some sky above the taller of the conditions.

RSV Residential/Retail Development (East Campus)

- Examine the effects of floor area redistributions, changes in form, height, bulk, building textures, materials, ground floor uses, landscape design, plantings and view corridors on pedestrian comfort and orientation and community scale, context, image, identity,

coherence, architectural mix and integrity, high-rise and low-rise interplay, area cohesiveness and continuity, and neighborhood recognition. Compare these changes with the existing urban context.

- Examine the compatibility of the Reiss replacement building design and the architecture of the surrounding buildings.
- Analyze the effects of proposed accessory parking access on W. 12th Street between Avenue of the Americas and Seventh Avenue South and added curb cuts throughout on pedestrian comfort, enjoyment, access, orientation, sightlines and general experience of the street and streetscape.
- Assess the impact of the new forms, bulk and heights, in particular the one oversized avenue building, on blockage of sunlight, obscuring sightlines, obstruction of view corridors, and creation of shadows.
- Assess the effect of adding up to 100 feet of retail display windows in from Seventh Avenue South and the inclusion of a garage entrance/exit near the middle of the block on the typical Village residential character of West 12th Street between Seventh Avenue South and Avenue of the Americas. In this connection it is important to note that while West 12th Street has hospital buildings, those buildings were designed to give the appearance of lower Fifth Avenue apartment buildings, and so the street currently has the feel of a totally residential block.
- Analyze the effects of ambient lighting from proposed new buildings.

NSLIJ Site (O'Toole Building)

- Analyze placement of new curb cuts resulting from the proposed new ambulance access, loading dock and entrances and their potential for interfering with streetscape continuity and image, urban essence and area cohesiveness as well as pedestrian access and orientation.
- Assess frequency and duration of time ambulances will occupy the sidewalk and the effect of loading dock activities breaking up the sidewalk ambience on W. 12th Street between Seventh Avenue South and Greenwich Avenue, all of which interfere with sidewalk character and continuity and obscure sightlines, and explore design opportunities to create a more harmonious/less jarring effect in that urban design context and provide a more open pedestrian experience along the sidewalk route.
- Study and compare alternative scenarios (at least three) of the Seventh Avenue South façade entrance with different proportions, materials (e.g. a fabric instead of glass canopy), transparencies, enhancements and forms, along with different renderings of landscaping fronting the façade, to determine the warmest, most open and inviting design and appearance that most suitably fits the community context, character and surrounding urban forms, best interfaces with the street and enhances the street, building and entrance experience for both passersby and facility clients. It is important that the design does not invite unwanted activity in the alcoves.

Triangle Site

- It has been indicated that the applicant is agreeable to increasing the size of the anticipated community park at the Triangle site from 7,300 to 15,000 square feet, which would be achieved by eliminating (tearing down) the materials handling facility. Therefore, CB2 urges that this option be studied to both enhance the urban design context and provide sorely needed open space in a neighborhood that severely falls short of the 2.5 acres of open space per thousand people that is considered a minimal requirement. CB2 also urges that the applicant work with the community (as suggested by the applicant) in developing a

park that meets neighborhood needs and fits community context and character as well as in developing a plan for maintenance by the applicant. In addition, CB 2 requests that the applicant study removing the oxygen tanks altogether from the Triangle site and placing them in another location, possibly underground. Does NSLIJ require all of the oxygen tanks that the new hospital was going to use, even though the NSLIJ freestanding emergency department is a much smaller facility?

IX. Natural Resources

- *Subsurface Conditions* – CB 2 endorses the idea that the EIS should identify any subsurface conditions (including diverted watercourses) that might be affected by construction of the projects. Soil borings should be taken in order to make this determination and a soils report should be provided.
- *Ground Stabilization* - Information should be furnished on all aspects of ground stabilization within the immediate and surrounding areas. Vibration and stabilization monitors must be installed in buildings in the surrounding areas and the results of these monitors must be posted online weekly.
- *Minetta Brook* – An analysis of whether this project will have an impact on this subterranean stream should be undertaken.

X. Hazardous Materials

- *Include Asbestos Abatement* – An analysis of the presence of asbestos is important since it will require special precautions in connection with any demolition. The EIS should identify how buildings will be decontaminated in a safe manner prior to any demolition, especially given their location in a dense residential neighborhood and proximity to two schools. In particular, the presence of asbestos in the Reiss building should require consideration of an interior renovation only for this building and would involve significantly less risk of exposure to asbestos than a complete demolition.
- *Materials Handling Building* – CB 2 requests that the EIS address any dangers of oxygen storage in the Materials Handling Building (and its piping to the new tower) and the fuel tanks for generators if they are retained.

