West 108th Street WSFSSH Development

~~DRAFT~~ FINAL SCOPE OF WORK
FOR A TARGETED ENVIRONMENTAL IMPACT STATEMENT

CEQR NO. 17HPD083M
ULURP NOs. ~~PENDING~~ 180112 ZMM, N 180113 ZRM, and 180114 HAM

~~May 23~~October 13, 2017

A. INTRODUCTION

This ~~Draft~~ Final Scope of Work (~~Draft~~ Final Scope) outlines the technical areas to be analyzed in the preparation of a Targeted Environmental Impact Statement (EIS) for the proposed West 108th Street WSFSSH Development in the Manhattan Valley neighborhood of Manhattan Community District (CD) 7. The proposal involves an application by the City of New York – Department of Housing Preservation and Development (HPD)and the project sponsor, the West Side Federation for Senior and Supportive Housing (WSFSSH), for approval of several discretionary actions subject to City Planning Commission (CPC) approval (collectively, the "Proposed Actions") to facilitate the construction of two new buildings consisting of affordable and supportive housing and community facility uses on West 108th Street in the Manhattan Valley neighborhood of Manhattan CD 7. The Proposed Actions include designation of an Urban Development Action Area (UDAA), approval of an Urban Development Action Area Project (UDAAP), disposition of City-owned property, a zoning map amendment to change a portion of Manhattan Block 1863 from R8B to R8A, and a zoning text amendment to Appendix F of the NYC Zoning Resolution to map a Mandatory Inclusionary Housing (MIH) Area on the Project Area. The project sponsor may seek construction financing from HPD and other agencies at a later date.

As shown in **Figure 1**, the Project Area (a.k.a., "rezoning area") includes Block 1863, Lots 5, 10, 13, 17 and 26, is located midblock on the north side of West 108th Street between~~is generally bounded by~~ Amsterdam Avenue (to the west) and~~,~~ Columbus Avenue (to the east)~~, and West 108th street to the south~~, and is currently part of a larger R8B zoning district. The Project Area has a total lot area of approximately 60,552 square feet (sf). Lots 5, 10, 13, and 26 constitute the Development Site upon which redevelopment would occur as a result of the Proposed Actions. ~~Of the Development Site,~~ Lots 5, 10, and 13 make up the site of proposed Building 1 (the "Western Development"), and Lot 26 is the site for proposed Building 2 (the "Eastern Development"). Lots 5, 13, and 26 are currently owned by the City and occupied by three public parking garages with a combined total capacity of approximately 675 spaces, ~~whereas~~ while Lot 10 is owned by the project sponsor and occupied by the five-story Valley Lodge shelter, which provides transitional housing for homeless older adults. Lot 17, which is located between Lots 13 and 26, is occupied by the Anibal Aviles Playground and zoned R8B according to Zoning Sectional Map 5d. Although Lot 17 it is part of the rezoning area, it is a "public park" for zoning purposes and ~~not subject to zoning regulation. It is also~~ not proposed for any redevelopment under the Proposed Actions. The rezoning area is located across West 108th Street from the Booker T. Washington Middle School and its adjacent playground.

The Proposed Actions would facilitate the development of approximately 277 affordable units (including supportive housing), an approximately 31,000 gross square foot (gsf) transitional housing facility for older adults with approximately 110 shelter beds, and an additional approximately 6,400 gsf of other

community facility uses. This proposed development would consist of two buildings: the Western Development (Lots 5, 10, and 13), with approximately 193,000 gsf (maximum height of 11 stories), and the Eastern Development (Lot 26), with approximately 45,000 gsf (maximum height of 11 stories). The Proposed ~~Actions~~ Project would provide much needed affordable and supportive housing, as well as transitional housing for older adults in this area of Manhattan, in addition to ~~and~~ makinge efficient use of large City-owned sites suitable for housing ~~which~~ that are located in close proximity to public transportation in order to meet City needs. Construction of the Western Development is expected to begin in 2018, with all building elements complete and fully operational by the end of 2020; construction of the Eastern Development is expected to begin in 2023, with all building elements complete and fully operational by the end of 2025.

This document provides a description of the Proposed Project, required discretionary land use actions and funding sources, and includes task categories for all technical areas to be analyzed in the EIS. After reviewing an Environmental Assessment Statement (EAS) dated May 23, 2017, HPD, acting as lead agency, determined that the Proposed Actions could have the potential for significant adverse impacts and issued Positive Declaration on May 23, 2017. Therefore an EIS for the Proposed Actions will be prepared in conformance with City Environmental Quality Review (CEQR) guidelines.

B. REQUIRED PUBLIC APPROVALS AND REVIEW PROCEDURES

PROPOSED ACTIONS

The Proposed Project would require several discretionary actions that are subject to review under the Uniform Land Use Review Procedure (ULURP), Section 200 of the City Charter governing zoning text amendments, and CEQR. It is anticipated that the following discretionary public actions would be required to facilitate the Proposed Project:

- **Urban Development Action Area Designation and Project ~~(UDAAP)~~Approval –** The Development Site (Block 1863, Lots 5, 10, 13, and 26) would be designated as an Urban Development Action Area and the Proposed Project would be approved as a UDAAP.

- **Disposition of City-Owned Property –** The disposition of City-owned property (Block 1863, Lots 5, 13, and 26) would be approved pursuant to ~~the Uniform Land Use Review Procedure (~~"ULURP"~~)~~.

- **Zoning Map Amendment –** The Project Area, including the Anibal Aviles Playground, is currently located in an R8B zoning district~~, including the Anibal Aviles Playground~~ (as noted above). As shown in **Figure 2**, the proposed zoning map amendment (to Zoning Sectional Map 5d) would extend the existing R8A zoning district that is mapped along the Amsterdam Avenue frontage of Block 1863 (at a depth of approximately 100 feet) eastward along the southern half of the block (to include all of Lots 5, 10, 13, 17, and 26), ending at the western boundary of Lot 29, a corner lot at West 108th Street and Columbus Avenue. As shown in the figure, the northern boundary of the ~~proposed~~ rezoning area would be located along the horizontal centerline of the block (approximately 100.92 feet north of, and parallel to, West 108th Street), and the eastern boundary of the ~~proposed~~ rezoning area would be located 100 feet to the west of, and parallel to, Columbus Avenue. As noted above, although Lot 17 it is part of the rezoning area, it is a "public park" for zoning purposes and not subject to zoning regulation. It is also not proposed for any redevelopment under the Proposed Actions. R8A districts permit residential and community

facility uses at a maximum FAR of 6.02 (as discussed further below, 7.20 in areas designated as part of the ~~Mandatory Inclusionary Housing~~MIH program) and 6.50, respectively. It should be noted, however, that the Proposed Project would not utilize the entire developable area allowed under an R8A district, but would be built at a lower FAR of approximately 5.3. ~~The restriction to a~~This lower FAR ~~will~~ would be set forth in a restriction enforceable by the City. The building form in R8A districts requires a base height between 60 and 85 feet and a maximum building height of 120 feet.

- **Zoning Text Amendment –** A zoning text amendment would be made to Appendix F of the NYC Zoning Resolution to map a Mandatory Inclusionary Housing (MIH) Area on the Project Area. An MIH Area requires permanent affordable housing to be provided equivalent to either 25 or 30 percent of the residential floor area developed. The MIH Area sets a new maximum permitted residential FAR which supersedes the FAR permitted by the underlying zoning district. With the designation of the Project Area as an MIH Area, the maximum permitted FAR within the proposed R8A district would be 7.2 (also 7.2 for Affordable Independent Residences for Seniors (AIRS)), and the maximum permitted base and building heights would be up to 105 feet and 140 feet, respectively, for MIH developments and AIRS. It should be noted however that the Proposed Project would not be able to utilize the entire developable area allowed under an R8A district, but would be built at a lower FAR of approximately 5.3. ~~The restriction to a~~This lower FAR ~~will~~ would be set forth in a restriction enforceable by the City. ~~-~~All of the Proposed Project's units would be affordable for households earning 60 percent or below of the Area Median Income (AMI).

- **Funding –** In addition to the actions described above, the project sponsor may seek construction financing for one or more of the proposed buildings from multiple sources, including: the HPD Supportive Housing Loan Program, the New York City Housing Development Corporation's (HDC) Extremely Low and Low-Income Affordability Program, Low Income Housing Tax Credits, and HDC tax exempt bonds. The HPD and/or HDC funding may include federal assistance originating from the U.S. Department of Housing and Urban Development (HUD).

As part of the Proposed Project, a Fair Share Analysis will be conducted for the existing Valley Lodge facility.

CITY ENVIRONMENTAL QUALITY REVIEW (CEQR) AND SCOPING

The Proposed Actions are subject to environmental review pursuant to CEQR procedures. An EAS was completed on May 23, 2017. A Positive Declaration, issued on May 23, 2017, established that the Proposed Actions (classified as Unlisted Actions) may have the potential to result in significant adverse impacts on the environment for selected CEQR technical areas, which may not be mitigable, thus warranting the preparation of an EIS. HPD, as lead agency, has directed that a targeted EIS be prepared.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Project. The process at the same time allows other agencies and the public a voice in framing the scope of the EIS. This draft scoping document, which was issued on May 23, 2017, set~~s~~ forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope ~~may do so and~~were able to give their comments to the lead agency. The public, interested agencies, and elected officials~~, are~~ were invited to comment on the Draft Scope, either in writing or orally, at a public scoping meeting that ~~has been scheduled for~~was held on **Thursday June 22, 2017 at 4:00 PM at the Edward A. Reynolds West Side High School, 140 West 102nd Street, New York, NY**. Written comments on the Draft Scope of Work (included in **Appendix C** of this

document) ~~will be~~were accepted by the lead agency until the close of business on July 3, 2017 (10 days following the scoping meeting). Comments received during the D~~d~~raft ~~s~~Scope's public hearing~~,~~ and written comments received up to 10 days after the hearing~~, will be~~were considered and incorporated as appropriate into this~~a~~ Final Scope of Work. The lead agency ~~will oversee~~oversaw preparation of a Final Scope of Work, which incorporates relevant comments made on the Draft Scope and revises the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. **Appendix B** of this document includes responses to comments received during the Draft Scope's public hearing and written comments received during the public comment period. The Draft EIS (DEIS) will be prepared in accordance with this~~e~~ Final Scope of Work for an EIS.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. Issuance of the Notice of Completion signals the start of the public review period for the DEIS. During this time the public may review and comment on the DEIS, either in writing and/or at a public hearing that is convened for the purpose of receiving such comments. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the ULURP application to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will incorporate all substantive comments made on the DEIS, along with any revisions to the technical analysis necessary to respond to those comments. The FEIS will then be used by the decision makers to evaluate project impacts and proposed mitigation measures before deciding whether to approve the requested discretionary actions.

C. DESCRIPTION OF THE PROPOSED PROJECT

EXISTING CONDITIONS

~~PROPOSED~~ REZONING AREA/PROJECT AREA

As shown in **Figure 1**, the Project Area includes Block 1863, Lots 5, 10, 13, 17 and 26, is located midblock on the north side of West 108th Street between~~generally bounded by~~ Amsterdam Avenue (to the west) and~~,~~ Columbus Avenue (to the east)~~, and West 108th street to the south~~, and is currently part of a larger R8B zoning district. The Project Area has a total lot area of 60,552 ~~square feet (~~sf~~)~~. Lots 5, 10, 13, and 26 constitute the Development Site upon which redevelopment would occur as a result of the Proposed Actions. Of the Development Site, Lots 5, 10, and 13 make up the site of proposed Building 1 (the "Western Development"), and Lot 26 is the site for proposed Building 2 (the "Eastern Development"). Lots 5, 13, and 26 are currently owned by the City, whereas Lot 10 is owned by the project sponsor. Lot 17, which is located between Lots 13 and 26, is occupied by the Anibal Aviles Playground and zoned R8B according to Zoning Sectional Map 5d. Although Lot 17 it is part of the rezoning area, it is a "public park" for zoning purposes and not subject to zoning regulation. It is also not proposed for any redevelopment under the Proposed Actions. Under the existing R8B zoning, each zoning lot has a permitted maximum FAR of 4.0 for residential and community facility uses. Lots 5, 10, and 26 are currently underbuilt, with FARs of 3.66, 2.47, and 2.88, respectively, while Lot 13 exceeds its permitted FAR, with a built FAR of 4.46.

Both the Western Development (Block 1863, Lots 5, 10, and 13) and the Eastern D~~d~~evelopment (Block 1863, Lot 26) have frontage on the northern side of West 108th Street. The site of the Western Development has a combined lot area of approximately 30,276 sf and is currently occupied by two City-owned four- and five-story public parking garages (combined floor area of approximately 91,190 sf, with a total capacity of approximately 550 spaces), and the approximately 18,730 sf project sponsor-owned

five-story Valley Lodge shelter, which provides transitional housing for homeless older adults. The site of the Eastern Development has a lot area of approximately 7,569 sf and is currently occupied by a City-owned approximately 21,800 sf three-story public parking garage, with a capacity of approximately 125 spaces.

All three garages within the Project Area are active pursuant to month-to-month lease agreements between the garage operators and the City.

SURROUNDING AREA AND CONTEXT

Area within 400-Foot Radius

The area within a 400-foot radius of the Project Area ~~presents~~ includes a varied mix of land uses. The properties immediately adjacent to the rezoning area are residential multi-family walkup buildings and mixed commercial/residential buildings, with local retail on the ground floors. North of the rezoning area are several larger residential multi-family elevator buildings, a mixed commercial/residential building, and a Con Edison utility facility. South of the rezoning area is the Booker T. Washington Middle School (MS 54) and its adjacent playground, two churches, a Manhattan Mini Storage facility, and a Time Warner Cable facility. To the east and west of the rezoning area, Amsterdam Avenue and Columbus Avenue are dominated by mixed commercial/residential buildings, with the exception of a commercial property at the intersection of Cathedral Parkway and Columbus Avenue. A Con Edison facility occupies the eastern block front of Amsterdam Avenue between West 109th Street and Cathedral Parkway.

Surrounding Area: The Manhattan Valley Neighborhood

The Manhattan Valley neighborhood of Manhattan CD 7, generally bounded by West 110th Street to the north, West 96th Street to the south, Central Park to the east, and Broadway to the west, is a smaller neighborhood within the borough's larger Upper West Side. The area includes five- to eight-story walkup apartment buildings with ground floor retail along the north-south avenues, a mix of brownstone townhouses in the neighborhood's eastern section, and a number of prewar high-rise elevator apartment buildings and New York City Housing Authority (NYCHA) developments to the south of the rezoning area.

A significant portion of Manhattan Valley, including the subject block, was rezoned in 2007 as part of the *Upper West Side Rezoning*, an area-wide rezoning of approximately 51 blocks which changed R8 and R7-2 districts to R9A, R8A, and R8B districts to better reflect the area's built character. Much of the northern section of Manhattan Valley is currently zoned R8, R8A, and R8B, with C1-5 and C2-5 commercial overlays along all of Amsterdam ~~Avenue~~ and Columbus aAvenues north of West 104th Street. The larger apartment buildings and the NYCHA developments are located within an R7-2 district, which occupies the southern section of Manhattan Valley. The area is also well-served by public transportation, including the 1/2/3 subway lines along Broadway, the A/C and B/D subway lines along Central Park West, and several New York City Transit (NYCT) bus routes, including the M7 and M11 along Amsterdam Avenue and Columbus Avenue, the M116 along West 106th Street, the M4 along Cathedral Parkway (West 110th Street), and the M60 Select Bus Service (SBS) along Broadway. As ~~T~~the Project Area is located in ~~a Designated Transit Zone, which does not require any~~the Manhattan Core, there are no accessory parking ~~for affordable housing units pursuant to ZR Section 25-251~~requirements for residential units.

There are a number of public facilities and institutions located in the surrounding neighborhood. Most prominent among them is the main campus of Columbia University, located north of the rezoning area in the Morningside Heights neighborhood, as well as the Cathedral of St. John the Divine, also located north of the rezoning area. As noted above, the Booker T. Washington Middle School, with approximately 850 students, is located across West 108th Street directly south of the rezoning area, at 103 West 107th Street.

Other schools in the surrounding neighborhood include P~~.~~S~~.~~ 145 at 150 West 105th Street, the Edward A. Reynolds West Side High School located further south at 140 West 102nd Street, and the Park West Montessori School located at 435 Central Park West to the east. Mt. Sinai St. Luke's Hospital is also located nearby, at 1111 Amsterdam Avenue.

There are several major open space resources in the surrounding area, including Morningside Park to the north, Central Park to the east, and Riverside Park to the west, as well as several smaller open spaces, including the Anibal Aviles and Booker T. Washington playgrounds, and a number of community gardens.

PURPOSE AND NEED FOR PROPOSED ACTIONS

The Proposed Actions are intended to facilitate much needed affordable and supportive housing (approximately 277 affordable units), transitional housing for older adults (approximately 110 shelter beds), and community facility uses. The Proposed Actions would support the City's goals of creating new affordable and supportive housing, as well as addressing the needs of the City's homeless population, by optimizing the use of City-owned land within close proximity to public transportation. The Proposed Project is also intended to create new jobs (approximately 50 new permanent on-site workers, excluding construction workers).

The Proposed Actions would help address specific needs of the local community, as well as the City at large, including the provision of affordable and supportive housing, transitional housing, and community facility uses~~, and would optimize the use of City-owned property in close proximity to public transportation in order to meet City needs~~. All of the proposed 277 units would be affordable. Furthermore, the transitional housing facility would provide approximately 110 shelter beds for homeless older adults to replace the existing 92-bed facility at the Valley Lodge shelter on Lot 10. As the Proposed Actions would facilitate the creation of affordable, supportive, senior, and transitional housing, they would further achieve~~ment of~~ the goals set forth by the City in *Housing New York: A Five-Borough, Ten-Year Plan*.

DESCRIPTION OF THE PROPOSED PROJECT

The Proposed Actions, as noted above, would facilitate the development of approximately 277 affordable units, and approximately 37,400 gsf of community facility space comprising two separate facilities: (1) an approximately 31,000 gsf transitional housing facility for homeless older adults with 110 shelter beds that will replace an existing 92-bed facility~~;~~, and (2) an additional approximately 6,400 gsf of community facility use, which is expected to be occupied by a medical office/health center and other community facility uses. The proposed affordable housing is anticipated to be marketed to households earning between 30 percent and 60 percent of AMI. The Proposed Project would consist of two buildings: the approximately 193,000 gsf Building 1 (maximum height of 11 stories) and the approximately 45,000 gsf Building 2 (maximum height of 11 stories). As the Proposed ~~Project~~ Area is located within the Manhattan Core~~an affordable housing development located in a Designated Transit Zone~~, no parking spaces are required. **Figure 3** shows a preliminary site plan for the Proposed Project, and each proposed building is discussed in greater detail below.

BUILDING 1 (THE WESTERN DEVELOPMENT)

Building 1 would be located on Block 1863, Lots 5, 10, and 13 with frontage along West 108th Street. As shown in **Figure 3**, Building 1 would have multiple setbacks, ~~ranging~~ and would range from 6 stories to 11

stories (approximately 118[1] feet) at its tallest. Building 1 would measure approximately 193,000 gsf and contain a total of approximately 195 units, with 115 studio units set aside as supportive housing for older adults, and 79~~80~~ affordable units that would accommodate singles and families, consisting of a mix of studio, one-, two-, and three-bedroom units, as well as one super's unit. The building would also contain a transitional housing facility for older adults, which would contain 110 transitional shelter beds, as well as an additional approximately 6,400 gsf community facility use (see **Table 1** below). It is anticipated that the community facility floor area would largely comprise a medical office/health center and other community facility uses, with small portions dedicated to vehicle storage and restrooms accessible to users of the adjacent Anibal Aviles Playground. The rear yard of Building 1 would be developed with a courtyard for use by building tenants. As shown in the preliminary site plan in **Figure 3**, the main residential entrance to the building, as well as entrances to the community facility uses, would be located on West 108th Street. Construction of Building 1 is anticipated to begin in 2018, and the building is expected to be completed and fully operational by the end of 2020.

TABLE 1
Proposed Project Program

Building	Total GSF	Residential GSF	Units	Community Facility GSF	Shelter Beds	Open Space SF	Max. Building Height (ft)
1	193,000	155,600	195 [1]	37,400 [2]	110	9,000	118'[4]
2 [3]	45,000	45,000	82	-	-	-	11~~0~~2'
Total	**238,000**	**200,600**	**277**	**37,400**	**110**	**9,000**	-

Notes:
[1] Includes 115 supportive housing studios for the formerly homeless, 79~~and 80~~ affordable units (studios and one- to three-bedroom apartments), ~~including a~~and one building super's unit~~)~~.
[2] Split between an approximately 31,000 gsf transitional housing facility for seniors (110 shelter beds) and an additional approximately 6,400 gsf of other community facility uses.
[3] Building design pending; these values are based on preliminary estimates, but all units would be either supportive housing for older adults or affordable senior housing, with one super unit.
[4] In project refinement the maximum building height of Building 1 has been lowered from 118 feet to 115.5 feet; however, as 118 feet represents the more worst-case building height, it is assumed for environmental review purposes.

BUILDING 2 (THE EASTERN DEVELOPMENT)

Building 2 would be located on Block 1863, Lot 26 with frontage along West 108th Street. ~~Although complete designs are not yet available at this time, t~~The Eastern Development is expected to comprise a maximum floor area of approximately 45,000 gsf~~,~~ and, as shown in **Figure 3**, would rise up to 11 stories (approximately 11~~0~~2 feet). It is ~~planned~~ expected that the building would be comprised entirely of either supportive housing for older adults or affordable senior housing, with approximately 82 units, including one super's unit (see **Table 1**). Construction of Building 2 is anticipated to begin in 2023, once the five-year (2017-2022) lease extension on the existing garage expires, and the building is expected to be completed and fully operational by the end of 2025.

D. ANALYSIS FRAMEWORK FOR ENVIRONMENTAL REVIEW

The Proposed Actions would change the regulatory controls governing land use and development in the Project Area. The 2014 *CEQR Technical Manual* will be used to provide guidance regarding the

[1] In project refinement the maximum building height of Building 1 has been lowered from 118 feet to 116.5 feet; however, as 118 feet represents the more worst-case building height, it is assumed for environmental review purposes.

methodologies and impact criteria for evaluating the Proposed Actions' potential effects on the various environmental areas of analysis. The EIS assesses the reasonable worst-case impacts that may occur as a result of the Proposed Actions. In disclosing impacts, the EIS considers the Proposed Actions' potential adverse impacts on the environmental setting.

BUILD YEAR

Construction of the Western Development would commence as soon as all necessary public approvals are granted. Construction of the Western Development is anticipated to begin in 2018, with all building elements complete and fully operational by the end of 2020. Construction of the Eastern Development is expected to begin in 2023, with all building elements complete and fully operational by the end of 2025. Accordingly, the EIS will assume a 2025 Build Year (a.k.a. analysis year), as it represents full build-out of the Proposed Project. However, where applicable, an evaluation of conditions in the interim 2020 build year will also be provided (e.g., for construction analysis purposes). As the Proposed Project would be fully built and operational in 2025, ~~its~~ the environmental setting ~~are~~ for analysis purposes is ~~not the existing conditions, but the~~ future conditions at that time. The EIS will therefore provide a description of "Existing Conditions" from which projections will be made of future conditions without the Proposed Project ("No-Action Condition") and with the Proposed Project ("With-Action Condition"). The No-Action condition and the With-Action condition will be compared for purposed of determining the potential of the Proposed Project to result in significant adverse environmental impacts.

REASONABLE WORST-CASE DEVELOPMENT SCENARIO (RWCDS)

In order to assess the possible effects of the Proposed Actions, a reasonable worst-case development scenario (RWCDS) was established for both Future No-Action and Future With-Action conditions. As discussed above, the incremental difference between the Future No-Action and Future With-Action conditions will serve as the basis of the impact analyses in the EIS.

THE FUTURE WITHOUT THE PROPOSED PROJECT (NO-ACTION CONDITION)

In the 2025 future No-Action condition, it is expected that no disposition of City-owned property and no changes to zoning or land use would occur within the Project Area. In absence of the Proposed Actions, Block 1863, Lots 5, 13, and 26 would remain City-owned (under the jurisdiction of HPD) and would continue to operate with three off-street public parking garages (a total of approximately 675 parking spaces); Lot 10 would remain under the project sponsor's ownership and continue to operate as a transitional shelter for older adults (92 shelter beds).

THE FUTURE WITH THE PROPOSED PROJECT (WITH-ACTION CONDITION)

The Proposed Actions would facilitate development within the Project Area. By 2025, the Proposed Actions would result in the development of Buildings 1 and 2. As discussed above, the Proposed Project would not utilize the entire developable area allowed under an R8A district, but would be built at a lower FAR of approximately 5.3. ~~The restriction to a~~This lower FAR ~~will~~ would be set forth in a restriction enforceable by the City. As such, for CEQR analysis purposes, the Proposed Project described above represents the RWCDS.

In the 2025 future with the Proposed Actions, the existing buildings within the Project Area (three garages and one shelter) would be demolished, and two new buildings would be constructed on the Development Site, containing a combined total of approximately 277 affordable units, including family and supportive

senior housing units, approximately 110 transitional shelter beds for older adults, and an additional approximately 6,400 gsf of medical office ~~community facility~~ uses[2]. The 92 shelter residents currently residing at the Valley Lodge Shelter ~~will~~ would be temporarily relocated within ~~Community Board~~CD 7 and remain at that location under a WSFSSH Department of Homeless Services (DHS) contract for the ~~extent~~ duration of ~~the~~ construction ~~period~~. No shelter beds ~~will~~ would be lost or gained during construction, and 18 beds ~~will~~ would be gained once construction is complete. As noted above, although Lot 17 it is part of the rezoning area, it is a "public park" for zoning purposes and not subject to zoning regulation, and is also not proposed for any redevelopment under the Proposed Actions.

Table 2 below provides a comparison of the 2025 No-Action and 2025 With-Action conditions identified for analysis purposes. As shown, by 2025 the incremental (net) change that would result from the Proposed Actions is a net increase of 277 affordable units, approximately 18 shelter beds, approximately 6,400 gsf of community facility uses (excluding the shelter facility), and approximately 0.2 acres (9,000 sf) of private open space for tenants, as well as a net decrease of approximately 675 public parking spaces. The estimates of future residents and workers are based on specific resident projections for the Proposed Project~~,~~ and rates derived from the number of residents and workers currently at the Valley Lodge shelter and at other WSFSSH facilities. As shown in **Table 2**, the Proposed Actions would result in a net increase of 403 residents and 50 permanent workers compared to No-Action conditions.

TABLE 2
Comparison of 2025 No-Action and 2025 With-Action Conditions

Use		**No-Action Scenario**	**With-Action Scenario**	**Increment**
Residential	Affordable Housing (Including Supportive Senior Housing)	--	277 units	**277 units**
Community Facility	Shelter beds	92 beds	110 beds	**18 beds**
	Medical Office[1] ~~Other CF Uses~~	--	6,400 gsf	**6,400 gsf**
Public Parking (spaces)		675 spaces	-	**- 675 spaces**
Accessory/Private Open Space		--	0.2 acres (9,000 sf)	**0.2 acres (9,000 sf)**
Population/Employment~~[3]~~[2]		**No-Action Scenario**	**With-Action Scenario**	**Increment**
Residents		92 residents	495 residents ~~[2]~~[1]	**403 residents**
Workers		54 workers	104 workers ~~[1]~~[2]	**50 workers**

Notes:

[1] While a small portion of the 6,400 sf of non-shelter community facility floor area is expected to comprise vehicle storage, as well as restrooms for the neighboring Anibal Aviles Playground, as (1) medical offices would comprise the majority of the 6,400 sf; and (2) medical offices are the highest intensity use of those planned for the site, for RWCDS purposes, all 6,400 gsf are assumed to comprise medical offices.

