

CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

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LESLIE BOGHOSIAN MURPHY
Chair

JESSE R. BODINE
District Manager

February 23, 2026

Edith Hsu-Chen
Executive Director
NYC Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

RE: ULURP Application DeWitt Clinton Park North (801 Eleventh Avenue & 629 West 54th Street)

Dear Executive Director Hsu-Chen,

At its February 4, 2026 Full Board meeting, Manhattan Community Board 4 (MCB4) voted, by a vote of 33 in support, 1 in opposition, 1 abstentions, and 1 Present-Not-Eligible, to **deny the proposed zoning map amendments, zoning text amendments, and zoning special permits (collectively, the Proposed Actions) to facilitate the development of two buildings at 629 West 54th Street and 801 Eleventh Avenue unless modifications are made in accordance with the conditions detailed below.**

INTRODUCTION

The development team for the applicant, 760 Twelfth, LLC and 801 Eleventh Ave., LLC (the Applicant), presented their proposal at the Clinton/Hell's Kitchen Land Use Committee meeting on January 14, 2026. The public hearing for this ULURP action was held on February 4, 2026, during MCB4's Full Board meeting.

This proposed plan is a major rezoning of two sites between Eleventh and Twelfth Avenues in the West 50's, in the Other Area of Special Clinton District which was rezoned in 2009 at MCB4's request as part of the Western Railyards Points of Agreement. Since 2015, MCB4 has requested further rezoning of these sites in its Affordable Housing Plan¹ to permit both the Transfer of Development Rights from Hudson River Park Trust and permit residential development at Floor Area Ratio (FAR) of 12, with a component of permanently affordable housing. In 2025, MCB4 made further recommendations to increase the proposed FAR to Very High Density zoning with residential density greater than 12 FAR. The current proposed rezoning by the Applicant now proposes a 14.4 FAR, nearly tripling the current mapped 5 FAR. MCB4 supports this Very High Density at this location.

MCB4 thanks the Applicant for engaging in discussions to address and resolve the conditions below.

¹ [MCB4 Affordable Housing Plan, Revised June & July 2025](#)

Even with this tripling of existing density, MCB4 welcomes this proposal to the Hell’s Kitchen community to fulfill a part of MCB4 Affordable Housing Plan. However, the project is not fully developed and there are serious issues not resolved or committed to in the Proposed Actions. Therefore, MCB4 denies the proposed rezoning unless modifications are made in accordance with the following conditions:

Building Height and Bulk

- Reduce the proposed Twelfth Avenue building height to be no greater than 450 feet, 30 feet lower than the Eleventh Avenue building proposed at 485 feet. Achieve this height reduction by redistributing the massing to the base of the building. MCB4 supports building height stepping down toward the Hudson River to mitigate shadows and preserve light in the district.
- MCB4 supports of a Very High Density FAR of 14.4, and requests this height reduction through bulk redistribution (not a FAR reduction).

Streetwall Requirements

- Maintain current Streetwall Requirements (ZR 96-332)² for the Eleventh Avenue Building of 50 to 95 feet, along Eleventh Avenue with no setbacks, recesses or entry plaza to reinforce and contribute to the existing streetwall streetscape.

Twelfth Avenue Building – Masonry Façade Treatment

- Modify the façade of the Twelfth Avenue building to contain a greater percentage of masonry, brick or precast elements, to connect with built context of Hell’s Kitchen not Riverside South to the north of the project. The development team will produce an update façade rendering, indicating percentage of such masonry, brick or precast elements

Increase Affordability, Family Size Apartments and Affordable Apartment Distribution

- Increase the percentage of affordable apartments from 25% of residential square footage to 30% of the entire square footage both residential and commercial. As part of any such increase, include moderate and middle income permanently affordable apartments in the development
- Include apartment distribution of at least 20% 2 bedroom and/or 3-bedroom apartments. These proposed developments must promote family sized apartments and stability in the Hell’s Kitchen community. This request is modeled on the SCD’s Preservation Area zoning requirements (ZR Section 96-104) for 20% 2-bedroom apartments.
- Increase the affordable apartment distribution from 65% of the floors to 80% of the floors

Parity and Inclusivity – Market-Rate and Affordable Apartments

- Agree to identical apartment finishes and equipment in the affordable and market rate apartments.
- Agree to affordable and inclusive amenity spaces for affordable and market rate apartments.

DeWitt Clinton Park Improvements

- Agree to a negotiated contribution to current capital projects DeWitt Clinton Park as planned by the NYC Department of Parks

² Streetwall requirements for the Special Clinton District, [ZR 96-332](#).

Good-Paying Jobs

- Agree to recognize 32BJ SEIU for building maintenance jobs.

Construction Task Force

- Establish a Construction Task Force to manage communication with the public and impacted neighbors during entire project construction period.

PROJECT DESCRIPTION

Project Area

The project area (“Project Area”) and its surroundings are located within the Special Clinton District, created to preserve and strengthen the residential character of the Hell’s Kitchen community, adjacent to Times Square and the Midtown Central Business District, maintain a broad mix of incomes, and ensure that the community is not adversely affected by new development.³ Development Site 1 is located in Western Sub-Area C2 of the Special Clinton District and Development Site 2 is located in Northern Subarea C1.⁴

The Project Area is currently in M2-3 (CL) and M2-4 (CL) underlying zoning districts with no residential uses permitted as-of-right. The Applicants have proposed a mixed-use residential and commercial development by mapping a commercial C4-7 district, which has an R10 residential district equivalent, with a maximum FAR of 12. This proposed district would permit the development of new market rate and affordable housing in the northwestern part of Hell’s Kitchen in a dense, mixed-use character in close proximity to DeWitt Clinton and Hudson River Parks.

Proposed Zoning Actions

- Extend the mapping of the Special Hudson River Park (HRP) District to Site 1 and 2 to enable the transfer of development rights from HRP. This action will overlay the Special HRP and Special Clinton Districts to the development sites.
- Special permit to effectuate the transfer of development rights from the Special HRP District to Sites 1 and 2⁵
- Special permit to modify the minimum base height, maximum base height, and minimum setback for the West 54th Street and Twelfth Avenue site.
- Special permit to modify the street wall location on the West 55th Street and Eleventh Avenue site.⁶
- Zoning text amendment to allow auto showroom and repair uses in a C4-7 district.
- Mapping Mandatory Inclusionary Housing (MIH) on both sites to ensure permanent affordability as an MIH area.⁷

³ [Special Clinton District General Purposes, ZR 96-00 \(a\)-\(b\).](#)

⁴ [Special Clinton District, Other Areas \(Area C\), ZR 96-30.](#)

⁵ [Special Hudson River Park District, Transfer of Floor Area from Hudson River Park, ZR 89-21.](#)

⁶ [Special Clinton District, Other Areas, Height and setback, ZR 96-332.](#)

⁷ [Mandatory Inclusionary Housing, NYC ZR 27-131, as mapped in Appendix F.](#)

- *Proposed Buildings*

The Applicants propose to construct two buildings: a 42-story, mixed-use residential and commercial building on Development Site 1; and a 38-story, mixed-use residential and commercial building on Development Site 2.

Site 1 – West 54th Street and Twelfth Avenue

Development Site 1 is on the western portion of Block 1102 with approximately 201 feet of frontage along Twelfth Avenue and 175 feet of frontage along West 54th and West 55th Streets, with a total lot area of 35,145 square feet (SF). The site currently has a six-story car dealership building built in 1930 with a gross floor area (GSF) of approximately 152,375 GSF.

The proposed building on Development Site 1 has 617 Dwelling Units (DUs), with 154 permanently affordable units under MIH, and 84,349 GSF for commercial auto dealership space. The proposed building would be a roof height of 550 feet with a maximum height of up to 590 feet, with a 40-foot mechanical bulkhead.

The maximum proposed base height on West 54th Street is 155 feet, with a 10-foot setback before reaching the maximum building height. On West 55th Street, the maximum base height is proposed at 167 feet with a 15-foot setback. The maximum base height along Twelfth Avenue is proposed at 58 feet. The commercial use is proposed in the first through third floors, with the residential use in the fourth through 42nd floors.

Site 2 – West 55th Street and Eleventh Avenue

Development Site 2 is on the eastern portion of Block 110 with approximately 201 feet of frontage along Eleventh Avenue, 100 feet of frontage along West 55th Street, and 150 feet of frontage along West 56th Street, with a total lot area of approximately 26,830 SF. The site currently has one two-story building and one three-story building built in 1920, operating as a single commercial car dealership, with a 57,805 GSF. The northern building was enlarged in 2011.

The proposed building on Development Site 2 has 477 DUs, with 119 permanently affordable units under MIH, and 64,392 GSF for commercial auto dealership space. The proposed building has a roof height of 485 feet with a maximum height of up to 525 feet, with a 40-foot mechanical bulkhead.

The proposed maximum base height is 110 feet on Eleventh Avenue and West 55th and 56th Streets. Eleventh Avenue has a proposed 10-foot setback before reaching the maximum building height. West 55th Street and West 56th Street has a proposed 15-foot setback. The commercial use is proposed in the first through third floors, with the residential use in the fourth through 38th floors.

