



CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

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April 20, 2026

Joel Hochman
Empire State Development
655 Third Avenue, 4th Floor
New York, NY 10017

**RE: Draft Scope of Work for the preparation of an Environmental Impact Statement
Site K and Site 3HB Mixed-Use Project**

Dear Mr. Hochman,

The Proposed Project is a mixed-use development to be located on two parcels at 418 Eleventh Avenue (Site K) and 400 Eleventh Avenue (Site 3HB) near the Jacob K. Javits Convention Center on the West Side of Midtown Manhattan. The predominantly residential Proposed Project would facilitate the redevelopment of Site K and Site 3HB with approximately 3,950 apartments (including 1,185 affordable units), a total of 2,988,000 residential square feet; a 400-key hotel; and other community facility, retail, and parking uses. Public realm improvements, including shared streets and other streetscape improvements, would also be implemented in connection with each site along West 35th Street between Eleventh Avenue and Bella Abzug Park, and along Hudson Boulevard West between West 35th Street and West 36th Street. Construction of the Proposed Project is anticipated to start in 2027 and would be complete and operational in 2034.

An Environmental Impact Statement Public Scoping is in progress with preparation for a Draft Environmental Impact Statement (DEIS) on the Proposed Project. On March 11, 2026, Manhattan Community Board 4 (MCB4)'s Clinton/Hell's Kitchen Land Use (CHKLU) Committee received a presentation from the Applicant team, detailed below:

- Moinian Group, partial owner of Site 3HB and RFP designee for Site K
- BXP (formerly known as Boston Properties), partial owner of Site 3HB and RFP designee for Site K
- BRP, project affordable housing consultant

- Urbane, project community development and planning consultant
- FXCollaborative, project architect

MCB4 subsequently prepared comments on the technical areas to be analyzed in the DEIS, identifying issues to be addressed, including potential impacts and studies needed to better inform decisions.

On March 31, 2026, at its regularly scheduled Full Board Meeting, MCB4 by a vote of 36 in favor, 0 opposed, 1 present but not eligible to vote, and 0 abstaining, voted to submit the following comments on the technical areas to be analyzed in the DEIS.

OVERVIEW

In 2003, the Bloomberg Administration began advancing a proposal to redevelop the southern portion of Hell’s Kitchen and the northern portion of Chelsea as a predominantly commercial district. MCB4 engaged in concentrated and serious negotiations with the Bloomberg Administration to include a residential component to create a mixed-use district.

2005 HY Rezoning

In 2005, the New York City Council approved the Special Hudson Yards District (SHYD), a special purpose district in the New York City Zoning Resolution. In the SHYD, all main commercial developments are concentrated on the West 34th Street corridor, from Ninth to Eleventh Avenues, known as SHYD Subdistrict C.¹ The Eleventh Avenue corridor between West 34th and 41st Streets was conceived and approved as a high-density commercial area, now known as SHYD Subdistricts A1 to A5. The High Density residential area is centered on the Tenth Avenue corridor, known as Subareas D1 and D2 of the Hell’s Kitchen Subdistrict D.

As a strategy to incentivize commercial development over residential development in subareas A through C, a residential 6 FAR cap was put into place.

2015 Affordable Housing Plan

In 2015, the West 34th Street Corridor had approximately 10.1 million square feet of commercial development. That corridor has the densest zoning in the city, where development has occurred, including Manhattan West, the Eastern Rail Yards, and the four corners of West 34th between Tenth and Eleventh Avenues. In that corridor, many commercial developments had already been completed. At the same time, the Eleventh Avenue corridor did not attract that degree of commercial development. In fact, Hotel Meta at 450 Eleventh Avenue, at 37th Street, is the only commercial building that has been built.

While several development plans were announced for the northern part of Eleventh Avenue, the Eleventh Avenue corridor did not attract the same level of commercial development.

Therefore, MCB4 requested the elimination of the 6 FAR residential cap and consulted with property owners regarding a shift to market-rate and affordable residential development.

¹ See appendix A for Special Hudson Yards District map.

In its first Affordable Housing Plan dated June 2015, MCB4 proposed to amend the Hudson Yards zoning text to eliminate the 6 FAR residential cap allowing residential development as of right, with Inclusionary Housing Bonuses, to provide both market rate and affordable housing then to be followed by commercial development.

During the de Blasio administration, MCB4 continued to advocate for that zoning text change for the residential 6 FAR cap to be lifted to 12 FAR for denser residential use. Multiple property owners in the Eleventh Avenue corridor were supportive of MCB4's efforts. Within Subareas A3, A4, and A5, MCB4 proposed to maintain existing extremely dense overall FARs but increase the residential FAR, currently capped at 6 FAR, to increase residential FAR to 12 with Inclusionary Housing Zoning Text (proposed 30% affordability).

In 2022, MCB4 also recommended removing the restriction that commercial FAR be planned or built prior to residential development.

MCB4 Affordable Housing Plan – 2025 Revisions

After the residential FAR cap was lifted in the 2024 NYS budget negotiation process, MCB4 further revised its Affordable Housing Plan to focus the Eleventh Avenue corridor from West 34th to 41st Streets as a landing spot for Very High Density (VHD) residential zoning, as the existing overall FARs already had high densities of 18 to 33 FAR.

Through the Department of City Planning's 2024 City of Yes for Housing Opportunity, R11 and R12 districts were introduced, with residential FARs of 15 and 18, respectively. VHD zoning in select areas would alleviate the increased housing demands in Manhattan Community District 4 (MCD4). MCB4 supported the development of VHD sites in the Eleventh Avenue corridor from West 33rd to West 56th Streets, at selected locations which included the following:

- 651 W 33rd Street - Javits Marshalling Yards (between Eleventh and Twelfth Avenue)
- 525 Eleventh Avenue – MTA Quill Bus Depot (between W 40th and W 41st Street)
- 450 W 41st Street – Former Hunter Vorhees Campus (between Dyer and Tenth Avenue)
- 629 W 54th Street (between Eleventh and Twelfth Avenue)
- 801 Eleventh Avenue (between W 54th and W 55th Street)
- 314 W 40th Street – NYS DOC Parole Office 13 (between Eighth and Ninth Avenue)

However, MCB4 further noted that the recommendation of siting VHD residential developments must be accompanied by a series of requirements for the siting of civic infrastructure, including NYPD, FDNY, EMS, schools, public healthcare facilities, social services, arts and cultural resources, recreational and green spaces, and adequate sewer and water infrastructure upgrades. Without these requirements attached to the siting of VHD districts, development will put a major strain on existing public services.