~~[2]~~[1] Assumes 1 person per shelter bed, 1 person per studio unit, 2 people per one-bedroom unit, 3 people per two-bedroom unit, and 4 people per three-bedroom unit (data provided by WSFSSH).

~~[3]~~[2] No-Action worker estimates are based on the 54 current employees within the Project Area (36 employees at the existing Valley Lodge Facility and 18 employees at the parking garages). With-Action estimates are based on data provided by WSFSSH (20 total workers associated with the permanent units, 21 workers for the supportive senior units, 39 workers for 110-bed shelter facility, 23 workers for the community facility space, and 1 park/associated maintenance worker).

[2] While a small portion of the 6,400 sf of non-shelter community facility floor area is expected to comprise vehicle storage, as well as restrooms for the neighboring Anibal Aviles Playground, as (1) medical offices would comprise the majority of the 6,400 sf; and (2) medical offices are the highest intensity use of those planned for the site, for RWCDS purposes, all 6,400 gsf are assumed to comprise medical offices.

E. PROPOSED SCOPE OF WORK FOR THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

As the RWCDS associated with the Proposed Actions would affect various areas of environmental concern and was found to have the potential for significant adverse impacts pursuant to the EAS and Positive Declaration, a T~~t~~targeted EIS pursuant to CEQR will be prepared for the Proposed Actions in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA) (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules of Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The T~~t~~targeted EIS will follow the guidance of the *CEQR Technical Manual*, and will contain:

- A description of the Proposed Actions, Proposed Project, and the Project Area's environmental setting;
- A statement of the environmental impacts of the Proposed Actions, including its short-and long-term effects and typical associated environmental effects;
- An identification of any significant adverse environmental effects that cannot be avoided if the Proposed Actions are implemented;
- A discussion of reasonable alternatives to the Proposed Actions;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the Proposed Actions should they be implemented; and
- A description of mitigation measures proposed to eliminate or minimize any significant adverse environmental impacts.

The first step in preparing the EIS document is the public scoping process. Scoping is the process of focusing the environmental impact analysis on the key issues that are to be studied in the EIS. The EAS that has been prepared for the Proposed Actions identified several technical areas in which the Proposed Project would not result in significant adverse impacts and therefore do not require further analysis in the EIS. Therefore, the EIS will be "targeted" in that it will have a detailed focus on those technical areas that could not be screened out at the EAS level. As per the EAS, the technical areas that do not warrant analysis in the EIS are: Socioeconomic Conditions; Community Facilities; Historic and Cultural Resources; Natural Resources; Water and Sewer Infrastructure; Solid Waste and Sanitation Services; Energy; and Greenhouse Gas Emissions and Climate Change.

The proposed scope of work for each technical area to be analyzed in the EIS follows. Each chapter of the EIS that requires a detailed analysis will include an analysis of the future With-Action condition compared to the future No-Action condition. The technical analyses of the EIS will examine the potential impacts related to the completion of the Proposed Project by the 2025 Build Year, based on the methodologies and guidance set forth in *the CEQR Technical Manual*. HPD, as lead agency, will coordinate the environmental review of the Proposed Actions among the involved and interested agencies and the public.

TASK 1. PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the discretionary actions required to facilitate the Proposed Project, and sets the context in which to assess impacts. The chapter contains a description of the Proposed Actions; Proposed Project; ~~proposed~~ rezoning area (including background and/or history);

a statement of the purpose and need for the Proposed Actions; key planning considerations that have shaped the current proposal; a detailed description of any project-related improvements; and discussion of the approvals required, procedures to be followed, and the role of the EIS in the process.

This chapter provides a baseline for understanding the Proposed Project and its potential for impacts, and gives the public and decision-makers a base from which to evaluate the Proposed Project against the future condition absent the project. The section on approval procedures will explain the ULURP process, its timing, and hearings before the Community Board, the Manhattan Borough President's office, the CPC, and the New York City Council. The role of the EIS as a full-disclosure document to aid in decision-making will be identified and its relationship to ULURP and the public hearings described.

TASK 2. LAND USE, ZONING, AND PUBLIC POLICY

Under CEQR, a land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project, describes the public policies that guide development in the area, and determines whether a proposed project is compatible with those conditions and consistent with these policies. In addition to considering the Proposed Project's effects in terms of land use compatibility and trends in zoning and public policy, this chapter will also provide a baseline for other analyses. The analysis will include the following subtasks:

- Provide a brief development history of the ~~proposed~~ rezoning area and surrounding study area. The study areas will include the 400-foot radius around the ~~proposed~~ rezoning area (the "primary study area") and the area within approximately ¼-mile radius of the rezoning area (the "secondary study area") (see **Figure 4**).
- Describe conditions in the study areas, including existing uses and the current zoning.
- Describe predominant land use patterns in the secondary study area, including recent development trends and zoning changes.
- Summarize other public policies that apply to the ~~proposed~~ rezoning area and secondary study area, including any formal neighborhood or community plans, *Housing New York*, Vision Zero, the FRESH Program, and the City's sustainability/PlaNYC/OneNYC policies.
- Prepare a list of other projects expected to be built in the secondary study area that would be completed by the 2025 analysis year. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas.
- Describe the Proposed Actions and provide an assessment of the impacts of the Proposed Project on land use and land use trends, zoning, and public policy. Consider the effects of the Proposed Project related to issues of compatibility with surrounding land use, consistency with public policy initiatives, and the effect on development trends and conditions in the area.

TASK 3. OPEN SPACE

The 2014 *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct effect on an area open space (e.g., displacement of an existing open space resource) or an indirect effect through increased population size (for the Proposed Project, which is located in a well-served area, an assessment would be required if the Proposed Project's population is greater than 350 residents or 750 employees).

The Proposed Project would not have any direct effect on open space, as there are no publicly accessible open spaces on Lots 5, 10, 13, or 26, which comprise the Development Site proposed for development. Therefore, an analysis of direct impacts on open space is not warranted; however, based on other chapters of the EIS, this chapter will summarize the findings of potential direct effects related to shadows, noise, and construction. With respect to potential indirect impacts, compared to conditions in the future No-Action condition, the Proposed Project is not expected to result in an incremental increase of 750 or more employees; therefore, an assessment of the potential for indirect effects on open space due to an increased worker population is not warranted. However, the incremental increase in the residential population resulting from the Proposed Project would exceed the 350-resident CEQR threshold requiring a detailed residential open space analysis. Therefore, a detailed open space analysis is warranted for the residential population only, which ~~would~~ will be included in the EIS pursuant to the following sub-tasks.

The open space analysis will consider both passive and active open space within a ½-mile study area. The study area would generally comprise those census tracts that have 50 percent or more of their area located within a ½-mile radius of the ~~proposed~~ rezoning area, as recommended in the *CEQR Technical Manual*. The resultant open space study area is shown in **Figure 5**.

The detailed open space analysis in the EIS will include the following subtasks:

- To determine the number of residents in the study areas, 2010 Census data will be compiled for census tracts comprising the residential open space study area. As the study area may include a workforce and daytime population that may also use open spaces, the number of employees and daytime workers in the study area will also be calculated, based on reverse journey-to-work census data and other available information.
- Existing active and passive open spaces within the ½-mile open space study area will be inventoried and mapped. The condition and usage of existing facilities will be described based on the inventory and field visits conducted on typical weekday peak hours; field visits to the Booker T. Washington Playground will also be conducted on a typical weekend and typical summer day to determine year-round utilization levels. Acreages of these facilities will be determined and the total study area acreages will be calculated. The percentage of active and passive open space will also be calculated.
- Based on the inventory of facilities and study area populations, total, active, and passive open space ratios will be calculated for the residential and worker populations and compared to City guidelines to assess adequacy. Open space ratios are expressed as the amount of open space acreage (total, passive, and active) per 1,000 user population, as per the *CEQR Technical Manual*.
- Expected changes in future levels of open space supply and demand in the 2025 analysis year will be assessed, based on other planned development projects within the open space study area. Any new open space or recreational facilities that are anticipated to be operational by the analysis year will also be accounted for. Open space ratios will be calculated for future No-Action conditions and compared with exiting ratios to determine changes in future levels of open space supply and demand.
- Assess the effects on open space supply and demand resulting from increased residential populations added by the Proposed Project. The assessment of the Proposed Actions' impacts will be based on a comparison of open space ratios for the future No-Action versus future With-Action conditions. In addition to the quantitative analysis, a qualitative analysis will be performed to determine if the changes resulting from the Proposed Actions constitute a substantial change (positive or negative) or an adverse effect to open space conditions. The qualitative analysis will assess whether or not the study area is sufficiently served by open space, given the type (active vs. passive), capacity, condition, and distribution of open space, and the profile of the study area populations.

TASK 4. SHADOWS

This chapter will examine the Proposed Project's potential for significant and adverse shadow impacts pursuant to 2014 *CEQR Technical Manual* guidelines. A shadow analysis is generally warranted if an action would result in new structures (or additions to existing buildings resulting in structures greater than 50 feet in height) located adjacent to, or across the street from a sunlight-sensitive resource. Such resources include publicly accessible open spaces, certain sunlight-sensitive natural features, or sunlight-sensitive features of historic resources. The Proposed Project would result in two new buildings, ~~the taller of which (Building 1) would rise to 11 stories with a maximum height of approximately 118 feet~~both of which would exceed 50 feet in height. In addition, the Development Site is located adjacent to Anibal Aviles Playground and across the street from the Booker T. Washington Playground. Therefore, a shadows assessment is warranted to determine the extent, duration, and effects of any potential incremental new shadows on these two playgrounds or any other sunlight-sensitive resource in the vicinity of the Development Site. The shadows assessment will follow the methodology described in the *CEQR Technical Manual*, and will include the following:

The preliminary screening assessment would include the following tasks:

- Develop a base map illustrating the Development Site in relationship to sunlight-sensitive resources. As defined in the *CEQR Technical Manual,* sunlight sensitive resources include publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features in the area; city streets, sidewalks, and private open spaces (such as private residential front and back yards, stoops, and vacant lots) are not considered to be sunlight-sensitive resources.
- Determine the longest possible shadow that could result from the Proposed Project to determine whether it could reach any sunlight-sensitive resources at any time of year.
- Perform a screening assessment (Tier 1 through Tier 3) to ascertain seasons and times of day during which shadows from the Proposed Project could reach any sunlight-sensitive resources.

If the possibility of new shadows reaching sunlight-sensitive resources cannot be eliminated in the preliminary screening assessment, the EIS will include a detailed analysis. This will entail the following tasks:

- Develop a three-dimensional computer model of the elements of the base map developed in the preliminary assessment. The three-dimensional computer model will include existing buildings and No-Action developments (if applicable), as well as taking into account the topographic characteristics of the area, such as substantial changes in grade.
- Develop a three-dimensional representation of the Proposed Project.
- Using three-dimensional computer modeling software, determine the extent and duration of existing/No-Action shadows, as well as new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Project on four representative days of the year (March 21/September 21, May 6/August 6, June 21, and December 21), as outlined by the *CEQR Technical Manual*.
- Document the analysis with graphics illustrating the incremental shadow resulting from the Proposed Project highlighted in a contrasting color when compared to existing shadows from nearby existing buildings.
- Include a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.

- Assess the significance of any shadow impacts on sunlight-sensitive resources, taking into consideration the amount of remaining sunlight on those sensitive resources and the types of vegetation and or recreational activities involved. If any significant adverse shadow impacts are identified, potential mitigation strategies will be identified.

TASK 5. URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the 2014 *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a development site beyond those allowable by existing zoning that could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. As the Proposed Actions include ~~a~~ zoning map and text amendments that would result in an increase in allowable built floor area, a preliminary assessment of urban design and visual resources will be prepared in the EIS. The urban design study area will be the same as that used for the land use analysis (delineated by a ¼-mile radius from the ~~proposed~~ rezoning area boundary), in accordance with the 2014 *CEQR Technical Manual*. For visual resources, the view corridors within the study area from which such resources are publicly viewable will be identified. The preliminary assessment will consist of the following:

- Based on field visits, the urban design and visual resources of the ~~proposed~~ rezoning area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale (including building heights).
- In coordination with Task 2, "Land Use, Zoning, and Public Policy," the changes expected in the urban design and visual character of the study area due to known development projects in the future No-Action condition will be described.
- Potential changes that could occur in the urban design character of the study area as a result of the Proposed Actions will be described. For the Development Site, the analysis will focus on the general massing of the two building comprising the Proposed Project, including elements such as streetwall height, setback, and building envelope. Photographs and/or other graphic material will be utilized, where applicable, to assess the potential effects on urban design and visual resources, including view of/to resources of visual or historic significance.

A detailed analysis will be prepared, if warranted based on the preliminary assessment. As described in the 2014 *CEQR Technical Manual*, examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstructing view corridors, or competing with icons in the skyline. The detailed analysis would describe the urban design and visual resources of the Project Area and the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the Proposed Actions, in comparison to the No-Action condition, focusing on the changes that could negatively affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 6. HAZARDOUS MATERIALS

A hazardous materials assessment determines whether a proposed action 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 exposure; (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.

A Phase I Environmental Site Assessment (ESA) was prepared for the Development Site in June 2015, and a Phase II Environmental Site Investigation ~~Report~~ (ESI) was prepared in September 2016 and subsequently revised in January 2017. In addition, a limited asbestos, lead paint, and polychlorinated biphenyl (PCB) caulk survey report was prepared March 2017 that confirmed the presence of asbestos-containing materials (ACMs) and lead-based paint (LBP) in the existing Development Site buildings, as anticipated due to their construction history. The EIS will summarize the completed Phase I ESA, ~~and~~ Phase II ESI, and asbestos, lead paint, and PCB caulk survey report conducted for the Development Site, and will include any necessary recommendations for additional testing or other activities that would be required either prior to or during construction and/or operation of the Proposed Project, including a discussion of any necessary remedial or related measures. In addition, the project sponsor ~~is consideringwill~~ enroll~~ment~~ in New York City's Voluntary Cleanup Program (NYCVCP), and the requirements of the program will be summarized in the EIS. Requirements of the NYCVCP~~which requires the~~ include NYC Mayor's Office of Environmental Remediation (OER) ~~to~~ approval of a Remedial Action Plan (RAP) (which outlines how the hazardous materials present on the site will be remediated to avoid potential significant adverse impacts)~~e a Remedial Investigation Report (RIR), a Remedial Action Work Plan (RAWP),~~ and ~~a~~ Remedial Action Report (RAR) (which includes documentation showing that the remedial actions has been achieved and a description of ~~for the Development Site, including~~ Engineering and Institutional Controls and a Site Management Plan (SMP)). The EIS will include a general discussion of the health and safety measures that would be implemented during project construction to protect site workers and the surrounding community. Required testing/remedial measures would be enforced through the Land Disposition Agreement (LDA) between HPD and the project sponsor. The appropriate remediation measures specific to the proposed end use of the site, including those recommended by ~~the New York City Office of Environmental Remediation (~~OER~~)~~ will be provided in the EIS.

TASK 7. TRANSPORTATION

The objective of a transportation analysis is to determine whether a proposed action may have a potential significant impact on traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, the safety of all roadway users (pedestrians, bicyclists, and motorists), on- and off-street parking, or goods movement. The Proposed Actions would result in the elimination of three public parking garages within the Project Area, with a combined capacity of approximately 675 spaces. This change may result in a significant future parking shortfall in the surrounding area, and therefore, a detailed parking analysis will be provided in the EIS. Additionally, the Proposed Actions are expected to introduce affordable housing and community facility uses to the Project Area, which would generate additional vehicular travel and demand for parking, as well as additional subway and bus riders and pedestrian traffic. These new trips have the potential to affect the area's transportation systems. Therefore, a transportation screening assessment has been conducted to determine if detailed analysis is warranted.

TRAVEL DEMAND AND SCREENING ASSESSMENT

A detailed travel demand forecast has been prepared for the Proposed Project using standard sources, including the 2014 *CEQR Technical Manual*, U.S. Census data, previously approved studies, and other references. The travel demand forecast (a Level 1 screening assessment) is summarized by peak hour and mode of travel, as well as by person and vehicle trips. The travel demand forecast also identifies the

number of peak hour person trips made by transit and the numbers of pedestrian trips traversing the area's sidewalks, corner areas, and crosswalks. The results of this forecast have been summarized in a Transportation Planning Factors and Travel Demand Forecast (TPF/TDF) Technical Memorandum (refer to **Appendix A**), which ~~is~~ was subject to review and approval by DOT.

TRAFFIC

As shown in the TPF/TDF in **Appendix A**, the Proposed Project is expected to generate 36~~18~~ vehicle trips (vph) in the weekday AM peak hour, 32~~11~~ vph in the weekday midday, 31~~22~~ vph in the weekday PM, and 27~~18~~ vph in the Saturday midday~~, compared to No-Action conditions~~. In addition, by displacing three existing public parking garages in the Project Area, the Proposed Actions would eliminate 29 vph, 25 vph, and 33 vph in the weekday AM, m~~M~~idday, and PM peak periods, respectively, on West 108th Street and adjacent streets. As such, the Proposed Actions would result in a net reduction of two vehicle trips on West 108th Street during the weekday PM peak hour, with minor increases (up to 27 vehicle trips) in the remaining peak hours. As the net number of vehicle trips generated/diverted by the Proposed Actions would not exceed the 50 peak hour vehicle trip CEQR threshold for detailed traffic analysis, significant adverse traffic impacts would be very unlikely. As such, in accordance with *CEQR Technical Manual* guidelines, a detailed traffic analysis is not warranted and will not be provided in the EIS.

TRANSIT

Detailed transit analyses are generally not required if a proposed action is projected to result in fewer than 200 peak hour rail or bus transit trips according to the general thresholds used by MTA and specified in the *CEQR Technical Manual*. If a proposed action would result in 50 or more bus trips being assigned to a single bus line (in one direction), or if it would result in an increase of 200 or more trips at a single subway station or on a single subway line, a detailed bus or subway analysis would be warranted. As shown in the TPF/TDF in **Appendix A**, the Proposed Project would generate 173~~43~~, ~~73~~94, 190~~55~~, and 157~~35~~ subway trips in the weekday AM, midday, and PM~~,~~ and Saturday midday peak hours, respectively, and 18~~32~~, 12~~18~~, 21~~36~~, and 17~~31~~ bus trips in the weekday AM, midday, and PM~~,~~ and Saturday midday peak hours, respectively. These transit trips are less than their associated CEQR thresholds. As such, in accordance with *CEQR Technical Manual* guidelines, a detailed transit analysis is not warranted and will not be provided in the EIS.

PEDESTRIANS

Projected pedestrian volumes of less than 200 persons per hour at any pedestrian element (sidewalks, corner areas, and crosswalks) are not typically be considered a significant impact, since the level of increase would not generally be noticeable and therefore would not require further analysis under *CEQR Technical Manual* criteria. As shown in the TPF/TDF in **Appendix A**, the Proposed Project would not exceed the 200-trip CEQR thresholds at any pedestrian element. As such, in accordance with *CEQR Technical Manual* guidelines, a detailed pedestrian~~s~~ analysis is not warranted and will not be provided in the EIS.

VEHICULAR AND PEDESTRIAN SAFETY

The key issue to be resolved in safety analyses is the extent to which vehicular and pedestrian exposure to crashes may reasonably be expected to increase with a proposed project in place. According to the *CEQR Technical Manual*, a detailed analysis of safety impacts may need to be addressed for some projects, such as those located near sensitive land uses, such as hospitals, schools, parks, nursing homes, elderly housing, or study intersections located in Senior Pedestrian Focus Areas (SPFAs) that could be affected by increased traffic and pedestrian volumes generated by a proposed project. As discussed above, the

Proposed Project does not warrant a quantitative analysis of traffic and does not trigger detailed analysis of pedestrian conditions at any corners or crosswalks. However, as the Project Area is located within the Manhattan Valley SPFA, is located near schools and playgrounds, and the Proposed Project would include senior housing units, the EIS will provide a qualitative discussion of pedestrian safety.

PARKING

Under the 2014 *CEQR Technical Manual*, a parking analysis is typically conducted if a quantified traffic analysis is necessary. While the Proposed Project does not warrant a quantified traffic analysis, the Proposed Actions would result in the elimination of three public parking garages within the Project Area, with a combined capacity of approximately 675 spaces. In addition, the affordable and supportive housing facilities developed under the Proposed Actions would not include any replacement parking. The elimination of this number of parking spaces without provision of replacement parking is atypical of most development subject to environmental review under the 2014 *CEQR Technical Manual*. Given this specific combination of factors~~,~~ and the potential to result in a shortfall of parking in the surrounding area, a detailed analysis of on-street and off-street parking conditions in the surrounding study area will be provided in the EIS.

Detailed existing on-street parking and off-street parking inventories will be conducted within a ¼-mile radius of the Project Area. The inventories will be conducted for the weekday overnight period (when residential parking demand typically peaks) and the weekday midday period (when commercial parking demand typically peaks) to document the existing supply and demand for each period. The parking analyses will document changes in the parking supply and utilization under the No-Action and With-Action conditions based on accepted background growth rates and projected demand from any other major projects in the vicinity of the ~~proposed~~ rezoning area. Parking demand generated by the Proposed Project will be forecasted based on auto ownership data for the proposed uses within the rezoning area as well as auto ownership data for the surrounding area. Parking demand from all other uses will be derived from the forecasts of daily auto trips generated by these uses. Based on the above assumptions, an assessment will be provided to determine whether there would be a sufficient number of on- or off-street public parking spaces available in the study area to accommodate the parking spaces displaced by the Proposed Actions. If the ¼-mile study area demonstrate<u>s</u> an insufficient amount of parking to accommodate the parking spaces displaced by the Proposed Actions, the study area will be expanded to a ½-mile radius. The same analyses will then be conducted for the ½-mile study area.

If the ½-mile study area also demonstrates an insufficient amount of parking to accommodate the parking spaces displaced by the Proposed Actions, more detailed analyses will be conducted to determine the transit utilization of residents in the zip codes where the current garage occupants reside and the weekday/weekend usage of the existing garages. In considering any shortfall, the analysis will also take into account parking and transportation policies <u>and trends</u> that apply within Parking Zones 1 and 2 within Manhattan, as shown in Map 16-2 (CEQR Parking Zones) of the *CEQR Technical Manual*.

TASK 8. AIR QUALITY

An air quality assessment is required for actions that could have potential to result in significant air quality impacts. Mobile source impacts can arise when an action increases or causes a redistribution of traffic, creates any other mobile sources of pollutants, or adds new uses near existing mobile sources. Mobile source impacts can also be produced by parking facilities, parking lots, or garages. Stationary source impacts can occur with actions that create new stationary sources or pollutants, such as emission stacks from industrial plants, hospitals, or other large institutional uses, or a building's boilers, that can affect

surrounding uses; Stationary source impacts can also occur when a proposed action introduces new uses near existing or planned future emission stacks, and the new uses might be affected by the emissions from the stacks.

The EAS that has been prepared for the Proposed Actions determined that the Proposed Project would not result in significant adverse mobile source air quality impacts, and therefore an analysis of mobile source air quality is not warranted and will not be provided in the EIS. The EAS also determined that, assuming that natural gas-fired combustion equipment would be used to provide heating and hot water to Buildings 1 and 2 (except for an emergency diesel fuel generator for the shelter facility), there would not be any significant adverse air quality impacts due to the Proposed Project's HVAC systems. The LDA between HPD and the project sponsor~~s~~ would include restrictions requiring any new development on the Development Site to ensure that fossil fuel-fired heating and hot water equipment utilize only natural gas. With these restrictions in place, no significant adverse air quality impacts are predicted from the Proposed Project's HVAC systems, and no further analysis is warranted. However, the potential for impacts on the Proposed Project from existing industrial emissions sources could not be screened out without further evaluation, and will therefore be provided in the EIS, as detailed below.

INDUSTRIAL SOURCE ANALYSIS

- A field survey will be performed to identify processing or manufacturing facilities within 400 feet of the ~~proposed~~ rezoning area. A copy of the air permits for each of these facilities will be requested from the New York City Department of Environmental Protection's (DEP's) Bureau of Environmental Compliance.
- A review of New York State Department of Environmental Conservation (NYSDEC) Title V permits and the U.S. Environmental Protection Agency (EPA) Envirofacts database will also be performed to identify any Federal- or State-permitted facilities within 1,000 feet of the Project Area.
- Facilities with sources of emissions located within 400 feet of the Project Area will be considered for analysis.
- If industrial sources are identified, a~~A~~ cumulative impact analysis will be performed for multiple sources that emit the same air contaminant. Predicted concentrations of these compounds will be compared to NYSDEC DAR-1 guideline values for short-term (SGC) and annual (AGC) averaging periods. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.
- If a cumulative impact analysis is warranted, ~~P~~potential cumulative impacts of multiple air pollutants will be determined based on the EPA's Hazard Index Approach for non-carcinogenic compounds ~~and~~ using the EPA's Unit Risk Factors for carcinogenic compounds. Both methods are based on equations that use EPA health risk information (established for individual compounds to determine the level of health risk posed by specific ambient concentrations of that compound). The derived values of health risk are additive and can be used to determine the total risk posed by multiple air pollutants.

TASK 9. NOISE

According to the 2014 *CEQR Technical Manual*, a noise analysis is appropriate if an action would generate any mobile or stationary sources of noise or would be located in an area with high ambient noise levels. Specifically, an analysis would be required if an action generates or reroutes vehicular traffic, if an action is located near a heavily trafficked thoroughfare, or if an action would be within one mile of an existing

flight path or within 1,500 feet of existing rail activity (and with a direct line of sight to that rail facility). A noise assessment would also be appropriate if the action would be located in an area with high ambient noise levels resulting from stationary sources.

For the Proposed Project, noise analysis will focus on two areas of concern: (1) the effect the Proposed Project may have on noise levels in the surrounding community; and (2) the level of building attenuation necessary to achieve acceptable interior noise levels. The detailed noise analysis will disclose required attenuation levels to meet both CEQR and HUD noise guidelines (as the Proposed Project may include federal sources of funding in the future).The Proposed Project would generate vehicle trips, but given the background conditions and the anticipated project-generated traffic, it is not expected that project-generated traffic would result in significant adverse noise impacts. As discussed in the "Transportation" task above, the Proposed Actions would result in a net reduction of vehicle trips on West 108th Street in the weekday PM peak hour, with increases of only seven vehicle trips in the weekday AM and midday peak hours (refer to TPF/TDF memo in **Appendix A**) ~~in the weekday AM, midday, and PM peak hours~~. As such, the Proposed Actions would not result in a doubling of Noise Passenger Car Equivalents (PCEs), and in accordance with *CEQR Technical Manual* guidelines, a detailed mobile source noise analysis is not warranted and will not be provided in the EIS. It is also assumed that outdoor mechanical equipment would be designed to meet applicable regulations and consequently no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed.