MCB4 RECOMMENDATIONS

MCB4 supports the following:

- Extending the mapping of the Special HRP District to allow the transfer of development rights.
- The special permit to effectuate the transfer of development rights from the HRPT with the proviso of the Hudson River Park Trust's agreement of a minimum of \$200 per square foot for

- the purchase of the additional HRP Trust development rights, subject to updated appraisal when the transaction is effectuated, for the maximum financial benefit of the Hudson River Park Trust.
- Mapping of the C4-7 district with the maximum bulk of 14.4 FAR.
 - MIH mapping under ZR 27-131 for Site 1 and 2 to produce permanently affordable housing.⁸
 - Special permit to modify the minimum base height, maximum base height, and minimum setback for the West 54th Street and Twelfth Avenue site.
 - Zoning text amendment for auto showroom and repair uses. As proposed by MCB4 in the 2009 West Clinton Rezoning, MCB4 requested to continue auto showroom and repair uses to protect the Eleventh Avenue Auto Row uses. MCB4 is particularly concerned with preserving UAW union jobs at many of these auto showroom and repair locations.
 - Agreement to eliminate the Special Permit to allow for a modification of the Eleventh Avenue street wall. On February 17, 2026, the Applicant committed to eliminating the street wall waiver and location the ground floor of the building at the Eleventh Avenue street line. MCB4 appreciates the Applicant's response to maintain the current street wall requirements compliant with ZR section 96-332 along Eleventh Avenue.
 - Agreement to recognize 32BJ SEIU union for building maintenance jobs.
 - MCB4 recognizes that the agreement with Hudson River Park guarantees a minimum of \$200/SF for the purchase of the additional development rights, and that the final number will be determined after an independent market appraisal. MCB4 recommends this number is finalized prior to commencement of construction of the project, and that the price truly reflects a current market analysis.

Unresolved Development Matters & Commitments

On December 15, 2024, the Applicant filed an Environmental Assessment Statement for the DeWitt Clinton Park North Project. Subsequently, MCB4 first met with the Applicant on December 16, 2024. The Applicant issued their Draft Scope of Work in January 2025. On February 10, 2025, MCB4 commented on the Draft Scope of Work for the proposed projects in a letter to the NYC Department of City Planning (DCP).⁹ In this letter, MCB4 prepared comments on the technical areas to be analyzed in the DEIS. MCB4 did not hear back from the Applicant until September 3, 2025, when the Applicant presented a project briefing to CHKLU leadership. At that briefing, MCB4 was disappointed to learn that many outstanding matters raised in December 2024 were not addressed by the Applicant.

1. Building Height on West 54th Street and Twelfth Avenue¹⁰

The height of proposed Twelfth Avenue tower is out of context with the surrounding blocks. MCB4 has historically requested that new developments lower in height going west towards the Hudson River consistent with decades of planning actions of MCB4 and DCP in Manhattan Community District 4.

⁸ [Mandatory Inclusionary Housing, NYC ZR 27-131, as mapped in Appendix F.](#)

⁹ [February 2025 MCB4 Letter to DCP re DSOW at 629 West 54th Street and 801 Eleventh Avenue](#)

¹⁰ A requested height reduction with no reduction in the proposed 14.4 FAR.

The height of the roof line at the Twelfth Avenue tower is 510 feet, while the Eleventh Avenue tower is 485 feet. MCB4 recommends that the Twelfth Avenue tower has a maximum height of 450 feet, 35 feet lower the Eleventh Avenue building.

2. Masonry Façade Treatment on the West 54th Street and Twelfth Avenue Building

The proposed glass tower does not reference the surrounding context of masonry loft and residential buildings. MCB4 recommends that the Applicant incorporate masonry, brick, or precast elements into the facades to better relate the project to the existing built environment.

3. Eleventh Avenue Street Wall

The proposed recessed entrance condition at the northwest corner of West 55th Street and Eleventh Avenue is inconsistent with the established street wall and built context on the Eleventh Avenue corridor. MCB4 further notes that recessed entry conditions in this area have historically raised quality-of-life and public safety concerns.

MCB4 recommends that the Applicant revise the entrance design to align with the lot-line street wall on Eleventh Avenue and West 55th Street. **MCB4 recommends a denial of the Special Permit which would allow for a modification of the street wall along Eleventh Avenue.**

MCB4 requests that the Applicant maintain current street wall Requirements (ZR 96-332)¹¹ for the Eleventh Avenue Building of 50 to 95 feet, along Eleventh Avenue with no setbacks, recesses or entry plaza to reinforce and contribute to the existing street wall streetscape.

4. Percentage of Affordable Apartments

The Applicant decided to use MIH Option 1, which designates 25% of the residential floor area as affordable for an Area Median Income (AMI) of 60% (with 10% of the affordable units designated at 40% AMI). In its Affordable Housing Plan, MCB4 has a history of promoting and supporting MIH mapping on these sites and sees further opportunities to create more affordable units than currently proposed.

MCB4 also recognizes that the development sites have commercial and residential components and supports the integration of the auto dealership components of the development sites as part of the Proposed Actions.

MCB4 recommends that the Applicant use MIH Option 2, which designates 30% of residential floor area as affordable at an average of 80% AMI. Further, **MCB4 further recommends that the Applicant provide 30% of the overall square footage, both residential and commercial, as affordable units.** This action has the potential of increasing the total number of affordable units from 273 to 393 units.

MCB4 sustains its requests that the Applicant provide 30% of the overall square footage as affordable units and that a broader range of AMI's are taken into consideration to address the serious shortage of moderate- to middle-income housing our District. MCB4 requests the Applicant work with MCB4 and our elected City and State officials to arrive at a creative financial solution to increase the affordable apartments to 30% of the overall project square footage and include moderate- and middle-income apartments in the development.

¹¹ Streetwall requirements for the Special Clinton District, [ZR 96-332](#).

5. Family Size Apartments

MCB4 requests the developer include at least 20% of 2-and 3-bedroom apartments in the project to promote community stability and attract larger households. This request is modeled on ZR 96-104¹² to prevent towers of studios and one-bedrooms creating a transient dormitory effect.

6. Distribution of Affordable Apartments

MCB4 requests that the affordable apartment distribution exceed MIH requirements of 65% of the floors, to 80% of the floors in both towers. In the past, MCB4 has achieved this percentage distribution in many developments in Hell’s Kitchen and Chelsea.

7. Building Amenity Spaces

MCB4 requests that all amenity spaces be inclusive and accessible to all building tenants regardless of market rate or affordable housing status.

For Inclusionary Housing developments in MCD4, it is standard for tenant amenity spaces, such as lounges, workspaces, function rooms, roof, set back outdoor decks, or other unattended spaces to be inclusive for both affordable and market-rate apartments with no fee. For amenity spaces that require staffing, such as a gym, club, or pool, they may require an additional fee for financial feasibility. In those cases, MCB4 expects affordable apartments must have a discounted amenity fee to ensure the spaces are accessible.

8. DeWitt Clinton Park Capital Improvements

MCB4 requests that the Applicant make a negotiated contribution towards funding needed capital improvements to DeWitt Clinton Park.

DeWitt Clinton Park is one of the largest and most utilized parks in the District. However, the capital improvements to the park have long been neglected. There will be an influx of additional use the developments by the new residents resultant from the Proposed Actions. Capital improvements to the park must be addressed by all interested parties. There are capital needs identified by the New York City Department of Parks that exceed \$12 million.

OPEN ITEMS TO BE RESOLVED WITH THE APPLICANT DURING THE ULURP PROCESS

The ULURP was certified on December 15, 2025. Because the ULURP was certified immediately before the holiday season, MCB4’s discussion with the Applicant was truncated. On January 14, 2026, the Applicant first presented their proposal to the CHKLU Committee. At that meeting, CHKLU proposed to approve the proposal with a series of conditions.

However, on February 4, 2026, at the MCB4 Full Board meeting, the Board members raised concerns regarding the substantive conditions raised by MCB4 had not yet been fully addressed by the Applicant. Given that fact, MCB4 then voted to deny the ULURP action, unless the MCB4 conditions substantially met. The membership further requested the CHKLU leadership to meet with the Applicant before Board’s ULURP response deadline, February 23, 2026. On February 17, 2026, the Applicant met with CHKLU leadership to further resolve the open items.

¹² [Special Clinton District, Dwelling unit regulations, ZR 96-104](#)

MCB4 and the applicant made serious progress in agreement on several open items. The applicant also agreed to provide an updated letter of commitment (Enclosed). However, many development items remain unresolved, as shown in the table below.

Open Items to be Resolved with the Applicant (2/23/26)

Proposed Action	Initial Applicant Proposal (12/15/2025)	MCB4 Response (2/4/2026)	Applicant Draft Commitment Letter (1/26/26)	Applicant Response to MCB4 (2/17/2026)
Building Height on West 54 th Street and Twelfth Avenue ¹³	The proposed building on West 54 th Street and Twelfth Avenue would be 550 feet tall.	MCB4 recommends reducing the building height to be no greater than 450 feet to roof line, 30 feet lower than the proposed Eleventh Avenue building at 485 feet.	The Applicant proposed to reduce the building height to 510 feet from 550 feet, a reduction of 40 feet.	The Applicant did not commit to reducing the building height any further. MCB4 restates its request for a building of no more than 450 feet to roof line.
Masonry Façade Treatment on the West 54 th Street and Twelfth Avenue Building	No Applicant position indicated.	The proposed glass tower does not reference the surrounding context of masonry loft and residential buildings in the Eleventh Avenue Corridor, relating more to the Riverside South development than Hell’s Kitchen. MCB4 recommends that the Applicant incorporate masonry, brick, or precast elements into the facades to relate the project to the existing built environment.	The Applicant committed to the tower portion of the building not having an all-glass façade, and will contain vertical and/or horizontal elements characterized by masonry or similar materials (e.g. brick, stone, precast concrete, etc.)	The Applicant shared updated renderings of the façade with vertical and horizontal elements characterized by masonry or similar contextual materials (e.g., brick, stone, precast concrete). MCB4 recommends that approximately 40-50% of the façade be masonry, brick, or precast elements. The Applicant was not willing to commit to a percentage of masonry but stated they would further discuss this matter with the Manhattan Borough President and the Councilmember.