Site K – Residential RFP Announcement (2023)

When Site K was announced with VHD residential FAR, MCB4 embraced the opportunity for VHD development on this location. Given the unique circumstances that the Site K ownership

team was the same for the block to the south (now known as Site 3HB), MCB4 requested that the developer and ESD consider extending the proposed residential project to include that block.

Proposed Project

This Proposed Project will be the first in the City and State of New York with VHD residential zoning of 18 to 30 FAR, after the elimination of the 2024 NYS Multiple Dwelling Law (MDL) 12 FAR cap. This Proposed Project will set a precedent for districts across the City to implement VHD housing.

Given the significance of this VHD residential zoning, MCB4 requests the State recognize the impact of high-density housing well beyond the technical aspects as defined in the State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR) Technical Manuals when undertaking the studies of potential impacts.

Proposing to construct a mixed-use project with approximately three million square feet of residential use (close to 4,000 apartments), in addition to hundreds of thousands of square feet for hotel, retail, and community facility space, **this Proposed Project is similar to building an entire town in other parts of the State.** The proposed increase of approximately 6,000 residents² from this one development alone merits serious consideration of the quality of life of thousands of new neighbors and tens of thousands of existing neighbors. To that end, it is critical that the plan incorporates all the demands of a livable town including the following:

- a mix of apartment sizes, particularly family-sized units of 2- and 3-bedroom apartments
- a wide range of affordability at a range of Area Median Incomes (AMIs), including low-, moderate-, and middle-income housing
- a percentage of affordability greater than 30% over the entire development
- provide locations for necessary public safety services including new police, fire, and EMT stations
- provide locations for new medical facilities and public health services to offset already diminished hospitals in MCD4
- provide locations for affordable food stores to serve the needs of existing and new affordable and market-rate apartment tenants
- widening sidewalks along West 35th and 36th Streets, east of Tenth Avenue, to increase the pedestrian capacity of sidewalks from the Proposed Project and the Javits Center,
- provide a location for daycare and a public school
- a thoughtful approach to connected, accessible, open, green space
- a mix of retail that meets the demands of an economically diverse population
- a sustainable and renewable on-site energy production system to meet the demands of the new residents, workers, and visitors

² This projection is based on an average household size of 1.5 people in 3,950 apartments.

CUMULATIVE IMPACT

The entire Middle West Side of Manhattan has been reconceived and is being rebuilt. Therefore, the State and City must provide a study of the cumulative impact of these State- and City-sponsored projects and their impact on the public infrastructure, including:

- Emergency services, including EMS, FDNY, and NYPD
- Public school classrooms
- Hospitals and health care services
- Transportation services and expanded transit options
- Food stores and other affordable food options
- Recreational services

The study should identify service gaps, quantify infrastructure strain, and forecast future needs to guide equitable capital planning and investment.

MCD4 is home to some of the largest and most complex infrastructure projects in the City and the State of New York. See the following table for further information:

Project	Duration	\$ Amount
Port Authority Bus Terminal Replacement ³	2024-2040	\$10,600,000,000
Manhattan Cruise Ship Terminal ⁴	To be determined	Development cost to be determined
Penn Station Redevelopment ⁵	2027-2044	\$7,000,000,000
Western Rail Yards Development ⁶	To be determined	\$2,000,000,000
Hudson River Gateway Tunnel Project ⁷	2023-2038	\$16,000,000,000
NYCHA Fulton/Elliott-Chelsea (FEC) Proposed Redevelopment	2025-2040 ⁸	\$1,200,000,000
Total		Approx. \$36,200,000,000

Further, this comprehensive study must take into consideration, the following rezonings and requests for proposals (RFPs) since January 2021:

- 2025 Midtown South Mixed Use (MSMX) rezoning
- 2024 City of Yes for Housing Opportunity rezoning
- Empire State Development (ESD) sites
 - 2025 Intrepid Parking Lot RFP
 - Javits Center Marshalling Yards (RFP to be issued)

³ [Phase 1 to be completed 2028, main terminal operational in 2032, and full completion expected in 2024.](#)

⁴ No timeline or development cost available at this time. See [NYCEDC masterplan](#) and [MCB4 response](#).

⁵ [Construction starting 2027, station to be completed 2032, and all new developments to be completed by 2044.](#)

⁶ See the 2026 MCB4 [letter](#) to the Mayor, Comptroller, and City Council Speaker regarding WRY financing.

⁷ [Construction began in 2023, new tunnel to be completed in 2035, rehab of old tunnel to be completed in 2038.](#) See [US DOT website](#) for proposed project cost.

⁸ Timeframe refers to the [originally proposed timeline](#) prior to ongoing legal actions. See [here](#) for development cost.

VHD Developments	Address	FAR	Proposed Total Units	Proposed Affordable Units
Intrepid Parking Lot ⁹	621 West 45 th Street	18.0	978	245
DeWitt Clinton Park North	801 Eleventh Avenue 629 West 54 th Street	14.4	1,094	273
Total			2,072	518

In total, these development projects will bring tens of thousands of new apartments, residents, hotel guests, workers, and visitors to MCB4. MCB4 has a proven track record of supporting growth of commercial and residential uses, including affordable housing. MCB4 remains committed to doing so by ensuring adequate preparation for and delivery of essential services. MCB4 requests for a cumulative impact study rooted in the goal of being proactive, rather than reactive, in anticipating necessary community services due to recent, ongoing, and planned development projects in MCD4.

STUDY REQUESTS FOR THE PROJECT DEIS

There are thirteen areas identified in the Environment Assessment Form for which the Proposed Project has the potential to cause significant adverse impacts, and that an Environmental Impact Statement is required. As the study is prepared, and the Draft Scope of Work (DSOW) lists areas needing study, MCB4 requests the following impacts be included within each of the identified technical impact categories. The DSOW notes that there are no significant natural resources within the project area. Therefore, the DSOW does not include a chapter on natural resources.

Due to the cumulative impact of multiple developments within close proximity to these proposed development sites, MCB4 requests that the entire study area be increased from ¼ mile to ½ mile radius.