Consequently, the noise analysis will examine the level of building attenuation necessary to meet CEQR interior noise level requirements. As the Proposed Project would be located near two playgrounds, playground noise during will also be taken into account. The following tasks will be performed in compliance with *CEQR Technical Manual* guidelines:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the noise environment and the impact of the Proposed Project will be selected. The L_{eq}, L_{10}, and L_{dn} levels will be the primary noise descriptors used for the analysis. Other noise descriptors, including the L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} levels, will be examined as appropriate.
- Select receptor locations for building attenuation analysis purposes. Up to three receptor locations will be selected adjacent to the Proposed Project's buildings.
- Determine existing noise levels based on noise monitoring. Perform 20-minute measurements at each receptor location during typical weekday AM, (7:00 AM to 9:00 AM), midday, (12:00 PM to 2:00 PM), and PM (4:30 PM to 6:30 PM)peak periods. ~~(4:30 PM to 6:30 PM)~~. L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values will be recorded. As the Proposed Project would be located near two playgrounds (the Anibal Aviles playground and the Booker T. Washington Playground), playground noise during the School PM peak hour (2:30-3:30PM) will also be taken into account in the analysis
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine future noise levels both with and without the Proposed Actions. Future noise levels will be determined based on the measured existing noise levels and the incremental changes in noise levels calculated by the mobile source noise screening analysis.
- Determine the level of attenuation necessary to satisfy CEQR as well as HUD criteria. The level of building attenuation necessary to satisfy CEQR as well as HUD requirements is a function of exterior noise levels and will be determined. The building attenuation study will identify the level of building attenuation required to satisfy CEQR as well as HUD requirements by building and

façade. Recommendations regarding general noise attenuation measures needed for the Proposed Project to achieve compliance with standards and guideline levels will be made.

TASK 10. PUBLIC HEALTH

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and, if so, to identify measures to mitigate such effects.

A public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and HPD determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas in accordance with 2014 *CEQR Technical Manual* guidelines.

TASK 11. NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise, etc. The Proposed Actions have the potential to alter certain elements contributing to the affected area's neighborhood character. Therefore, a neighborhood character analysis will be provided in the EIS.

A preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis areas ~~analyzed in the EIS~~—including land use, zoning, and public policy; socioeconomic conditions; open space; urban design and visual resources; historic and cultural resources; transportation; and noise—may affect a defining feature of neighborhood character. The preliminary assessment will:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the With-Action condition and compare to the No-Action condition.
- Evaluate whether the Proposed Actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the Proposed Actions could affect the defining features of neighborhood character, a detailed analysis will be conducted, following the guidelines of the *CEQR Technical Manual*.

TASK 12. CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction activity can affect transportation conditions, community noise patterns, air quality conditions, and mitigation of hazardous materials. This chapter will describe the reasonable worst-case construction schedule and phasing plan for each

construction-related impact area, and logistics assumptions for the Proposed Project. General construction practices will also be discussed, including government coordination and oversight, community outreach, hours of work, deliveries/access, construction staging, and rodent control. It will also include a discussion of anticipated on-site activities and will provide estimates of construction workers and truck deliveries. Technical areas to be analyzed include:

TRANSPORTATION

The preliminary assessment will qualitatively consider potential losses in lanes, sidewalks, on-street parking, and effects on other transportation services, if any, during the construction of the Proposed Project. It will also identify the construction-period increase in vehicle trips from construction workers and deliveries, and discuss measures to ensure pedestrian safety during construction. A reasonable worst-case peak construction year (or years, if applicable) will be selected for the assessment of potential transportation-related construction impacts and a determination of likely required mitigation measures.

AIR QUALITY

The Proposed Project involves construction of two noncontiguous buildings and over two years of construction activity, triggering a quantitative construction air quality analysis under CEQR. The air pollutants analyzed for construction activities include nitrogen dioxide (NO_2), particulate matter with an aerodynamic diameter of less than or equal to 10 micrometers (PM_{10}), particulate matter with an aerodynamic diameter of less than or equal to 2.5 micrometers ($PM_{2.5}$), and carbon monoxide (CO). Monthly and annual emission profiles will be developed based the emission factors predicted using the EPA NONROAD model (which is now incorporated as an option within MOVES2014a). Based on the emission profiles, the worst-case short-term (24-hr) and annual periods will be identified for dispersion modeling of pollutant concentrations.

In addition to emissions from on-road haul trucks, and off-road construction equipment engines, the $PM_{2.5}$ and PM_{10} emissions analysis will include quantification of fugitive dust emissions. Fugitive dust emissions from demolition, excavation, and transferring of excavated materials into dump trucks will be calculated based on the estimated quantity of soil/debris to be moved and the equations delineated in EPA AP-42 Table 13.2.3-1. Dust emissions will also be calculated for general site preparation and grading activity. Fugitive dust emissions would primarily be a concern during the initial excavation and site preparation activities. In later construction phases soil handling would be minimal. ~~The analysis will incorporate a typical 50% emissions reduction credit assuming the implementation of standard dust control best management practices, such as spraying water during demolition, stabilized truck exit areas, stabilizing or watering disturbed soil areas, covering soil piles etc.~~

The ~~closest~~ sensitive receptors will ~~then~~ be placed ~~modeled to determine potential worst-case air quality impacts within or~~ around the Development Site to determine potential worst-case air quality impacts. The receptors will include the Anibal Aviles Playground, nearby schools (e.g., Booker T. Washington Middle School), residences, and new sensitive receptors created by the Proposed Project that would be occupied at the same time that construction activity is occurring. AERMOD will be used for dispersion modeling. For modeling 1-hr, 8-hr, and 24-hr concentrations, stationary equipment (e.g., tower cranes) will be assumed as point sources and, mobile equipment (e.g., excavators, bulldozers) will be assumed as area sources. For modeling annual average concentrations, all equipment will be assumed as area sources.

The quantitative construction air quality analysis will account for emission reduction measures required by law or committed to by the project sponsor. These measures are expected to include idling restrictions, a dust control plan, use of diesel particulate filters or other tailpipe emission reduction measures on

equipment over 50 horsepower, and requirements to utilize newer equipment (at least Tier 3 for equipment over 50 HP, at least Tier 2 for all other off-road equipment).

The maximum predicted concentration increments from construction of the Proposed Project and maximum overall concentrations (including background concentrations) for the construction peak periods analyzed will be compared with the applicable National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* criteria. The NAAQS and CEQR *de minimis* criteria are intended for permanent project impacts and will be used for screening purposes for construction impacts. If construction impacts exceed these screening thresholds, further assessment of the magnitude and duration of impacts will be conducted to determine whether a significant adverse impact would occur.

~~The United States Environmental Protection Agency (EPA)'s Tier 1 through 4 standards for non-road engines regulate the emission of criteria pollutants from new engines, including PM, CO, NOx, and hydrocarbons (HC). The construction air quality impact analysis will assume that all non-road construction equipment with a power rating of 50 hp or greater would meet at least the Tier 3 emissions standard with a Diesel Particulate Filter (DPF). All non-road engines rated less than 50 hp will be assumed to meet at least the Tier 2 emissions standard.~~

~~The maximum predicted concentration increments from construction under the Proposed Actions, and maximum overall concentrations including background concentrations for the construction peak periods analyzed will be compared with the National Ambient Air Quality Standards (NAAQS) for CO, $PM_{2.5}$, PM_{10}, and NO_2, and the CEQR *de minimis* criteria for CO and $PM_{2.5}$ to determine the potential impacts of the Proposed Project.~~

NOISE

The Proposed Project involves construction of two noncontiguous buildings and over two years of construction activity, triggering a quantitative construction noise analysis under CEQR. A quantitative construction noise analysis will be prepared using SoundPLAN software, to determine potential noise impacts at receptors within or around the Development Site, such as the Anibal Aviles Playground, nearby schools (e.g., Booker T. Washington Middle School (all facades)), residences, and new sensitive receptors created by the Proposed Project that would be occupied at the same time that construction activity is occurring. SoundPLAN is a *CEQR Technical Manual*-approved detailed analysis noise model capable of representing point, line, and area noise sources. The model takes into account absorption and reflection off the ground and buildings. Data input requirements for the model include digital elevation data, buildings, ground cover, receiver locations, source locations, and source noise emission levels. L_{max} reference sound levels will be based on the project sponsor's commitment to use quieter equipment as required by subchapter 5 of the New York City Noise Control Code~~obtained from *CEQR Technical Manual* Table 22-1~~.

Similar to the construction air quality analyses, the construction noise analysis would rely on the potential construction schedule to identify peak periods of construction activity for detailed analysis. Up to six representative time periods ~~(~~months ~~or quarters) would~~ will be modeled to provide an estimate of the variation in temporary construction noise impacts across the duration of construction as the focus of activity shifts to different locations/buildings in the various phases. Project-on-project construction noise impacts will also be evaluated given the phased construction schedule.

Background noise levels for the construction noise analysis will be based on existing conditions noise monitoring data. A pedestrian survey of the noise-sensitive receptor buildings within approximately 150 feet of each construction site will be conducted to estimate the condition of windows and to confirm

whether or not the facility has a central HVAC system or window AC units. The primary impact screening metric for residential and school receptors will be the CEQR interior noise threshold of 45 dBA (L_{10}). Receptors exceeding the screening threshold will be subject to further consideration of the extent, magnitude, and duration of impacts to determine whether significant adverse impacts would occur. Mitigation measures will be considered to address potential significant adverse construction noise impacts, as appropriate.~~Predicted noise levels would be compared to CEQR impact thresholds and mitigation measures discussed, as appropriate. The potential duration of impacts to each receptor will be estimated using the results of the six modeled months or quarters. A field inspection of the noise-sensitive receptor buildings within approximately 150 feet of each construction site will be conducted to determine the condition of windows and to confirm whether or not the facility has a central HVAC system that would allow for a continuous closed-window condition.~~

OTHER TECHNICAL AREAS

As appropriate, the construction assessment will discuss other areas of environmental concern, including l~~L~~and u~~U~~se and ~~N~~neighborhood c~~C~~haracter, ~~S~~socioeconomic c~~C~~onditions, c~~C~~ommunity ~~F~~facilities, ~~O~~open ~~S~~space, ~~H~~historic and ~~C~~cultural ~~R~~resources, and ~~H~~hazardous ~~M~~materials, for potential construction-related impacts. In accordance with *CEQR Technical Manual* guidelines, the construction analysis will include an assessment of whether construction of the Proposed Project would potentially physically impact, or inhibit access to, adjacent land uses, including community facilities. The chapter will summarize the potential for direct or indirect impacts on nearby open space resources (specifically, the adjacent Anibal Aviles P~~p~~layground) during the Proposed Project's construction; and summarize actions to be taken during project construction to limit exposure of construction workers, residents, and the environment to potential contaminants.

TASK 13. MITIGATION

Where significant adverse project impacts have been identified in any of the above tasks, measures to mitigate those impacts will be described. These measures will be developed and coordinated with the responsible City agencies, as necessary, including DEP, DPR, and DOT. Where impacts cannot be mitigated, they will be described as unmitigated and unavoidable adverse impacts.

TASK 14. ALTERNATIVES

The purpose of an alternatives analysis in an EIS is to examine reasonable and practical options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the Proposed Project. The alternatives are usually defined once the full extent of the Proposed Project's impacts has been identified; however, they will include the No-Action Alternative, as required by SEQRA/CEQR, which demonstrates environmental conditions that would exist if the Proposed Project were not implemented. Alternatives may also include, as necessary, a No-Unmitigated Impact Alternative, which considers an alternative to the Proposed Project that would result in no unmitigated impacts. The alternatives analysis is primarily qualitative, except in those areas where significant adverse impacts have been identified for the Proposed Project.

TASK 15. SUMMARY EIS CHAPTERS

In accordance with CEQR guidelines, the EIS will include the following three summary chapters, where appropriate to the Proposed Project:

- **Unavoidable Adverse Impacts** - which summarizes any significant adverse impacts that are unavoidable if the Proposed Project is implemented, regardless of the mitigation employed (or if mitigation is not feasible).

- **Growth-Inducing Aspects of the Proposed Project** - which generally refer to "secondary" impacts of a proposed project that trigger further development.

- **Irreversible and Irretrievable Commitments of Resources** - which summarizes the Proposed Project and its impacts in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.

TASK 16. EXECUTIVE SUMMARY

The executive summary will utilize relevant material from the body of the EIS to describe the Proposed Project, the necessary approvals, study areas, environmental impacts predicted to occur, measures to mitigate those impacts, unmitigated and unavoidable impacts (if any), and alternatives to the Proposed Project. The executive summary will be written in sufficient detail to facilitate drafting of a Notice of Completion for the EIS by the lead agency.

APPENDIX A

Transportation Planning Factors (TPF)/
Travel Demand Forecast (TDF)
Technical Memorandum

Philip Habib & Associates

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West 108th Street WSFSSH Development

Transportation Planning Factors (TPF) / Travel Demand Forecast (TDF)

TECHNICAL MEMORANDUM

INTRODUCTION

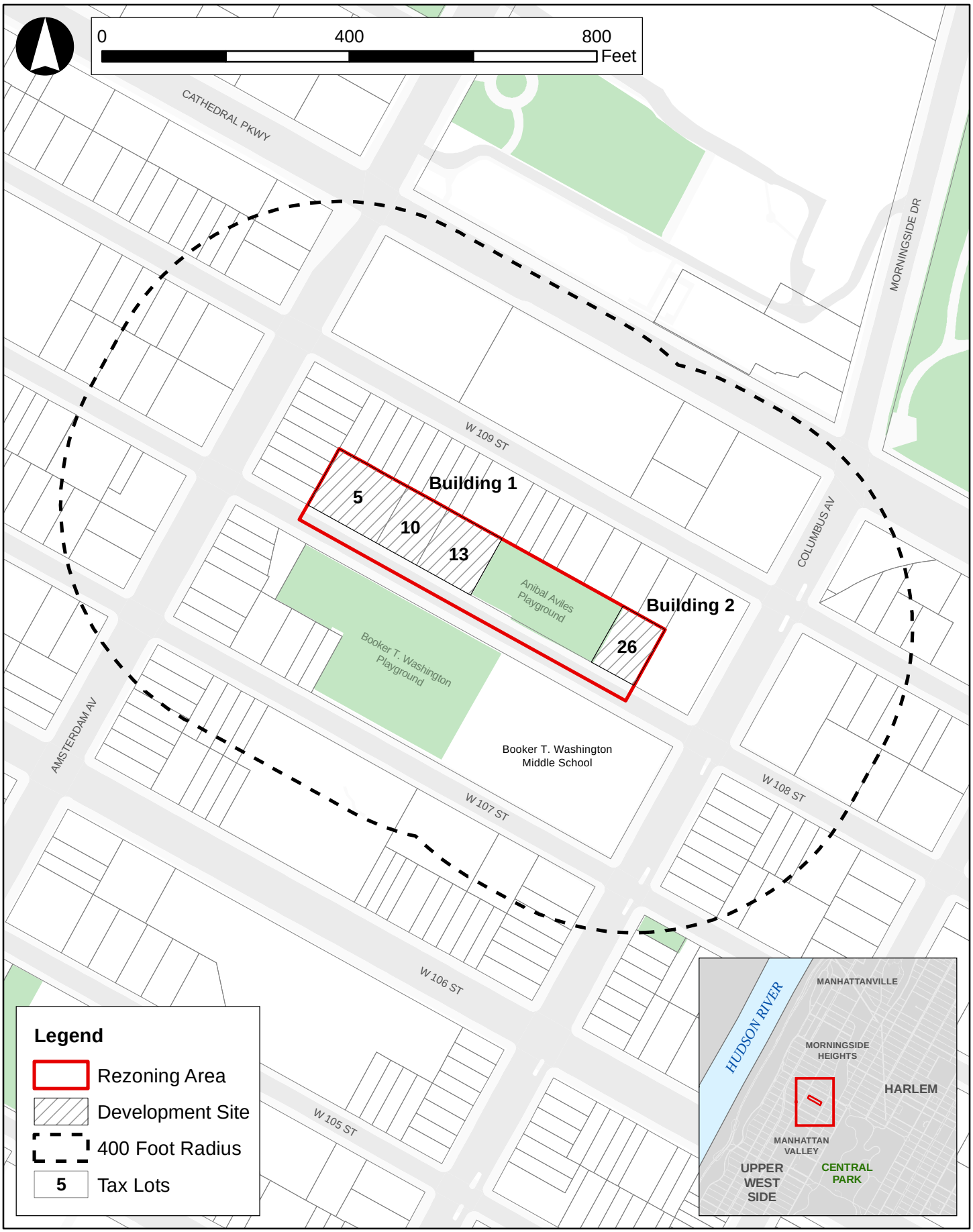
The City of New York – Department of Housing Preservation and Development (HPD) and the project sponsor, the West Side Federation for Senior and Supportive Housing (WSFSSH), are seeking approval of several discretionary actions subject to City Planning Commission (CPC) approval (collectively, the "Proposed Actions") to facilitate the construction of two new buildings consisting of affordable and supportive housing and community facility (medical office) uses on West 108th Street in the Manhattan Valley neighborhood of Manhattan Community District (CD) 7 (refer to Figure 1). The Proposed Actions include designation of an Urban Development Action Area (UDAA), approval of an Urban Development Action Area Project (UDAAP), disposition of City-owned property, a zoning map amendment to change the Project Area zoning from R8B to R8A, and a zoning text amendment to Appendix F of the NYC Zoning Resolution to map a Mandatory Inclusionary Housing ("MIH") Area on the Project Area. The project sponsor may seek construction financing from HPD and other agencies at a later date.

The Proposed Actions would facilitate the development of approximately 277 affordable dwelling units (DUs), an approximately 31,000 gross square foot (gsf) transitional housing facility for older adults with approximately 110 shelter beds, and an additional approximately 6,400 gsf community facility (medical office) use (the "Proposed Project"). This proposed development would consist of two buildings: the Western Development (Lots 5, 10, and 13) with approximately 193,000 gsf, and the Eastern Development (Lot 26) with approximately 45,000 gsf. This memorandum summarizes the transportation planning factors to be used for the analyses of traffic, transit, pedestrian, and parking conditions for the Proposed Project.

REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDS)

In order to assess the potential effects of the Proposed Actions, a Reasonable Worst-Case Development Scenario (RWCDS) for both the "future without the Proposed Actions" (No-Action) and the "future with the Proposed Actions" (With-Action) conditions is analyzed for an analysis year of 2025. In the absence of the Proposed Actions, it is expected that no disposition of City-owned property and no changes to zoning or land use would occur within the Development Site. Currently, Lot 5 is occupied by a four-story parking garage containing 250 parking spaces, Lot 10 is occupied by a five-story building that houses the Valley Lodge Shelter which contains 92 beds for the homeless, Lots 13 and 26 are also occupied by five- and three- story public parking garages containing 300 and 125 parking spaces, respectively. Under the No-Action condition, the three off-street public parking garages (with a total of 675 parking spaces) would continue to operate.

Project Location



Under the With-Action condition, the Proposed Actions would facilitate development within the Project Area. By 2025, the Proposed Actions would result in the development of Building 1 (the "Western Development") and Building 2 (the "Eastern Development") on the Development Site (Block 1863, Lots 5, 10, 13, and 26). For CEQR analysis purposes, the Proposed Project described above represents the RWCDS.

Table 1 below provides a comparison of the 2025 No-Action and 2025 With-Action conditions identified for analysis purposes. As shown, by 2025 the incremental (net) change that would result from the Proposed Actions is the addition of 277 affordable units (approximately 200,600 gsf), approximately 18 shelter beds, approximately 6,400 gsf of community facility uses (predominantly medical office - excluding the shelter facility), and approximately 0.2 acres (9,000 sf) of private open space for tenants, as well as a reduction of 675 public parking spaces.

Table 1
Comparison of 2025 No-Action and 2025 With-Action Conditions

Use		No-Action Scenario	With-Action Scenario	Increment
Residential	Affordable Housing (Including Supportive Senior Housing)	--	277 units	**+277 units**
Community Facility	Shelter beds	92 beds	110 beds	**+18 beds**
	Medical Office	--	6,400 gsf	**+6,400 gsf**
Public Parking (spaces)		675 spaces	-	**- 675 spaces**
Accessory/Private Open Space		--	0.2 acres (9,000 sf)	**+0.2 acres (9,000 sf)**

Construction of Building 1 (Block 1863, Lots 5, 10, and 13) is expected to begin in 2018, with all building elements complete and fully operational by the end of 2020; construction of Building 2 (Block 1863, Lot 26) is expected to begin in 2023, with all building elements complete and fully operational by the end of 2025. Accordingly, the EIS will assume a 2025 Build Year (a.k.a. analysis year), as it represents full build-out of the Proposed Project. As the incremental development resulting from the Proposed Actions would exceed the densities in Table 16-1 of the *City Environmental Quality Review* (CEQR) *Technical Manual* analysis thresholds, a preliminary travel demand forecast was prepared.

TRANSPORTATION PLANNING FACTORS

In order to conduct a Level 1 Trip Generation Screening Assessment for the Proposed Actions in 2025, a travel demand forecast was prepared for a typical peak hour during the weekday AM, midday, and PM and Saturday midday periods. The transportation planning factors shown below in Table 2 were developed based on standard criteria as per the 2014 *CEQR Technical Manual*, census data, and studies that have been used in previous EISs for projects with similar uses. These include trip generation rates, temporal and directional distributions, mode choice factors, and vehicle occupancies for the With-Action increment of 277 affordable DUs, 18 new transitional shelter beds (a total of 110 shelter beds to be provided, replacing the existing 92 beds), and 6,400 gsf of community facility (medical office) space. The 277 affordable DUs and the 18 shelter beds were conservatively analyzed, for transportation purposes, as typical dwelling units (a total of 295 DUs).

Table 2
Transportation Planning Factors

Land Use:	Residential	Medical Office (Staff)	Medical Office (Visitors)
Size/Units:	295 DU	6,400 gsf	6,400 gsf
Trip Generation:	(1)	(4,5)	(4,5)
Weekday	8.075	10.0	33.6
Saturday	9.600	4.3	14.5
	per DU	per 1,000 gsf	per 1,000 gsf
Temporal Distribution:	(1)	(4,5)	(4,5)
AM	10.0%	24.0%	6.0%
MD	5.0%	17.0%	9.0%
PM	11.0%	24.0%	5.0%
SatMD	8.0%	17.0%	9.0%
Modal Splits:	(2) All Periods	(6) All Periods	(5) All Periods
Auto	7.4%	17.4%	25.0%
Taxi	1.4%	0.2%	25.0%
Subway	67.7%	51.4%	29.0%
Bus	6.3%	12.9%	11.0%
Walk/Other	17.2%	18.1%	10.0%
	100.0%	100.0%	100.0%
In/Out Splits:	(3) In / Out	(4,5) In / Out	(4,5) In / Out
AM	16.0% / 84.0%	100% / 0%	90% / 10%
MD	50.0% / 50.0%	50% / 50%	50% / 50%
PM	67.0% / 33.0%	0% / 100%	30% / 70%
Sat MD	53.0% / 47.0%	50% / 50%	50% / 50%
Vehicle Occupancy:	(2,3) All Periods	(5,6) All Periods	(5) All Periods
Auto	1.10	1.15	1.65
Taxi	1.40	1.40	1.20
Truck Trip Generation:	(1)	(4,5)	
Weekday	0.06	0.04	N/A
Saturday	0.02	0.00	N/A
	per DU	per 1,000 sf	
	(1)	(4,5)	
AM	12.0%	9.7%	N/A
MD	9.0%	7.8%	N/A
PM	2.0%	5.1%	N/A
Sat MD	9.0%	0.0%	N/A
	In / Out	In / Out	In / Out
AM/MD/PM	50.0% / 50.0%	50.0% / 50.0%	N/A

Notes:

(1) Based on data from the 2014 *CEQR Technical Manual.*

(2) Based on American Community Survey 2011-2015 Means of Transportation to Work data for Manhattan Census Tracts 189, 191, 193, 195, 197.01, 197.02, 199, and 216.

(3) Based on the 2012 *West Harlem Rezoning FEIS.*

(4) Based on data from the 2007 *Jamaica Plan Rezoning FEIS.*

(5) *Based o*n the 2012 *Saint Vincent's Campus Redevelopment FEIS.*

(6) Based on 2006-2010 AASHTO CTPP Reverse Journey to Work 5-Year Data for Manhattan Census Tracts 189, 191, 193, 195, 197.01, 197.02, 199, and 216.

Residential

The forecast of travel demand for the residential use used a weekday trip generation rate of 8.075 person trips per DU, a Saturday trip generation rate of 9.6 person trips per DU, and temporal distributions of 10%, 5%, 11%, and 8% for the weekday AM, midday, and PM and Saturday midday peak hours, respectively, as per the 2014 *CEQR Technical Manual*. The residential modal splits were estimated to be 7.4%, 1.4%, 67.7%, 6.3%, and 17.2% mode shares for private auto, taxi, subway, bus, and walk-only modes, respectively, as per 2011-2015 *American Community Survey (ACS)* Means of Transportation to Work data Manhattan Census Tracts 189, 191, 193, 195, 197.01, 197.02, 199, and 216 (the tracts located within a ¼-mile radius of the Project Area). Directional splits (in/out) shown in Table 2 were based on the 2012 *West Harlem Rezoning FEIS*. The vehicle occupancy of 1.10 persons per vehicle was also assumed based on ACS data, while the taxi occupancy of 1.40 persons per taxi was based on the 2012 *West Harlem Rezoning FEIS*.

Community Facility (Medical Office)

Travel demand for the proposed medical office use was forecasted separately for employees and patients/visitors. The forecast of travel demand for medical office employees used a weekday trip generation rate of 10 person trips per 1,000 sf, a Saturday employee trip generation rate of 4.3 persons per 1,000 sf, and temporal distributions, and temporal distributions of 24%, 17%, 24%, and 17% for the weekday AM, midday, and PM and Saturday midday peak hours, respectively, as per the 2007*Jamaica Plan Rezoning FEIS* and the 2012 *Saint Vincent's Campus Redevelopment FEIS*. The employee modal splits were estimated to be 17.4%, 0.2%, 51.4%, 12.9%, and 18.1% for private auto, taxi, subway, bus, and walk-only modes, respectively, as per the 2006-2010 American Association of State Highway and Transportation Officials (AASHTO) Census Transportation Planning Products (CTPP) Reverse Journey to Work data for Manhattan Census Tracts 189, 191, 193, 195, 197.01, 197.02, 199, and 216. The directional (in/out) splits shown in Table 3 were based on directional splits from the 2007 *Jamaica Plan Rezoning FEIS* and the 2012 *Saint Vincent's Campus Redevelopment FEIS*. Additionally, the vehicle occupancy of 1.18 and taxi occupancy of 1.40 were based on AASHTO CTPP data and the 2012 *Saint Vincent's Campus Redevelopment FEIS*, respectively.