¹³ A requested height reduction with no reduction in the proposed 14.4 FAR.

Proposed Action	Initial Applicant Proposal (12/15/2025)	MCB4 Response (2/4/2026)	Applicant Draft Commitment Letter (1/26/26)	Applicant Response to MCB4 (2/17/2026)
Eleventh Avenue Street Wall	Street wall waiver at the ground floor level.	MCB4 requests that the Applicant maintain current Streetwall Requirements (ZR 96-332) ¹⁴ for the Eleventh Avenue Building of 50 to 95 feet, along Eleventh Avenue with no setbacks, recesses or entry plaza to reinforce and contribute to the existing streetwall streetscape.	The Applicant committed to no longer utilize the street wall waiver at the ground floor level and will locate the ground floor of the building at the Eleventh Avenue street line.	No further changes.
Percentage of Affordable Apartments	25% of the residential floor area will be affordable for an average of 60% AMI, with 10% of the affordable units designated at 40% AMI.	30% of the overall floor area, both residential and commercial, as affordable units. This action has the potential of increasing the total number of affordable units from 273 to 393.	The Applicant stated that its financial viability is predicated on the New York State real estate tax exemption for affordable housing. That exemption, Section 485-x of New York State Real Property Tax Law, also mandates union labor costs, and is aligned with income eligibility requirements for MIH Option 1. The applicant further stated that that increased commitments to affordability would further undermine overall project feasibility.	The Applicant committed to discuss the total square footage of affordability with the Borough President and the Councilmember.

¹⁴ Streetwall requirements for the Special Clinton District, [ZR 96-332](#).

Proposed Action	Initial Applicant Proposal (12/15/2025)	MCB4 Response (2/4/2026)	Applicant Draft Commitment Letter (1/26/26)	Applicant Response to MCB4 (2/17/2026)
Family Size Apartments	No Applicant position indicated.	Include apartment distribution of at least 20% 2-bedroom and/or 3-bedroom apartments, modeled on the SCD Preservation Area zoning requirements (ZR96-104).	The Applicant committed to include at least 15% of the residential zoning floor area as family sized units of 2-bedrooms or more.	The Applicant committed to further discuss increasing the percentage of family-sized units with the Borough President and the Councilmember.
Distribution of Affordable Apartments	No Applicant position indicated.	MCB4 requested that the Applicant commit to distribute affordable units on 80% of residential floors.	As set forth in ZR 27-16(b), affordable housing units must be distributed on not less than 65% of residential stories. The Applicant committed to provide affordable housing units on a minimum of 70% of stories in both proposed towers.	The Applicant restated its commitment to the distribution of affordable housing on a minimum of 70% of residential floors.
Building Amenity Spaces	No Applicant position indicated.	MCB4 requested that the Applicant agree to affordable and inclusive amenity spaces for affordable and market rate apartment.	The Applicant committed to provide residents of the affordable housing units equal access to all building amenities.	<p>However, MCB4 requests that the Applicant reconsiders its response, as inclusive and affordable amenity spaces are standard in MIH developments in the District.</p> <p>The Applicant committed to discuss amenity spaces and associated fees with the Borough President and the Councilmember.</p>

Proposed Action	Initial Applicant Proposal (12/15/2025)	MCB4 Response (2/4/2026)	Applicant Draft Commitment Letter (1/26/26)	Applicant Response to MCB4 (2/17/2026)
DeWitt Clinton Park Capital Improvements	No Applicant position indicated.	MCB4 recommends that the Applicant make contributions to capital improvements to DeWitt Clinton Park.	The Applicant stated it will provide at least \$29 million to public open spaces in HRP. The Applicant further stated that the requested contribution is not legally required, as the EIS did not find any significant adverse impacts on DeWitt Clinton Park.	The Applicant committed to discuss amenity spaces and associated fees with the Borough President and the Councilmember.

CONCLUSION

MCB4 appreciates that the Applicant has both addressed some of the open items in Board’s conditions for approval of this proposed zoning change. MCB4 further appreciates the Applicants new willingness to resolve open matters with Manhattan Borough President and the Councilmember during the continuing ULURP process for this proposed development.

MCB4 intended to note its appreciation of the Applicant’s commitments made to date in the attached letters. However, the applicant, after further detailed discussion with Board leadership on February 19, 2026, has sent a letter revising its clear commitments to “will consider further”. Their response backtracks on progress already made. Notwithstanding, all outstanding commitments detailed above are surmountable. MCB4 will work diligently with both the Manhattan Borough President and the Councilmember to bring these matters to resolution.

MCB4 is the only Community Board in New York City with an extensive written and documented Affordable Housing Plan.¹⁵ MCB4 has embraced both existing preservation and new housing construction in that plan. This proposal embodies multiple elements of MCB4 Affordable Housing Plan. However, given the number of unresolved items in the proposed plan, **MCB4 has decided to deny the proposed rezoning, unless the conditions as noted are resolved.**

¹⁵ [MCB4 2025 Affordable Housing Plan](#)

We look forward to continue working in partnership with the Applicant and our elected officials to ensure a thoughtful and integrated residential and commercial development to bring both market-rate and affordable housing to our community.

Sincerely,



Leslie Boghosian Murphy
Chair
Manhattan Community
Board 4



Paul Devlin
Co-Chair
Clinton/Hell's Kitchen
Land Use Committee



Rachel Lee
Co-Chair
Clinton/Hell's Kitchen
Land Use Committee

Enclosure

cc: Hon. Zohran Mamdani, Mayor
Hon. Brad Hoylman-Sigal, Manhattan Borough President
Hon. Gale Brewer, City Council
Applicant Team

760 12th LLC
c/o Friedland Properties
500 Park Avenue, 11th Floor
New York, NY 10022

801 11th Ave., LLC
c/o Chapman Consulting LLC
770 Lexington Avenue, 18th Floor
New York, NY 10065

February 23, 2026

Jesse Bodine
District Manager
Manhattan Community Board 4
424 W. 33rd Street, Suite 580
New York, NY 10001

Re: Dewitt Clinton Park North
629 West 54th Street – ULURP Numbers: N260062ZRM, C260060ZMM, C260061ZSM
801 Eleventh Avenue – ULURP Numbers: N260014ZRM, C260013ZMM, C260015ZSM

Dear Mr. Bodine,

Thank you for the Manhattan Community Board 4 Land Use Committee’s time and consideration of these zoning actions for both 629 West 54th Street and 801 Eleventh Avenue, each requesting a zoning map amendment, zoning text amendment, and special permit to facilitate two new mixed-use developments in the Special Clinton District. We appreciate the Committee’s engagement and the detailed feedback provided through the process.

As requested, this letter responds to the comments that were received from the Committee and summarizes areas where we have made progress, as well as topics where additional work and discussion remain:

801 Eleventh Avenue

- Street Wall: The applicant will continue to consider changes to the proposed design of the street wall and consistency with application regulations for a C4-7 zoning district.

629 West 54th Street

- Maximum Building Height: While reducing height brings results in significant tradeoffs, the applicant continues to explore the implications of bringing the massing line with the Eleventh Avenue building by reducing the height of the tower
- Facade Materiality: As shown in the attached rendering, the applicant proposes to redesign the tower portion of the building to not have an all-glass facade, and instead to contain vertical and/or horizontal elements characterized by masonry or similar materials (e.g., brick, stone, precast concrete, etc.).
- Floating Base: The applicant is exploring alternatives that would remove the design element that gives the appearance of a “floating base.”

Both Projects

- Family Apartments: We have been continuing to evaluate unit mix and are exploring increasing the share of family-sized units (2+ bedrooms), while recognizing the Committee's interest in this topic and the need for continued discussion.
- Affordable Housing: We have studied the Committee's request to utilize Mandatory Inclusionary Housing (MIH) Option 2 and to exceed the amount of affordable housing required by the MIH program. As we have discussed, complying with Section 485-x of the New York State Real Property Tax Law currently imposes costs that would make the projects financially unviable. Increased commitments would further undermine the feasibility of these projects, making it unlikely that we will be able to deliver the much needed housing and contributions to Hudson River Park that are proposed by these projects. Due to those factors, the projects must continue to have the ability to utilize MIH Option 1 (i.e., 25% of floor area rented at an average of 60% of AMI), consistent with the program requirements.

For the affordable housing units that are provided, we have made progress on the following items, which remain the subject of continued coordination through the ULURP process and project development:

- Distribution of Affordable Units: Section 27-16(b) of the Zoning Resolution requires affordable housing units to be distributed on not less than 65% of residential stories. We are evaluating whether it is possible to increase the distribution of affordable units throughout the buildings.
- Finishes and Appliances: We are proceeding on the basis that market-rate and affordable units would utilize identical finishes and identical (or comparable) appliances.
- Construction Task Force: We are open to establishing a regular forum for communication regarding construction activities, including periodic meetings (no more frequently than once every three months during active construction) to discuss schedule and milestones, street closures, and hours and types of work.
- 32BJ SEIU: Both projects have committed to recognizing 32BJ SEIU for building maintenance jobs and have executed neutrality agreements with 32BJ.
- Street Trees: We have been evaluating street tree planting around the projects in accordance with the Zoning Resolution, to the extent feasible. Where existing Con Edison vaults may constrain planting locations, we are continuing to consider appropriate alternatives in coordination with relevant agencies.
- On-Site Trash Collection: The projects are being designed for on-site trash collection and storage, with removal from an internal loading dock, and no curbside set-outs.