XI. Water and Sewer Infrastructure

- *Sewer Infrastructure* – CB 2 urges DCP to address the impacts the project will have on the Hudson River and any other receiving body of sanitary sewage/wastewater, particularly during rainstorms that cause backups and overflow. The EIS should identify the likely frequency of such discharges and the incremental discharges that will be caused by the project.

XII. Solid Waste and Sanitation Services

- *Waste Disposal* – The EIS should address the impacts of disposing of medical waste and the quantity of demolition of solid waste that will be created during the gut rehab of the O’Toole building and demolition of part of the East Campus.
- *Solid Waste Collection* - Solid waste and its collection is a major concern. CB 2 has the following questions that apply to both during and after construction:
 - What measures will be instituted to promote reuse and waste prevention?

- Specifically where will the refuse be collected by the private carter and which streets will be used to access those locations?
- Which days of the week and at which times will refuse be collected from both the residential sites and from the O’Toole site? Please provide further information as to how the Comprehensive Care Center will dispose of medical waste
- An analysis needs to be made of the amount (in tons) and types of waste that will be created during construction and after completion.

XIII. Energy

- *Assess Overall Energy Implications* - The overall energy implications of the project should be assessed, including the energy required for demolition, hauling of debris, mining, manufacture and transportation of building materials, and construction and gut renovation of the new structures.
- *LEED Gold* - All new buildings and renovations should be designed to achieve at a minimum a LEED “Gold” rating. The EIS needs to outline the methods used to achieve this standard.
- *Overall Impacts* - The EIS should indicate what impact this project will have on the New York City steam, natural gas, and electric grid/systems.

XIV. Transportation

Although the Draft Scope of Work’s preliminary analysis concludes that “detailed quantified traffic, transit and pedestrian analyses are not expected to be required”, CB2 strongly urges an extensive, in-depth transportation analysis in view of the new residential development adding new traffic, including resident trips, deliveries and trips generated by retail and doctors’ offices components as well as changes in traffic and trips generated by NSLIJ facility. These entail significant changes in parking patterns, vehicular usage and speed, ambulance use and routing, pedestrian access and safety concerns, added transit trips and increased congestion. As part of this necessary detailed analysis, the following should be considered:

Vehicles

- The study should include intersections and approach routes in the immediate study area and also approach routes to the study area, and what the impact of the new commercial, residential and institutional use will have in generating vehicular trips on these already congested corridors.
- The study should include times of day beyond the typical time periods assigned as critical peak hours (i.e. weekdays am, midday, pm) because there will be other periods of high traffic volume (e.g. evening and weekend hours). Health-related/ambulance service needs are not limited to one time of day or week, and the added residential population and commercial activities will be accessing and exiting the area (and parking) at different times of day and week.

Parking

- Assess the impact of an additional parking garage entrance/exit on West 12th Street between Avenue of the Americas and Seventh Avenue South, an already crowded vehicular street where three garages already exist (more than on any other block in Greenwich Village), on congestion, sidewalk obstruction, pedestrian safety and access,

especially in view of the larger size accessory parking facility proposed (at least 152 spaces for cars) than is customary in the neighborhood. Examine the feasibility of relocating the entrance/exit to 7th Avenue.

- Since the proposed on-site accessory parking spaces for residents and tenants are expected to accommodate 30%-40% of anticipated residential units, and the O'Toole Building site will lose a 48-space parking garage, estimate the overflow of those seeking on-street parking and assess the impact of their cruising and circling looking for spaces on traffic safety, congestion and emissions impacts.
- Assess capacity to accommodate parking for additional delivery trucks and service vehicles for the new commercial/retail, residential and health-related uses and what their effect will be on general parking space availability, as well as in obstructing vehicular street passage and pedestrian sightlines and safety (from increased double parking).
- Study alternative scenarios with provision of accessory parking on the east side of Seventh Avenue South between W. 11th & W. 12th Streets and a garage entrance on W. 11th St., and compare with the proposed parking entrance/exit of the parking facility on W. 12th Street between Avenue of the Americas and Seventh Avenue South in terms of impacts on congestion, sidewalk obstruction, pedestrian safety and access.
- Assess impact of new employees in the area on local parking resources.