The forecast of travel demand for the medical office visitors used a weekday trip generation rate of 33.6 trips per 1,000 sf, a Saturday visitor trip generation rate of 14.5 trips per 1,000 sf, and temporal distributions of 6%, 9%, 5%, and 9% for the weekday AM, midday, and PM and Saturday midday peak hours, respectively, as per the 2007 *Jamaica Plan Rezoning FEIS* and the 2012 *Saint Vincent's Campus Redevelopment FEIS.* Similarly, the visitor modal splits were estimated to be 25%, 25%, 29%, 11%, and 10% for private auto, taxi, subway, bus, and walk-only modes, respectively, as per the 2007 *Jamaica Plan Rezoning FEIS*. The directional (in/out) splits were also based on the 2007 *Jamaica Plan Rezoning FEIS* and the 2012 *Saint Vincent's Campus Redevelopment FEIS.* The vehicle occupancy rates of 1.65 visitors per auto and 1.2 visitors per taxi were based on the 2012 *Jamaica Plan Rezoning FEIS*.

TRIP GENERATION

According to the 2014 *CEQR Technical Manual* guidelines, a two-tier screening process is used to determine whether quantified analyses of any technical areas of the transportation system are necessary. A Level 1 screening is typically necessary if a proposed project has the potential to exceed either 50 vehicle trips, 200 transit trips, or 200 pedestrian trips during any given peak hour. If these thresholds are exceeded, a Level 2 screening assessment is required in order to ensure that there are not 50 vehicle trips, 50 bus trips, 200 subway/rail trips, or 200 pedestrian trips assigned to an individual transportation element (intersections, bus routes, subway stations, etc.) during any analysis peak hour. Based on the planning factors shown in Table 2,

a travel demand forecast (Level 1 screening) was prepared for the Proposed Project, and is shown in Table 3, below.

Table 3
Travel Demand Forecast

Land Use:		Residential		Medical Office (Staff)		Medical Office (Visitors)		Total	
Size/Units:		295 DU		6,400 gsf		6,400 gsf			
Peak Hour Person Trips:									
	AM	240		16		14		270	
	MD	120		12		20		152	
	PM	264		16		12		292	
	Sat MD	228		6		10		244	
Person Trips:									
		In	Out	In	Out	In	Out	In	Out
AM	Auto	3	15	3	0	3	0	9	15
	Taxi	1	3	0	0	3	0	4	3
	Subway	26	135	7	0	4	1	37	136
	Bus	2	13	2	0	1	0	5	13
	Walk/Other	7	35	3	1	2	0	12	36
	Total	39	201	15	1	13	1	67	203
		In	Out	In	Out	In	Out	In	Out
MD	Auto	4	4	1	1	3	3	8	8
	Taxi	1	1	0	0	3	3	4	4
	Subway	41	41	3	3	3	3	47	47
	Bus	4	4	1	1	1	1	6	6
	Walk/Other	10	10	1	1	0	0	11	11
	Total	60	60	6	6	10	10	76	76
		In	Out	In	Out	In	Out	In	Out
PM	Auto	13	6	0	3	1	2	14	11
	Taxi	2	1	0	0	1	2	3	3
	Subway	120	59	0	8	1	2	121	69
	Bus	12	6	0	2	0	1	12	9
	Walk/Other	30	15	0	3	1	1	31	19
	Total	177	87	0	16	4	8	181	111
		In	Out	In	Out	In	Out	In	Out
Sat MD	Auto	9	8	1	1	1	1	11	10
	Taxi	2	2	0	0	1	1	3	3
	Subway	81	72	1	1	1	1	83	74
	Bus	8	7	0	0	1	1	9	8
	Walk/Other	21	18	1	1	1	1	23	20
	Total	121	107	3	3	5	5	129	115
Vehicle Trips :									
		In	Out	In	Out	In	Out	In	Out
AM	Auto (Total)	3	14	3	0	2	0	8	14
	Taxi	1	2	0	0	3	0	4	2
	Taxi Balanced	3	3	0	0	3	3	6	6
	Truck	1	1	0	0	0	0	1	1
	Total	7	18	3	0	5	3	15	21
		In	Out	In	Out	In	Out	In	Out
MD	Auto (Total)	4	4	1	1	2	2	7	7
	Taxi	1	1	0	0	3	3	4	4
	Taxi Balanced	2	2	0	0	6	6	8	8
	Truck	1	1	0	0	0	0	1	1
	Total	7	7	1	1	8	8	16	16
		In	Out	In	Out	In	Out	In	Out
PM	Auto (Total)	12	5	0	3	1	2	13	10
	Taxi	1	1	0	0	1	1	2	2
	Taxi Balanced	2	2	0	0	2	2	4	4
	Truck	0	0	0	0	0	0	0	0
	Total	14	7	0	3	3	4	17	14
		In	Out	In	Out	In	Out	In	Out
Sat MD	Auto (Total)	8	7	1	1	1	1	10	9
	Taxi	1	1	0	0	1	1	2	2
	Taxi Balanced	2	2	0	0	2	2	4	4
	Truck	0	0	0	0	0	0	0	0
	Total	10	9	1	1	3	3	14	13

Total Vehicle Trips			
	In	Out	Total
AM	15	21	36
MD	16	16	32
PM	17	14	31
Sat MD	14	13	27

Traffic and Parking

Based on the factors outlined above, the Proposed Project would generate approximately 36, 32, 31, and 27 vehicle trips (in and out combined) during the weekday AM, midday, and PM and Saturday midday peak periods, respectively (refer to Table 3). However, as previously mentioned, there are currently three parking garages located at the Development Site (Block 1863, Lots 5, 13, and 26), which would be displaced in the future with the Proposed Actions. In order to assess the existing conditions at the Development Site, vehicle counts were conducted at the entrances to each of the three parking garages during the weekday AM, midday, and PM peak periods in November 2016. These counts are summarized below in Table 4.

Table 4
Vehicle Counts at Existing Garages

Time Period		Garage 1 (Lot 5)			Garage 2 (Lot 13)			Garage 3			Total
		In	Out	Total	In	Out	Total	In	Out	Total	
7:30 AM	8:30 AM	2	5	7	1	11	12	1	2	3	22
7:45 AM	8:45 AM	4	6	10	2	9	11	0	1	1	22
8:00 AM	9:00 AM	5	6	11	2	7	9	0	1	1	21
8:15 AM	9:15 AM	8	7	15	2	4	6	0	1	1	22
8:30 AM	**9:30 AM**	9	12	21	2	4	6	1	1	2	**29**
12:00 PM	**1:00 PM**	7	11	18	3	2	5	1	1	2	**25**
12:15 PM	1:15 PM	6	10	16	2	1	3	1	3	4	23
12:30 PM	1:30 PM	7	9	16	1	2	3	1	2	3	22
12:45 PM	1:45 PM	4	4	8	1	4	5	1	2	3	16
1:00 PM	2:00 PM	4	2	6	1	4	5	0	3	3	14
5:00 PM	6:00 PM	6	10	16	2	0	2	3	3	6	24
5:15 PM	6:15 PM	7	13	20	2	4	6	3	1	4	30
5:30 PM	6:30 PM	10	9	19	4	4	8	3	1	4	31
5:45 PM	**6:45 PM**	12	7	19	5	5	10	3	1	4	**33**
6:00 PM	7:00 PM	10	7	17	6	6	12	3	0	3	32

Notes:

1. Based on PHA counts (November 2016).
2. **Bold** indicates peak hour volume

As shown in Table 4, a total of 29, 25, and 33 vehicle trips (in and out combined) were generated by the three parking garages during the weekday AM, midday, and PM peak hours, respectively. As previously mentioned, the Proposed Project would generate 36, 32, and 31 vehicle trips (in and out combined) during the weekday AM, midday, and PM peak hours (refer to Table 3). Accounting for the vehicle trips generated by the existing parking garages that would be displaced in the With-Action condition, the Proposed Project would result in a net reduction of two vehicle trips during the weekday PM peak hour, with only seven incremental vehicle trips generated during both the weekday AM and midday peak hours. As the *CEQR Technical Manual* Level 1 screening threshold of 50 vehicle trips per peak hour is not exceeded during any of the four peak hour periods, significant adverse impacts would be unlikely and a Level 2 screening analysis is not warranted.

As per the *CEQR Technical Manual*, a detailed parking assessment is not needed if the threshold for traffic analysis is not exceeded. However, as the Proposed Actions would eliminate a combined 675 parking spaces, and may result in a significant parking shortfall in the surrounding area. Therefore, a detailed parking analysis will be included in the EIS.

Transit

According to the general thresholds used by the Metropolitan Transportation Authority (MTA) specified in the 2014 *CEQR Technical Manual*, detailed transit analyses are not required if the proposed development is projected to result in fewer than 200 peak hour subway/rail or bus transit riders.

As shown in Table 3, the Proposed Project would generate 173, 94, 190, and 157 subway (in and out combined) trips during the weekday AM, midday, and PM and Saturday midday peak periods, respectively. Similarly, the Proposed Project would generate 18, 12, 21, and 17 bus trips during the weekday AM, midday, and PM and Saturday midday peak hours, respectively. Therefore, the transit thresholds are not met in any of the four analyzed peak hours, and a detailed transit analysis would not be warranted as no significant adverse impacts are expected.

Pedestrians

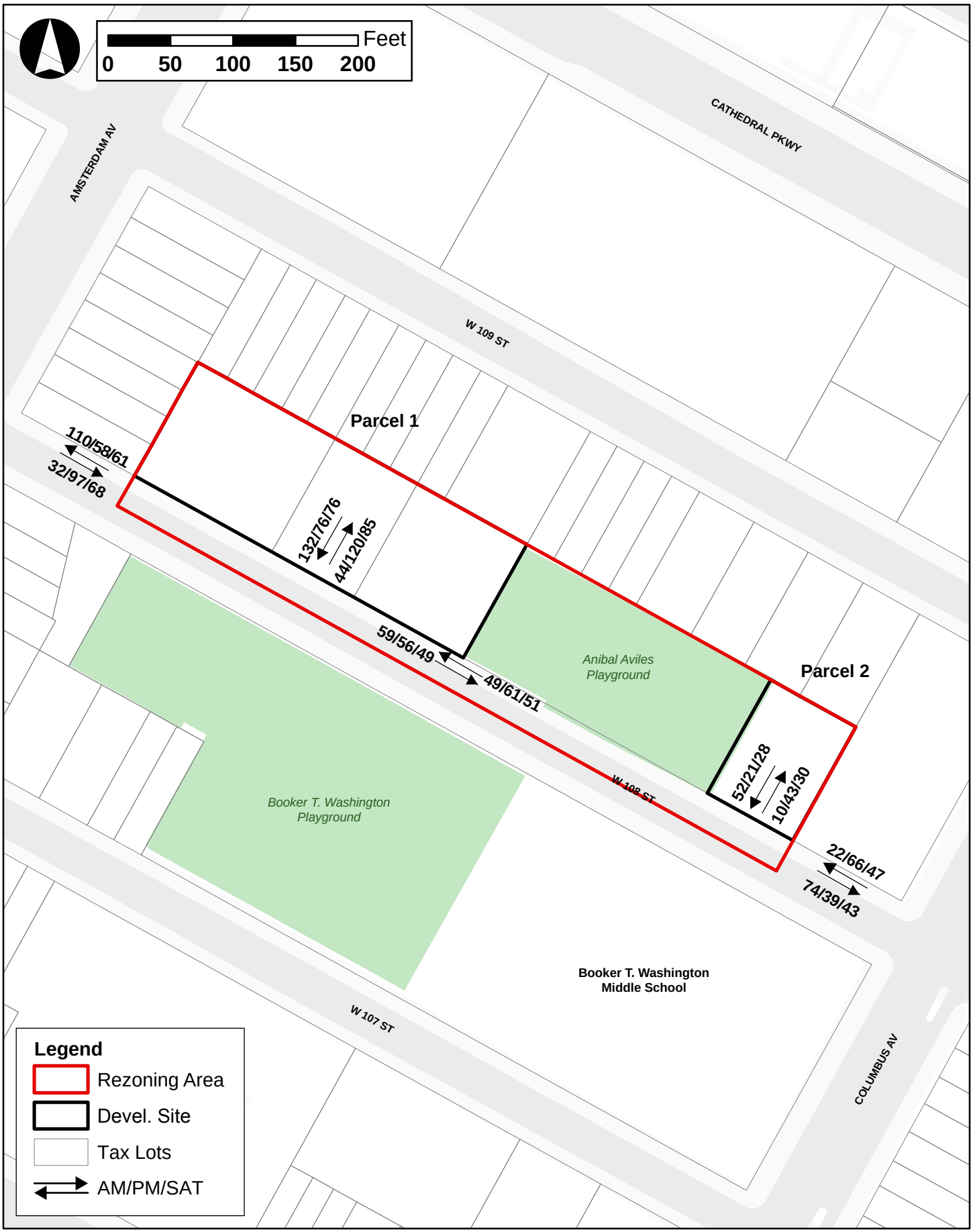
According to the *CEQR Technical Manual*, detailed pedestrian analyses are not required if the proposed development is projected to result in less than 200 peak hour pedestrian trips. As shown in Table 3, the Proposed Project would generate 48, 22, 50, and 43 walk-only trips (in and out combined) during the weekday AM, midday, and PM and Saturday midday peak periods, respectively (refer to Table 3). In addition to the walk-only trips, accounting for the walk portions of the subway and bus trips generated by the Proposed Project, the Proposed Project would generate a total of 239, 128, 261, and 217 walk trips in the weekday AM, midday, and PM and Saturday peak periods respectively. As the total walk trips exceed the *CEQR Technical Manual* threshold during the weekday AM, weekday PM, and Saturday midday peak hours, a more detailed analysis is warranted for these peak hours. The subsequent Level 2 pedestrian assignment is shown below in Figure 2 for the weekday AM and PM and Saturday midday peak hours.

As shown in Figure 2, pedestrian trips would be distributed eastbound and westbound between the entrances to Buildings 1 and 2, and no single pedestrian element is expected to experience an increase of greater than 200 person trips during any of the peak hour periods. Therefore, no significant adverse impacts are expected, and a detailed pedestrian analysis is not warranted.

CONCLUSIONS

The incremental trips generated by the Proposed Project would be less than the 2014 *CEQR Technical Manual* thresholds during all peak periods, and detailed traffic, parking, transit, and pedestrian analyses are not warranted as impacts are not likely. However, as the Proposed Actions would eliminate three public parking garages containing a combined 675 parking spaces, which may result in a significant parking shortfall in the surrounding area, a detailed parking analysis will be included in the EIS.

Pedestrian Assignments



APPENDIX B

Response to Comments on the Draft Scope of Work

Response to Comments on the Draft Scope of Work for the Targeted Environmental Impact Statement

WEST 108th STREET WSFSSH Development

A. INTRODUCTION

This document summarizes and responds to comments on the Draft Scope of Work (DSOW), issued on May 23, 2017, for the West 108th Street WSFSSH Development (the "Proposed Project"). Oral and written comments were received during the public meeting held by the New York City Department of Housing Preservation and Development (HPD) on June 22, 2017. Written comments were accepted through the close of the public comment period, which ended at 5:00 PM on Monday, July 3, 2017. Appendix C contains the written comments received on the DSOW. A Final Scope of Work (FSOW) was issued on October 13, 2017, incorporating comments received on the DSOW where relevant and appropriate, as well as other background and project updates that were made subsequent to publication of the DSOW.

Section B lists the elected officials, organizations and individuals that provided relevant comments on the DSOW. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the task structure of the DSOW.

B. LIST OF ELECTED OFFICIALS, ORGANIZATIONS AND INDIVIDUALS THAT COMMENTED ON THE DRAFT SCOPE OF WORK

Elected Officials

1. Borough President Gale Brewer; oral statement delivered by Diana Howard at public scoping meeting.
2. Councilman Mark Levine; oral statement at public scoping meeting.
3. Community Board (CB) 7; written submission dated June 22, 2017.

Organizations and Interested Public (listed in alphabetical order)

4. Peter Arntsten; oral statement at public scoping meeting.
5. Albert Bergeret; oral statement at public scoping meeting.
6. Robert Botfeld; oral statement at public scoping meeting.
7. Rabbi Josh Bushin (Rememu Clergy); written submission dated June 25, 2017.
8. Rafael Castellanos (Central Park Medical Unit); oral statement at public scoping meeting.
9. Ken Coughlin (CB 7); oral statement at public scoping meeting.
10. Chet Davis; written submission dated June 24, 2017.
11. Mark Diller (CB 7); oral statement at public scoping meeting.
12. Reverend Alistair Drummond (WSFSSH board member); undated written submission and oral statement at public scoping meeting.

13. David Dubbin; oral statement at public scoping meeting.
14. Kate Dunham; written submission dated June 22, 2017.
15. Jill Freeman (Save Manhattan Valley); oral statement at public scoping meeting.
16. Nathan Gebbard; oral statement delivered by Samantha Richins at public scoping meeting.
17. Maxine Golub (Institute for Family Health); written submission dated June 22, 2017 and oral statement at public scoping meeting.
18. Mark Greenberg (director of the Interfaith Assembly on Homelessness and Housing); oral statement at public scoping meeting.
19. Jean Greendorcy; oral statement at public scoping meeting.
20. Terry Gruber; oral statement at public scoping meeting.
21. Michael Hiller (Save Manhattan Valley); oral statement at public scoping meeting.
22. Emily Horowitz; oral statement at public scoping meeting.
23. Katelyn Hosey (LiveOn NY); written submission dated June 22, 2017.
24. Ted Houghton (president of Gateway Housing); undated written submission and oral statement at public scoping meeting.
25. Madeline Innocent (CB 7); oral statement at public scoping meeting.
26. Patricia Ireland; oral statement at public scoping meeting.
27. Jean Juwarik (Northwest Central Park Multi-Block Association, Duke Ellington Boulevard Neighborhood Association, & Save Manhattan Valley); oral statement at public scoping meeting.
28. Elizabeth Kellner; oral statement at public scoping meeting.
29. Relina Kim; oral statement at public scoping meeting.
30. Gloriann Kirstein (president of Duke Ellington Boulevard Neighborhood Association); oral statement at public scoping meeting.
31. Jerome Kramer; oral statement at public scoping meeting.
32. Margaret Lew; oral statement at public scoping meeting.
33. Judith Linn; oral statement at public scoping meeting.
34. Thomas Lopez-Pierre; oral statement at public scoping meeting.
35. Brendan Maylor (Save Manhattan Valley); oral statement at public scoping meeting.
36. Alexander Medwedw; oral statement at public scoping meeting.
37. Aaron Mendelsohn (Friends of the Anibal Aviles Playground); oral statement at the public scoping meeting.
38. Mark Merritt (executive director of DeRote); undated written submission and oral statement delivered by Ellen Amstutz at the public scoping meeting.
39. Steven Minor; oral statement at public scoping meeting.
40. Steve Peluso (Central Park Medical Unit); oral statement at public scoping meeting.
41. Arthur Pier; oral statement at public scoping meeting.
42. Thomas Power; oral statement at public scoping meeting.
43. Linda Prudhomme (Northwest Central Park Multi-Block Association); oral statement at public scoping meeting.
44. Sandra Roche (Bloomingdale Family Program); written submission dated June 19, 2017.
45. Ermala Rowland; oral statement at public scoping meeting.
46. Hugh Rowland; oral statement delivered by Michael Hiller at public scoping meeting.
47. Richard Rosenblum; oral statement at public scoping meeting.
48. Julie Sandorf; written submission dated Jun 22, 2017 and oral statement at public scoping meeting.
49. Carl Scalise; oral statement at public scoping meeting.
50. Save Manhattan Valley; undated written submission.
51. Roberta Semer (CB 7); oral statement at public scoping meeting.
52. Roberta Solomon (Goddard Riverside Community Center); written submission dated June 23, 2017.
53. James Steckman; oral statement at public scoping meeting.
54. Judy Steed; oral statement at public scoping meeting.
55. Jeannette Tumor; oral statement at public scoping meeting.
56. Paul Walsh; oral statement at public scoping meeting.
57. Maryann Wong; oral statement at public scoping meeting.
58. Dan Zweig; undated written submission and oral statement at public scoping meeting.

C. COMMENTS AND RESPONSES ON THE DRAFT SCOPE OF WORK

1. Project Description

Comment 1.1: This project will build upon WSFSSH's strong presence in the neighborhood and will increase the supply of affordable housing with services for low-income residents (1, 2, 6, 12, 44)

Response 1.1: Comment noted.

Comment 1.2: WSFSSH and the Valley Lodge have been assets to our community; WSFSSH has a strong track record. (1, 4, 12, 14, 17, 23, 24, 24, 44, 48, 51, 52, 54)

Response 1.2: Comment noted.

Comment 1.3: When I first saw this project in the fall of 2015, it was a seven-story building. Since then, the project has changed and my feelings about it have changed. I am very much opposed to the request to construct a taller building. (43)

Response 1.3: In December 2015, WSFSSH presented both a seven-story as-of-right building and a larger building with more affordable housing and community facility to the CB7 Land Use Committee.

Comment 1.4: The thing I like about this project is that it is permanent affordable housing and supportive housing together; it is not one or the other, and is a reflection of the world that we are living in. I think that, as a public/private partnership, it is an excellent idea. (19)

Response 1.4: Comment noted.

Comment 1.5: I think that there should be some creative, flexible way to keep some of the parking. If it is possible, the project would be much improved, but, either way, the project should be built because it is a good idea. (18, 19)

Response 1.5: As outlined in the FSOW, under the 2014 CEQR Technical Manual, a parking analysis is typically conducted if a quantified traffic analysis is necessary. While the Proposed Project does not warrant a quantified traffic analysis, as the Proposed Actions would result in the elimination of approximately 675 parking spaces with no replacement parking (a situation that is atypical of most development subject to environmental review under CEQR), a detailed analysis of on-street and off-street parking conditions in the surrounding study area will be provided in the DEIS. If significant adverse parking impacts are identified, mitigation measures will be coordinated between HPD and the appropriate City agencies.

Comment 1.6: The Friends of Anibal Aviles Playground supports this project, as it will (1) provide facilities for the playground that will enable the New York City Department of Parks and Recreation (DPR) to staff the playground, provide storage space for the playground's maintenance, and provide daily oversight , programming, and activities for the playground during the warmer months; (2) will provide spaces for us and other local non-profits to use for community space; and (3) will provide affordable housing for seniors, families, and individuals when housing is becoming increasingly difficult to afford. (23, 37, 52)

Response 1.6: Comment noted.

Comment 1.7: I support this project. (7, 14, 16, 17, 18, 19, 23, 24, 32, 37, 38, 44, 52)

Response 1.7: Comment noted.

Comment 1.8: There has got to be some way to accommodate the needs of people who have affordable parking and won't have affordable parking if this is built. HPD should talk to the New York City Department of Transportation (DOT) and find some way of providing a subsidy. (18)

Response 1.8: Refer to Response 1.5.

Comment 1.9: There is a severe shortage of long-term housing and supportive services for seniors, with over 200,000 New York City seniors on a waiting list for affordable housing. This project will create much needed affordable housing for low-income families and seniors and an invaluable community asset for the community. (23, 38, 48)

Response 1.9: Comment noted.

Comment 1.10: Maybe they should build an 11-story parking garage right next to the building to house all of the cars that they are displacing; otherwise, we are in for a disaster. (20)

Response 1.10: Refer to Response 1.5.

Comment 1.11: This project is unacceptable unless they come up with a plan to put the 800 cars that will be displaced with the demolition of the garages in another facility in this neighborhood. There are many other ways to provide affordable housing in any neighborhood in New York without destroying a vital community resource, which is exactly what is happening here. What about affordable parking garages for hardworking, taxpaying, middle class community members? Why should we be pushed out and have to make more sacrifices in our community? (22, 41, 53)

Response 1.11: As outlined in the FSOW, the DEIS will include a detailed parking analysis, which will determine future study area parking utilization levels and determine whether the Proposed Project would result in a significant adverse parking impact. If significant adverse impacts are identified, mitigation measures will be developed with the appropriate City agencies.

Comment 1.12: I think that WSFSSH can find a way to identify the people currently parking in the garages who desperately need it because of either sickness or work and ensure that they continue to have access to a parking garage. (32)

Response 1.12: Comment noted.

Comment 1.13: I value the diversity of our neighborhood, but sometimes with this diversity, there is a pushback because there is a disproportionate amount of affordable housing and services that exist in our community. I understand that more affordable housing is needed in the City—and maybe in our neighborhood, too—but I haven't seen any studies to show that it is needed here or that the income brackets that are proposed for the project actually meet the needs of the people in the neighborhood. (26)

Response 1.13: The DEIS will provide further information regarding the purpose and need for the Proposed Actions.

Comment 1.14: There are 40 pre-school children that use the Anibal Aviles Playground every date between 10am and noon and no one has talked to them about what they want for the playground. They don't want a bathroom in the playground; playgrounds with bathrooms are fraught with all kinds of problems. There has not been enough collaboration with the community. (26)

Response 1.14: ***The New York City Department of Parks and Recreation (DPR) has been included in pre-development planning, management, and maintenance of the restroom that would be included in Building 1 and available to Anibal Aviles Playground users. The ULURP process will provide members of the public with multiple opportunities to comment and provide input regarding this feature of the Proposed Project.***

Comment 1.15: The Proposed Project could have parking underground with housing above. (49)

Response 1.15: ***Refer to Response 1.5.***

Comment 1.16: We want to express our thank you to WSFSSH for amending their plans and accommodating space to store two Central Park Medical Unit (CPMU) ambulances, which would otherwise be displaced. (8, 40)

Response 1.16: ***Comment noted.***

Comment 1.17: I would be okay with a taller building if it would include parking, more affordable housing, and/or more community space. (4)

Response 1.17: ***Comment noted.***

Comment 1.18: The Valley Lodge is an incredible asset that deserves a place in the neighborhood and needs more space to serve people in need. (54, 56)

Response 1.18: ***Comment noted.***

Comment 1.19: Having a car in the City makes less and less sense. If it is a choice between preserving cheap parking spots or providing a rare opportunity for social benefits and affordable housing, the decision should be obvious. (14)

Response 1.19: ***Comment noted.***

2. Land Use, Zoning, and Public Policy

Comment 2.1: I understand that the community has concerns about the increase in residential density and know that HPD will take these concerns seriously as the Proposed Project matures. (1)

Response 2.1: ***As noted in the FSOW, the DEIS will include an analysis of land use, zoning, and public policy.***

Comment 2.2: Within CB 7 we have had a long fight over very tall buildings that currently exist on Broadway, and because of that, we came up with guidelines for our side streets. The Project Area is currently zoned R8B and would require a zoning map amendment to supersede those guidelines and I, and the Northwest Central Park Multi-Block Association, are very much opposed to that. The City's support of this project is reneging on that zoning deal less than nine years after agreeing to it (4, 50)

Response 2.2: ***As indicated in the FSOW, the land use, zoning, and public policy analysis will include a description of recent zoning changes in the area and an assessment of the potential impacts of the proposed zoning change on surrounding zoning.***

Comment 2.3: Although recognizing the importance of supportive housing facilities, the people of Save Manhattan Valley insist that the placement of such projects follow existing laws and be more

evenly distributed throughout the City, rather than just cramming yet another one into their neighborhood—particularly one that would post environmental hazards and violate the law. We ask you personally whether it feels right that one group of highly disadvantaged residents—the disabled, who rely on the existing Development Site garages—should make room for another group of disadvantaged residents—those who need shelters and affordable housing—when Manhattan Valley already has its fair share of such institutions. (45, 50)

Response 2.3: ***The shelter portion of the Proposed Project is evaluated under the Criteria for the Location of City Facilities in conjunction with ULURP.***

Comment 2.4: In 2007, we reached a key victory in getting protective zoning (R8A and R8B) in response to the Extel Building (the 44-story building on West 100th Street and Broadway). The protective zoning was intended to ensure the air, light, and warmth of other buildings that are contextual and generally five-story walkups. This is the first time in ten years that a violation of this protective zoning is being sought, and the victory of the community to establish this protective zoning in 2007 should not be ignored. This is setting a precedent. (27, 30)

Response 2.4: ***See Response 2.2.***

Comment 2.5: They say that the Proposed Project is seeking less FAR than permitted in R8A districts, but R8A is not the zoning on West 108th Street today; R8B is the current zoning and you cannot have buildings more than 75 feet (six stories) tall in R8B districts. This is what you should be focusing on. (30)

Response 2.5: ***See Response 2.2.***

Comment 2.6: This neighborhood has more than its fair share of affordable housing, halfway houses, and treatment programs. (22)

Response 2.6: ***See Response 2.3.***

Comment 2.7: How will upzoning (spot zoning) for these buildings impact other rezoning requests in the area? (3)

Response 2.7: ***The proposed rezoning is a site-specific action subject to a site-specific ULURP application that will be analyzed in the DEIS. Any future rezoning effort would be subject to its own approval process, environmental review, and community input.***

Comment 2.8: While I am supportive of affordable housing, I don't think that the residents who currently live here should have to pay the price and suffer their own quality of life for the benefit of more affordable housing when the Upper West Side—and Manhattan Valley, specifically—has more than its fair share of affordable housing in the City. (35)

Response 2.8: ***The DEIS will provide additional information concerning the purpose and need for the Proposed Actions.***

Comment 2.9: The Proposed Project would violate New York State and City law, including, without limitation, the New York City Zoning Resolution and Fair Share Criteria. (50)

Response 2.9: ***The Proposed Project would require an amendment to the New York City Zoning Resolution. As such, an analysis of the Proposed Project on zoning is included as part of the land use, zoning, and public policy task. Refer to Response 2.3 with respect to the Criteria for the Location of City Facilities.***

Comment 2.10: The Proposed Project would require the demolition of three highly-used, near-capacity parking garages and their replacement with three out-of-scale, zone-restriction-busting buildings that would unquestionably violate the Zoning Resolution. (50)

Response 2.10: Refer to Responses 2.1 and 2.2.