The applicants recognize the need to continue discussions regarding the maximum height of the 629 West 54th Street building, discounts on amenity spaces, the percentage of family-sized units and a potential contribution to Dewitt Clinton Park. We look forward to further discussing these aspects of the project with the Council Member, in light of the totality of the project requirements and the need to maintain viable projects.

The Committee's input has been valuable and has informed continued refinements to the proposals. We remain committed to engaging constructively with Community Board 4 as the ULURP process continues, with the goal of delivering needed housing, including affordable housing, to Hell's Kitchen while providing significant funding for Hudson River Park.

Sincerely,


William Friedland

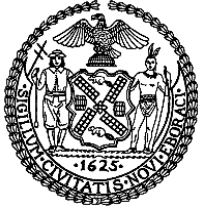

Patrick Milner

Exhibit A

629 West 54th Street Renderings

629 W. 54th St.





CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD No. 4

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<https://cbmanhattan.cityofnewyork.us/cb4/>

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February 23, 2026

Dan Gardonick
Chair
NYC Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

**RE: Draft Environmental Impact Statement
DeWitt Clinton Park North (801 Eleventh Avenue & 629 West 54th Street)**

Dear Chair Garodnick,

At its February 4, 2026 Full Board meeting, Community Board 4 (MCB4) voted by a vote of 35 in support, 0 in opposition, 0 abstentions, and 0 Present-Not-Eligible, to **deny, unless the following conditions are met**, the proposed application from the development team for zoning map amendments, zoning text amendments, and zoning special permits (collectively, the Proposed Actions) to facilitate the development of two buildings at 629 West 54th Street and 801 Eleventh Avenue.

The development team for the applicants, 760 12th, LLC and 801 11th Ave., LLC (the Applicants), presented their proposal at the Clinton/Hell's Kitchen Land Use Committee meeting on January 14, 2026. The public hearing for this ULURP action was held at the February 4, 2026 MCB4 Full Board meeting.

This proposed plan is a welcome addition to our community as part of the overall MCB4 Affordable Housing Plan, yet there remain issues that concern MCB4 in the implementation of the Proposed Actions. Specifically, MCB4 requests that the Proposed Actions occur only if:

- the massing of the buildings reduces overall height;
- the percentage of affordable units increases from 25% of residential square footage to 30% of the overall square footage of the entire development;
- the Eleventh Avenue street-wall remain uninterrupted;

- the unit mix of affordable apartments includes a wider range of AMI’s and includes more family-sized units¹;
- there is a significant contribution to the capital needs of DeWitt Clinton Park²; and
- there is a Construction Task Force to keep communication lines open with impacted neighbors³.

MCB4 has continued concerns about the cumulative impacts of multiple developments within Manhattan Community District 4 (MCD4). The Draft Environmental Impact Statement (DEIS) has multiple shortcomings as to the impact of this development on our neighbors. Specific issues from each chapter of the DEIS are detailed below.

PROJECT DESCRIPTION

Project Area

The project area (“Project Area”) and its surroundings are located within the Special Clinton District, created to preserve and strengthen the residential character of a community bordering midtown, maintain a broad mix of incomes, and ensure that the community is not adversely affected by new development. Development Site 1 is located in the C2 Sub-district of the Special Clinton District and Development Site 2 is located in the C1 Sub-district.

The Project Area is currently in M2-3 (CL) and M2-4 (CL) zoning districts and no residential uses are permitted as-of-right. The Applicants wish to pursue a mixed-use residential and commercial development by mapping a commercial C4-7 district, which has an R10 residential district equivalent. The Applicants hold that a replacement of the existing manufacturing districts with a high-density commercial district permitting residential uses would allow for the development of new housing (including affordable housing) in an area of Hell’s Kitchen with a dense, mixed-use character at a location in close proximity to public open space including DeWitt Clinton Park and the Hudson River Park.

Proposed Actions

The Proposed Actions include zoning map amendments to map the Special Hudson River Park (HRP) district on the Rezoning area and the portion of the granting sites not already mapped within the Special Hudson River Park District; and zoning text amendments to identify granting and receiving sites within the Special HRP District.

The Proposed Actions include zoning special permits under ZR Section 89-21 to transfer floor area from the designated granting sites to the development sites. Plus, on the W 54th Street site a Special Permit for a modification of minimum base height, maximum base height, and minimum setback; and, on the 11th Avenue site a Special Permit for the modification of street wall location.

¹ In the draft Commitment Letter, dated January 26, 2026, the Applicant has committed to ensuring that at least 15% of the residential zoning floor area will be comprised of family sized units (2+ bedrooms), and MCB4 requests that additional units be family-sized units.

² In the draft Commitment Letter, dated January 26, 2026, the Applicant declined this request, citing the projects’ existing commitment of at least \$29 million to Hudson River Park, and MCB4 maintains this request.

³ In the draft Commitment Letter, dated January 26, 2026, the Applicant has committed to participating in a community construction task force with periodic meetings held no more frequently than once every three months, to provide information on the construction schedule, upcoming milestones, street closures, and hours and types of work.

As well, the Proposed Actions include a use-related zoning text amendment to allow auto showroom uses with repair and the preparation of motor vehicles for the delivery as permitted uses in the Project Area . The text amendment is necessary, according to the Applicants, to continue allowing auto showroom uses within the Project Area to include, as under the existing zoning, repair and preparation of motor vehicles for delivery.

The Proposed Actions also include mapping a Mandatory Inclusionary Housing (MIH) area coterminous with the proposed C4-7 (CL) (HRP) district. The proposed MIH area would ensure permanent affordability is included in the Proposed Actions.

Project Areas

The Applicants intend to construct two buildings: a 42-story, mixed-use residential and commercial building on Development Site 1; and a 38-story, mixed-use residential and commercial building on Development Site 2.

Site 1 – West 54th Street

Development Site 1 occupies the western portion of Block 1102 and has approximately 201 feet of frontage along Twelfth Avenue and 175 feet of frontage along West 54th and West 55th Streets. Site 1 has a total lot area of 35,145.25 square feet (sf). It is improved with a six-story, 82-foot-tall commercial car dealership building with a total built area of approximately 152,375 gross floor area (gsf). The building was constructed in 1930.

The proposed building on Development Site 1 would contain a total of 617 Dwelling Units (DUs), of which 154 units would be designated as permanently affordable pursuant to MIH – Option 1, and 84,349 gsf of commercial auto dealership space. The proposed building on the Development Site 1 would rise to a roof height of 550 feet with a maximum height of up to 590 feet including a 40-foot mechanical bulkhead. The maximum base height would be 155 feet along West 54th Street and 167 feet along West 55th Street, after which a 10-foot setback from West 54th Street and a 15-foot setback from West 55th Street would be provided before reaching the maximum building height. The maximum base height along Twelfth Avenue would be 58 feet. The commercial use would occupy the first through third floors, and the residential use would occupy the fourth through 42nd floors.

Site 2 – Eleventh Avenue

Development Site 2 occupies the eastern portion of Block 110 and has approximately 201 feet of frontage along Eleventh Avenue, 100 feet of frontage along West 55th Street, and 150 feet of frontage along West 56th Street. Site 2 has a total lot area of approximately 26,830 sf, and is occupied by two buildings that have been operated as a single commercial car dealership, including a two-story, roughly 50-foot-tall building and a three-story, roughly 35-foot-tall building, with a total built area of approximately 57,805 gsf. The buildings were constructed in 1920, and the northern building was enlarged in 2011. Development Site 2 is mapped in a M2-3 district within the C1 Sub-district of the Special Clinton District (CL).

The proposed building on Development Site 2 would contain a total of approximately 477 DUs, of which 119 units would be designated as permanently affordable pursuant to MIH Option 1, and 64,392 gsf of commercial auto dealership space. The proposed building on Development Site 2 would rise to a roof height of 485 feet with a maximum height of up to 525 feet including a 40-foot mechanical bulkhead. The maximum base height would be 110 feet, after which a 10-foot setback from Eleventh Avenue and 15-foot setbacks from West 55th Street and West 56th Street would be provided before reaching the

maximum building height. The commercial use would occupy the first through third floors and the residential use would occupy the fourth through 38th floors.

MCB4 COMMENTS TO DEIS

The overall DEIS remains unfulfilled with regards to MCB4’s requests for further EIS study in our February 10, 2025 letter⁴ (MCB4 Requests) regarding the draft scope of work (DSOW). The greatest concern is the outdated methodology by relying solely on the CEQR standards and neglecting the cumulative impact of multiple developments within MCD4. The oft repeated phrase “No Significant Impact” throughout the DEIS is a result of avoidance of a true study of the impacts developments are having within MCD4.

MCB4 has called upon the Department of City Planning to fund and conduct a study on the cumulative impact of ULURP approvals since January 2021 on public infrastructure demands, particularly on public safety (e.g., police, fire, and EMT), schools, health care, recreational, and transportation services. This would include a forward perspective study taking into consideration specifically the rezonings in Midtown South (MSMX) and City of Yes, and a review of the future impact of NYCHA (Elliot-Chelsea/Fulton) redevelopment and ESD sites (Site K and Intrepid) that are now in the early stages of development. The study should quantify infrastructure strain, identify service gaps, and forecast future needs to guide equitable capital planning and investment. The study should include the cumulative impact of the possible approval of this ULURP, as an individual ULURP may not trigger certain detailed analysis. MCB4 and the overall community remain concerned about not being proactive and prepared for the influx of new residents, workers and visitors in the coming decades. MCB4 has a proven track record of supporting growth, and we remain committed to doing so by ensuring adequate preparation for and delivery of essential services.