Traffic Circulation

- In view of anticipated transfer relationships between the NSLIJ and hospitals including Lenox Hill, New York Presbyterian, NYU, Bellevue, New York Downtown, Beth Israel Medical Center, etc., prepare a route map of ambulance trips to these other facilities, and analyze the impact of these rapid transport vehicles along those routes on street congestion, pedestrian, motorist and cyclist safety, and increase in noise and emissions.
- Estimate the number of daily trips and address the effects of ambulance traffic on the side streets in the study area on traffic flow, pedestrian access and safety, noise disturbances, and blockage of other essential vehicles, in particular on W. 12th Street (where ambulances will be arriving and leaving the proposed healthcare facility in O'Toole) an already heavily used west-east thoroughfare where trucks are allowed, and cross-town traffic is excessive.
- Analyze the effects of increased vehicular traffic generated by new resident, retail, doctors' office, medical and other support staff, and client trips as follows:
 - Estimate added vehicular trips by new residents, establishments, medical personnel, support staffs, and clients and their impact on already clogged streets and complex intersections (such as Mulry Square) in terms of congestion, pedestrian access and safety, vehicular and cycling safety and flow, air quality and noise.
 - Analyze the impact from increased delivery trucks and service vehicles such as sanitation trucks and oil deliveries on street congestion, pedestrian safety, and vehicular access and determine if current truck routes are likely to be changed.
 - Assess the potential for blocked emergency vehicle (e.g. fire trucks) access.
 - Determine the effects of additional limo and taxi traffic.

Pedestrians

- Analyze the impact of additional foot traffic generated by 1,000+ new residents, and daily estimated 391 medical employees, 358 visitors and 453 patients (a portion arriving on foot), as well as retail workers, clients and residential support staff on sidewalks

(already heavily used at similar times of day) on pedestrian access and sidewalk congestion.

- Assess the impacts of blocked access from increased vehicular traffic on safety and mobility for seniors, the disabled and children.
- Evaluate the impact of ambulance entries (including frequency of sidewalk occupation and duration) and loading dock activities on W. 12th Street and additional curb cuts and driveways in the general study area on pedestrian access, passage, comfort and orientation, and investigate design solutions to mitigate these impacts.

Alternative Transportation Modes

- Analyze the projected modal split in the study area and how it will differ from current conditions in terms of impact on access, safety, and congestion.

Transit

- Because the W.11th Street/Seventh Avenue South/Greenwich Avenue intersection, where the current bus stop at Seventh Avenue South and W. 12th Street is proposed to be moved (i.e., one block south at the Triangle), is an especially complex one which is already confusing, congested, and dangerous to cross, particular in-depth consideration should be given to analyzing the impact on both vehicular traffic and pedestrian safety and access of this move as compared to retaining the bus stop in its current location (which is also more convenient to the proposed CEMS) or considering possible other alternatives.
- Assess need for increased bus service and frequency, including the need for restoration of as well as additional bus service and routes in the area.
- Assess need to restore on-site service employees (token booths, etc.) at subway entrances in light of increased usage. Include evening hours in this study in additional to the usual am/pm peak hours.
- Assess need to increase subway trip frequencies.
- Assess potential for sidewalk crowding and interference with subway access on way to subway stops.

Bicycles

- Develop scenarios that include transportation alternatives, such as bicycle lanes, racks and other accommodations that would reduce vehicular impacts, and examine opportunities for their locations.
- Examine the effects of a proposed transference of required-by-law indoor bicycle parking to other facilities on bicycle and pedestrian safety and access, as well as the effect of preserving indoor bicycle parking on lessening the need for vehicular parking.

XV. Air Quality

- *Include Traffic Congestion* - CB 2 urges that DCP requires the air quality analysis to consider the effects from traffic congestion, double parked delivery vehicles, ambulances and the like.
- *Wind* - How would wind patterns be affected by the new buildings in terms of noise, flying debris, stability of neighboring buildings and wind screens, etc.?
- *Fuel Particulates* - It is vital that all vehicles and equipment used during construction use Ultra-Low Sulfur Diesel and Best Available Technology for contaminant filtration. Please inform CB 2 whether delivery trucks and additional buses resulting from the expansion utilize

diesel fuel? If so, please estimate how much additional particulate will be generated into the air.

- *Air Quality Studies* – CB 2 requests a study of air quality during the summer and winter months from increased congestion, both traffic and human, on ground-level ozone levels. Also, air quality studies during both summer and winter months for increased particulate matter (including but not limited to pollen, dust, elemental carbon, etc.) are necessary for both before, during, and after construction.
- *Air Monitoring* – CB 2 notes that third-party air monitoring is mandatory throughout a 5 block radius of the project and the results must be posted online weekly.