Task 2. Land Use, Zoning, and Public Policy

The Proposed Actions, including the override of existing zoning regulations, to facilitate construction of a primarily residential, mixed-use development on the Project sites, would affect zoning, land use, and public policy in the Project area.

The public policies listed in the DSOW are not sufficient and do not cover all recently enacted policies.

- Please study the impact on how the Proposed Project can further the specific goals outlined in the 2025 revision of MCB4’s Affordable Housing Plan.
- Please study the impact of the Proposed Project on the Bella Abzug Park and district maintenance functions of the Hudson Yards/Hell’s Kitchen BID.

Task 3. Socioeconomic Conditions

According to the DSOW, the Proposed Actions are not expected to cause direct residential or business displacement but could cause indirect residential or business displacement by causing

⁹ See [Intrepid Parking Lot RFP here](#). Proposed total units and affordable units were estimated from the lot area, FAR, and existing Intrepid Parking Agreement for 14 bus parking spaces.

increases in property values and thus rents for a potentially vulnerable population or category of business.

Further, the DSOW notes that the Proposed Actions would not meet the City Environmental Quality Review (CEQR) thresholds warranting analyses of (1) direct residential displacement, (2) direct business displacement, and (3) indirect business displacement due to market saturation.

However, this is the densest development to ever be built in the State and City of New York. To state that this Proposed Project does not meet the CEQR thresholds is shocking and misleading, given the scale of its development. Further, in conjunction with the VHD developments listed above, there will be serious and substantial impacts. If this Proposed Project does not meet the CEQR thresholds, the City should consider changing its guidelines warranting analysis.

This is based on a technical manual that does not recognize the cumulative impact of multiple developments within a short radius of the site. The DSOW does not adequately recognize the cumulative impact of thousands of new residents into two blocks that currently have no residents.

- Please study the direct residential displacement, the direct business displacement, and the indirect business displacement for a ½ mile radius beyond the proposed sites beyond the CEQR technical manual guidelines.

Task 4. Community Facilities

The Proposed Actions must be studied in conjunction with other VHD developments, including the DeWitt Clinton Park North site at 629 West 54th Street and 801 Eleventh Avenue, the Intrepid Site at 621 West 45th Street, and the Javits Marshalling Yards site at 651 West 33rd Street.

Due to the unprecedented population increase of approximately 6,000 new residents from the Proposed Project, in conjunction with other VHD developments, there will be a substantial impact on existing public schools, public libraries, early childhood programs, community facilities, and services. The potential impact of 3,950 new apartments and 400 hotel rooms on neighborhood facilities and services requires thorough analysis that supersedes studies required for projects of a smaller scale.

The historic nature of this proposed development, and the establishment of precedence for high-density housing, is even more reason to approach this in a new and creative way.

Please study the impact on:

Schools

The primary study area for the analysis of elementary and intermediate schools will be the school district's "sub-district" in which the Project Area is located [Community School District (CSD) 2, Sub-district 3 (Chelsea/Midtown West)].

The zoned elementary school for these addresses is the P.S. 51 (Elias Howe), located at 525 West 44th Street, approximately a half mile away from the proposed site. The next closest school is P.S. 33 (Chelsea Prep) at 281 Ninth Avenue on property adjacent to the NYCHA housing community set for redevelopment over a 30-year timeline. The impact on the school and the school's immediate and long-term future are presently unknown.

Further, according to the 2009 Western Rail Yards Points of Agreement, Related Companies has committed to the construction of an approximately 120,000 square foot, 750-seat, K-8 public school on the Western Rail Yards (WRY), between West 30th to 33rd Streets and Eleventh and Twelfth Avenues. The WRY has not begun and there is no set timeline for construction and occupancy of the proposed K-8 school.

Given that all New York City Public Schools must adhere to the Class Size Law (requiring the reduction of all class sizes by 2028):

- Please study the potential need for the additional number of K-5th grade seats generated by this development as well as the impact on local, existing early childhood centers and elementary schools and proposed mitigation.
- Please study the potential need for the additional number of middle school and high school seats needed as a result of this Proposed Project.
- Please study the potential school district rezoning of elementary schools to accommodate the increase in students.
- Please study the need in existing elementary, middle, and high schools for more space, teachers, administrators, and specialists (e.g., nurses, social workers, counselors) in elementary, middle schools, and high schools to accommodate the influx of students.

Daycare

- Please study the potential need for the additional number of daycare, 3K, and pre-K seats generated by this development as well as the impact on local, existing early childhood centers and elementary schools and proposed mitigation.

Libraries

The DSOW states that the assessment will identify and present on a map library branches serving the area within approximately ¾-mile of the Project Area. However, there are no New York Public Library (NYPL) branches within ¾ miles of the project site. Currently, the closest NYPL branches are the Columbus Library at 742 Tenth Avenue, at West 51st Street, and the Muhlenberg Library at 209 West 23rd Street. Further, the NYPL branch that previously served this portion of MCD4, the Carnegie Library 40th Street Branch at 457 West 40th Street, between Dyer and Tenth Avenues, was one of the original Carnegie libraries that was closed and demolished after the Lincoln Tunnel Redevelopment. Therefore, west of Eighth Avenue, there are no public libraries between West 24th and 50th Streets. This portion of Hell's Kitchen/Hudson Yards needs a new NYPL branch through space for a library branch at this development site.

- Please study the potential impact of the project on the delivery of library services to existing populations, as well as the new population brought into the neighborhood

through the Proposed Project, specifically the potential need to add a library branch to this development site.

- Please study the potential need to add space for a library branch in the Proposed Project.

Emergency Response Services

The DSOW states that the Proposed Project does not warrant detailed analyses of potential impacts on police and fire facilities.

The unprecedented size of this project necessitates review of appropriate emergency response services, including capacity, response times, and the impact of a redirection of services to the community will have on other areas currently served by those same services.

- Please study the impact on and potential need for increased New York City Police Department (NYPD), New York City Fire Department (FDNY) services in the area to adequately serve the existing population, approximately 6,000 new residents, and influx of visitors and employees, especially during peak periods. Please provide a detailed plan to address such impact, including the estimated number of NYPD and FDNY personnel expected to serve the area.
- Please study a potential location in the Proposed Project for a new FDNY or NYPD station.