The following details MCB4’s requests from the February 10, 2025 letter for further EIS study, the Applicant’s response as presented in the DEIS, and follow-up comments and requests from MCB4.

A. LAND USE, ZONING, AND PUBLIC POLICY

MCB4 DSOW Request:⁵

Please study an Alternative Proposal of development on these lots without added bonuses, meaning one that was not a receiving site of development rights from Hudson River Park, nor with the additional residential FAR. We need to understand the incremental difference of impacts between what could be built with a simple zoning change to a commercial zone versus what they plan to build as a receiving site with a 14 FAR.

- **DEIS Response:**

In the Land Use, Zoning, and Public Policy section, this is studied as a “No-Action Condition,” in which no zoning changes take place, noted on page 2-20 to 2-21. This alternative condition is an assessment of the expected environmental conditions in 2029 in the absence of the Proposed Actions and is different from MCB4’s request for a scenario where a zoning change to a commercial zone takes place.

⁴ [February 10, 2025 MCB4 Letter to Applicant re DeWitt Clinton Park North Draft Scope of Work](#)

⁵ Please note that all subsequent MCB4 DSOW Requests cite requests detailed in the [February 10, 2025 MCB4 Letter to Applicant re DeWitt Clinton Park North Draft Scope of Work](#) for analysis.

- MCB4 Comments:

However, Chapter 20 – Alternatives of the DEIS, considers a “No Special Permit Alternative,” in which the Applicant would seek a rezoning, but would not seek a transfer of development rights from Hudson River Park. **MCB4 requests an Alternative Proposal be studied in the EIS without the added bonuses as a result of the transfer of development rights from Hudson River Park.**

MCB4 DSOW Request:

Please study a plan to address potential flooding in the area due to higher temperatures and rising seas. This should include awareness of current and future flooding potential, especially given the proximity to the Hudson River. This should also include working with the different City and State agencies considering long-term solutions to flood resiliency, including large-scale projects providing coastal protection

- DEIS Response:

The only analysis of the flood risk and resiliency in the DEIS is the following:

“Neither Development Site is waterfront adjacent or located within 2050s 1% Annual Chance Floodplain. Development Site 1 is partially within a moderate risk flood zone with a 0.2% annual chance or greater of being met in any year; development on the Development Site 1 would be built to Appendix G Building Code standard as described throughout the WRP Policy response sections. The Proposed Actions would be consistent with WRP policies by supporting commercial and residential redevelopments in appropriate Coastal Zone areas, protecting ecological systems and water quality within the New York City coastal area, minimizing negative impacts on public health from hazardous materials, increasing climate resilience, and enhancing the public waterfront access(WRP# 23-225).” (pg. 2-6)

- MCB4 Comments:

A study of a plan to address potential flooding due to higher temperatures and rising seas is largely missing. **MCB4 requests that a more detailed study be done in the EIS to address potential flooding in the area beyond the limited technical definitions and limitations of the current CEQR standards, but more expansive to include the 2050 1% chance possibilities.**

B. SOCIOECONOMIC CONDITIONS

MCB4 DSOW Requests:

- *We recommend that the DEIS include an explanation of how the other types of displacement were deemed not to meet the CEQR thresholds before focusing primarily on the indirect residential displacement analysis.*
- *It would be helpful if the DEIS included a brief description of what the Maximum Residential Scenario entails, including the scale and type of development anticipated and a detailed explanation of the criteria used to determine whether and how the Proposed Actions would introduce or accelerate a trend of change in socioeconomic conditions in the area.*
- *Please specify the exact data sources used (e.g., links or citations of databases or reports) in the DEIS to ensure transparency and credibility of the analysis involving “recent available U.S. Census data and current real estate market data.”*

- *Please specify the timeframe over which the increasing rent trends will be assessed for accuracy and context and consider including a discussion of potential confounding factors that could influence rent trends, such as broader economic conditions or policy changes.*
- *The draft mentions that a detailed analysis will be conducted if the preliminary assessment reveals potential for the Proposed Actions to introduce a trend of change in socioeconomic conditions. It would be beneficial for the community to know the criteria or thresholds that would trigger this detailed analysis in the DEIS. Please include in the DEIS a brief description of what such analysis would entail, including any additional data sources or methodologies for community awareness and understanding.*

- **DEIS Response:**

The DEIS relies on prior EAS conclusions rather than clearly presenting the screening analysis within the DEIS; does not fully explain why business displacement and industry impacts are excluded; does not clearly state the rent trend analysis timeframe; and does not take into account socioeconomic effects related to the cruise terminal.

- **MCB4 Comments:**

MCB4 requests that:

- the FEIS provide a step-by-step explanation of each displacement screening determination;
- the FEIS clearly define study areas and analytical assumptions (including how the Maximum Residential Scenario is applied);
- the FEIS fully disclose all data sources and timeframes used for rent, demographic, and trend analyses; and
- the FEIS present transparent thresholds and calculations that trigger a detailed displacement analysis.

C. COMMUNITY FACILITIES AND SERVICES

MCB4 DSOW Request:

All New York City Public Schools must adhere to the Class Size Law (requiring the reduction of all class sized by 2028). Please study what effect this will have on the need for more space and teachers in elementary and middle schools.

- **DEIS Response:**

DEIS Findings on the Project's impact on schools: Conclusion - No significant adverse impacts were determined

The DEIS provides a detailed assessment of the potential indirect effects on public elementary and intermediate (middle) schools in Community School District 2, Subdistrict 3, and concludes that the Proposed Actions would not result in significant adverse impacts to these schools.

Based on the Maximum Residential Scenario (1,242 dwelling units), the project is projected to introduce: 39 elementary school students and 13 intermediate school students.

The DEIS analyzes the "With-Action" condition (future with the project) against the "No-Action" condition (future without the project) for the year 2029.

Elementary Schools

- Capacity: In the With-Action condition, elementary schools in the subdistrict are expected to operate within capacity at a utilization rate of 89.0%.
- Impact: Because the utilization rate remains below 100%, no significant adverse impact is anticipated.

Intermediate (Middle) Schools

- Capacity: Intermediate schools are expected to operate above capacity in the future, regardless of the project.
 - No-Action Condition: Projected utilization of 135.9%.
 - With-Action Condition: Projected utilization of 137.2%, with a deficit of 369 seats.
- Impact: Although the schools will be overutilized, the project does not create a "significant adverse impact" according to CEQR guidelines because it generates fewer than 100 intermediate-school-aged students (specifically, it generates only 13).

▪ MCB4 Comments:

Despite the technical “Action” and “No Action” implications showing “no significant adverse impacts,” there is clearly an Intermediate Schools deficiency. This is likely a correlation between the effects of cumulative developments occurring across the district without an analysis of cumulative impacts.

MCB4 requests that the EIS recognizes the Adverse Impact of pending developments on the Intermediate Schools and offers mitigation.

D. OPEN SPACE

MCB4 Requests:

- *An analysis of the impact of 2,000 new residents on DeWitt Clinton Park and the additional costs associated to preserve and enhance the park with this additional use.*
- *An analysis of the measures which will be in place to ensure the safety of park goers during construction.*
- *A plan for improving the sites with community greening, including the feasibility of planting trees.*

▪ DEIS Response:

The DEIS finds that there is no Significant Adverse Impact, that the Proposed Actions would not result in any significant adverse impacts with respect to open space resources, and that the developer will provide trees as required by the Zoning Resolution of New York City (“ZR”) Section 26- 41. There are numerous additional open spaces within a half mile of the development sites that are not included in the quantitative analysis, including Hell’s Kitchen Park, Gutenberg Playground, Damrosch Park, and Lincoln Center Plaza. These spaces would reduce the burden on open spaces in the study area. because there are sufficient parks and open space in the vicinity of the developments.

▪ MCB4 Comments:

Gutenberg Playground, Damrosch Park, Lincoln Center Plaza, are neither green nor spaces for active recreation. In fact, the reconstruction of Damrosch Park is slated to begin this year. It will

not reopen for years. Hell's Kitchen Park, a small local park, is already heavily used and a half mile walk from the 54th Street proposed development. Lorraine Hansberry Plaza is currently an empty lot. It is unclear when it will be developed as open space and available to the public.

DeWitt Clinton Park, directly across the street from the proposed 54th Street development, has a playground for children, a paved basketball court, a handball court, a playing field, a dog run, benches, trees and flower beds and public restrooms. It has paths for walking and, when baseball and soccer sports teams are playing, provides opportunities for nearby residents to gather and watch the games. Because of its proximity to the Project Area, it will serve as the go-to park for many of the 2,000-plus residents including children, teens, adults, and their animal companions.

A well-maintained nearby park would be an extraordinary amenity for the 2,000-plus new residents at DeWitt Clinton North, as well as a selling point for the Proposed Actions.

MCB4 requests that the EIS recognize the Adverse Impact on DeWitt Clinton Park and offer mitigation. MCB4 supports the developer working in consultation with Councilmember Brewer, the Parks Department, and MCB4 to work out a commitment by the developer to contribute to Parks Department funds to improve, beautify, and maintain DeWitt Clinton Park.

E. SHADOWS

MCB4 DSOW Request:

Please study potential shadow impacts on all surrounding areas, including DeWitt Clinton Park and Hudson River Park, for all daylight hours and during all seasons

- DEIS Response:

The Applicant completed detailed shadows analyses for DeWitt Clinton Park, Hudson River Greenway, Pier 96 and Hudson River Park, Pier 97 at Hudson River Park, Gertrude Ederle Playground, Samuel N. Bennerson Playground, Balsley Park, and the Hudson River. These sites were identified as being within the area of the longest shadow for the Proposed Actions.