Comment 2.11: The Proposed Project is directly contrary to Vision Zero, which is designed to minimize significant pedestrian injuries and death. Vision Zero specifically identified Broadway as a roadway with a high number of auto accidents and fatalities, relative to other roads in Manhattan. With more than eight percent of alternative parking spaces located west of Broadway, if the Development Site garages are demolished, the high number of traffic accidents along Broadway would be exacerbated as residents who now park on the east side of Broadway would be forced to garages west of Broadway, crossing Broadway to return home. (50)

Response 2.11: As outlined in the FSOW, as part of Task 2, "Land Use, Zoning, and Public Policy" an assessment of the Proposed Project's consistency with, and potential impacts on, public policy will be provided. Vision Zero is a public policy that applies to the Project Area that will, therefore, be assessed as part of the DEIS public policy analysis. In addition, and as also outlined in the FSOW, as part of Task 7, "Transportation," a pedestrian safety assessment will be provided (refer to Response 9.4).

Comment 2.12: Under the City Charter, whenever the City locates a new facility or significantly expands or significantly reduces the size and capacity for service delivery or existing facilities, it must conduct a Fair Share Hearing and consider the Fair Share Criteria. Manhattan Valley already provides more than 40 percent of the affordable housing on the entire Upper West Side. In addition, as of 2014, there were at least 28 operating community-based facilities in the Manhattan Valley neighborhood. When compared with other communities throughout the five boroughs, it becomes clear that Manhattan Valley already bears far more than its fair share of community supportive facilities. Under these circumstances, a Fair Share Hearing is required, as is an alternative site analysis. Further, in view of the alternate sites available, it would be advisable for the City to reconsider its selection of the Development Site, rather than subjecting the parties to the cost and inconvenience of the ULURP process and possible litigation. (50)

Response 2.12: Refer to Response 2.3.

3. Socioeconomic Conditions

Comment 3.1: I'm all for affordable housing, and I think that it is something that is needed, but I don't think that it is needed in this area. 50 percent of affordable housing in Manhattan is being done in the Upper West Side and not in other areas, which is leading to de facto segregation. The working class are being pushed out of Manhattan, and I'm not saying it is this project's fault, but for the high rises that are going in. (39)

Response 3.1: The DEIS will provide additional information concerning the purpose and need for the Proposed Actions, including information concerning the numbers of new construction affordable rental units located within CB 7 and the percentage of all Manhattan affordable rental units located within CB 7.

Comment 3.2: I don't think the DSOW adequately speaks to the impacts of the Proposed Project on the commercial viability of this neighborhood. A great many of the shopkeepers who are left in this neighborhood depend on the Development Site garages for their own businesses, for travel to and

from the businesses if they do not live in the City, and for customers. This area has not been addressed in the DSOW. (13)

Response 3.2: ***Pursuant to 2014 CEQR Technical Manual guidelines, a socioeconomic assessment of direct displacement is conducted when a project or action would directly displace a business that is unusually important because its products or services are uniquely dependent on its location; that, based on its type or location, is the subject of other regulations or public policy adopted plans aimed at its perseveration; or that serves a population uniquely dependent on its services in its present location. As presented in the West 108th Street WSFSSH Development EAS, the Proposed Project would directly displace three public parking garages with a total capacity of 675 spaces that employ an estimated 18 workers. There are 16 public parking facilities within a ½-mile radius of the Project Area (excluding the Development Site garages). As per the New York City Department of Consumer Affairs (DCA), there are approximately 1,000 licensed parking facilities, currently operating in Manhattan. Of these 1,000 facilities, there are approximately 100 licensed parking facilities located within the Upper West Side (zip codes 10023, 10024, and 10025). As noted in the FSOW, the DEIS will include an off-street public parking inventory within an approximately ½-mile radius of the Project Area that will assess the existing peak hour utilization of these facilities (refer to Task 7, "Transportation," in the FSOW).***

Comment 3.3: Manhattan Valley is an overwhelmingly low-income and working class community; most of the people who own cars in Manhattan Valley fit into those socioeconomic groups and cannot afford off-street parking under any circumstances and are at risk of losing the precious parking that they have on the street to the 800 people who are displaced by the garage, and I don't think that is fair. (28)

Response 3.3: ***As outlined under Task 7, "Transportation," of the FSOW, the DEIS will assess the existing peak hour utilization of on- and off-street public parking facilities within a ½-mile radius of the Project Area. The analysis will be conducted in accordance with 2014 CEQR Technical Manual methodology and will account for displaced demand from the existing Development Site parking garages in its determination of future With-Action parking utilization levels.***

Comment 3.4: I have been priced out of this community due to gentrification. (27)

Response 3.4: ***The Proposed Project would introduce 277 affordable housing units. As presented in the West 108th Street WSFSSH Development EAS, the project sponsor has committed to making all of the Proposed Project's units affordable to households earning at or below 60 percent of Area Median Income (AMI). The Proposed Project would be financed by the Low-Income Housing Tax Credit (LIHTC) program; based on 2017 LIHTC income limits, the Proposed Project's senior, supportive, and standard studio units would be marketed towards individuals earning no more than $40,080; the one-bedroom units would be marketed towards households earning between $20,050 and $45,850; the two-bedroom units would be marked towards three-person households earning no more than $51,540, and the three-bedroom units would be marketed towards four-person households earning no more than $57,240. All of these income levels fall below the median household income of the seven census tracts surrounding the Project Area ($64,381, or $65,074 in 2016 dollars). As set forth in the EAS, the Proposed Project would not introduce any new housing that would potentially create or accelerate a trend in changing socioeconomic conditions that might increase rents in the surrounding area.***

Comment 3.5: The Proposed Project will certainly have socioeconomic impacts on the neighborhood, which are especially important in Manhattan Valley because the area immediately surrounding the Project Area is part of specially recognized commercial districts created to promote varied and active retail environments. Removal of the three parking garages at the Development Site would grossly undermine the very purpose for which these districts were established by reducing the availability

of parking in these areas, resulting in a substantial reduction in transient shopping opportunities, as well as a substantial inconvenience to the shopkeepers and merchants who drive to their small businesses in the area. (50)

Response 3.5: ***Refer to Response 3.2.***

Comment 3.6: Those of whom need the Development Site garages support other businesses in this district, and if you take those people away, the rest of the neighborhood implodes. (5)

Response 3.6 ***Refer to Response 3.2.***

4. Community Facilities

Comment 4.1: The technical area of community facilities is too narrowly defined in the DSOW and should include these garages. The Development Site garages have become an intimate part of this community and their removal will have a significant impact on the community. You would not contemplate removing a subway station or a hospital with the sort of cavalier attitude shown on this project. (13)

Response 4.1: ***As defined in the 2014 CEQR Technical Manual, "community facilities are public or publicly funded schools, libraries, child care centers, health care facilities, and fire and police protection." The impact of the removal of the existing Development Site garages is assessed as part of the Transportation Task (refer to Task 7, "Transportation" in the FSOW).***

5. Open Space

Comment 5.1: The playgrounds that belong the M.S. 54 are used all summer long by youth sports groups, and they are used on the weekends by young adult soccer leagues, as well as youth sports teams, so the DEIS should assess the effects on the children that use those playgrounds throughout the day during the summer months and on weekends throughout the year. (51)

Response 5.1: ***Comment noted. The FSOW has been updated to indicate that the Booker T. Washington (M.S. 54) Playground will be surveyed on the weekend and during the summer, in addition to the typical weekday peak hours. As outlined in the FSOW, as part of Task 10, "Construction," the potential impacts from construction of the Proposed Project on area sensitive receptors, including open spaces/open space users will be conducted.***

6. Shadows

Comment 6.1: What will be the impact of the Proposed Project's shadows on the buildings and rear yards of the lots to the north of the Development Site, on West 109th Street. Please include sunlight-sensitive resources used for gardening and gathering. (3, 51)

Response 6.1: ***The DEIS will assess the shadow impacts of the Proposed Project on sunlight-sensitive resources. As defined in the 2014 CEQR Technical Manual, sunlight sensitive resources include publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features in the area. City streets, sidewalks, and private open spaces (such as private residential front and back yards, stoops, and vacant lots) are not considered to be sunlight-sensitive resources. The FSOW has been updated to indicate as such.***

Comment 6.2: The environmental report commissioned by Save Manhattan Valley determined that the Proposed Project would have shadow impacts on the Booker T. Washington schoolyard playground, Anibal Aviles Playground, and other areas of the neighborhood. (21)

Response 6.2: ***As outlined in the FSOW, if the possibility of new shadows reaching sunlight-sensitive resources cannot be eliminated in the preliminary screening assessment, the DEIS will include a detailed shadows analysis. If any significant adverse shadow impacts are identified, potential mitigation measures will be identified.***

Comment 6.3: The buildings on West 109th Street will lose all of the warmth that they get from the sun during the winter months when the sun passes low in the sky, which will drive up the heating bills and operational costs for the low- and moderate-income residents living in these buildings. (30)

Response 6.3: ***See Response 6.1. The impacts of shadows on heating bills and operational costs is outside the scope of CEQR.***

Comment 6.4: The Anibal Aviles Playground and the Booker T. Washington Playground (both considered "sunlight-sensitive resources of concern") would be subjected to darkness for extended periods throughout the day. With increased shadows and darkness, the use and enjoyment of the playgrounds would be largely diminished, if not eliminated. (50)

Response 6.4: ***Refer to Response 6.1. As the Anibal Aviles Playground and Booker T. Washington Playground are sunlight-sensitive resources, they will be included in the shadow impact analysis.***

7. Urban Design and Visual Resources

Comment 7.1: Please include more details about the heights of the surrounding buildings. (3, 51)

Response 7.1: ***As noted in the FSOW, based on field visits, the urban design and visual resources of the Project Area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale. The FSOW has been updated to note that the heights of area buildings would be identified as part of this task.***

Comment 7.2: We have been asking for a rendering of the Proposed Project from the other side (West 109th Street), because there are 200 units of housing in five-story old, loft walkups along West 109th Street that will be completely dwarfed by this mammoth building. (30)

Response 7.2: ***As the urban design study area will be the same as that used for the land use analysis (delineated by a ¼-mile radius from the proposed rezoning area boundary), changes to the pedestrian experience along publicly accessible locations on West 109th Street will be included in the assessment. As presented in the FSOW, "photographs and/or other graphic material will be utilized, where applicable, to assess the potential effects on urban design and visual resources."***

Comment 7.3: The Proposed Project will help make this block of West 108th Street a more vibrant, pedestrian-friendly place that will promote the health and wellbeing of the entire neighborhood. (17)

Response 7.3: ***Comment noted.***

8. Hazardous Materials

Comment 8.1: I understand that the community is concerned about potential disruption of below-grade hazardous materials and know that HPD will take these concerns seriously as the Proposed Project matures. (1)

Response 8.1: ***As noted in the FSOW, the DEIS will include a hazardous materials assessment. The Mayor's Office of Environmental Remediation (OER) is currently overseeing the site investigation and remediation plan development specific to the Development Site through the City's Voluntary Cleanup Program (VCP). (Refer to Task 6, "Hazardous Materials.")***

Comment 8.2: We ask that the protocols for testing to determine how or whether there are toxins present on the Development Site be fully discussed and analyzed in the DEIS, including the results of the Phase I ESA and Phase II ESI, which ought to be publicly available now. (3, 11)

Response 8.2: ***As noted in the FSOW, the DEIS will summarize the completed Phase I ESA and Phase II subsurface investigation(s) conducted to date for the Development Site, and will include any necessary recommendations made by OER for additional testing or other activities that would be required either prior to or during construction and/or operation of the Proposed Project, including a discussion of any necessary remedial or related health and safety measures. For City-owned sites requiring investigation and remedial actions, HPD requires written approval of a site remedy from the oversight agency (in this case OER) as a condition of the Land Disposition Agreement (LDA). The remedy would then be implemented during construction with oversight provided by OER, as required through the VCP process.***

Comment 8.3: Given the nature of the uses of the Development Site for car-related activities, the issues of oil and gas source toxins that may be uncovered and may need to be mitigated should be fully disclosed. If they are not present, assurance needs to be given to the community that, in fact, the testing has been rigorous enough to ensure that the conclusion that they are not there is one that can be relied upon. (3, 11)

Response 8.3: ***Refer to Responses 8.1 and 8.2.***

Comment 8.4: The middle school across the street from the Development Site is a home to many families who are already families at an elementary school that has a project being developed next door on the site of a car or gasoline-sourced site. These families are very familiar with the issues and very concerned that they have moved from one school to another with the same issues. These concerns need to be addressed and mitigated, or to be reassured that they are not there. (11)

Response 8.4: ***Comment noted. (Refer to Responses 8.1 and 8.2.)***

Comment 8.5: The Phase I ESA shows that all three Development Site garages were historically used as automotive repair/servicing facilities, which are associated with certain VOCs. It is likely that, over time that the buildings have existed, discharges have impacted fill material beneath them. Absent the Proposed Project, there would be no risk of exposure; however, as currently planned, the Proposed Project would almost certainly lead to the release of these dangerous materials, threatening the health and lives of everyone in the community. (50)

Response 8.5: ***Refer to Responses 8.1 and 8.2.***

9. Transportation

Comment 9.1: I understand that the community is concerned about the loss of parking and know that HPD will take these concerns seriously as the Proposed Project matures. (1, 57)

Response 9.1: ***As outlined in the FSOW, the DEIS will assess the existing peak hour utilization of on- and off-street public parking facilities within a ½-mile radius of the Project Area. The analysis will be conducted in accordance with 2014 CEQR Technical Manual methodology and will account for displaced demand from the existing Development Site parking garages in its determination of future With-Action parking utilization levels.***

Comment 9.2: I don't think that people have given enough thought to the crowdedness on the subways, as well as just the streets. To increase it without doing a really serious DEIS would be really problematic. The 110th Street/Central Park West B and C lines and the 110th Street/Broadway No. 1 station will be used by the tenants, visitors, and staff of the Proposed Project. Because usage is likely to be split, depending on the destination of the user, it is possible that either station will cross the threshold of an additional 200 trips each. If either station reaches this threshold, attention should be paid to conditions at these facilities. Please examine the turnstile counts at the 110th Street B/C station and the 110th Street No. 1 station, as well as boarding counts on the bus lines serving the Proposed Project. (3, 9, 57)

Response 9.2: ***As noted in the Comment, detailed transit analysis are generally not required if the Proposed Actions are projected to result in fewer than 200 peak hour rail or bus trips according to the general thresholds used by the MTA and specified in the 2014 CEQR Technical Manual. As discussed in Appendix A, "West 108th Street WSFSSH Development Transportation Planning Factors (TPF)/Travel Demand Forecast (TDF) Technical Memorandum" of the FSOW, the Proposed Project will not result in an increase of 200 or more trips at a single subway station or on a single subway line, or 50 or more bus trips assigned to a single bus line (in one direction). DOT has reviewed the TPF/TDF and concurred with these findings. As the threshold for transit analysis are not met, in accordance with 2014 CEQR Technical Manual guidelines, a detailed transit analysis is not warranted and will not be provided in the DEIS, and the Proposed Project is unlikely to create a significant transit impact.***

Comment 9.3: Are there plans to request one or more additional Citibike docking station near the facilities for those who wish to utilize this transit option? (3, 9)

Response 9.3: ***This is beyond the CEQR scope of this project.***

Comment 9.4: Please pay attention to increased pedestrian activity at the Proposed Project and safety measures at Columbus and Amsterdam avenues, including pedestrian ramps, countdown timers, well-marked striping and "Barnes Dances", where appropriate. (3, 9)

Response 9.4: ***As noted in the FSOW, the DEIS will include a discussion of pedestrian safety. In addition, as noted in Response 2.11, as part of Task 2, "Land Use, Zoning, and Public Policy," an assessment of the Proposed Project's consistency with Vision Zero will be provided.***

Comment 9.5: I am concerned about the environmental consequences of the traffic from the multiple hundreds of cars that will no longer have a place to park, and will be searching for on-street parking. What will be the impact of the loss of parking spaces to the neighborhood? Will there be a detailed traffic analysis of where those displaced vehicles are likely to go? (3, 28)

Response 9.5: ***Pursuant to 2014 CEQR Technical Manual methodology, the determination of a need for a detailed traffic analysis begins with a Level 1 trip generation screening assessment, which determines the number of incremental trips that would be generated by a proposed project, as compared to the No-Action condition. If, based on the Level 1 trip generation screening***

assessment, it is determined that a project would generate 50 or more vehicle trips, further assessment is warranted. As presented in Appendix A, "West 108th Street WSFSSH Development Transportation Planning Factors (TPF)/Travel Demand Forecast (TDF) Technical Memorandum" of the FSOW, based on counts conducted at the three existing development site garages, a total of 29, 25, and 33 vehicle trips enter/exit the garage in the weekday AM, midday, and PM peak hours, respectively. Accounting for vehicle trips generated by the Proposed Project, the number of vehicle trips to/from the Project Area would decrease by two vehicles in the weekday PM peak hour, with only seven incremental vehicle trips generated in both the weekday AM and midday peak hours. Therefore, as the Proposed Project would not generate 50 or more vehicle trips in any one peak hour, the Proposed Project does not warrant a detailed traffic analysis, pursuant to CEQR. While, pursuant to 2014 CEQR Technical Manual methodology, a parking analysis is not typically required if a detailed traffic analysis is not needed, as outlined in the FSOW, the DEIS will include a detailed parking analysis that will evaluate the potential for the Proposed Actions to result in significant adverse parking impacts. The analysis will determine future parking study area parking utilization levels, accounting for the existing Development Site parking spaces that would be displaced in the future with the Proposed Actions and the redistribution and dispersal of parking demand to study area parking locations.

Comment 9.6: I have a car for work, as I commute anywhere from deep into Brooklyn, up to Westchester, or even further upstate, so I need that car. I currently have a parking spot in one of the Development Site garages. Over the time I have lived here I have seen the community become denser and watched precious parking be eliminated due to countless, poorly planned Citibike ports. Parking in the City is extremely expensive and the garage that I use is one of the few affordable options in the neighborhood; if it is eliminated, I cannot afford any of the other garages. (35)

Response 9.6: Refer to Response 9.1.

Comment 9.7: The traffic and congestion of the 800 cars that will be forced to find street parking will affect me as a cyclist. I'm put in danger as a cyclist because cars continually double park, park in the bike lanes, and park right next to the Citibike ports. (35)

Response 9.7: Refer to Responses 9.5 and 9.4.

Comment 9.8: The environmental report commissioned by Save Manhattan Valley determined that the Proposed Project would have traffic impacts due to increased traffic and congestion. (21)

Response 9.8: Refer to Response 9.5.

Comment 9.9: The Proposed Project would undoubtedly lead to increased traffic accidents in Manhattan Valley, resulting in increased injuries and deaths, particularly by pedestrians (including, and especially, children). With the loss of the three highly utilized Development Site parking garages, there will be a sharp increase in the number of distracted drivers looking for on-street parking. Such dangers are particularly acute in the neighborhood around the Project area, as M.S. 54 is in close proximity, and young children are particularly at risk of being struck by vehicles. The conditions in the vicinity of the Project Area, which consists of a high density of pedestrians and vehicles and drivers distracted looking for parking will be similar to conditions in parking lots, where 1 in 5 of all traffic accidents take place. The environmental report commissioned by Save Manhattan Valley determined that the Proposed Project would result in threats to pedestrians, particularly to those who attend nearby schools and are vulnerable to pedestrian knock-down car accidents. (21, 50)

Response 9.9: Refer to Response 9.4.

Comment 9.10: While residents of the area may live nearby abundant public transportation alternatives, they still need their automobiles; they need their vehicles for work and overall mobility. This is not a community that over-uses cars. The people that use the garage are all working class people. The Development Site garages are important for residents, businesses, teachers, doctors, and visitors. People also need their cars when they are coming for a visit from outside of the City or when they are moving. Nobody is going to the Hamptons with their cars. We use these cars on a daily basis, or we uses them when we need them; we need our cars. We have 60,000 people between 96th and 110th streets and we only have approximately 3,000 public parking spaces on the street, in addition to the garages, so removing the parking spaces will have drastic impacts on the working families who park their cars because they need the cars for their families. If we remove these parking garages, we are telling the working people who are reverse commuting or who need the car to get to their job, or just to get away for the weekend inexpensively with their family, or to visit their elderly relatives that this neighborhood is not for them. How do you people who commute from outside of town, to get to work on time? The other garages are full and cannot accept any more cars. (4, 5, 6, 10, 33, 36, 53, 57)

Response 9.10: Refer to Response 9.1.

Comment 9.11: For us elderly and severely disable residents, we need to be able to park in these garages to maintain a minimum of freedom to get on with our lives; we want to stay in the neighborhood we know and don't want to be exiled to a nursing home in the boondocks where we wouldn't need a car. I use the car for bulk shopping outside of Manhattan and to see friends, relatives, doctors, and therapists outside of Manhattan. Public transportation is unsuitable, as some subway stations do not have elevators, street parking is impossible because of parking regulations and inclement weather, and wheelchair-accessible cars are highly undependable. The elimination of the parking garages would have a direct and potentially irreversible impact on me personally, as I rely on my car to travel to medical visits and other appointments I have. (22, 45, 46)

Response 9.11: Refer to Response 9.1.

Comment 9.12: The 800 cars that will be on the street with the displacement of the garage, at 20 feet per car, translates to three miles of cars looking for parking spots, snaking from 96th Street to 105th Street, from Amsterdam Avenue to West End Avenue. On top of that West End Avenue is now only one lane, and Citibike have taken up about 100 on-street parking spots. If you look at a block, one block of parking in this neighborhood is 32 cars on both sides of the street. Do the division—how many streets are going to be double parked? How many cars are going to be in gridlock? (20)

Response 9.12: Refer to Response 9.1.

Comment 9.13: There are no extra parking spaces in the area today with all the Citibike, bike, lanes, and bus lanes in the area, so there is nowhere for these displaced cars to go. (6, 10, 22, 33, 50, 53)

Response 9.13: Refer to Response 9.1.

Comment 9.14: I have a car and have parked on the street for 37 years and have seen the ebb and flow of available street spots over this time. Parking has become safer, with far fewer automobile break-ins in recent years. Even with the loss of parking spots and the popularity of parking in this area, I can still find a spot. I use my car for work and have noticed ways the City has restricted traffic, making it harder to have a car in the City—this is good. Cars are not the future. Young people are owning fewer cars. (32)

Response 9.14: Comment noted.

Comment 9.15: Having a car has allowed me to keep working through my knees problems. I normally park on the street, but when I can't find street parking, the only garages I can afford are the ones on the Development Site. (55)

Response 9.15: Refer to Response 9.1.

Comment 9.16: Amsterdam Avenue functions like a major highway, and has resulted in a number of pedestrian deaths in car crashes. (4)

Response 9.16: Refer to Response 9.4.

Comment 9.17: I park the commercial vehicle that I use for work in the Development Site garages. My livelihood depends on being able to park in these garages, as I am not allowed to park my commercial vehicle on the street. There are no available spaces in other garages within a 25-block radius; there is no accommodation for parking for us whatsoever. That means I have to find parking someplace else and that I may have to move out of the neighborhood. (42)

Response 9.17: Refer to Response 9.1.

Comment 9.18: Parking demand has been increasing, while supply has been decreasing and the price of off-street parking has been increasing. The people who have vehicles truly need and want them and those vehicles will not just go away. They will compete further for on-street spaces in their home zip codes, 10024, 10025, increase cruising, and take additional time from the lives of those car owners in the neighborhood who need to find a place to park their vehicle in the street. For those vehicle owners who can afford increased cost or travel time to another off-street parking facility, those vehicles will in turn drive up the costs of off-street parking throughout the west side and displace other off-street parked vehicles, not just close to the Project Area, but way up north until you get to the end of the chain, where you are going to affect people the most drastically and who can least afford the changes. (58)

Response 9.18: Refer to Response 9.1.

Comment 9.19: We need the DEIS to examine how much vehicle ownership has increased, and how will it increase as populations change going forward. On the supply side, the DEIS needs to examine how much off-street parking has already been lost since the need for these garages was last reviewed (around 10 to 20 years ago), as media reports have counted over 1,300 spaces lost in just the most recent years. How much off-street parking will be lost on the west side due to the further development of private properties, and how much on-street parking on the west side has been lost due to various City actions. (58)

Response 9.19: The FSOW has been updated to indicate that, if the ½-mile study area also demonstrates an insufficient amount of parking to accommodate the parking spaces displaced by the Proposed Actions, the analysis will also take into account parking and transportation trends.

Comment 9.20: I think this project will negatively impact our community. Where will 800 cars go? Will there be a study of the loss of parking spaces in the community? Will there be an effort to accommodate existing garage tenants in the surrounding garages? Please include a study of who uses the parking garages. (2, 3, 22)

Response 9.21: Refer to Response 9.1.