Healthcare Services

The DSOW states that the Proposed Project does not warrant detailed analyses of potential impacts on health care services and facilities in the study area.

The unprecedented size of this project necessitates review of appropriate healthcare services, including capacity, response times, wait times for appointments, and the impact of a redirection of services to the community will have on other areas currently served by those same services.

- Please study the impact on and potential need for increased emergency medical services, urgent care facilities, hospitals, out-patient services, imaging, and physician and dental care. Please study current and projected capacity, wait times, and ability to get an appointment due to the influx of visitors and employees, especially during peak periods. Please provide a detailed plan to address such impact and increased demands reflecting both impact on this community and existing populations served by these services.
- Please study the potential increase in demand for and ability of healthcare services to adequately serve the existing and new transient population in the Project Site.
- Please study the ability of healthcare services to adequately serve approximately 6,000 new residents and workers which will be added to MCD4, and how servicing these new populations will impact service of existing populations.

Food and Grocery Stores

Given the projected need for retail services for new residents, consideration should be given to where people will shop for day-to-day necessities. The closest full-service supermarket is Whole Foods, with an entrance on West 33rd Street and Tenth Avenue. A limited-service supermarket is available at Brooklyn Fare, at 431 West 37th Street, between Ninth and Tenth Avenues.

Approximately 6,000 new residents of the Proposed Project will need to shop for day-to-day groceries and other necessities.

- Please study the impact of the Proposed Project's introduction of 6,000 new residents on grocery stores in the area, including their ability to supply adequate quantity of healthy and common staples, impact on capacity within the stores at peak times, wait times for check-out, and accessibility to the Proposed Project, especially given that the closest current stores are close to ½ mile away.
- Please study the potential of additional grocery and food store locations that provide both affordable and healthy options.
- Please study the impact of including a full-service grocery store at the Proposed Project.

Other Community Facilities

- Please study the Proposed Project's impact on existing community centers providing social services, such as the Hudson Guild and Hartley House.
- Please study the potential to include community spaces and facilities, for meetings and recreational use, within the Proposed Project to address the lack of existing community meeting spaces and facilities within the MCD4.
- Please provide a detailed explanation of the potential community benefits of the proposed teaching kitchen.
- Please provide a detailed explanation of the potential community benefits of the Climate Museum.

Task 5. Open Space

Proposed Actions will introduce approximately 3,950 apartments, and approximately 6,000 new residents. This increased population will result in significant adverse impacts related to open space, well above the 200-resident and 500 non-resident CEQR thresholds.

- Please analyze the direct and indirect impacts on residential and nonresidential open space.
- Please study the impact of the new residents on the adjacent Bella Abzug Park, and the additional costs associated to maintain and enhance the park with the dramatic increase in residential and commercial use following the Proposed Project.
- Please study measures which will be in place to ensure the safety of parkgoers in Bella Abzug Park, especially families and children, during construction.
- Please study the impact of the new residents on the nearby Hudson River Park.

The Proposed Project is within the Hudson Yards Uniform Tax Exemption Policy (UTEP) area, and the Proposed Project will make Payments in Lieu of Taxes (PILOTs) to the Hudson Yards Development Corporation, rather than real estate tax payments to the City of New York. Future residents of the Proposed Project will heavily use Bella Abzug Park, given its direct adjacency. The Hudson Yards Hell's Kitchen Alliance (HYHK), the local Business Improvement District (BID) is responsible for the operations and maintenance of Bella Abzug Park funded through real estate tax assessments from real estate developments. Under current private ownership, Site 3HB currently makes BID payments to HYHK. Site K, under State ownership, does not. With the transfer of Site 3HB to State ownership, as well as the current State ownership of Site K:

- Please provide details on how Site K and 3HB will make BID payments to HYHK, to operate, maintain, and conduct programming in the adjacent Bella Abzug Park.

Task 6. Shadows

The Proposed Actions would introduce buildings that would exceed 800 feet in height, and new shadows will be cast on sunlight-sensitive resources. Under the guidance of the CEQR Technical Manual, a shadows assessment is required for proposed actions that would result in new structures more than 50 feet taller than the No Action condition and either adjacent to a sunlight-sensitive resource or over 250 feet in height.

Shadows

The “longest-shadow radius” may extend beyond immediate project area with potential effects on Hudson River Park, Bella Abzug Park, the Javits Center’s glass entrance/reception atrium, Javits Center’s green rooftop (e.g., trees, plants, solar arrays, aviary breeding/nesting grounds, apiaries & greenhouse) and neighboring residential streets. The DEIS should map the full geographic extent of shadows and not just a generalized radius.

- Please study the maximum shadow length expected from buildings exceeding 800 feet, including the distance the December 21st shadow will extend.
- Please study shadow impacts on Hudson River Park and Piers (notably Pier 76), the High Line, and smaller neighborhood parks, plazas, and Privately Owned Public Space (POPS) as the current scoping definition may undercount heavily used but smaller scale neighborhood resources.
- Please study the cumulative loss of sunlight over growing season and not just limited to four representative days currently identified in proposed scope.
- Please study the impacts of shadows on residential corridors and pedestrian realm, notably all sidewalks in the study area.
- Please study the impact of cumulative developments within the study area, notably the approved or planned developments in the Hudson Yards/Javits Center sites.

Task 7. Historic and Cultural Resources

The Proposed Actions would result in new construction near several properties, detailed below, known to be eligible to be listed on the State/National Registers of Historic Places and would involve in-ground disturbance.

Please study the impact on these sites:

- Pinehill Crystal Water Company, 500-504 West 36th Street
- The Hill Building, 469-475 Tenth Avenue
- 500 West 37th Street
- The High Line

Off-Off-Broadway Theaters

MCD4 has a long history of nurturing and preserving small theater companies, which are the lifeblood of innovation and development in the theater industry that is central to the City’s image

and economy. Adding a theater to the Proposed Project would both acknowledge this history and continue this important tradition.

- Please study the feasibility of including a small off-off-Broadway theater in the Proposed Project.

Task 8. Urban Design and Visual Resources

According to the CEQR Technical Manual, a preliminary assessment is appropriate when there is the potential for a pedestrian to observe, from the street level, a substantial physical alteration beyond that allowed by existing zoning. The Proposed Actions would result in a physical alteration of more than 1.5 acres and thus meets a CEQR Technical Manual preliminary analysis threshold.