Table 6-3 Detailed Analysis Summary of Incremental Shadow Entry/Exit Times

Resource	Analysis Day			
	December 21 8:51AM - 2:53PM	March 21/Sept 21 7:36AM - 4:29PM	May 6/Aug 6 6:27AM - 5:18PM	June 21 5:57AM - 6:01PM
Open Space Resources				
O1 – DeWitt Clinton Park	No incremental shading	No incremental shading	No incremental shading ¹	7:30AM-8:45AM (1 hour 15 minutes)
O2 – Hudson River Greenway	9:20AM-12:18AM (2 hours 58 minutes)	7:36AM-12:10PM (4 hours 34 minutes)	6:27AM-11:55AM (5 hours 28 minutes)	5:57AM-10:37AM (4 hours 40 minutes)
O3 – Pier 96 at Hudson River Park	8:51AM-11:22AM (2 hours 31 minutes)	8:00AM-11:15AM (3 hours 15 minutes)	7:28AM-10:44AM (3 hours 16 minutes)	No incremental shading
O4 – Pier 97 at Hudson River Park	8:51AM-11:30AM (2 hours 39 minutes)	No incremental shading	No incremental shading	No incremental shading
O5 – Gertrude Ederle Playground	No incremental shading	No incremental shading	No incremental shading	No incremental shading
O8 – Samuel N. Bennerson Playground	No incremental shading	No incremental shading	No incremental shading	No incremental shading
O10 – Balsley Park	No incremental shading	No incremental shading	No incremental shading	No incremental shading
Natural Resources				
N1 – Hudson River	8:51AM-12:18PM (3 hours 27 minutes)	7:36AM-10:22AM (2 hours 46 minutes)	6:27AM-8:27AM (2 hours)	5:57AM-8:21AM (2 hours 24 minutes)

Notes:

Per the 2021 CEQR Technical Manual, the selected time zone for the analysis is Eastern Standard Time and daylight-saving time was not used.

¹ There would be no incremental shadows on this resource due to intervening buildings

Page 6-14 onwards details shadow impact and analysis for DeWitt Clinton Park, Hudson River Park, and the Hudson River.

The conclusion is that there is “No Significant Adverse Impact” on the areas studied.

- MCB4 Comments:

However, MCB4 notes that the technical definitions of “no impact” do not take into consideration the negative effect on people using the bike lanes and walkways being cast in shadows for up to five and a half hours during the days.

MCB4 requests the EIS recognize the adverse impact of losing five hours of sunlight on the pedestrian and bike paths of Hudson River Park and offers mitigation.

F. URBAN DESIGN AND VISUAL RESOURCES

MCB4 DSOW Request:

Please study the feasibility of designing and planting a robust street tree canopy and vertical greenery to provide both important environmental benefits and a pleasing aesthetic.

- DEIS Response:

The DEIS does not address our request for a study of the feasibility of designing and planting a robust street tree canopy and vertical greenery. While it notes the existence of street trees along the development sites as part of its existing conditions description, the DEIS lacks analysis of whether the proposed building footprints, setback configurations, or base heights would accommodate enhanced tree planting, nor does it evaluate vertical greenery options such as green walls or planted façades.

- MCB4 Comments:

MCB4 requests that the Applicant consider both the environmental benefits and the aesthetic integration of a robust greening strategy into the final building designs.

With respect to 625 W 54th Street, MCB4 finds that the proposed development at 625 West 54th Street, located adjacent to DeWitt Clinton Park and Hudson River Park along Twelfth Avenue, may result in significant adverse impacts related to urban design, neighborhood character, and visual resources. Based on the massing diagrams and preliminary renderings submitted by the applicant, the proposed bulk, height, and material expression are not consistent with the existing scale and character of the surrounding built environment.

Further, MCB4 notes that the proposed 45-story glass tower element, set back approximately 70 feet from the Twelfth Avenue lot line and rising from a three-story podium base, is inconsistent with the established street walls in the district and the built form along Twelfth Avenue and introduces a tower typology that is not reflective of the prevailing development patterns in the area. MCB4 finds that this configuration may result in adverse urban design impacts, including an erosion of characteristic street wall heights and a pronounced visual presence along the waterfront corridor.

MCB4 finds that the proposed predominantly glass material palette of the tower portion does not adequately reference the surrounding context, which is characterized largely by masonry commercial loft buildings and former warehouse structures. The Applicant has committed that the tower will not have an all-glass façade and will contain vertical and/or horizontal elements characterized by masonry or similar contextual materials (e.g., brick, stone, precast concrete).

With respect to 801 Eleventh Avenue, MCB4 finds that the proposed recessed entrance condition at the northwest corner of West 55th Street and Eleventh Avenue is inconsistent with the established street wall and built context along both frontages and may result in adverse impacts related to urban design and pedestrian experience. MCB4 notes that recessed entry conditions in this area have historically raised quality-of-life and public safety concerns. The Applicant has committed to eliminating the street wall waiver and locating the ground floor of the building at the Eleventh Avenue street line.

Therefore, MCB4 requests that, in accordance with the Applicant’s commitments:

- the Applicants further evaluate a redistribution of floor area across the site, including a reduction in overall tower height and a reconfiguration of massing that more closely aligns with lot-line street wall conditions, particularly along Twelfth Avenue, in order to mitigate potential adverse impacts on urban design and neighborhood character;
- the Applicants incorporate masonry and other contextual materials into the tower elevations to better relate the project to the existing built environment, thereby mitigating potential adverse visual resource impacts; and

- with respect to 801 Eleventh Avenue, the applicant revise the entrance design to align with the lot-line street wall on Eleventh Avenue and West 55th Street in order to better integrate the building with existing conditions, reinforce street wall continuity, and mitigate potential adverse impacts on neighborhood character.

G. HAZARDOUS MATERIALS

MCB4 Request:

Please study the potential impact of hazardous materials on the surrounding community, please study the potential impact on ground water, please study potential soil contaminants, and please study the impact of hazardous materials during construction.

▪ DEIS Response:

In the Final Scope of Work in Preparation of a Draft Environmental Impact Statement, it was stated that

“A hazardous materials assessment determines whether the Proposed Actions may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: (a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposures; (b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or (c) the project would introduce a population to potential human or environmental exposure from off-site sources. The presence or likely presence of any hazardous substance or petroleum products on a site under conditions that indicate an existing release, past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property is known as a Recognized Environmental Condition (REC), which must be disclosed under CEQR.”

In the DEIS, it was reported that “The Proposed Actions would not result in significant adverse impacts with respect to hazardous materials with the placement of an E-designation (E-869) on Development Sites 1 and 2.”

▪ MCB4 Comments:

It is concerning that, as was noted, the Phase 1 Environmental Site Assessments identified a Recognized Environmental Condition (REC) and several Business Environmental Risks (BERs) at the development sites. The DEIS asserted that potential impacts would be reduced or eliminated through subsurface investigation and, if applicable, remediation. These issues remain a concern. As does the fact that the DEIS admits “Implementation of the DEP-approved Phase II ESI Work Plan for Development Site 1 has not occurred as of yet since the existing tenant at the site has denied access for further site investigations due to concerns that testing would disrupt and negatively impact business operations.

The fact that this study has not been completed leaves this issue at best an open one, and at worst one that could cause harm to the surrounding area.

A designation on a zoning map is a step in the right direction, but it would be more reassuring with known test and analysis results as opposed to relying on an internal notation to *possibly* conduct a study, and then if necessary, to remediate.

With 133 years of potential impact of auto shops, repairs, and industrial discharges, MCB4 remains concerned about the impact of hazardous materials. With DeWitt Clinton Park, where families and children visit and play every day, just a few feet across the street from one of the Project Areas, MCB4 remains very concerned about the impact of hazardous materials both now and into the future.

MCB4 requests that all environmental studies are completed and that all mitigation measures are in place prior to approvals of any building permits.

H. WATER AND SEWER INFRASTRUCTURE

MCB4 DSOW Request:

Please study the impact on wastewater and storm water on the City's sewage infrastructure both during construction and on completion of the projects.

- DEIS Response:

The DEIS provides an analysis of the project's impact on water and sewer infrastructure upon completion. It notes that the incremental increase in combined sewage flow would represent only approximately 0.04 percent of the North River Water Resource Recovery Facility's permitted capacity of 170 million gallons per day (MGD), and that the facility would retain approximately 55 MGD of available capacity under With-Action conditions. The analysis uses the Maximum Commercial Scenario as the conservative basis, as it generates greater water demand and sewage than the Maximum Residential Scenario. The DEIS states that the Proposed Actions would incorporate best management practices that would be required in accordance with the NYC Department of Environmental Protection (DEP)'s Unified Stormwater Rule (USWR) guidelines, which include requirements for bringing the development sites into compliance with the allowable stormwater release rate. However, the determination of specific best management practice methods are subject to further refinement of the building and site design and DEP consultation, and the chapter does not address infrastructure impacts during the construction phase.

- MCB4 Comments:

MCB4 requests that the Applicant provide a construction-phase stormwater and wastewater impact assessment and mitigation strategy addressing the potential for dewatering discharge, sediment-laden runoff, and other construction-related impacts on the City's combined sewer infrastructure. Additionally, MCB4 requests that the final EIS include specific commitments regarding the green infrastructure and best management practice measures to be implemented at each development site upon completion.