XVI Greenhouse Gas Emissions

- No comment

XVII. Noise

- *Vehicle Traffic* – CB 2 believes the Draft Scope of Work’s noise analysis wrongly assumes no increased vehicle traffic. Noise from ambulances alone that will be concentrated on W. 12 St. and other specific ambulance routes deserves assessment, and so does traffic noise that will come from new patterns of circulation, cruising and parking.
- *Construction Noise & Schools* – What will be the effect of construction noise on area schools (PS 41 on 11th St. and the City and Country School on 12th St.) and on the children that attend these schools. (Please note the study by Dr. Arline Bronzaft, which paired classes at an upper Manhattan school, revealing significant test score differences, depending on whether the classrooms faced the noisy or quiet sides of the building.)
- *HVAC* – We request an examination of the noise impacts from the HVAC units for the proposed NSLIJ facility, new residential buildings and the Materials Handling Building. The EIS should indicate where these machines will be located and focus on these impacts in a nighttime environment, when background noise is less.

XVIII. Construction

- During the recent real estate expansion CB 2 has gained significant experience in construction impacts. In such a dense residential area, construction projects can and have created noise, dirt, vermin and other challenges for residents and businesses. In order to address these kinds of issues the Board formed the Construction Committee. Based on our extensive expertise CB2 asks that the applicant include plans to reduce or eliminate these problems. In addition, please provide the following items:
 - A detailed plan of the methods that will be used to achieve LEED status;
 - If the findings of the Phase I Environmental Site Assessment (ESA) require further testing and / or remediation, complete information on any required protocols and the methods of implementing them during construction;
 - A complete plan for construction monitoring and testing systems;
 - Complete details of the construction phasing plan and its impacts;
 - A plan to implement the requirements for protecting land marked structures during construction;

- The approved Stage 1A Archaeological Assessment that will be implemented during construction;
- Details of the proposed foundation systems including the methods of installation and a site preparation and excavation plan;
- A detailed construction site plan that includes crane locations, construction elevator locations, material storage, contractor entry points, contractor parking, garbage removal, and temporary street and sidewalk closings;
- A detailed demolition plan and asbestos cleaning protocols prior to any demolition;
- CB 2 notes that there have been serious impacts on other projects in the area from Dewatering & the noise it creates. Please provide complete details for dewatering including a noise mitigation plan;
- A detailed vermin abatement plan;
- A construction noise mitigation plan, as CB 2 has experienced significant noise complaints from construction projects in our district;
- A plan for Public Notification and Community Outreach during construction;
- The results of Soil Borings & the Soils Report;
- An analysis of traffic impacts from construction/demolition activities and devise mitigation measures, such as banning all parking across from any active construction location in order to facilitate traffic flow and minimize traffic stoppages;
- An examination of the effect of construction of an emergency subway ventilation fan plant on Mulry Square (Greenwich Avenue/Seventh Avenue South/West 11th Street) in connection with concurrent construction activity of the proposed St. Vincent Campus development and consideration of the ways that their combined impacts on the community could be mitigated. (The MTA-NYC Transit fan plant project could result in several years of construction, including street closings, and its impact alone on local residents, small businesses, traffic and the environment will be tremendous.)

XIX. Public Health

- *Overall public health concerns* - How would health be affected overall? The ways different populations would be affected (children, adults, seniors, etc.) in terms of sleep disruption, elevated blood pressure, and psychological effects must be discussed.
- *Airborne Objects* – Please examine the risks of injury from airborne objects and debris due to heightened winds, particularly for small children and seniors.

XX. Neighborhood Character

- *Examine Impact on Side Streets* – CB 2 believes the impacts of the project on neighborhood character are particularly important. Obviously, the impact of building two oversized buildings will need to be analyzed. Among the impacts that also need to be considered, however, is that the residential project will change the character of a street – 12th Street -- that now has the feel of a typical village residential block and add visual retail and a fourth parking garage (materially closer to the center of the block than the other garages). This will create a block with a significantly greater commercial feel. In addition, by adopting an out-of-context design for the building to replace Reiss the proposed plan also negatively affects the character of the block.