- Please study the impact of the loss of relative residential scale in mass of buildings to the neighboring blocks to the north.
- Please study mitigation measures, such as bulk or height reduction, setbacks and tapering, facade articulation and materials, and streetscape improvements, for adversely impacted areas.

View Corridors and Visual Resources

- Please study the impacts of the view corridors along the key pedestrian gateways of Midtown/Hell's Kitchen residential streets on West 34th, 35th, and 36th Streets, including the waterfront approaches west of Eleventh Avenue along West 34th Street.
- Please study waterfront and skyline views, long-distance views from adjacent Streets, and views looking east from inside Javits Center's glass atrium.
- Please study and provide mitigation measures to address the impacts of the Proposed Project on the High Line, including visual site lines to sites such as the Empire State Building.

Streetscape, Public Realm, Contextual Impact

- Please study how the Proposed Project would affect open space and streetscape continuity and be integrated with Bella Abzug Park and nearby waterfront.
- Please study ground-floor/street-level transparency and activation, sidewalk widths and congestion impacts, and the effects of large-scale developments on walkability, access, and pedestrian engagement as it relates to wind, shadow, and light interplay. Please consider avoiding blank walls or inactive frontage, lighting, to ensure consistency with neighborhood character.
- Please study the impact on pedestrian usage along West 34th, West 35th, and West 36th streets, which are robust pedestrian thoroughfares to and from Javits Center located on Eleventh Avenue in relation to the planning and placement of "back-of-house" functions.
- Please study the feasibility of required street tree planting on all sidewalks which abut the sites and coordination with any required Con Ed electrical vaults.
- Please study the inclusion of expanded tree beds, known as sidewalk gardens, in conjunction with the HYHK Streetscape Study.¹⁰

¹⁰ [See HYHK Streetscape Study and other reports.](#)

Task 9. Hazardous Materials

The Proposed Actions would result in new in-ground disturbance within the project area, with the potential to increase pathways to hazardous materials, petroleum products, and/or other environmental concerns that may be present. Site 3HB was enrolled in the New York State Department of Environmental Conservation's Brownfield Cleanup Program, with all cleanup and remedial activities on the site completed in 2012 (BCP Site No. C231049). Sites K and 3HB are currently mapped with E-designations (E-137) for hazardous materials, which requires that the fee owner of the sites conduct a testing and sampling protocol and prepare construction-related health and safety plans.

As noted in MCB4's Affordable Housing Plan, Site K on 418 Eleventh Avenue includes a MTA Ventilation Shaft, MTA Mechanical Building, and an active below-ground train track owned by Amtrak.¹¹ MCB4 is concerned about the impact of hazardous materials at these sites, and its effect on nearby residences, the Westside Highway, the Hudson River, outdoor spaces, and parks, including Bella Abzug Park, Hudson River Park, and the High Line. Impacts also extend to schools, childcare and early learning, healthcare facilities, and transportation hubs.

Concerns about hazardous materials at Site K and the surrounding Hudson Yards area, including 3HB, stem from previous fill, prior industrial uses, and underground storage tanks. These can contain contamination below the surface. Prior rail use could lead to asbestos, lead, and other concerning contaminants.

Because the Proposed Actions would result in new in-ground disturbance, an assessment of hazardous materials is warranted.

- Please conduct an environmental study of soil samples to determine *current* contaminants and if so, what their impact would be on the community.
- Please study the potential impact of the removal of hazardous materials, including all possible contaminants, on the surrounding community within a ½ mile radius, including nearby residential buildings, outdoor spaces, park areas frequented by families and children, schools, healthcare facilities, transportation stations or stops, the Westside Highway, Hudson River, as well as any buildings, structures and commercial facilities. The above should be for both during the years of construction and permanently thereafter.
- Please study the potential impact of the removal of hazardous materials associated with the Proposed Project on ground water and soil, including whether there are any contaminants that would impact the community health and safety.
- Please study and provide updated testing or monitoring to ensure no residual contamination remains from the prior cleanups noted in the DSOW, especially given the scale of excavation and construction proposed.
- Please study mitigation efforts that would be necessary during and after construction to reduce the impact of hazardous materials.
- Please study the impact of hazardous materials and propose mitigation measures beyond those merely to “minimize potential exposure,” specifically including the institution of an

¹¹ [MCB4 Affordable Housing Plan, page 61.](#)

asbestos and other hazardous materials remediation plan and an emergency exposure plan should be prepared for all residences within a 20-block radius.

Task 10. Water and Sewer Infrastructure

The DSOW states that according to the CEQR Technical Manual, an analysis of an action's impact on the water supply system should be conducted for actions that would have exceptionally large demand for water, such as large developments. For the Proposed Project, an analysis of water supply is warranted as the Proposed Actions would result in a water demand of more than one million gallons per day, exceeding the threshold for an analysis of water supply. The Proposed Actions would also result in an incremental increase of more than 1,000 residential units, exceeding the CEQR Technical Manual threshold for a sewer infrastructure analysis.

- Please study the water demand by use (residential, hotel, retail), including peak demand conditions, to assess localized impacts on pressure and distribution—not just system-wide supply.

Wastewater

Building dual pipes for stormwater separated from sewage in new construction and under the streets and piping stormwater directly into local water bodies is a vital environmental issue for the future of the city.

- Please study the longer-term issue of piping stormwater without sewage directly into the estuary.
- Please study the existing combined sewer capacity and overflow risk, particularly during heavy rain events, which are increasing in frequency and intensity.
- Please study stormwater analysis to incorporate future precipitation patterns and climate-adjusted scenarios, not solely historical data.
- Please study cumulative impacts with nearby large-scale developments and identify whether DEP infrastructure upgrades are required, including timing and responsibility.

Task 11. Solid Waste & Sanitation Services

Based on CEQR Technical Manual guidance, if a project's generation of solid waste would not exceed 50 tons per week, it may be assumed that it would not overburden available waste management capacity. The Proposed Actions have the potential to generate 50 tons or more of solid waste per week, requiring additional trucks or sanitation services.

With the project expected to generate more than 50 tons of waste per week, the DSOW should go further in addressing operational realities.