I. TRANSPORTATION

MCB4 DSOW Requests:

- *Please undertake a congestion impact study focused on traffic, noise, and environmental implications during both peak and off-peak hours during construction.*

- *Please study the impact of construction on traffic patterns and any re-routing of traffic in the community and any impact on the West Side Highway.*
- *Please undertake a collaborative plan with the MTA to address potential delays and overcrowding on local bus routes, especially studying plans for a potential increase of the frequency of the M12.*
- *Please study the possibility of sidewalk widenings to compensate for where the existing sidewalk may be narrow.*
- *Please study opportunities to make crossing over to Hudson River Park safer for the new residents as well as for all residents in the area.*
- *Please study a pedestrian safety plan.*
- *Please study a plan for consulting and communicating with the community if and when construction necessitates blocking streets or sidewalks.*
- *Please explore the feasibility of incorporating ample, secure bicycle parking and work with the DOT on measures to harden the bike lanes on 54th and 55th Streets and on 11th Avenue.*
- *Please study if and how the concurrent construction of the Port Authority Redevelopment will interact with the impact on transportation/traffic of this project, and develop mitigation plans accordingly.*

- **DEIS Response:**

The DEIS correctly identifies that M57 and M12 service must be increased to compensate for additional ridership.

The DEIS does not include a meaningful analysis of bicycle traffic, despite the rapid growth of cycling in Manhattan, existing bicycle lanes along W 54th Street, W 55th Street, and Eleventh Avenue, and the State's ongoing study of additional West Side Highway corridor improvements.

The DEIS identifies a significant adverse traffic impact at Twelfth Avenue and W 55th Street during the Saturday peak hour and contemplates mitigation through signal timing changes.

- **MCB4 Comments:**

MCB4 agrees with the DEIS findings on the need for increased M57 and M12 service and that these enhancements must be in place by the time the new buildings are occupied. We emphasize the need to improve rider comfort and safety along Eleventh Avenue, including upgraded waiting areas and shelters from W 54th Street through W 57th Street.

Given the distance to nearby subway stations, MCB4 expects increased bicycle use by residents, visitors, and delivery workers. The Proposed Actions should thus make significant on-site and curbside bicycle accommodations. MCB4 supports widening and upgrading the W 55th Street bike lane into a two-way configuration to help calm traffic and improve pedestrian safety at crossings.

MCB4 remains concerned about pedestrian safety around the West Side Highway, particularly at the W 55th Street crossing, where traffic movements create dangerous conditions. Safety improvements at this gateway to the highway will benefit new residents as well as the broader Hell's Kitchen community and will improve access to Hudson River Park.

MCB4 is concerned that the Proposed Actions regarding traffic may be infeasible or ineffective if it requires reducing green time for the West Side Highway, which is under the purview of the New York State Department of Transportation (DOT), and notes that this area is becoming a

major residential district at a major highway entrance, increasing conflicts among vehicles, pedestrians, and cyclists.

MCB4 agrees that W 57th Street and Eleventh Avenue is a dangerous intersection and should be addressed with pedestrian and bus-rider safety improvements.

MCB4 supports streetscape measures that enhance the pedestrian experience, including closely spaced elongated tree pits, and expects that building operations will not compromise sidewalk access (including that garbage staging will occur within a loading dock and not on the sidewalk). Sidewalk widening does not appear necessary for this Project.

Therefore, MCB4 requests that:

- M57 and M12 service be increased, with service enhancements implemented no later than building occupancy, and that bus waiting areas on Eleventh Avenue and bus shelters be installed at all stops from W 54th Street through W 57th Street to ensure and improve the quality of the commute;
- the EIS include an analysis of bicycle traffic and that the Project provide a substantial allocation of parking dedicated to secure bicycle parking, supported by one or more in-roadway bicycle corrals and a large in-roadway bike-share station adjacent to the site entrances;
- the W 55th Street bike lane be widened and upgraded into a permanent two-way bike lane to calm traffic and improve pedestrian crossing safety;
- the Applicant coordinate with NYC and State DOT to improve pedestrian safety at and around the West Side Highway, including at the West 55th Street crossing, through measures such as shorter crossing distances, exclusive turning signal phases, and increased pedestrian walk time;
- traffic mitigation for the Saturday peak-hour impact at Twelfth Avenue and West 55th Street be revisited with realistic assumptions regarding State DOT signal constraints, and that alternatives, including diverting some highway-bound traffic to West 57th Street, be evaluated if signal timing reductions on highway approaches are infeasible;
- safety improvements be implemented at West 57th Street and Eleventh Avenue, including bus waiting areas, protected turning signal timing (including red-arrow protections where appropriate), and bulb-outs;
- elongated tree pits be installed at close intervals to improve the pedestrian experience, and that Con Edison access be provided from within the building where feasible; if not, utility grates should be located between tree pits in the furnishing zone;
- all refuse and garbage staging occur within a building loading dock and never on the sidewalk; and
- the Applicant present a construction-period traffic and pedestrian management approach that minimizes disruption to traffic operations and maintains safe, continuous pedestrian access along sidewalks and crossings.

J. AIR QUALITY

MCB4 DSOW Requests:

- *Please study air quality impacts from project-generated vehicle trips, as well as heat and hot water systems.*
- *Please study impacts on air quality from on-site construction emissions and off-site mobile source emissions that result from construction equipment, delivery trucks, fugitive dust, and worker vehicles*

- *Please study an asbestos and other hazardous materials remediation plan, including an emergency exposure plan for all residences within the 1/2-mile radius. This should go beyond merely developing measures to “minimize potential exposure.”*
- *Please study the traffic delays resultant from the project, especially during construction. Those delays will translate into engine idling with further negative impacts on air quality. Please analyze those impacts and provide quantitative results. Similarly, concrete delivery trucks will also queue and idle, further affecting air quality. Please analyze those impacts and quantify the results. Idling for hours will affect air quality. Where will the cement trucks be queued up?*
- *Please study the use of low carbon and carbon negative building materials for all elements of the proposed project. Please also study incorporating CO₂ capturing building materials.*
- *Please study the air quality impact of construction on De Witt Clinton Park and Hudson River Park and the families and children using these parks.*

▪ DEIS Response:

The Air Quality section does not address emissions related to traffic idling, congestion, or stop-and-go conditions near the project site. As a result, it is unclear whether localized vehicle-related air quality impacts have been fully evaluated.

While the Transportation study estimates the number of trips generated by the project, it does not analyze traffic flow or idling conditions, and no additional information is provided to support the Air Quality analysis.

In addition, demolition and construction activities may release dust, asbestos, or other hazardous materials into the air. The DEIS does not clearly describe how construction-related air quality impacts would be monitored or managed, or what measures would be in place to protect nearby residents, workers, and pedestrians

▪ MCB4 Comments:

Therefore, MCB4 requests:

- a localized air quality analysis of project-generated vehicle trips, including congestion, stop-and-go conditions, and idling, with quantitative results;
- an analysis of emissions and air quality impacts from building heat and hot water systems, including the fuel/source assumptions and expected operational emissions profile;
- a construction-period air quality analysis covering on-site emissions and off-site mobile source emissions associated with construction activity, including construction equipment, delivery trucks, fugitive dust, and worker vehicles, with quantitative results and clearly stated assumptions;
- an analysis of traffic delays attributable to the project, especially during construction, and the resulting idling emissions, including concrete delivery truck routing, staging/queuing locations, expected idling duration, and quantified air quality impacts;
- a detailed asbestos and hazardous materials remediation plan, including an emergency exposure plan for residences within a one-half-mile radius, that goes beyond general statements about minimizing exposure;
- evaluation and adoption, where feasible, of low-carbon and carbon-negative building materials across the project, including CO₂-capturing materials where appropriate; and

- an assessment of construction-related air quality impacts on DeWitt Clinton Park and Hudson River Park, including potential exposures affecting families and children using these parks, with protective measures informed by the findings.

K. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

MCB4 DSOW Requests:

- *Please study a plan to address potential flooding in the area due to higher temperatures and rising seas. This should include awareness of current and future flooding potential, especially given the proximity to the Hudson River. This should also include working with the different City and State agencies considering long-term solutions to flood resiliency, including large scale projects providing coastal protection*
- *Please provide confirmation that the Proposed Project will comply with Local Law 33 of 2018/Local Law 95 of 2019 requiring owners of certain buildings over 25,000 square feet to obtain the Building Energy Efficiency Rating labels and display them near building entrances.*
- *Please provide confirmation that the Proposed Project is meeting the requirements of Local Law 97 of the Climate Mobilization Act (CMA) which requires most buildings over 25,000 square feet to meet greenhouse gas emissions limits*

▪ DEIS Response:

The DEIS concludes that the project would comply with New York City climate policies, including local laws, but much of this compliance is based on future actions rather than firm commitments. The DEIS does not clearly explain which measures will be used, when they will be implemented, or how long-term compliance will be ensured.

While flood resilience measures are described, additional clarity is needed to better understand how the project will reduce greenhouse gas emissions and remain resilient to future climate conditions, especially given the site's location in a coastal, flood-prone area.

▪ MCB4 Comments:

Therefore, MCB4 requests:

- a comprehensive plan addressing current and future flooding risks associated with sea level rise and climate change impacts, with clear assumptions and coordination with relevant City and State agencies on long-term resiliency solutions, including large-scale coastal protection projects;
- confirmation that the Proposed Project will comply with Local Law 33 of 2018 / Local Law 95 of 2019 regarding Building Energy Efficiency Rating labels and required posting near building entrances, as applicable; and
- confirmation that the Proposed Project will comply with Local Law 97 of the Climate Mobilization Act, including applicable greenhouse gas emissions limits for buildings over 25,000 square feet.