Comment 9.22: The scope of the geographic area of investigation for the effects of the removal of 675 parking spaces should include all of zip codes 10024 and 10025, and perhaps 10023 (if residents of zip code

10023 park in the garages today) and should include where the displacement impacts will move northward up to the West 130s and West 140s, impacting ultimately the pocketbooks and quality of life of those vehicles owners least able to afford the impact. The removal of the parking will affect a wide swath of the west side from the West 70s to the West 140s, and particularly those vehicle owners who can least afford it. (58)

Response 9.22: ***As outlined in the FSOW, a ½-mile radius parking study area will be used to investigate any potential impacts as a result of the Proposed Actions. Additionally, as discussed in the FSOW, more detailed analysis will be conducted to determine the transit utilization of residents in the zip codes where the current garage occupants reside, should the ½- mile study area demonstrate insufficient parking.***

Comment 9.23: With the removal of the three parking garages at the Development Site, the public parking facility at 1090 Amsterdam Avenue—which is currently utilized by Mount Sinai St. Luke's Hospital—would absorb the impact of the displaced parking spots used by residents and workers in the area, resulting in fewer available spaces for visitors. This, in turn, would create a domino effect, resulting in distracted driving in the area around the hospital, leading to increased pedestrian knock-downs and other automobile accidents. (50)

Response 9.23: ***Refer to Responses 9.1 and 9.4.***

Comment 9.24: A particular set of services (parking) is being taken away from the community with no thought on what is going to happen as a result of that. (27)

Response 9.24: ***Refer to Response 9.1.***

Comment 9.25: A decade or two ago, we reviewed these same properties and reached out to the neighborhood to examine the need for these parking facilities. The response at that time was overwhelmingly from the neighborhood that the continued need and use for these parking facilities was crucial. Since that time, the demand for parking has increased while the supply of parking all over the west side has decreased, resulting in more difficulty finding parking and increased cruising to find rarer available spaces throughout the west side, along with the pollution that produces. (58)

Response 9.25: ***Refer to Response 9.1.***

10. Air Quality

Comment 10.1: Please include a study of the use of non-sustainable fuels in this location, with respect to particulate matter and other impacts. (3, 51)

Response 10.1: ***As presented in the West 108th Street WSFSSH Development EAS, the project sponsor would use natural gas-fired combustion equipment to providing heating and hot water, and an emergency diesel fuel generator for the shelter facility. Based on the stationary source screening assessment provided in the EAS for the operational phase of the Proposed Project, the Proposed Project would not result in significant adverse stationary source air quality impacts. Refer to Section 15 of this document for additional information on air quality as it relates to the construction phases of the Proposed Project.***

Comment 10.2: I am concerned about the environmental consequences of the pollution/emissions from the multiple hundreds of cars that will no longer have a place to park, and will be searching for on-street parking. The scope of investigation should look at the impact of the pollution that will accompany this increased time spent searching for parking. (3, 28, 35, 51, 58)

Response 10.2: ***Pursuant to 2014 CEQR Technical Manual methodology, an analysis of air quality emissions from project-generated vehicles is warranted if a proposed action would either (a) result in 170 or more peak hour auto trips/diverted existing peak hour auto trips; or (b) generate a substantial number of peak hour heavy-duty vehicle traffic or its equivalent As presented in Appendix A, "West 108th Street WSFSSH Development Transportation Planning Factors (TPF)/Travel Demand Forecast (TDF) Technical Memorandum" of the FSOW, based on counts conducted at the three existing development site garages, a total of 29, 25, and 33 vehicle trips enter/exit the garage in the weekday AM, midday, and PM peak hours, respectively. Accounting for vehicle trips generated by the Proposed Project, the number of vehicle trips to/from the Project Area would decrease by two vehicles in the weekday PM peak hour, with only seven incremental vehicle trips generated in the weekday AM and midday peak hours. Therefore, the Proposed Project does not warrant a mobile source air quality analysis, pursuant to CEQR, and no significant mobile source air quality impacts are anticipated.***

Comment 10.3: The environmental report commissioned by Save Manhattan Valley determined that the Proposed Project would result in threats to air quality due to increases in greenhouse gas emissions. (21)

Response 10.3: ***See Response 10.2.***

Comment 10.4: With all of the concerns for air quality affected by cruising cars, maybe we should notice that young people are owning cars less and less. (32)

Response 10.4: ***Comment noted.***

11. Greenhouse Gas Emissions and Climate Change

Comment 11.1: Please include a study of the use of non-sustainable fuels in this location, with respect to greenhouse gases and other impacts. (3, 51)

Response 11.1: ***As outlined in the 2014 CEQR Technical Manual, the greenhouse gas (GHG) emissions assessment currently focuses on City capital projects, projects proposing power generation or a fundamental change to the City's solid waste management system, and projects being reviewed in a DEIS that would result in the development of 350,000 gsf or greater (or smaller projects that would result in the construction of a building that is particularly energy-intense). As the Proposed Project does not meet any of these criteria, a GHG emissions assessment is not warranted and no significant GHG emissions impacts are anticipated.***

Comment 11.2: It has been suggested that the Proposed Project would have no impact on greenhouse gases and climate change, which we believe is not the case. The DSOW does not appear to contemplate the impacts of having 800 or more cars circling in the neighborhood emitting all of those emissions. (13, 50)

Response 11.2: ***Pursuant to CEQR Technical Manual methodology, an analysis of air quality emissions from project-generated vehicles is warranted if a proposed action would either (a) result in 170 or more peak hour auto trips/diverted existing peak hour auto trips; or (b) generate a substantial number of peak hour heavy-duty vehicle traffic or its equivalent As presented in Appendix A, "West 108th Street WSFSSH Development Transportation Planning Factors (TPF)/Travel Demand Forecast (TDF) Technical Memorandum" of the FSOW, based on counts conducted at the three existing development site garages, a total of 29, 25, and 33 vehicle trips enter/exit the garage in the weekday AM, midday, and PM peak hours, respectively. Accounting for vehicle trips***

generated by the Proposed Project, the number of vehicle trips to/from the Project Area would decrease by two vehicles in the weekday PM peak hour, with only seven incremental vehicle trips generated in the weekday AM and midday peak hours. Therefore, the Proposed Project does not warrant a mobile source air quality analysis, pursuant to CEQR, and no significant mobile source air quality impacts are anticipated.

12. Noise

No comments. For comments on the construction noise analysis, refer to section 15, below.

13. Public Health

Comment 13.1: I believe that this project will create issues because of toxins in the air, which will result in significant lung diseases and other issues. (15)

Response 13.1: As presented in the FSOW, if unmitigated significant adverse impacts are identified for the Proposed Actions in any of the technical areas that contribute to public health (such as air quality, hazardous materials, or noise) and HPD determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas in accordance with 2014 CEQR Technical Manual guidelines.

Comment 13.2: I am concerned about the health and welfare of the community at M.S. 54. (31)

Response 13.2: Refer to Response 13.1.

Comment 13.3: This project is pitting seniors against the health of young children. There are three schools in the area (M.S. 54, plus two on West 109th Street) and there are a lot of families in this community. They do not need to be breathing carcinogenic elements in the air. They should not be playing on a field that has asbestos and lead. This is outrageous. Don't you have the resources to find another location where you are not going to endanger the lives of children, young adults, mothers, and families? (55)

Response 13.4: As presented in the FSOW, the DEIS will include detailed air quality and construction air quality impact analyses. If unmitigated significant adverse air quality impacts are identified, a public health assessment will be provided in the DEIS.

Comment 13.5: The neighborhood has a high asthma rate because of the traffic on Amsterdam Avenue. (4)

Response 13.5: Refer to Response 13.1.

Comment 13.6: The removal of 675 or 800 users of parking spaces currently available in the garages will not just affect the people/families who have vehicles in the garages, but will affect the health and quality of life of those in the neighborhoods to which the vehicles will be displaced. (58)

Response 13.6: Refer to Response 13.1.

Comment 13.7: I am concerned about carcinogens from demolition and construction, and pollution in our air from 800 cars circling the block looking for parking that doesn't exist. Our children are breathing in the air; there is a school across the street, and there are many schools in our neighborhood. (22)

Response 13.7: Refer to Response 13.4.

Comment 13.8: My son is a student at M.S. 54 and I am not happy about the potential for him being near the Development Site, with the safety concerns on the street, dust concerns for his health, and noise concerns for his concentration on learning. (29)

Response 13.8: ***As presented in the FSOW, if unmitigated significant adverse impacts are identified in the areas that contribute to public health (including construction air quality and noise), a public health assessment will be provided in the DEIS.***

Comment 13.9: The Proposed Project will increase the amount of cars circling the streets looking for paring, resulting in increased emissions; increased carbon dioxide emissions have been shown to cause health effects, including increased lung dead space volume, increased blood pressure, erratic and abnormal behavior, and premature death. (50)

Response 13.9: ***Refer to Responses 10.2 and 13.1.***

Comment 13.10: The proposed demolition of three parking garages would result in the result of hazardous materials into the air (including gasoline, PCBs, lead and other metals, asbestos, and PAH compounds), which can cause serious health issues. (50)

Response 13.10: ***As noted in the FSOW, the DEIS construction impact analysis will summarize actions to be taken during project construction to limit exposure of construction workers, residents, and the environment to potential contaminants. If unmitigated significant adverse impacts are identified in the areas that contribute to public health (including construction air quality and noise), a public health assessment will be provided in the DEIS.***

Comment 13.11: Soil contamination creates a number of exposure issues for the public: vapors generated from gasoline contamination can seep into residential buildings and result in eye and respiratory irritation, headaches, and/or nausea; lead found in USTs is a recognized cause of cancer and causes adverse effects on developing children; gasoline (used at the Development Site parking garages) most likely contains organic lead, which is extremely toxic and has been shown to cause health issues; and exposure to other carcinogens increases the risk of developing cancer. (50)

Response 13.11: ***Refer to Response 13.4.***

14. Neighborhood Character

Comment 14.1: I know we need supportive housing, senior housing, and shelter space, but the buildings as they are proposed will change the nature of the neighborhood drastically. (47)

Response 14.1: ***As presented in the FSOW, the DEIS will include a neighborhood character impact assessment. The assessment will determine whether changes expected in other technical analysis areas analyzed in the DEIS—land use, zoning, and public policy; open space; urban design and visual resources; transportation; and noise—may affect a defining feature of neighborhood character.***

Comment 14.2: The fact that the Proposed Project requires changing the zoning tells us that this is not in character with the current neighborhood. The current neighborhood is for the most part low-rise buildings, and to change the zoning to put up a very tall building will change the nature of the neighborhood. (47)

Response 14.2: ***As part of Task 11, "Neighborhood Character," the assessment will evaluate whether changes to urban design resulting from the Proposed Project will affect a defining feature of neighborhood character.***

Comment 14.3: This is a working class neighborhood, and I need a car to go to my job, as I work for the public and there are no trains or subway where I work. Removing these parking garages will change the character of the neighborhood. (39)

Response 14.3: Refer to Response 14.1.

Comment 14.4: I love our neighborhood and its rich cultural and economic diversity. This development, in addition to enlivening the block and creating positive changes to the Anibal Aviles Playground, will help secure the qualities of the Manhattan Valley neighborhood. (37)

Response 14.4: Comment noted.

Comment 14.5: We talk about the character of the Upper West Side; I think that there is no place like the Upper West Side and we represent the best of New York City. This proposal incorporates that, providing housing, supportive services, neighborhood support, and beauty. (18)

Response 14.5: Comment noted.

Comment 14.5: WSFSSH's proposal will help protect our neighborhood from the effects of rapid gentrification and help to preserve the income diversity that makes Manhattan Valley special, while continuing to provide resources for low-income seniors to live with security and dignity. (12)

Response 14.5: Comment noted.

Comment 14.6: The rendering of the project does not look anything like the character of the neighborhood. (20)

Response 14.6: Refer to Response 14.1.

Comment 14.7: The Proposed Project would remove a community resource (the existing Development Site parking garages) that has served this community and helped make it what it has been for the last 40 years—a working class and middle class community. (6)

Response 14.7: Refer to Response 14.1.

Comment 14.8: What makes a neighborhood, and what makes a community? A community needs services for its people, like grocery stores, laundromats, and, yes, parking garages. (22)

Response 14.8: Refer to Response 14.1.

Comment 14.9: Year after year, we have seen affordable housing in the community being replaced by luxury buildings. The vibrant mix of low-, middle-, and upper-income families that has long characterized our community is under serious threat. Affordable housing would be extremely valuable to the neighborhood, the clients of the Bloomingdale Family Program, and the City. (44)

Response 14.9: Comment noted.

Comment 14.10: By replacing the garage, the Proposed Project will do much more good for the neighborhood than the garages ever did, benefitting the public park next door, activating the sidewalks, providing community activities and space, and providing local jobs. I think it will benefit our neighborhood in the long run to reduce the number of cheap parking garage options. (14)

Response 14.10: Comment noted.

Comment 14.11: The Project Area block, which currently has no permanent housing on it, will be integrated back into the neighborhood with a building that is designed to have an activated street presence and that would be in keeping with the neighborhood character. (52)

Response 14.11: Comment noted.

Comment 14.12: The Proposed Project would result in the loss of three parking garages that play a particularly significant role in the neighborhood. (50)

Response 14.12: Refer to Response 14.1.

15. Construction

Comment 15.1: I understand that the community has concerns about the impact of construction on the local public school community and know that HPD will take these concerns seriously as the Proposed Project matures. (1)

Response 15.1: As noted in the FSOW, the DEIS will include a construction analysis. If impacts are identified, mitigation measures will be coordinated between HPD and the appropriate City agencies.

Comment 15.2: Please include a plan for queuing construction trucks delivering and removal when not at the site, and please assess the potential locations and the impacts of waiting trucks on air quality, noise, transportation, etc. (3, 51)

Response 15.2: As noted in the FSOW, the preliminary construction transportation analysis will qualitatively consider potential losses in lanes, sidewalks, on-street parking, and effects on other transportation services, if any, during the construction of the Proposed Project. In addition, the detailed construction air quality and noise analyses will consider the potential for impacts related to on-road sources (e.g., trucks).

Comment 15.3: There needs to be plans for comprehensive construction coordination groups, as well as methods to communicate with the community and the school (M.S. 54), in consultation with the Council member, the Manhattan Borough President, and other City agencies. There needs to be bi-weekly updated and look-aheads, including stages of work and anticipated noise impacts, which will be distributed by email and posted, where possible. (3, 51)

Response 15.3: Comment noted. Refer to Response 15.1.

Comment 15.4: The DSOW already calls for construction noise receptors at key sites, and the school is identified as one. I want to make sure that the northwest and south facades of the school be included as receptors, because of the way sound bounces around buildings in this cavern-type area. (3, 11)

Response 15.4: The FSOW has been updated to specify that all facades of Booker T. Washington Middle School would be included as separate receptors in the detailed construction noise analysis.

Comment 15.5: I was a school teacher at a school when construction was going on across the street and during that site's construction, approximately half of the classrooms in the school I worked in were unusable because of the noise. It was an impossible amount of noise. (47)

Response 15.5: As noted in the FSOW, the DEIS will include a detailed construction noise analysis, which will determine the noise levels at nearby sensitive receptors, including Booker T. Washington Middle School.

Comment 15.6: When you tear down a building—especially a building as old as on the Development Site—not only will you have noise, but you will have dust, and there are materials in that existing building that probably do not meet current building codes. The project sponsor claims that they will mitigate the dust when they tear down the building by spraying water on it. As someone who has seen firsthand, it is impossible to hold down all of the dust unless you constantly water everything and put a bubble around the project. When the stuff dries over (e.g., over the weekend when they are not watering it), the material will become fryable, and will be all over; it will affect the kids at M.S. 54 and all of the people living on West 109th Street, because it will come in their windows and there is no way to prevent it. (47)

Response 15.6: ***As noted in the FSOW, the construction air quality impact analysis will include quantification of fugitive dust emissions from demolition, excavation, and transferring of excavated materials into dump trucks. Dust emissions will also be calculated for general site preparation and grading activity.***

Comment 15.7: The environmental report commissioned by Save Manhattan Valley determined that the Proposed Project would have construction/demolition impacts, including noise and water pollution impacts, as well as the release of dangerous airborne particulates, including asbestos, benzines, polychlorinated biphenyls (PCBs), lead paint, lead-based gasoline, polycytic aromatic hydrocarbons, and volatile organic compounds (VOCs). (21)

Response 15.7: ***Refer to Response 15.1. If significant adverse construction-related impacts are identified, they will be disclosed in the DEIS, and potential mitigation measures will be identified.***

Comment 15.8: The toxics and dust that will come from the demolition of the Development Site buildings will be trapped in the AstroTurf of the park across the street where little kids lie on the ground to do sit ups during Little League practice. (20)

Response 15.8: ***As noted in the FSOW, the DEIS will include a detailed construction air quality analysis, which will consider dust emissions. The impact on nearby sensitive receptors will be evaluated, including nearby open spaces (e.g., Booker T. Washington Playground and Anibal Aviles Playground).***

Comment 15.9: I am certainly concerned about the impact on M.S. 54 across the street at a time when students would be in the buildings. (2)

Response 15.9: ***As discussed in the FSOW, the construction impact analysis will assess the potential for impacts at nearby sensitive receptors, including Booker T. Washington Middle School (M.S. 54).***

Comment 15.10: During construction and demolition, carcinogens, PCBs, and VOCs will be coming out, and there is a school next door, with a playground that is used year round (including weekends and summer). I don't believe anything that the EPA is going to say about it, because we know they will say something different two years later, so I am very concerned about all of these chemicals coming out of the garages—these were industrial facilities and we have no idea what is inside or underground these buildings. (53)

Response 15.10: ***As noted in the FSOW, the DEIS construction impact analysis will summarize actions to be taken during project construction to limit exposure of construction workers, residents, and the environment to potential contaminants. Refer to Responses 8.1 and 8.2 related to Hazardous Materials.***

Comment 15.11: I think the environmental problems will be limited because construction today, and the people that demolish buildings, take care when demolishing and rebuilding. (49)

Response 15.11: Comment noted.

Comment 15.12: The Development Site garages are ancient, with materials in there that never saw a safety standard, and you do not know what you are going to unearth once you demolish them. (55)

Response 15.12: Refer to Response 15.10.

Comment 15.13: There is a river running underneath the Development Site. When the construction uncovers that river, we will have a major rat problem, which is a major health problem for the neighborhood. (42)

Response 15.14: The FSOW has been updated to note that, as part of Task 12, "Construction," general construction practices—including rodent control—will be discussed.

Comment 15.15: This is a very long construction project that is going to have constant noise levels, and dust and safety concerns. The construction is not just a couple of months or something that they can start and finish during summer vacation. I am concerned that it will affect his learning at a critical time in his schooling as he is preparing for high school admission tests. (29)

Response 15.15: Refer to Response 15.9.

Comment 15.16: I am concerned about the construction. (57)

Response 15.16: Refer to Response 15.1.

Comment 15.17: I am concerned about the demolition because of the toxic materials that have been under the Development Site garages for so long, which, personally, I would rather see stay where they are. (27)

Response 15.17: Refer to Response 15.10.

Comment 15.18: Please assess the scheduling of the noisiest periods of construction during periods (e.g., summer) when school is not in session. (3)

Response 15.18: As outlined in the FSOW, the DEIS will include a detailed construction noise impact analysis. If significant adverse impacts are identified, potential mitigation measures will developed and coordinated with the responsible City agencies. (Refer to Response 16.1.)

Comment 15.19: Historical maps of the Project Area reveal the presence of underground storage tanks (USTs). USTs contain dangerous substances that can cause cancer and harm children and that pose a risk of explosion of they are leaving; construction projects can cause UST leaks. Demolition of the garages and disturbance of the USTs could also result in the release of petroleum and other hazardous substances into nearby soil and groundwater, especially since the USTs were used prior to the EPA regulations of the 1980s. Should the garages be demolished, a release of gasoline from at least one of the USTs would result. (50)

Response 15.19: Refer to Response 15.10.

16. Mitigation

Comment 16.1: The DEIS should disclose and mitigate construction noise impacts to the extent possible, or determine whether it is impossible to mitigate. However, the key here is scheduling, as certain

phases of construction are much louder than other parts of construction. To the extent that the noisiest aspects of construction and demolition can be scheduled during the summer or in the periods when the high stakes testing is not taking place at the school, would be advantage to the community and important to know one way or another when people are making decisions about where to go to school. (11)

Response 16.1: ***If significant adverse construction noise impacts are identified, mitigation measures will be developed and coordinated with the responsible City agencies, including, if feasible, scheduling the noisiest activities so as to minimize disruption. Where impacts cannot be mitigated, they will be described as unmitigated and unavoidable adverse impacts.***

Comment 16.2: Given the large community that frequents M.S. 54 year round, both inside and outside of the building, it is critical that we err on the side of great caution in mitigating for dangers having to do with everything from particulates to noise pollution to traffic concerns and any other sorts of negative impacts. (31)

Response 16.2: ***Refer to Response 16.1.***

17. Alternatives

Comment 17.1: Consider a study of what could be built under R8B or R9A, using less FAR. (3, 51)

Response 17.1: ***The DEIS will provide information concerning the extent to which the Proposed Project's affordable and supportive housing program could be achieved under R8B, as part of the discussion of the purpose and need for the Proposed Project.***

Comment 17.2: There are 3,000 other alternate City properties that are underutilized or vacant that would be able to accommodate the Proposed Project. (21, 50)

Response 17.2: ***HPD seeks to create affordable and supportive housing throughout New York City and is actively been pursuing affordable housing opportunities throughout the City. There are, however, limited opportunities to create affordable housing on either public or private land, especially considering, among other things, land use and zoning restrictions, a competitive real estate market, and the need to provide affordable units on a timely basis. The Proposed Project presents WSFSSH and HPD a unique opportunity to develop much needed new affordable housing and community facility space in a community district with a demonstrated need for these types of uses***

Comment 17.3: Other locations for the Proposed Project should be explored, because the project in this location would punish this neighborhood and change its character. (5)

Response 17.3: ***As outlined in the FSOW, the DEIS will include a neighborhood character impact assessment in accordance with the methodology outlined in the 2014 CEQR Technical Manual. (Refer to Response 14.1.)***

Comment 17.4: There are alternate sites that could achieve the same affordable housing objectives of the Proposed Project without displacing members of our community. (46)

Response 17.4: ***HPD will continue to pursue development of affordable and supportive housing across New York City. (Refer to Response 17.2.)***

G. General

Comment G.1: Please expand the primary study area to at least a ¼-mile; a ½-mile is preferred, as it includes typical land configurations in Manhattan Valley. (3, 51)

Response G.1: ***The study areas for each of the technical areas were established in accordance with 2014 CEQR Technical Manual methodology. As outlined in the FSOW, the urban design and land use analyses will analyze the potential for impacts on both primary (400-foot radius) and secondary (1/4-mile radius) study areas.***

Comment G.2: I have a strong record of support for progressive supportive causes in this community, but never have existing residents of the community been asked to give up so much for the sake of affordable housing. (28)

Response G.2: ***The DEIS will assess the potential for the Proposed Project to result in significant adverse impacts in accordance with 2014 CEQR Technical Manual methodology.***

Comment G.3: There is a need for development; our neighborhood is not a cheap garage for the Upper West Side. This is a walking neighborhood, with a population density that encourages this. This is also a diverse neighborhood, with a lot of seniors, youth, and mobility-challenged people. The choice between people and cars is clear. (4)

Response G.3: ***Comment noted.***

Comment G.4: I think that we have to realize that we, as a City, look to find more sites to build housing, in many cases parking lots will be our target to find those sites. Clearly this is not going to be a city without cars, and cars and people have to find a way to live together. (18)

Response G.4: ***Comment noted.***

Comment G.5: Save Manhattan Valley expects a very clear environmental report that doesn't just check the boxed of things you have to do to get through the Uniform Land Use Review Procedure (ULURP), but really addresses the key environmental concerns that we have identified in the community. (15)

Response G.5: ***As outlined in the FSOW, the DEIS will analyze the potential for the Proposed Project to result in significant adverse impacts in all areas that were not screened out in the EAS. All analyses will be conducted in accordance with 2014 CEQR Technical Manual methodology and agency guidance.***

Comment G.6: Save Manhattan Valley submitted to the City an environmental report by GHD Consulting that concluded that, if the Proposed Project were to proceed, there would be at least 14 areas of genuine environmental concern, which would risk the health and lives of those living in Manhattan Valley. (21)

Response G.6: ***Refer to Response G.5.***

Comment G.7: I am certainly concerned about questions of infrastructure for the Proposed Project. (2)

Response G.7: ***Comment noted.***

Comment G.8: Homelessness is worse than ever in the City right now, with 60,000 people sleeping in shelters every night. (24)

Response G.8: Comment noted.

Comment G.9: A recent study showed that if we built to the maximum FAR allowed now we would not have enough housing for all the people that are going to move to the City in the next 20 years. We need to build bigger in New York. (24)

Response G.9: Comment noted.

Comment G.10: It is easy to talk about the school as a kind of general thing and not to think about the very specific negative potential impacts that it can have. I would implore that we think about it specifically and err on the side of caution with regard to this very significant part of the community. (31)

Response G.10: The DEIS will assess the potential for the Proposed Project to result in significant adverse impacts on the nearby Booker T. Washington Middle School for the applicable technical analyses. Notably, as the school and its adjacent playground are considered "sensitive receptors" the potential for impacts on the school during construction will be assessed; the shadows analysis will evaluate the potential for the Proposed Project to result in significant adverse shadow impacts on the school's playground; and a pedestrian safety analysis will be provided as part of Task 7, "Transportation," to determine the potential for the Proposed Project to result in worsened pedestrian safety conditions. The DEIS will also include urban design, land use, and neighborhood character analyses that will assess the compatibility of the Proposed Project with the surrounding area (including the school).

Comment G.11: There are seniors in the NYCHA developments that are being forced to move to locations in the outer boroughs. These seniors have nowhere to live in the community. These seniors could move into the Proposed Project and open up apartments in the NYCHA houses (for which there are long waiting lists) and also generate funds for NYCHA. (25)

Response G.11: Comment noted.

Comment G.12: Nobody has really looked at the equation of why we need to destroy three viable parking garages that employ people in the neighborhood, pay rent to the City, and pay taxes to the City, and replace them with a taxpayer-funded development. (41)

Comment G.12: The Proposed Actions are intended to facilitate much needed affordable and supportive housing (approximately 277 affordable units), transitional housing for older adults (approximately 110 shelter beds), and community facility uses. The Proposed Actions would support the City's goals of creating new affordable and supportive housing, as well as addressing the needs of the City's homeless population, by optimizing the use of City-owned land within close proximity to public transportation. The Proposed Project is also intended to create new jobs (approximately 50 new permanent on-site workers, excluding construction workers). The Proposed Actions would help address specific needs of the local community, as well as the City at large, including the provision of affordable and supportive housing, transitional housing, and community facility uses. All of the proposed 277 units would be affordable. Furthermore, the transitional housing facility would provide approximately 110 shelter beds for homeless older adults to replace the existing 92-bed facility at the Valley Lodge shelter on Lot 10. As the Proposed Actions would facilitate the creation of affordable, supportive, senior, and transitional housing, they would further achieve the goals set forth by the City in Housing New York: A Five-Borough, Ten-Year Plan.