- Please study a detailed waste generation profile by use, including peak conditions tied to hotel and commercial activity.
- Please study collection logistics, including truck routing, frequency, and curbside impacts along congested West Side corridors.
- Please study on-site waste management systems, (e.g., compaction, organics separation, enclosed loading) to reduce sidewalk and public realm impacts.
- Please study the DSNY service capacity and district-level operations for the proposed sites.

Task 12. Energy

The Proposed Actions would result in new construction that must follow the New York State Energy Conservation Code, which reflects State and City energy policy. Although significant adverse energy impacts are therefore not anticipated for the Proposed Actions, the EIS will disclose the projected amount of energy consumption and the potential effects of the Proposed Actions on the available energy supply during long-term operation of the Proposed Project.

The DSOW limits the study to building code compliance treating the energy impacts as minimal, without recognizing demands on a strained existing supply grid, over-dependency on fossil fuels, and management of peak demands.

- Please study a detailed analysis of energy consumption on the site at full capacity upon completion of the proposed project, including peak hour usage.
- Please study the impact of projected energy consumption on the existing regional supply infrastructure.
- Please study the potential for sustainable, renewable energy production on site and the impact such an operation would have on the reduction in fossil fuel consumption.

Task 13. Transportation

The Proposed Actions would increase vehicular, transit (e.g., subway/rail, bus, and ferry), and pedestrian traffic, increase demand for parking, and affect street user safety.

Transportation impacts must be studied with the cumulative impacts of major infrastructure and VHD developments in the area, including the Port Authority Bus Terminal Replacement, the Manhattan Cruise Ship Terminal, the Penn Station Redevelopment, the Western Rail Yards, and the Hudson River Gateway Tunnel Project.

Further, the EIS should study existing and future Level of Service (LOS) conditions at key study intersections to determine whether these combined projects could result in degraded roadway performance along corridors serving the Javits Center, Hudson Yards, Hell's Kitchen, and Chelsea.

- Please study the cumulative transportation impacts of concurrent infrastructure projects, including major projects such as the Port Authority Bus Terminal replacement project, the Gateway rail project, and the Western Rail Yards.
- Please study construction-period congestion and long-term operational impacts of the Proposed Project.

7 Train Capacity – Hudson Yards Station

- Please study the line-haul conditions on the 7 train and passenger volumes at the 34th Street–Hudson Yards station during peak periods with the proposed increase of 6,000 residents from the Proposed Project
- Please study the need for the previously proposed West 41st Street and Tenth Avenue No. 7 line train station originally proposed during the No. 7 line extension to Hudson Yards at West 34th Street and Eleventh Avenue.

Pedestrians and Traffic

Standard weekday and Saturday peak analyses may not fully capture the demand generated by the Javits Center, which primarily hosts large events that attract significant visitor volumes at varying times.

For example, between March 12 and 14, 2026, the United Airlines NYC Half Experience, presented by New Balance, was expected to draw approximately 27,000 visitors. In 2025, the New York Comic Con attracted over 250,000 visitors. Other major events—such as the New York International Auto Show, wellness and travel expos, and the NYC Marathon Expo—can generate pedestrian and vehicular surges that exceed typical commuter peak conditions.

- Please study the pedestrian circulation along West 34th and West 35th Streets as it interacts with project-generated foot traffic combined with heavy volumes associated with the Javits Center and nearby destinations such as the High Line.
- Please study Javits Center event-driven surges impact on transportation conditions in the surrounding area.
- Please study three additional periods: Saturday, Sunday, and midweek volumes during major events at Javits.
- Please study the widening of the Eleventh Avenue sidewalk to accommodate the hotel activity and the peak event surges—the Eleventh Avenue sidewalk is very narrow.

Bike Routes and Parking

- Please study the extension of the two-way Eleventh Avenue bike lane from West 39th Street to West 33rd Street.
- Please study the opportunity to install bike parking and delivery bike parking in the spaces allotted for car parking.

Curb Management and Deliveries

- Please study loading and unloading traffic related to ride-share pick-ups, hotel operations, and high-volume residential deliveries. That analysis should also consider staging and curb space management for delivery and micro-mobility activity along Eleventh Avenue and surrounding streets.
- Please study the potential implications of nearby freight initiatives such as the Hudson River Greenway/Marine Highway delivery project, including how shifts toward waterborne freight and last-mile delivery via cargo bikes or small electric vehicles may interact with curb demand and the adjacent bike paths.

Bus Service and Pedestrian Circulation

- Please study the installation of a south bus lane on Eleventh Avenue for the M12 and the installation of a busway on West 34th Street between Twelfth Avenue and Ninth Avenue to complement city plans for the corridor.
- Please study the potential impacts on the M11, M12, and M34 SBS bus routes.
- Please study the impact on intercity buses with currently approved DOT stops at this location. The study must include the impacts of their temporary relocation during construction, and their permanent relocation.

Parking

- Please study the cumulative parking spot supply between the Western Rail Yards and the Proposed Project. Please note that the proposed parking areas at the Western Rail Yards could meet the demands of the Proposed Project and the surrounding area.
- Please study the option of consolidating parking within Site K with access from West 36th Street. Locating a parking facility entrance on a shared street defeats the purpose of the shared street.
- Please study the feasibility of utilizing the proposed parking lot as a NYPD auxiliary site rather than parking for residents/visitors.

Construction and Tunnel Coordination

- Please study truck routes, lane closures, and construction staging throughout the construction period between 2027 and 2034, in relation to existing traffic conditions along Eleventh Avenue and streets serving the Lincoln Tunnel approaches, where queuing and spillback frequently occur.

Transportation Study Area

- Please clarify the study-area intersections proposed for transportation analysis, particularly those affected by Javits Center activity and Lincoln Tunnel corridor traffic.
- Please extend the study area to 1/2 mile to capture intersections where project-generated traffic may extend beyond the immediate project vicinity.

Task 14. Air Quality

The Proposed Actions have the potential to create new mobile sources of pollutants. Additionally, the Proposed Project is located within 1,000 feet of an industrial facility subject to a state facility air permit.

Given the project's proximity to the Lincoln Tunnel corridor, air quality impacts are likely to be driven not only by the proposed development, but by both local and regional sources.