L. NOISE

MCB4 DSOW Requests:

- *Please provide a noise analysis showing that the mechanical equipment will not result in any significant increases in noise levels, either by itself or cumulatively with other project noise sources.*
- *Please study the potential impact of construction high decibel levels.*

- *Please study the noise impact of construction on a wide area around the construction sites. Mitigation measures must extend to residential uses in that area.*
- *Extraordinary construction related traffic delays caused by construction will generate traffic backups. MCB4 has experienced that serious traffic backups create impatient motorists and significant car horn honking. This impact should be studied, quantified and mitigated with enforcement personnel and noise surveillance cameras.*
- *Please study the impact to tenants and commercial users of buildings, once completed, of noise from the West Side Highway.*
- *Please study the impact of noise on surrounding parks.*
- *Please study the mitigation on noise during construction.*

- **DEIS Response:**

The DEIS assumes mechanical equipment noise will be acceptable based primarily on compliance statements; does not discuss cumulative noise impacts; monitoring locations do not reflect park edges, playgrounds, or the most affected residences; construction noise mitigation language remains vague (e.g., “where feasible”); and does not take into account noise effects from the cruise terminal.

- **MCB4 Comments:**

Therefore, MCB4 requests that:

- the Applicants commit to enforceable measures for mechanical equipment placement, screening, and noise limits (not solely compliance-based conclusions);
- the Proposed Actions include monitoring that covers DeWitt Clinton Park and other sensitive outdoor spaces, including park edges and playground areas;
- the FEIS define construction noise mitigation measures with specificity, including monitoring and a response framework (with clear standards rather than “where feasible”); and
- the FEIS address cumulative noise impacts, including from the cruise terminal, to the extent relevant to the affected area.

M. PUBLIC HEALTH

MCB4 DSOW Requests:

- *Please provide an analysis of what impact thousands of new residents might have on the potential health care demands, including the use of emergency services, of the community. Please include in the analysis the impact on the district of the recent impending closure of the Beth Israel Hospital and Emergency Room.*
- *Please study the availability and accessibility of public transportation to medical, behavioral health, and dental facilities.*
- *Please study the impact on the ability to obtain timely doctor appointments and patient services, both for existing residents and the new ones.*
- *Please study the impact on the current EMS catchment area and its EMS station ability to provide emergency services.*
- *Please study the response time of EMS, FDNY, and NYPD to each of the sites and, as necessary, to the nearest appropriate hospital (such as for Trauma).*
- *Please study how the residents and workers of the Proposed Actions will have access to food in general, and healthy and affordable options in particular.*

▪ DEIS Response:

It was noted that the Project Area is located in a developed area that is served by existing police, fire, and healthcare services, and would not introduce a sizeable new neighborhood. The Applicant believes that the Proposed Actions do not have the potential to result in significant environmental impacts related to police, fire and healthcare services and no further analysis on these services is warranted.

▪ MCB4 Comments:

With a combined 1,094 new dwelling units between the two Project Areas, MCB4 remains concerned about the impact on Public Health and the areas we noted above, both for the existing residents, workers, and visitors as well as the new ones. This is especially so as no analysis or studies were done on the topics we requested above.

MCB4 requests a detailed analysis of the studies requested in February 2025 as to the impacts of close to 2,000 new residents on the demands on our health care systems.

N. CONSTRUCTION

MCB4 DSOW Requests:

- *Please study the use of bird-friendly glass and windows with a frit-dot pattern in all buildings. These materials will also make the buildings easier to heat and cool, reducing energy needs.*
- *Please Study: Please provide detailed plans for managing construction-related traffic, emphasizing minimizing disruption and ensuring resident safety as well as minimizing noise for Dewitt Clinton Park users.*
- *Please study a plan to control and contain and remove construction debris.*
- *Please study a rat abatement plan.*
- *Please develop a plan to work with the nearby community and MCB4 during the construction phase to keep the community, and the developers, informed of any potential problems so they can be quickly resolved.*
- *Please study the impact the construction schedule will have on the surrounding area in general, and on current and planned future construction in a 2-mile surrounding radius, up to the point of planned completion of this proposed project. For example, the impact on the construction on Pier 94.*
- *Please study a plan for consulting and communicating with local schools and social service programs on pedestrian safety during construction.*
- *Please study developing and implementing a complementary public safety and social services plan to manage scaffolding and construction site conditions.*
- *Please study the impact construction will have on nearby NYC Sanitation facility and salt storage units.*

▪ DEIS Response:

The DEIS treats analysis as sufficient without committing to mitigation; explicitly states a community communication plan is “not required”; lacks enforceable commitments on construction coordination, complaint response, and real-time monitoring; does not clearly address cumulative construction impacts in the surrounding area; and does not consider construction effects from the cruise terminal.

- MCB4 Comments:

Therefore, MCB4 requests that:

- the Proposed Actions require a Construction Community Protection Plan, including:
 - designated community liaison;
 - advance notice of disruptive work;
 - complaint response timelines;
 - regular coordination with MCB4; and
 - real-time monitoring during high-impact phases.
- the Proposed Actions include debris management and rodent abatement plans with defined responsibilities and enforcement mechanisms; and
- the FEIS analyze cumulative/overlapping construction impacts in the surrounding area, including cruise terminal-related construction effects where applicable.

O. ALTERNATIVES

MCB4 DSOW Request (for Land Use, Zoning, and Public Policy):

Please study an Alternative Proposal of development on these lots without added bonuses, meaning one that was not a receiving site of development rights from Hudson River Park, nor with the additional residential FAR. We need to understand the incremental difference of impacts between what could be built with a simple zoning change to a commercial zone versus what they plan to build as a receiving site with a 14 FAR.

- DEIS Response:

This chapter on alternative conditions in the DEIS considers a “No Special Permit Alternative,” in which the Applicant would seek a rezoning, but would not seek a transfer of development rights from Hudson River Park. This No Special Permit Alternative would result in 219 fewer units of housing, and 65 fewer permanently affordable units compared to the Proposed Actions. The DEIS also noted that anticipated significant adverse impacts of the Proposed Actions would still occur under the No Special Permit Alternative. The Applicant declined MCB4’s request to utilize MIH Option 2, citing that compliance with Section 485-x of New York State Real Property Tax Law would render the projects financially unviable, and the projects must therefore continue to utilize MIH Option 1 (25% of floor area at an average of 60% AMI).

The following table, extracted from the DEIS, also notes the differences in square footage and the number of market rate and affordable units with and without the Special Permit, in the maximum commercial and maximum residential scenarios.

Table 20-1 Future No-Action and With-Action Comparison

Maximum Commercial Scenario ¹				
		With-Action Condition	No Special Permit Alternative	Difference
Auto Dealership (GSF)		0	0	0
Commercial Retail (GSF)		87,036 ²	87,036 ²	0
Commercial Office (GSF)		112,714	112,714	0
Residential	GSF	939,934	754,215	-185,719
	DUs	1,094	875	-219
	<i>Affordable DUs</i>	<i>219 to 328</i>	<i>175 to 263</i>	<i>-44 to -65</i>
TOTAL GSF		1,179,321	993,603	-185,719
Population		1,838	1,470	-368
Workers		756	748	-8
Maximum Residential Scenario				
Auto Dealership (GSF)		88,559 ²	88,559 ²	0
Commercial Retail (GSF)		0	0	0
Commercial Office (GSF)		0	0	0
Residential	GSF	1,066,176	881,942	-184,234
	DUs	1,242	1,025	-217
	<i>Affordable DUs</i>	<i>248 to 373</i>	<i>205 to 308</i>	<i>-43 to -65</i>
TOTAL GSF		1,194,373	1,010,139	-184,234
Population		2,087	1,722	-365
Workers		138	130	-8

Notes:

¹ The Proposed Projects are similar to the Maximum Commercial Scenario, except that in lieu of commercial retail and office uses, the Proposed Projects would have 199,750 GSF of auto dealership use.

² Includes commercial loading area.

■ MCB4 Comments:

MCB4 appreciates the response from the Applicant to study the alternative conditions through a No Special Permit Alternative in the DEIS. However, MCB4 specifically requested an alternative proposal that studied the difference of impacts between what could be built with a simple zoning change to a commercial zone, without added bonuses through additional development rights and additional residential FAR. The No Special Permit Alternative studies the condition of the zoning map amendment and zoning text amendment that would also allow the transfer of residential FAR.

Therefore, MCB4 requests that:

- The FEIS studies a “No Added Bonuses Alternative,” which studies an alternative development scenario in which the Applicant would only seek zoning map amendments from an M2-3 and M2-4 zoning district to C4-7 zoning district.

- The Applicant increases the percentage of affordable units from 25% of residential floor area to 30% of the overall floor area of the entire development.

CONCLUSION

MCB4 is the only Community Board in New York City with an affordable housing plan⁶ with projections for development that bring both market rate and affordable housing into our community. We recognize that the Proposed Actions provide an opportunity for new housing in MCD4. However, there remains a number of shortcomings in the proposal that must be addressed before any zoning text amendments and special permits can be approved. The issues we present are surmountable with commitments from the development team to bring forward a thoughtful and integrated scheme.

We look forward to working in partnership with the Applicant to ensure that a respectful and successful mixed-use development occurs at these sites that enriches the lives of current residents as well as our new neighbors.

Sincerely,



Leslie Boghosian Murphy
Chair
Manhattan Community
Board 4



Paul Devlin
Co-Chair
Clinton/Hell's Kitchen
Land Use Committee



Rachel Lee
Co-Chair
Clinton/Hell's Kitchen
Land Use Committee

Cc: Hon. Zohran Mamdani, Mayor
Hon. Brad Hoylman-Sigal, Manhattan Borough President
Hon. Julie Menin, NYC Council Speaker
Hon. Gale Brewer, NYC Council
Applicant Team

⁶ [MCB4 2025 Affordable Housing Plan](#)