Comment G.13: We need to study the problem and look at everybody's needs, rather than looking at one need/one use: affordable housing. I have nothing against affordable housing, but this project is not being designed for everyone in the community, but, rather, is being designed to provide this one use and not solving the problem that is causing by displacing the garages. (36)

Response G.13: ***The Proposed Actions would help address specific needs of the local community, as well as the City at large, including the provision of affordable and supportive housing, transitional housing, and community facility uses. The impact of the Proposed Project on parking will be analyzed as part of Task 7, "Transportation."***

Comment G.14: We need a comprehensive parking policy in the neighborhood. We need parking garages. Why are these garages being taken away when other publicly-funded parking garages at the Frederick Douglass Houses are not? (36)

Response G.14: ***A comprehensive parking policy is outside the CEQR scope of this project.***

Comment G.15: The people that work at the Development Site garages are long-time members of the community. (4)

Response G.15: ***Comment noted.***

Comment G.16: M.S. 54 needs more eyes on the street; the block on which the Development Site is located is a deserted block today, with only one residence: the Valley Lodge. (4)

Response G.16: ***Comment noted.***

Comment G.17: It is important that there be a community advisory board. It is important for your (WSFSSH's) connection to all the neighborhood and should be embraced by all developers. (4)

Response G.17: ***Comment noted.***

Comment G.18: I understand that there is a need for affordable and supportive housing in the City; however, I think we need to take a hard look at why this is the case and address landlord and corporate greed rather than simply forcing taxpaying community members to be forced out of their important vital services. (22)

Response G.18: ***Refer to Response G.12.***

Comment G.19: I am appalled that people care more about keeping their cars than affordable housing. (34)

Response G.19: ***Comment noted.***

Comment G.20: I would not have chosen to have my son enroll at M.S. 54 if I knew that this project was happening. (29)

Response G.20: ***Comment noted.***

Comment G.21: Citibikes have taken up so many on-street parking spaces, all over from Riverside to Broadway to 110th Street; on 106th Street, they took up half of the block. I understand the desire for bikes, but we also need our garages. (33)

Response G.21: ***Comment noted.***

Comment G.22: While the Proposed Project may serve an important community need, it has been poorly conceived without proper planning for the overall community. The Proposed Project should be scrapped and a proper plan should be developed that will meet the needs of our diverse Manhattan Valley community. If these parking spaces are demolished as a result of the Proposed Project, it will have

severe economic, environmental, social, and other disruptive impacts on the Manhattan Valley community. (10)

Response G.22: ***Refer to Response G.5.***

Comment G.24: The Proposed Project threatens the people of Manhattan Valley, including and especially its children, with substantial environmental injury and other risk of harm. (50)

Response G.24: ***The DEIS will analyze the potential impacts resulting from the Proposed Project, including potential impacts at the nearby Booker T. Washington Middle School. (Refer to Response G.10.)***

Response G.25: I am certainly concerned about questions of the Proposed Project's density. (2)

Response G.25: ***As outlined in the FSOW, the DEIS will analyze the potential for impacts resulting from the Proposed Project, including additional transportation and open space demand generated by the increased density proposed for the Development Site.***

APPENDIX C

Written Comments on the Draft Scope of Work

Chet Davis
884 West End Avenue #43
New York, NY 10025

June 24, 2017

Mr. Aaron Werner, AICP
Director of Environmental Planning
HPD Office of Development, Building and Land Development Services
100 Gold Street, 7A-4
New York, NY 10038

RE: Opposition to West 108th Street WSFSSH Development

Dear Mr. Werner:

I am opposed to the WSFSSH Development that will demolish approximately 800 parking spaces on West 108th Street in Manhattan Valley.

I have lived in the Manhattan Valley community since 1974. After one of my cars was stolen from Riverside Drive in the 1980s, I elected to pay the extra monthly fee for parking at the 108th Street garages. I did this also because it was extremely difficult to find street parking in Manhattan Valley. This has recently been exacerbated with the inclusion of Citibikes and could be further exacerbated with the existing WSFSSH Development proposal.

I have a master's degree in Urban Planning. I am a supporter of subsidized housing and diversity in my community. However, I am opposed to the existing WSFSSH development proposal.

The existing WSFSSH development proposal does not take into account the needs of our Manhattan Valley community, and only benefits special interests. Due to the lack of sufficient street parking for residents and visitors, the garages on West 108th Street have been a viable Manhattan Valley resource for over 40 years. Along with other neighborhood garages located between West 96th Street and West 116th Street, the 108th Street garages are consistently close to 100% occupied and are a sorely needed valuable neighborhood resource. For various reasons, many citizens who might like to park on the street for free are forced to pay high monthly fees to park there. While they may live in an area with abundant public transportation alternatives, they still need their automobiles. At your public scoping meeting, you heard from numerous citizens who need their vehicles for work, and overall mobility. These citizens have a real need to park at the 108th Street garages; it is not just a luxury for these parkers. In addition, there are citizens who come into the neighborhood to work, shop or do business, and these garages have always been there for over 40 years to accommodate them.

While the existing WSFSSH development proposal may serve an important community need, it has been poorly conceived without proper planning for the overall community. The existing proposal should be scrapped and a proper plan should be developed that will meet the needs of our diverse Manhattan Valley community. If these parking spaces are demolished due to the existing WSFSSH development proposal, it will have severe economic, environmental, social and other disruptive impacts on the Manhattan Valley community.

Sincerely,

Chet Davis

Comments DEIS – HPD/WSFSSH – W108 St Project

Parking – from Dan Zweig

A decade or two ago we reviewed these properties and reached out to the neighborhood to examine the need for these parking facilities. The response at that time was overwhelming for the continuing need and use for these parking facilities.

Since that time the demand for parking has increased while the supply of parking has already decreased markedly.

This has resulted in more difficulty and increased cruising to find rarer available street spaces throughout the west side along with the additional pollution that produces. Off street price increases have been dramatic with the reduced supply of off street parking accompanied by the increased demand for off street parking as on street parking has been reduced and made more difficult to find and use.

The removal of 675 parking spaces currently available in the garages will affect not just 675 people or 675 families who have vehicles in the garages. I will affect the health and quality of life of those in the neighborhoods to which these 675 vehicles are displaced. There is no city or area where motor vehicle ownership is more difficult or expensive. The people who have vehicles truly need and want them and the 675 vehicles will not just go away. They will compete further for street spaces in their home zipcodes (10024 or 10025) and increase cruising, pollution, and take additional time from the lives all those motor vehicle owners in the neighborhood who need to find a place to park their vehicle on the street.

For those vehicles whose owners can afford increased cost or travel time to another off street parking facility, those vehicles will drive up the cost of off street parking throughout the west side and displace other off street parked vehicles not just a short distance from W108 St but throughout the west side from zip 10024 up through much of councilman Levine's district into the W130's and W140's. Throughout the west side additional vehicles will be forced to the street to again increase cruising, parking time, pollution, and stealing from the quality of life of any vehicle owner.

Related to parking, we need the EIS to examine:

On the demand side:

How much has vehicle ownership and use increased? How much will it increase as populations change?

On the supply side:

How much off street parking has already been lost since the last review of the W108 St garages?

(Reports by media have counted over 1300 spaces lost just in the most recent years).

How much off street parking will be lost on the Westside due to further development of private properties?

How much on street parking on the west side has been lost to various City actions?

300+ spaces were lost as part of a choice to implement the Columbus Ave bike lanes

300+ spaces have been lost as part of a choice to implement the Amsterdam Ave bike lanes

400+ spaces have been lost as part of a choice to implement the CitiBike installations and more will be lost as the Citibike program expands northward.

What number of parking spaces have been eliminated due to various attempts to enhance safety?

(We should know this number even for an indisbutable good cause).

How much street parking can it be estimated will be lost due to city actions including safety implementations, bike lane installations, CitiBike installations, etc.

The scope of the geographic area of investigation for the effects of the removal of 675 parking spaces should include all of zipcodes 10024 and 10025 – perhaps 10023 if there are 10023 vehicles in the garages – and should include where the displacement impacts will move northward up to the W130's and W140's – impacting ultimately on the pocketbooks and quality of life of those vehicle owners least able to afford the impact.

The scope of the investigation should include but not be limited to :

What will be the impact of the increased time spent cruising and accompanied pollution?

What will be the impact of the likely increased cost of off street parking have on those who are displaced to other more distant off street parking facilities?

What will be the impact at the end of the chain of displacement? Likely those least able to afford the change. Will they move to increase the street parking demand, time spent cruising, and pollution up the line in our less economically endowed neighborhoods? By how much?

This will affect a large portion of the West Side and a large number of people – much more than 675 families – much more than 100 or 200 families.

This is not to say that construction of affordable housing is not important. It is. It should not be done at this time at this location where the need for off street parking provided here is crucial to the lives of many, many individuals and families and where its removal would affect a wide swath of the West Side from the W70's to the W140's and particularly those vehicle owners who can least afford it.

Dan Zweig

Previously 30 years service as CB7 Board member and many CB7 Transportation Chair

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Statement from DOROT in Support of WSFSSH Project at West 108th St.

Good evening,

I'm Ellen Amstutz, Senior Program Officer for Community Based Programs at DOROT. I am here representing DOROT's Executive Director, Mark Meridy. DOROT has served the frail and isolated elderly on the Upper West Side and Manhattan Valley for over 40 years. We serve thousands of seniors and bring community volunteers together to make the Neighborhood a place where people of all ages can live and prosper. We are very familiar with the challenges faced by the elderly in this community, particularly those who struggle to maintain housing. DOROT has partnered with WSFSSH for decades and we operate a Homeless Prevention program—within a Westside Federation for Senior and Supported Housing building. This project has saved hundreds of neighborhood seniors from homelessness over the years, however, we struggle to find them permanent housing in the neighborhood where they have lived all their lives. Our efforts at preventing these seniors from becoming part of the population of long term homeless is affected by this severe shortage of long term housing and supportive services that will enable them to remain active and healthy. At this time over 200,000 NYC seniors are on the waitlist for affordable housing.

The transformation of the Manhattan Valley Neighborhood has been impressive and will continue. We need to insure for the future that seniors and families of all income groups continue to be a part of the fabric of our community. The economic and demographic diversity of this neighborhood is what makes this community vibrant and makes it such a desirable place to live. We must not lose this special asset.

DOROT supports the West Side Federation's project at West 108th St. It will create much needed affordable housing for low-income families and seniors and invaluable community assets such as space for health care, services and recreation that are vital to the fabric of our community.

Thank you,

Ellen Amstutz, MSW, PhD
Senior Program Officer for Community Based Programs and External Affairs
DOROT, Inc.
171 West 85th Street
New York, New York 10024
212-769-3749
www.dorotusa.org
DOROT - Generations Helping Generations

Public Hearing on the Draft Scope of Work for the Environmental Impact Statement
June 22, 2017
Julie Sandorf

Thank you for the opportunity to speak today. I proud resident of the Upper West Side, having lived here for 34 years. On a professional level, I was involved in the early revitalization of Manhattan Valley, having the privilege of working with Leah Schneider and the West Side Federation for Senior and Supportive Housing. I am also a proud member of the Board of Directors of WSFSSH and as a community member, I am truly grateful for WSFSSH's leadership and standards of excellence in providing desperately needed high quality affordable and supportive housing to help ensure that all in our community are able to be part of dynamic and diverse community.

Founded in 1976, WSFSSH has developed and operates 24 buildings housing 1,800 people on the Upper West Side, Harlem and the Bronx. Not only has WSFSSH developed these projects to the highest standards, but the buildings are managed with careful attention to the needs of their residents and the community.

WSFSSH has a superb track record in redeveloping complicated construction projects, including major renovations with tenants in place. These projects have greatly improved not only the living conditions of residents but the buildings' immediate surroundings. They blend into the fabric of community life, and are considered assets to the community.

WSFSSH has a highly respected reputation for responsiveness to community concerns. Valley Lodge has operated on West 108th Street successfully for more than 30 years.

The housing affordability crisis in NYC has hit an all-time high, especially for individuals and families who are getting priced out of areas like Manhattan Valley. 200,000 senior citizens are on wait lists for affordable housing, and thousands more are unable to meet the ever escalating rents in the private market.

WSFSSH has proven, time and again, that it is exactly the type of community oriented development organization that can not only preserve the income diversity that makes Manhattan Valley special, provide the resources, care and welcoming environment for low income seniors and families to live with security and dignity, but does so with care, respect and involvement of the community.

Thank you for the opportunity to speak

Werner, Aaron (HPD)

From: Kate Dunham <dunhamkate2@gmail.com>
Sent: Thursday, June 22, 2017 2:31 PM
To: Werner, Aaron (HPD)
Subject: WSFSSG West 108th Street project - YES!!

Hello Mr. Wernera,
I am writing to you to place in the official record my 100% support for the WSFSSH West 108th Street affordable housing project.
I have been a resident of this neighborhood for almost 25 years and have seen it transform substantially over this period of time into a vibrant, diverse and attractive neighborhood that I believe can support a higher density of residents and is in dire need of more affordable housing options.

- Especially in light of the gentrification that has taken place I think it is so important to take this rare opportunity for affordable housing to be built by a reliable organization with a great track record. If not for this project it seems we will only be getting more luxury housing.
- I also think by replacing the garage this project will do much more good for the neighborhood than the garage ever did. For example the project will be a benefit to the public park next door, it will activate the sidewalks, it will provide community activities and spaces, and it will provide local jobs.
- Thirdly I think in the long run it will benefit our neighborhood to reduce the number of cheap parking garage options.
- Having a car in the city makes less and less sense. If it's a choice between preserving cheap parking spots or providing a rare opportunity for social beneficial and affordable housing - the decision should be obvious.

I urge you to support this project and help it to happen as soon as possible.

Thanks!

- Kate Dunham
545 West 111th Street apt 2F
NYC NY 10025

--
from Kate

LiveOn NY
Making New York a better place to age

NYC Housing Preservation and Development
WSFSSH at West 108 Scoping Meeting: Draft Environmental Impact Statement
June 22, 2017

In support of WSFSSH at West 108

LiveOn NY respectfully submits the following testimony in support of WSFSSH at West 108.

LiveOn NY is proud to support WSFSSH at West 108, an opportunity for Manhattan Valley that is directly in line with our mission to make New York a better place to age. WSFSSH is currently a member organization of LiveOn NY, as well as a member of LiveOn NY's Afforable Senior Housing Coalition.

Today, New York City faces an unprecedented affordable housing crisis, one that effects every community throughout the five boroughs. As found in LiveOn NY's 2016 study, more than 200,000 low-income seniors in New York City languish on wait lists for affordable housing. More specifically, there are an astounding 2,000 seniors on waiting lists in Manhattan Valley and surrounding northern Manhattan communities. This affordable housing crisis is intensified as the cost of renting or purchasing apartments and the overall cost of living in New York City continues to rise.

For seniors, the dire need affordable housing cannot be overstated, as rent-burden can lead to adverse life choices such as skipping meals or medicine to afford rent. Affordable housing is consistently included in what is needed for a community to be considered "age-friendly", a priority of both the state and city government, and one we should all work to support.

Not only will WSFSSH at West 108 serve the eldest among us, but the development will be a vibrant and necessary resource for the community of Manhattan Valley as it provides numerous opportunities for communal use. Services to support seniors aging in place, as well as open space and public bathrooms, can be enjoyed by residents and the surrounding community. WSFSSH at West 108 is keeping Manhattan Valley affordable for older adults of every income level, which is invaluable as we work together to make New York a better place to age. Further, seniors who are able to age in community surrounded by the networks they have maintained are often invaluable sources of community and civic activism in their neighborhood.

Further, WSFSSH has a very long record of helping seniors with housing. In the 1980's WSFSSH redeveloped vacant buildings and helped turn blighted streets into safe residential blocks. At the time, there was no investment in Manhattan Valley, but WSFSSH stepped in and helped to make Manhattan Valley the safe, robust residential neighborhood it is today.

Thank you for the opportunity to testify in support of WSFSSH at West 108.

LiveOn NY is a non-profit organization that makes New York a better place to age by working on policy, advocacy and innovative programs. We have a membership base of 100 organizations that provide more than 1,000 community based programs, which range from individual community-based centers to large multi-service organizations. LiveOn NY's Affordable Senior Housing Coalition is comprised of 25 of the leading NYC non-profit senior housing with services providers. LiveOn NY's policy and advocacy work includes funding for community-based services, elder abuse, affordable housing, caregiver supports and other issues impacting older New Yorkers. We also run a robust outreach and enrollment program to assist older adults to access public benefits.

LiveOn NY • 49 West 45th Street • 7th Floor • New York, NY 10036 • 212.398.6565 • www.liveon-ny.org

Community Board 7/Manhattan
Comments On the Scoping Document
WSFSSH-108 St Project, June 22, 2017

Community Board 7's Core Principles value the creation of new affordable housing in addition to preserving, maintaining and protecting existing affordable housing. Our Core Principles include caring for and nurturing our seniors. Valley Lodge has been an asset for our community providing transitional housing for formerly homeless seniors. The West Side Federation for Supportive Senior Housing WSFSSH has numerous housing facilities in CB7.

Following are some suggestions and some questions:

Primary Study Area: Please expand the study are to at least 1/4 mile, 1/2 mile is preferred because it includes the typical configuration of land in Manhattan Valley

Transportation:

1. **Traffic**: What will be the impact of the loss of parking spaces to the neighborhood? Will there be a detailed traffic analysis of where those displaced vehicles are likely to go?

2. **Transit:** The 110th Street/Central Park West (B,C) lines, and the 110th St/Broadway(#1) stations will be used by the tenants, visitors and staff of the proposed development. Because usage is likely to be split depending on the destinations of the user, it is possible that neither station will cross the threshold of an additional 200 trips each. If either station reaches the threshold, attention should be paid to conditions at these facilities. Please examine turnstile counts at these two location, as well as boarding counts on the bus lines serving the new project.

3. **Pedestrians:** Please pay attention to increased pedestrian activity at the proposed development and safety treatments at Columbus & Amsterdam Avenues including: pedestrian ramps, countdown timers, well marked striping and "Barnes Dances" where appropriate.

4. **Parking:** Will there be a study of the loss of parking spaces in the community? Will there be an effort to accommodate existing garage tenants in the surrounding garages? Please include a study of who use the parking garages.

Air Quality: Will air-quality tests be undertaken to see if air quality is affected by cars cruising the streets searching for parking? Please include a study of the use of non sustainable fuels in this location with respect to particulate matter, greenhouse gases and other impacts of using non-renewable energy.

Land Use: Please include more details about the heights of the surrounding buildings. Please consider a study of what could be built under R8b or R9a using less FAR with shorter buildings. How will up zoning (spot zoning) for these buildings impact other rezoning requests in the area?

Shadows: What will be the impact of shadows on the 109th Street buildings and the rear yards? Please include sun-sensitive resources used for gardening and gathering.

Hazardous Materials: Please discuss the protocols for testing to determine whether there are toxins present in the buildings to be demolished and if so how they will be mitigated during deconstruction and construction. Please include the initial results reported in Phase I and Phase II reports to ensure that the risk of oil/gas sourced toxins are uncovered and mitigated, or be able to reasonably assure the community that they are not present.

Construction: Please include a plan for queuing construction trucks (delivery and removal) when not at site. Please assess potential locations and the impacts of the waiting trucks on air quality, noise, transportation, etc. There need to be plans for a comprehensive construction coordinating group, as well as methods to communicate with the community and the school.

Noise: Please put noise receptors on the school facade. Please asses the scheduling of the noisiest periods of construction during periods (ie summer) when the school is not in session.

THE INSTITUTE FOR FAMILY HEALTH

West Side Federation for Senior and Supportive Housing
Public Meeting: WSFSSH at West 108th
June 22, 2018

My name is Maxine Golub and I am the Senior Vice President for Planning and Development at the Institute for Family Health, a federally qualified health center network that has been providing comprehensive primary care in medically underserved communities in New York City for more than 30 years, and in upstate New York for the past 10 years. We also operate three residency-training programs in family medicine, and number of community health and health promotion programs.

In NYC, the Institute offers primary care, behavioral health care and dental care at nine full time health centers, five school-based health centers, and six sites that care for people who are homeless. Services are available for people of all ages, regardless of insurance status or ability to pay.

The Institute has been working with the West Side Federation for Senior and Supportive Housing (WSFSSH) since 1990, when we began providing services at Valley Lodge, a transitional shelter that they operate for vulnerable formerly homeless adults. An Institute family physician provides primary care two days per week, working closely with the Valley Lodge staff to coordinate services. On average, we provide 1,000 primary care

per year to the residents of Valley Lodge.

We are thrilled to be part of the WSFSSH project at 108th street, and will occupy roughly 5,000 square feet of community space for healthcare, serving both the residents of the new buildings and the community at large. The proposed health center will provide roughly 25,000 visits per year for about 5,000 patients. The Institute has a history of developing health centers in collaboration with community partners, and looks forward to working with the Upper West Side/Manhattan Valley community to help meet its primary health care needs.

As a longtime community partner, WSFSSH will help make this block of 108th street a more vibrant, pedestrian friendly place that will promote the health and wellbeing of the entire neighborhood. In addition, they will be supporting the community by providing space for the Central Park Medical Unit ambulances and volunteers, and public restrooms for the adjacent Anibal Aviles Playground.

WSFSSH has a strong track record of designing, building and managing complex developments in residential neighborhoods. The Institute for Family Health is happy to support WSFSSH at West 108th and to be part of the services it will provide for all of the Upper West Side and Manhattan Valley.

Thank you.

Maxine Golub, MPH
Senior Vice President
Institute for Family Health
2006 Madison Ave.
NY, NY 10003
212-633 – 0800 ext. 1286
mgolub@institute.org

Community Board 7/Manhattan
Comments On the Scoping Document
West 108th Street WSFSSH Development, CEQR No. 17HPD083M
June 22, 2017

Community Board 7's Core Principles value the creation of new affordable housing in addition to preserving, maintaining and protecting existing affordable housing. Our Core Principles include caring for and nurturing our seniors. Valley Lodge has been an asset for our community providing transitional housing for formerly homeless seniors. The West Side Federation for Supportive Senior Housing WSFSSH has numerous well managed housing facilities in CB7.

Questions and Concerns:

Primary Study Area: Please expand the study are to at least 1/4 mile, 1/2 mile is preferred because it includes the typical configuration of land in Manhattan Valley

Transportation:
1. **Traffic**: What will be the impact of the loss of parking spaces to the neighborhood? Will there be a detailed traffic analysis of where those displaced vehicles are likely to go? Which streets will be impacted and how?

2. **Transit:** The 110th Street/Central Park West (B,C) lines, and the 110th St/Broadway(#1) stations will be used by the tenants, visitors and staff of the proposed development. Because usage is likely to be split depending on the destinations of the user, it is possible that neither station will cross the threshold of an additional 200 trips each. If either station reaches the threshold, attention should be paid to conditions at these facilities. Please examine turnstile counts at these two location, as well as boarding counts on the bus lines serving the new project. Are there plans to consider a new Citi-bike station near this area?

3. **Pedestrians:** Please pay attention to increased pedestrian activity at the proposed development and safety treatments at Columbus & Amsterdam Avenues including: pedestrian ramps, countdown timers, well-marked striping and "Barnes Dances" where appropriate.

4. **Parking:** There needs to be a study of the loss of parking spaces in the community? Who will be displaced and what actions will they take? Will there be an effort to accommodate existing garage tenants in the surrounding garages?

Air Quality: How will air-quality be affected by this project? Will there be a study of the

use of non-sustainable fuels in this location with respect to particulate matter, green-house gases and other impacts of using non-renewable energy.

Land Use: Please include more details about the heights of the surrounding buildings. Please consider a study of what could be built using less FAR with shorter buildings. How will up zoning (spot zoning) for these buildings impact other rezoning requests in the area.

Shadows: What will be the impact of shadows on the 109th Street buildings and the rear yards? Please include sun-sensitive resources used for gardening and gathering.

Hazardous Materials: Please discuss the protocols for testing to determine whether there are toxins present in the buildings to be demolished and if so how they will be mitigated during deconstruction and construction. Please include the initial results reported in Phase I and Phase II reports to ensure that the risk of oil/gas sourced toxins are uncovered and mitigated, or be able to reasonably assure the community that they are not present.

Construction: Please include a plan for queuing construction trucks (delivery and removal) when not at site. Please assess potential locations and the impacts of the waiting trucks on air quality, noise, transportation, etc.

Construction Oversight: Create a construction working group convened by the Community Board 7, in consultation with the Council member and the Manhattan Borough Board President to meet monthly to review construction and the community concerns. MS 54 will be represented and each stakeholder will appoint one person to the group. Relevant City Agencies will be included. Additionally there needs to be bi-weekly updates and look-aheads including stages of work and anticipated noise impacts, which will be distributed by email and posted where possible.

Noise: Please put noise receptors on the school facade. Please asses the scheduling of the noisiest periods of construction during periods (i.e. summer) when the school is not in session.

Public School MS 54: Please consider every possible way to mitigate the disruptions to the children, staff and parents both during and after school hours.

romemu
JEWISH LIFE ELEVATED
43 Central Park North, Suite 1A
New York, NY 10026

June 25, 2017

Dear Aaron Werner, Director of Environmental Planning HPD

I want to write a letter supporting The West Side Federation for Senior and Supportive Housing's plan to expand Valley Lodge and offer more affordable housing for those who need it most. I, along with my colleagues at Kehilat Romemu, where I am a rabbi, support this initiative for several reasons.

First, we rent space from West End Presbyterian, a church located around t he corner from the proposed site of the rebuild (we are located at 165 W. 105th st). I am very aware of the needs of those in our community, of the poverty, of the homelessness, and of the struggle for people to find affordable housing. I am a ware of this from observations while walking to and from synagogue, from stories rom congregants – some of whom are struggling with homelessness – and from conversations with West End Presbyterian and their parishioners (although I am only writing this letter on behalf of Romemu Clergy, not on behalf of West End Presbyterian). The fact that the proposed development will include 194 100% permanently affordable apartments for low-income families and seniors, and a new Valley Lodge shelter serving 110 older adults, 18 more people than today, will be vital to the success and growth of our neighborhood as a whole, and will have an enormous impact on many of my congregants.

The Jewish tradition puts a tremendous emphasis on our obligation to assist those in need, and to take care of the stranger. In fact, the commandment most often repeated in the Torah is the commandment to take care of the stranger. This shows up 36 times. Who is the stranger? The stranger is the person who is marginalized, overlooked, and not supported. The stranger is the person in my community who recently started a fundraising campaign for herself because she was facing eviction. The stranger is the person in my community who is homeless and is surviving on food stamps. The stranger, in short, is the person who needs our help now. And I believe in the work of The West Side Federation for Senior and Supportive Housing, and believe that it has the potential to create more spaces where the marginalized, where the needy, where the stranger can be seen, accepted, and belong. This is why I am in favor of this proposal.