- Please conduct a comprehensive mobile source analysis, including construction emissions, delivery traffic, and increased for-hire vehicle activity.
- Please study the major regional traffic corridors and tunnel approaches to capture cumulative conditions.
- Please study background pollutant levels and cumulative impacts beyond incremental project contributions.
- Please study worst-case modeling including wind patterns and building canyon effects.

Task 15. Greenhouse Gas Emissions and Climate Change

Although the Proposed Project is expected to utilize all-electric heating and hot water, it is expected to generate direct greenhouse gas (GHG) emissions during construction, and indirect emissions via purchase of off-site electricity and mobile trip generation. Therefore, the Proposed Actions could have the potential to result in a significant adverse impact related to greenhouse gas emissions. The DSOW states that Proposed Project is located outside the 100 and 500-year flood zones and thus a flooding risk analysis associated with climate change is not required.

Given the scale of the project and its location within an already infrastructure-constrained portion of the Far West Side, the DSOW should reflect realistic peak conditions, cumulative development pressures, and future climate realities, rather than relying on minimum thresholds or existing baseline conditions. While the DSOW acknowledges both direct and indirect emissions, the scope should align more clearly with state and city climate goals. The DSOW should require a full lifecycle GHG analysis, including construction (embodied carbon), building operations, and transportation-related emissions.

- Please study a comparison of alternative design and energy scenarios, including fully electric vs. mixed-fuel systems.
- Please study the projected building performance metrics in relation to Local Law 97 and New York State climate targets.
- Please study energy demand and grid impacts of the Proposed Project in terms of intensity and peak load, not just total consumption.

Climate Change and Resiliency

Although the DSOW notes that the site is outside current flood zones, reliance on existing FEMA maps alone does not reflect future climate risk. The analysis should be coordinated with West Side and Hudson River resiliency planning efforts, where applicable.

- Please study future climate conditions, including sea level rise, extreme precipitation, and cloudburst events.
- Please study stormwater system performance in the above future climate conditions, including potential backup conditions in combined sewers.
- Please study the impact of building-level resiliency measures, including elevated critical systems, floodproofing, and heat mitigation strategies.

Task 16. Noise

The Proposed Actions would introduce new noise-sensitive receptors and could introduce noise levels that would adversely impact existing nearby noise-sensitive uses. Site K and Site 3HB are currently mapped with E-designations (E-137) for noise, which require 35 dBA of window/wall attenuation for the Proposed Project.

Further, the DSOW neglects the noise impacts on parks, playgrounds, and other outdoor spaces, where community members and existing residents spend time.

- Please study long-term construction and mechanical noise impacts on local outdoor spaces including Bella Abzug Park and Hudson River Park.
- Please study the impact of long-term mechanical noise on a day-to-day basis.
- Please study construction noise impacts on nearby residential buildings and noise mitigation plans for those affected areas.

Task 17. Public Health

The DSOW states that a public health assessment is warranted if an unmitigated significant adverse impact is identified in analysis areas related to air quality, water quality, hazardous materials, or noise.

However, public health impacts should be planned for and studied based on the 2026 standards of public health. Mount Sinai West, the nearest hospital to the Proposed Project, is over a mile away, on Tenth Avenue between West 58th and West 59th Streets. Since 1996, over 50 hospitals have closed across New York State, of which more than a third are within New York City.

Approximately 6,000 new residents, in addition to hotel guests, workers and visitors will make use of all aspects of patient care and public health in the immediate area. That care includes medical, dental, and behavioral care, including geriatric, intensive, labor and delivery/OB-GYN, pediatric, primary (inpatient and outpatient), psychiatric, emergent, trauma, and surgical care.

The ability to obtain timely medical appointments and patient services, depending on the specialty needed, is a serious concern. Existing and future residents will face increasing difficulty receiving timely care given the dramatic population increase and diminishing availability of hospital beds due to closures in New York City over the years. To rely on the technical standards of the CEQR manual, and to state that an analysis is not warranted, lacks clarity and does not address the concerns of the community.

- Please study the impact of the Proposed Project on the potential health care demands, including the use of emergency services. Please include the impacts of the recent closure of the Beth Israel Hospital and Emergency Room in that analysis.
- Please study the capacity of existing hospitals and healthcare clinics and facilities to provide services to the new population, considering both the additional census (number of patients occupying beds or receiving services) and acuity (relative degree/severity of sickness and required level of care) of the new potential patients.
- Please study the availability and accessibility of public transportation to medical, behavioral health, and dental facilities, including the distance to such locations.
- Please study the impact of the Proposed Project on the ability to obtain timely doctor appointments and patient services, both for existing and future residents.
- Please study the impact on the current EMS catchment area and its EMS station ability to provide emergency services.
- Please study the response times of EMS, FDNY, and NYPD to each of the sites and to the nearest appropriate hospital (e.g., for Trauma).
- Please study the public health impact of adverse air quality, both during construction and upon completion, especially as it relates to asthma and allergies.
- Please study the impact of construction workers, new permanent residents, hotel guests, permanent workers and visitors on neighborhood cleanliness and sanitation.

Task 18. Neighborhood Character

The development of Hudson Yards has only accelerated neighborhood change in Hell's Kitchen. To the east of the Proposed Project, the neighborhood is comprised of 4- to 5-story tenement

buildings and mid-rise apartment buildings, with a combination of market-rate and affordable housing.

Given that the Proposed Project will bring approximately 4,000 apartments, and 6,000 new residents into the neighborhood, the Proposed Actions could result in further significant adverse impacts related to neighborhood character.

- Please provide details on how the Proposed Project's impact on neighborhood character will be evaluated with respect to the introduction of a large mixed-use development with a proposed 3,950 units of housing.
- Please study comprehensive impacts on defining features of neighborhood character in MCD4, including but not limited to potential changes to the pedestrian experience, street life, and special purpose district zoning protections.
- Please study potential mitigation measures to preserve or enhance the unique identity of the communities in and surrounding the Project Site given the proposed introduction of 3,950 apartments.
- Please study a plan inclusive of a minimum of 20% 2- and 3-bedroom apartments in order to bring long-term stability at a broad range of AMI affordability. There is a demonstrated need of State sponsored projects as a counterweight to increase low-, moderate-, and middle-income, family-sized housing to create a new Mitchell-Lama program for the 2020s.
- Please study the potential impact on neighborhood character through widened sidewalks, to increase the capacity of pedestrians and transportation users from the Proposed Project and Javits Center. Specifically, please study its impact on West 35th and 36th Streets from Ninth Avenue to the Proposed Project sites.
- Please study the neighborhood impact on how the Proposed Project will manage the existing and proposed residential need for essential public health, safety, and emergency services.
- Please study the potential for an affordable senior housing component to address growing needs of affordable senior housing in MCD4.