XXI. Mitigation

- *Importance of Mitigation* - The enormity of this project and the major impacts on a relatively small and extremely dense area of CB 2 requires that as a general matter DCP should require the examination of any and all ways to mitigate impacts both during construction and on completion.
- *NYC Transit Emergency Fan Plant Mitigation* – As noted above, NYC Transit has proposed the construction of an emergency ventilation fan plant in the Mulry Square area. CB 2 requests that DCP examines the feasibility for St. Vincent’s to mitigate the combined impact of its project and the fan plant by relocating the fan plant underneath the St. Vincent’s Triangle.
- *Consider not Demolishing Reiss Building* - Given the enormous amount of demolition/construction which is part of this project consider as necessary mitigation not demolishing Reiss which would reduce the number of asbestos containing buildings which need to be demolished, avoid issues with putting in foundations across from 19th Century brownstones, potentially reduce vermin issues, and avoid other issues associated with demolition.

XXII. Alternatives

East Campus

- Analyze an alternative scenario which does not include the demolition of Reiss, thereby avoiding demolition/construction issues discussed under the Mitigation section and which would also avoid insertion of a new building which does not architecturally fit with any of the surrounding buildings and which would contain a mid-block garage/entrance which raises issues referenced elsewhere in these comments and which requires an additional zoning action.
- Provide analysis of an alternative that eliminates the entrance on West 12th Street, for the Accessory Parking Garage.
- Study, as a further alternative, removing the retail windows on West 12th and West 11th Streets.

Triangle Site

- As a reasonable alternative to retaining the Materials Handling building, provide an analysis of eliminating the facility, both above and below ground, thereby increasing the size of the proposed community park from 7,390 to almost 15,000 square feet, and allowing the park to be built entirely at street grade.
- As another alternative, analyze how the Materials Handling building could be modified, both above and below ground, to create a community recreational facility, and how entrances and egresses, safety considerations and management structure would impact the currently proposed community park, Comprehensive Care Center and new mixed uses on the East Campus.
- Analyze relocating “medical gas storage” tanks off the Triangle Site. These alternatives should explore all possible alternative locations within the project site for the medical gas storage tanks, including sites below grade or within other buildings.
- Consider alternative ownership scenarios for the Triangle Site: Specifically, an alternative that considers the disposition of the Triangle Site by RSV, LLC to NYC Department of

Parks and Recreation, to a local BID or to a not-for-profit that will permanently maintain the open space and other amenities.

The No Action Condition

- The Draft Scoping Document notes that, as a conservative measure, the EIS will assume no active use of the East Site in the future without the proposed project. The most conservative approach would be to assume that the East Campus would be fully occupied by conforming uses. Please provide an analysis of the No Action Condition that assumes full as of right occupancy.

Alternative: Full Build Out of a Hospital at the O'Toole Site

- As a reasonable alternative, CB 2 requests an analysis for a full build out of a hospital, as previously proposed, at the O'Toole site.

Alternative: No Increase of the Allowed Development Rights

- CB 2 notes that this application is a proposal by a private developer wishing to build in a landmark district and a significant “up-zoning” is requested. The Federal Bankruptcy Court valued the properties “as is” under the current zoning without regards or contingency of any zoning changes. The applicant requests a rezoning for their LSAD, from an R-6 to an R-8 (or equivalent) that has a residential FAR of 6.05, which is 175% higher than the existing frontage and over 200% higher than the allowable FAR on the mid-block. The applicant is not arguing a hardship of any kind.
- Please provide an analysis for a proposal that does not increase the development rights beyond what is allowed under the currently existing zoning districts.

Alternative: R-7 District

- CB 2 notes that a zoning change from R6 to R7 is not considered under this proposal. Please provide an analysis for a proposal that allows a R-7 district.

Alternative: Contextual Zoning District

- CB 2 notes that the Proposed Zoning Text Amendments would allow development “without regard to height factor or open space ratio requirements.” The applicant has noted that the height factor rules, which are part of the proposed zoning districts, are not appropriate for the buildings they intend to build. CB 2 further notes that there are very low-density, historic townhouses on 11th and 12th Streets and there are also low density apartment and townhouses that generally do not exceed the current zoning FAR levels. The existing density in this area is very appropriate for an historic district and was zoned as such well after the few larger buildings existed. The aggregate contextual density of the surrounding area is significantly less than the zoning districts that are proposed. Please provide an analysis of a lower density Contextual Zoning District that would be more compatible with the existing historic district and would have bulk rules that are more consistent with the proposed buildings.

XXIII. Summary Chapters

- No comment

Sincerely,

Handwritten signature of Brad Hoylman in blue ink.

Brad Hoylman, Chair
St. Vincent's Hospital Omnibus Committee
Community Board #2, Manhattan

Handwritten signature of Jo Hamilton in blue ink.

Jo Hamilton, Chair
Community Board #2, Manhattan