Task 19. Construction

According to the DSOW, construction impacts of the Proposed Project, though temporary, could have a disruptive and noticeable effect on the adjacent community as well as on people passing through the area.

While the DSOW considers transportation systems, air quality, noise and vibration, and environmental assessments as appropriate in its analysis, the DSOW does not consider how the construction will be managed on a day-to-day basis with a commitment to neighborhood communication, processing complaints, nor a specific timetable as to the duration of this disruption. The Proposed Project must include a construction management plan and communication plan.

- Please detail a clear construction management and communication plan to manage day-to-day disruptions due to construction.

- Please study the construction impacts on existing neighbors and employees commuting to the neighborhood.
- Please study the construction impacts of truck traffic and staging on pedestrian flow and overall traffic and congestion.
- Please study the impact of construction dust.
- Please study measures to mitigate the impact of construction on affected areas and users.

Task 20. Effects on Disadvantaged Communities

The Proposed Project could result in a significant adverse impact on disadvantaged communities. The DSOW states that it will identify communities that may be affected by the Proposed Project using NYSDEC’s Disadvantaged Communities Assessment Tool and will evaluate the potential impacts of the Proposed Project on disadvantaged communities following relevant guidance from NYSDEC.

- Please study the cumulative impacts of the Proposed Project on the nearby neighborhoods beyond the New York State Department of Environmental Conservation’s Disadvantaged Communities Assessment Tool cited in the DSOW.
- Please provide a detailed plan for community outreach and ongoing communication to ensure disadvantaged communities are meaningfully engaged in the review process.
- Please study the potential disproportionate negative impact a large influx of residents and hotel guests might have on MCD4, specifically on NYCHA tenants, Mitchell-Lama families, and voucher-holders in affordable housing buildings in the Special Clinton District.
- Please confirm building amenities will be accessible and affordable to residents of affordable units in both buildings.
- Please confirm parking access (if provided at all) will be accessible and affordable to residents of affordable units in both buildings.

Task 21. Alternatives

The DSOW states that 3 alternative conditions will be evaluated in the EIS:

- No Action Alternative, required by SEQRA
- No Unmitigated Impact Alternative
- Site K Only Alternative

MCB4 requests the following:

- Please provide all sources, technical studies, data, and assumptions to be made available to the public and a plan for ongoing public input throughout the EIS process. 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.
- Please present an alternative plan with lower overall height in alignment with MCB4’s call for decreasing heights moving south to north from Hudson Yards towards the residential neighborhood of Hell’s Kitchen, and lower heights moving east to west moving towards the Hudson River.

- Please present an alternative plan that includes on-site renewable and sustainable energy production.
- Please present an alternative with Increased percentage of overall affordable units to include AMI bands of moderate- and middle-income thresholds.

Task 22. Mitigation

Mitigation measures should be developed in consultation with MCB4.

- Please provide a mitigation plan that includes the inclusion of an urgent care facility in one of the buildings of the Proposed Project.
- Please provide a mitigation plan that includes a daycare facility in one of the buildings of the Proposed Project.
- Please include a mitigation plan for managing the residential waste inside each building of the Proposed Project.
- Please include a mitigation plan that includes a new NYPD precinct or a new FDNY firehouse within the Proposed Project.
- Please include a mitigation plan that includes a full-service grocery store at the Proposed Project that provides both affordable and healthy options.
- Please include a mitigation plan that includes electric vehicle charging stations.
- Please provide a list of potential community benefits, including but not limited to the use and accessibility of the community meeting space.
- Please provide a mitigation plan detailing how Site K and 3HB will make BID payments to HYHK, to operate, maintain, and conduct programming in the adjacent Bella Abzug Park.
- Please provide a mitigation plan that includes a small off-off-Broadway theater in the Proposed Project.
- Please provide a detailed construction mitigation management plan, including noise, dust, and traffic, as well as a robust community notification and engagement process during construction.
- Please provide a detailed mitigation plan to ensure accessibility for people with disabilities, seniors, and other populations with mobility challenges, both within the buildings and in the surrounding public realm.
- Please provide a detailed mitigation plan with bulk or height reduction, setbacks and tapering, facade articulation and materials, and streetscape improvements, for adversely impacted areas.
- Please provide a detailed mitigation plan for any other identified adverse impacts.
- Please provide a plan for ongoing monitoring of key impact areas and adaptive management strategies to address and mitigate future unforeseen impacts during construction and after the completion of the Proposed Project.
- Please provide a plan to ensure that the community can provide feedback on the effectiveness of mitigation measures during construction and after the completion of the Proposed Project.

CONCLUSION

MCB4 appreciates the opportunity to comment on the DSOW for the Site K and Site 3HB Mixed-Use Project. MCB4 supports the development of very high-density, mixed-use housing at 418 Eleventh Avenue and 400 Eleventh Avenue, and recognizes the historic significance of this project as the first in New York State to build housing at 18 and 33 FAR, following the elimination of the 12-FAR cap. At the same time, the scale and complexity of this proposed development, bringing approximately 3,950 new apartments, and approximately 6,000 new residents, in addition to hotel guests, workers, and visitors into our District, demands a rigorous, comprehensive, and forward-looking environmental review that goes beyond minimum technical thresholds.

MCB4 respectfully requests that Empire State Development and the leading agencies incorporate the study requests set forth above into the DEIS, expand the study radius from ¼ to ½ mile, and engage MCB4 and the broader community meaningfully throughout the EIS process. We look forward to continued collaboration to ensure that this Proposed Project serves not only future residents of these buildings, but the existing community of MCD4 and the City as a whole.

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. Jerrold Nadler, U.S. Congress
Hon. Erik Bottcher, NYS Senate
Hon. Tony Simone, NYS Assembly
Hon. Brad Hoylman-Sigal, Manhattan Borough President
Hon. Julie Menin, Speaker, NYC Council
Applicant Team

Appendix A: Special Hudson Yards District, Subdistrict and Subareas Map