With gratitude,

Rabbi Josh Buchin (on behalf of the Romemu Clergy)

Rev. Alistair Drummond, Pastor
West End Presbyterian Church, 165 West 105th Street, New York, NY 10025
Board Member of WSFSSH

Comments:

As a neighbor of Valley Lodge, a board member of the West Side Federation for Senior and Supportive Housing, and a member of the West 108th Street Coalition, I know firsthand that:

WSFSSH is a **good, responsive member of our community.**

- With 40 years of experience, WSFSSH can manage big complex construction projects in residential neighborhoods, including The Red Oak on 106th Street and Tres Puentes in the Bronx which is currently under construction.
- WSFSSH is part of the community they operate in, and is very responsive to any resident disputes that may arise. Valley Lodge has operated on West 108 successfully for more than 30 years.

WSFSSH at West 108 is a **necessary resource for our neighborhood.**

- New York City continues to wrestle with housing affordability—especially in Manhattan.
- 200,000 seniors are on waitlists for affordable housing alone. The need is real.
- WSFSSH is the kind of top-tier, responsible provider that can help protect our neighborhood from the effects of rapid gentrification and help to preserve the income diversity that makes Manhattan Valley special—while continuing to provide resources for low-income seniors to live with security & dignity.

I support WSFSSH at West 108 and the services it will provide for all of Manhattan Valley.

In January of this year the annual March for Peace on the Dr. MJKJr. Holiday took support for this project as its theme this year, recognizing that peaceful integrated communities of economic and social diversity are absolutely critical to the health of our upper west side ethos and identity and must remain so. Support for this project will help ensure that we remain a beacon of this kind of example and experience for our city and for our country.

Werner, Aaron (HPD)

From: Roberta Solomon <rsolomon@goddard.org>
Sent: Friday, June 23, 2017 10:16 AM
To: Werner, Aaron (HPD)
Subject: WSFSSH at West 108 Street - Affordable Housing & Community Benefits

Good morning,

My name is Roberta Solomon and I am Deputy Executive Director at Goddard Riverside Community Center. My portfolio includes permanent supportive homeless, homeless outreach, and mental health services.

I am writing today in support of WSFSSH at West 108 Street.

The West 108 Street development will become a vibrant and valuable resource for the Manhattan Valley community, and for the city as a whole.

- New York City continues to wrestle with housing affordability—especially in Manhattan.
- Affordable housing for seniors, older adults, and families is a real need.
- WSFSSH is a proven and responsible developer and provider of affordable housing that can provide resources for low-income families and seniors to live with security & dignity.
- Their work has helped to improve the Manhattan Valley neighborhood over the past forty years.
- The West 108 Street development will include resources for the surrounding community making it an integral part of the neighborhood. The development will provide many options for community use;
  - it will include public bathrooms for the Anibal Aviles playground – which will allow much greater use of the playground by the Parks Department (they can bring in Parks Associates to oversee and do activities once a bathroom is on site).
  - it will provide direct access to community rooms from the street for use by Manhattan Valley;
  - and it will include over 5,000 square feet of community space for healthcare.
  - This block, which currently has no permanent housing on it, will be integrated back into the neighborhood with a building that is designed to have an activated street presence and which is in keeping with the neighborhood character.

I support WSFSSH at West 108 and the critical housing and services it will provide to Manhattan Valley.

Thank you.

Roberta Solomon, LMSW
Deputy Executive Director
Goddard Riverside Community Center
rsolomon@goddard.org
(o) 212-724-1000 ext 327
(c) 929-246-4183

Werner, Aaron (HPD)

From: Sandra Roche <sandraroche@bloomingdalefamilyprogram.org>
Sent: Monday, June 19, 2017 9:17 AM
To: Werner, Aaron (HPD)
Subject: Manhattan Valley's need for Affordable Housing

Re: Public Hearing on the Draft Scope of Work for the Environmental Impact Statement
Date: Thursday, June 22
Location: Edward A. Reynolds West Side High School, 140 West 102nd Street
Time: 4:00

My name is Sandra Roche, and I represent the Bloomingdale Family Program, a nationally recognized early childhood education program dedicated to school success for children from low-income families in upper Manhattan. Our program has served the Manhattan Valley community for more than 50 years, providing vital services for families and encouraging their engagement and participation in making our community a welcoming and supportive place in which to live and raise their children.

I know firsthand how much Manhattan Valley needs affordable housing and community services. Year after year, we have seen the attrition of housing that a welcomes low-income families, as affordable housing has been replaced by luxury buildings. The vibrant mix of low-, middle-, and upper-income families that has long characterized our community is under serious threat. Affordable housing in Manhattan Valley would be extremely valuable to my clients, to the neighborhood, and the whole city. We all know that New York City is having a crisis of housing affordability; the wait lists are long and the need is urgent!

WSFSSH is a well-established, responsible provider that can help protect our neighborhood from the effects of rapid gentrification and help to preserve the income diversity that makes Manhattan Valley special—while continuing to provide resources for low-income seniors to live with security.

WSFSSH at West 108 will have resources for those who don't live in the building—benefiting the low and middle income people who live in our wider community.

- I am excited about the 5,000 feet of community space for health services and
- Restrooms for Anibal Aviles playground which will also allow for expanded services from the Parks Department. The Bloomingdale Family Program — which uses this playground for our early childhood program — will directly benefit from these enhanced facilities, and WSFSSH will also be providing on-site storage space at no cost for our playground equipment and supplies.
- We wholeheartedly support this project, which will help to make Manhattan Valley a more equitable neighborhood for all.

Sincerely,
Sandra Roche

Sandra Roche, Board Chair
Bloomingdale Family Program
125 West 109th Street
New York, NY 10025
212-663-4067
www.bloomingdalefamilyprogram.org

SAVE MANHATTAN VALLEY:

A Study of the Adverse Impacts of Yet Another Burdensome City Project on the Upper West Side, and Alternate Sites Where it Can Be Relocated

HILLER, PC
600 Madison Avenue
New York, New York 10022
(212) 319-4000

INTRODUCTION

"[N]o one knows a neighborhood better than the people who live there, and so residents should always play a major role in deciding its future."

On May 4, 2016, Mayor de Blasio wrote those words as he quoted Jane Jacobs in an Op-Ed for the New York Daily News, assuring New Yorkers, not only that he would listen to their concerns, but that he would carefully consider them in the context of urban and city planning. Today, the Mayor's commitment to this promise is in substantial question. Among the many contentious programs on the Mayor's land-use agenda is a major City project ("Project") on West 108th Street between Amsterdam and Columbus Avenues ("Proposed Site") in the Manhattan Valley section of the Upper West Side. The Project would result in the demolition and permanent loss of three parking garages on West 108th Street. But more important than the loss of parking spaces, which play a particularly significant role in this neighborhood, are the potential environmental hazards to the neighborhood threatened by the Project. Despite near-universal rejection of the Project by Manhattan Valley residents, the de Blasio Administration has refused to meet with them or offer an appropriate forum to express their views.

The purpose of this Memorandum is to create such a forum and begin a dialogue with respect to the Project. In particular, we present overwhelming evidence that: (i) the Project threatens the people of Manhattan Valley, including and especially its children, with substantial environmental injury and other risks of harm; (ii) the City's effort to shoehorn the Project into the Proposed Site, despite substantial and potentially fatal risks associated with environmental damage, is entirely unnecessary in view of the thousands of available, unused and/or under-utilized City properties throughout the Five Boroughs; and (iii) the Project would violate New York State and City law, including, without limitation, the New York City Zoning Resolution and Fair Share Criteria. In addition, by this Memorandum, we propose 10 alternate sites for the Project – examples of perfectly acceptable sites outside the already overly-burdened Manhattan Valley community.

Although cynical voices may occasionally be heard to cast this dispute as one involving "people vs. parking," the residents of Manhattan Valley – the people who actually live in the neighborhood – know better. This dispute is about their quality of lives, their safety, the well-being of their children, and their community, as well as their insistence that principles of fundamental fairness and compliance with New York law inform the policies of the Mayor's Office with respect to the distribution of municipal and related facilities in the City.[1]

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[1]The Mayor's Office is prone to suggesting that these issues should be addressed during the ULURP process – a complex and disconnected administrative procedure during which communities are supposed to be afforded the opportunity to articulate issues and concerns. However, commencement of the ULURP process presupposes the City's pre-existent support for the Project – support which, as reflected in this Memorandum, is entirely unjustified. More importantly, although affording communities the opportunity to have their voices heard, the ULURP process does not require City officials to actually *listen*. And, unfortunately, in this context, they rarely do. Thus, ULURP would

THE PROJECT AND PROPOSED SITE

The Proposed Site includes properties at 103, 143, 149 and 151 West 108th Street. The Project would require the demolition of three highly-used, near-capacity parking garages, and their replacement with three out-of-scale, zone-restriction-busting buildings, at least eleven (11) stories in height, that would unquestionably violate the Zoning Resolution. The Project is supposed to provide housing for seniors and low-income residents – a laudable goal which no one in Manhattan Valley opposes. The only questions are: where should the Project be sited and why has the City refused to consider more suitable locations, particularly in view of the extent to which Manhattan Valley is already over-burdened with such facilities?

The zoning for the Proposed Site is R8B, with a restriction against buildings in excess of 75 feet high (approximately seven (7) stories). The zoning restriction in question, adopted just nine years ago, was the product of an intense and competitive negotiation between the representatives of the City and the community, with each side making concessions to reach a consensus and fair resolution. One can well imagine the frustration of community residents when the City recently announced its intention to support an already-unpopular plan by reneging on that zoning deal less than nine years after agreeing to it.

Adjacent to two of the proposed buildings to comprise the Project is the Anibal Aviles Playground ("Aviles Playground"); across the street from the Proposed Site is the Booker T. Washington Middle School and Adjacent Playground and Sports Fields ("MS 54" and "School Playground").

SAVE MANHATTAN VALLEY

A group of Manhattan Valley residents deeply concerned at the prospect of the City shoe-horning the Project into their community began to organize in the neighborhood. What they discovered was that the more people learned about the Project, the stronger their opposition was to it. A petition was drafted and more than 1,930 people have signed it to date (*See* Exhibit 1, Petition).[2] Today, the organization of residents, Save Manhattan Valley ("SMV"), includes more than 2,000 people, all of whom are dedicated to protecting their neighborhood.[3] Although recognizing the importance of supportive housing facilities, the people of SMV insist that placement of such projects follow existing laws and be more evenly distributed throughout the City rather than cramming yet another one into their neighborhood – particularly one which would pose environmental hazards and violate the law.

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likely be of limited utility here.

[2]Almost immediately, more than 1,700 people signed (*See* Petition). Subsequently, an additional 230 people signed (*See* Exhibit 1A, Additional Petition Signatures).

[3]SMV is comprised of a coalition that includes the West Side Federation of Neighborhood and Block Associations, the North West Central Park Multi Block Association, the Duke Ellington Boulevard Neighborhood Association and the Dominican Sunday Group.

INDEPENDENT ENVIRONMENTAL STUDY

SMV recently commissioned a study by GHD Services, Inc., a world-renowned environmental analytics and consulting firm ("GHD"). Founded in 1928, GHD has 200 offices all over the world and operates in 136 countries. Without any connection to City developers or other well-connected political actors, GHD was free to perform its own research, provide an independent analysis, and arrive at its own conclusions, whether favorable or unfavorable to SMV and its objectives. As such, GHD was afforded the opportunity to engage in a truly independent analysis of the expected environmental and other impacts associated with the Project.

As shown below, GHD's Independent Environmental Study ("IES") confirms that the environmental and other adverse impacts threatened by the Project would likely have catastrophic and fatal consequences to the people of Manhattan Valley.[4]

I. THREATENED DANGERS POSED BY THE PROJECT

A. Increased Risk of Traffic Accidents

As reflected in the IES, the Project would undoubtedly lead to increased traffic accidents in Manhattan Valley, resulting in increased injuries and deaths, particularly of pedestrians (including and especially children) (GHD Report, at 2, 4). The three parking garages on West 108th Street currently accommodate as many as 785 vehicles on a daily basis (GHD Report and Attachment A). With the loss of these three highly utilized parking garages, there would be a sharp increase in the number of distracted drivers looking for on-street parking (GHD Report, at 2-5). On-street parking in Manhattan Valley is already at a premium within the Catchment Area (the area within 12 blocks of the three West 108th Street garages) (GHD Report, at 3-5 and Attachment A). A parking study considered by GHD concluded that "the additional available parking capacity in the Catchment Area Parking supply is insufficient to accommodate the displacement of monthly parking spaces as a result of the demolition of the West 108th Street Garages" (GHD Report, at 4, and Attachment A, at 2). More specifically, the study found that there would be a potential shortfall of 571 parking spaces in the Catchment Area (GHD Report at 4 and Attachment A, at 2).

The dangers of distracted drivers searching for on-street parking, even in the absence of the substantial reduction in available parking, are high (GHD Report at 2, 17). On-street parking "congests traffic, causes accidents, wastes fuel, pollutes the air, and degrades the pedestrian environment." Donald C. Shoup, "Cruising for Parking," University of California, Los Angeles, 13 Transport Policy 479, 480 (2006). Such dangers are especially acute in the neighborhood around the Proposed Site, as MS 54 is in close proximity, and young children are particularly at risk of being struck by vehicles (GHD Report at 2, 17). The conditions in the vicinity of the Proposed Site, which consists of a "high-density of pedestrians [and a] high density of motor vehicles and drivers distracted while looking for a parking space," are similar to parking lots, where approximately 1 in

[4] *See* Exhibit 2, GHD, Review of Existing Conditions and Effects Under the "With-Action" Condition ("GHD Report").

5 of all traffic accidents take place (GHD Report at 4).[5]

Given this analysis, the Project is directly contrary to New York City's Pedestrian Safety Action Plan Vision Zero ("Vision Zero Plan"), designed to minimize significant pedestrian injuries and death (GHD Report, at 1-2).[6] Furthermore, the Vision Zero Plan specifically identifies Broadway (which is a neighboring thoroughfare) as a Priority Roadway – that is, a roadway with a high number of automobile accidents and fatalities relative to other roads in Manhattan (GHD Report, at 4).[7] With more than 8% of alternative parking spaces located west of Broadway, if the three parking garages were to be demolished, "the high number of traffic accidents along Broadway would be exacerbated as residents who now park on the east side of Broadway would be forced to garages west of Broadway and would cross Broadway to return home" (GHD Report, at 4).

Moreover, as there would be an increase in cruising and drivers circling the streets looking for parking, there also would be an increase in greenhouse gas emissions (GHD Report, at 2-4, 6-7, n.1 and accompanying text). *See also* Shoup, "Cruising for Parking," 13 Transport Policy at 480. "Increased driving means increased vehicle emissions, increased pedestrian exposure to vehicle emissions, and excess greenhouse gas emissions" (GHD Report, at 4). "Prolonged exposure to carbon dioxide emissions has been shown to cause health effects including the following: increased lung dead space volume; increased blood pressure; erratic and abnormal behavior; and, premature death" (GHD Report, at 2). The environmental concerns associated with this Project are discussed in greater depth below.

B. Environmental Concerns: Risks of Release of Hazardous Materials

The Project poses a severe threat to the health of the residents, workers, visitors and others in Manhattan Valley, including any future residents of the proposed facility at the Proposed Site (GHD Report, at 8). The proposed demolition of three parking garages would result in the release of a variety of hazardous materials into the air, including gasoline, polychlorinated biphenyls (PCBs), lead and other metals, asbestos, and polycyclic aromatic hydrocarbon (PAH) compounds, which can cause serious health issues (GHD Report, at 8). Conversely, without demolition, such materials would be contained within the building materials beneath the garages and would not become airborne, posing no health threat (GHD Report, at 8). Each of these environmental hazards is addressed in turn below.

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[5] *See also* Pierre LeLong, "Parking Lots Can Be Hazardous to Your Car and Insurance Rates, www.usagencies.com/blog/parking-lots-can-be-hazardous-to-your-car-and-insurance-rates./ (*citing* Independent Insurance Agents and Brokers of America).

[6] *See* Pedestrian Safety Action Plan Vision Zero, Manhattan (2015), www.nyc.gov/html/dot/downloads/pdf/ped-safety-action-plan-manhattan.pdf.

[7] Pedestrian Safety Action Plan Vision Zero, Manhattan (2015), www.nyc.gov/html/dot/downloads/pdf/ped-safety-action-plan-manhattan.pdf.

1. Gasoline Contamination

Historical maps of the properties reveal the presence of underground storage tanks ("USTs") buried beneath the existing garages (GHD Report, at 9-10). "[USTs] hold toxic material, such as gasoline and waste oil, which contain dangerous substances that can cause cancer and harm developing children."[8] Further, leaking USTs "pose a risk of explosion" (Sierra Club, "Leaking Underground Storage Tanks"). Construction projects and inadvertent drilling are among the top ten causes of UST leaks.[9]

Demolition of the garages and disturbance of the USTs could also result in the release of petroleum or other hazardous substances into nearby soil and groundwater (GHD Report, at 10). This risk is especially serious at the Proposed Site because the USTs buried there were used at a time prior to the EPA regulations of the 1980s, which makes the release of gasoline from at least one of the USTs "almost certain" (GHD Report, at 10). And based on U.S. Department of Transportation data, it is very likely that such gasoline contamination was never cleaned up (GHD Report, at 10).[10] Should the garages be demolished, a release of the gasoline from at least one of the USTs would result (GHD Report, at 10).

Soil contamination also would create a number of exposure issues for the public (GHD Report, at 10). Vapors generated from gasoline contamination can seep into residential buildings and result in eye and respiratory irritation, headaches and/or nausea (GHD Report, at 10-11). Certain vapors associated with gasoline contamination include **carcinogens** such as benzene, toluene, MTBE, PCBs, lead and other cancer-causing agents (GHD Report, at 10-11; Sierra Club, "Leaking Underground Storage Tanks").

Lead found in leaking USTs is a "recognized cause of cancer" and causes "adverse effects on developing children" (Sierra Club, "Leaking Underground Storage Tanks"). The gasoline once used at the Proposed Site most likely contained organic lead, which is extremely toxic (GHD Report, at 11). One form, tetraethyl lead, targets important organs and systems such as the central nervous system, the eyes and the kidneys (GHD Report, at 11). Symptoms of exposure include insomnia and lassitude, anxiety, tremors, weight loss, confusion and hallucinations, or could lead those exposed to comas (GHD Report, at 11). Exposure, even at very low concentrations, has been shown to cause health issues (GHD Report, at 11).

Exposure to other carcinogens, such as benzene, increases the risk of developing cancer (GHD Report, at 10-11). Symptoms of benzene exposure also include anemia, drowsiness and dizziness, rapid heartbeat, headaches, unconsciousness and death (GHD Report, at 11; Sierra Club, "Leaking Underground Storage Tanks").

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[8]Sierra Club, "Leaking Underground Storage Tanks: A Threat to Public Health & Environment," http://www.csu.edu/cerc/documents/LUSTThreattoPublicHealth.pdf.

[9]*See* Allan Blanchard, "Top 10 Causes of Underground Storage Tank Leaks," EMS Environmental, http://emsenv.com/2016/07/21/causes-underground-storage-tank-leaks/ (July 21, 2016).

[10]*See also* Sierra Club, "Leaking Underground Storage Tanks."

2. Release of Other Hazardous Materials

An environmental study commissioned by WSFSSH, the party that has been urging the City to proceed with the Project, itself shows that all three garages were historically used as automotive repair/servicing facilities, which are associated with certain chlorinated and carcinogenic volatile organic compounds ("VOCs").[11] At the 103 West 108th Street garage, for example, there is evidence that 55-gallon drums, car batteries and waste oil were present throughout the building (GHD Report, at 11). Numerous chemicals were stored, used and disposed of in the servicing of vehicles, including fuels, hydraulic oils, brake fluid, coolant and waste oil (GHD Report, at 12). These substances include heavy metals, VOCs, semi-volatile organic compounds ("SVOCs"), and PCBs, all of which are highly toxic (GHD Report, at 12). Prior to use as an auto repair facility, evidence shows that the property at 103 West 108th Street was likely utilized to process iron ore, which also involved the use of heavy metals and fuels (GHD Report, at 12). It is likely that, over the time that the buildings have existed, discharges have impacted fill material beneath them (GHD Report, at 12-13). If the Project were not to proceed at the Proposed Site, there would be virtually no risk of exposure; however, as currently planned, the Project would almost certainly lead to release of these dangerous materials, threatening the health and lives of everyone in the community (GHD Report, at 12-13). These health hazards associated with the release of these various materials are explained in detail below.

(a) Heavy Metals

Exposure to fuel oils and the heavy metals (*e.g.*, copper, lead, and nickel) previously used at the Proposed Site, and that are likely still present beneath the garages, are known to cause severe health problems. Copper exposure can cause, among other things, irritation of the mucous membranes, dizziness, nausea, as well as cumulative lung damage (GHD Report, at 12).[12] Nickel exposure can cause chronic bronchitis, reduced lung function, and cancer of the lung and nasal sinus (GHD Report, at 12).[13] Exposure to fuel oils, depending on the petroleum product, can irritate mucous membranes and the respiratory system, and causes headaches, dizziness and/or drowsiness, among other serious medical issues (GHD Report, at 12).

(b) Lead and Lead-Based Paint

WSFSSH's own Phase I ESA confirms that, based upon the ages of the buildings, lead-based paint may be present (GHD Report, at 12 (*citing* Phase I ESA)). Banned by the Toxic Substances Control Act of 1978, lead-based paint was in widespread use prior to and during the period of time when the buildings housing the garages were constructed (GHD Report, at 15 (*citing* Phase I ESA)).

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[11]GHD Report, at 8 (*citing* Phase I Environmental Site Assessment ("Phase I ESA"), prepared by AKRF, June 2015).

[12]*See also* United States Department of Labor, OSHA, www.osha.gov/dts/chemicalsampling/data/CH_229300.html.

[13]*See also* United States Department of Labor, OSHA, www.osha.gov/dts/chemicalsampling/data/CH_256200.html (Sept. 6, 2012).

Some of the painted surfaces on the buildings were noted to be in poor condition (Phase I ESA). Therefore, there is a high likelihood of lead exposure that would result from demolition (GHD Report, at 15-16).

Lead exposure can have serious health effects, including seizures and death (GHD Report, at 15-16). Children under the age of six and fetuses exposed through lead in their mother's blood are most susceptible (GHD Report, at 15-16).[14] Given the proximity of the buildings to the Aviles Playground, MS54 and the School Playground, the risk of exposure is particularly acute and dangerous.

(c) Asbestos

Demolition of the buildings would cause exposure to asbestos-containing materials ("ACM") (GHD Report, at 13). Asbestos, a "Group A" human carcinogen, was specifically reported to be present in the furnace room at 103 West 108th Street, and based on the age of the existing buildings, is suspected to be present throughout all three buildings (GHD Report, at 13 (*citing* Phase I ESA)).

As the United States Environmental Protection Agency ("EPA") has explained, exposure to asbestos occurs "only when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air."[15] Such disturbance or damage is prevalent "during product use, *demolition work, building or home maintenance, repair, and remodeling*."[16] As is well known, exposure to asbestos is exceedingly dangerous and is known to cause severe and fatal effects, including lung cancer, mesothelioma, and asbestosis (GHD Report, at 13).[17]

(d) PCBs

PCBs, also likely to be present in the buildings given their age and previous use, must be removed very carefully and following strict procedures or they will cause serious health effects. This includes cancer, as well as dangers to various systems of the body, such as the immune system, reproductive system, nervous system and endocrine system (GHD Report, at 14; *see also* Sierra Club, "Leaking Underground Storage Tanks").

C. Economic and Cultural Effects

The Project will certainly have adverse socio-economic impacts on the neighborhood (GHD Report, at 5). Socio-economic impacts are especially important in Manhattan Valley because the area immediate surrounding the Proposed Site is part of specially recognized commercial districts

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[14] *See also* NYC Housing Preservation & Development, www1.nyc.gov/site/hpd/owners/Lead-Based-Paint.page.

[15] EPA, www.epa.gov/asbestos/learn-about-asbestos#asbestos.

[16] EPA, www.epa.gov/asbestos/learn-about-asbestos#asbestos.

[17] *See* EPA, www.epa.gov/asbestos/learn-about-asbestos#asbestos.

created to promote varied and active retail environments (GHD Report, at 5-6).[18] Removal of the three parking garages at the Proposed Site would grossly undermine the very purpose for which these Districts were established by reducing the availability of parking in these areas, resulting in substantial reduction in transient shopping opportunities (GHD Report, at 5-6). The resulting lack of parking would also cause a substantial inconvenience to the shopkeepers and merchants who drive to their small businesses in the area (GHD Report, at 5-6).

Separate and apart from retail losses, there would also be an impact on a major hospital located in the area (GHD Report, at 6). Mount Sinai St. Luke's Hospital utilizes the public parking facility at 1090 Amsterdam Avenue, which has a capacity of 135 parking spaces (GHD Report, at 6). With the removal of the three parking garages at the Proposed Site, the Hospital's lot would absorb the impact of the displaced parking spots used by local residents and workers in the area, including teachers at the local public schools, resulting in fewer available spaces for visitors (GHD Report, at 6 (*citing* Nelson/Nygaard Report)). This, in turn, would create a domino effect, resulting in distracted driving in the area around the hospital, leading to increased pedestrian knock-downs and other automobile accidents (Section I(A), above).

D. Reduced Enjoyment and Use of Nearby Playgrounds

The Project would also curtail the use and enjoyment of playgrounds and sports fields in the area by substantially reducing the amount of sunlight they receive (GHD Report, at 16-17). The Project proposes construction of three 11-story buildings adjacent to the Aviles Playground and across the street from the MS 54 School Playground, including its sports fields (collectively, the "Playgrounds") (GHD Report, at 16-17). The Playgrounds are considered Sunlight-Sensitive Resources of Concern (GHD Report, at 16-17), defined by New York City as "those resources that depend on sunlight or for which direct sunlight is necessary to maintain the resource's usability or architectural integrity."[19]

It is estimated that the proposed 11-story buildings, with approximately 10 feet per floor, would each cast shadows across both Playgrounds, subjecting them to darkness for extended periods throughout the day (GHD Report, at 16-17, and Figure 1). With increased shadows and darkness, the use and enjoyment of the Playgrounds would be largely diminished, if not eliminated (GHD Report, at 16-17).

* * * * * * *

This assortment of environmental, economic and social ills and hazards threatened by this Project, which Manhattan Valley residents understandably have rejected, warrant its full re-evaluation by the City.

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[18]Amsterdam Avenue at 108th Street is zoned as "Special Enhanced Commercial District 2" (EC-2), and Broadway at 108th Street is part of "Special Enhanced Commercial District 3" (EC-3) (GHD Report, at 5). *See* www1.nyc.gov/site/planning/zoning/districts-tools/special-purpose-districts-manhattan.page.

[19]New York City, www.nyc.gov/html/oec/downloads/pdf/2014_ceqr_tm/08_Shadows_2014.pdf.

II. THE WSFSSH PROJECT DOES NOT COMPLY WITH THE FAIR SHARE CRITERIA

Not only would the Project, as currently sited, cause adverse environmental impacts, but worse, it would violate the law. Specifically, under the City Charter, whenever the City locates a new facility or significantly expands or significantly reduces the size or capacity for service delivery of existing facilities, it must conduct a Fair Share Hearing and consider the Fair Share Criteria.[20] The "Fair Share Criteria" require the City to:

> (a) site facilities equitably by balancing the considerations of community needs for services, efficient and cost-effective service delivery, and the social, economic, and environmental impacts of city facilities upon surrounding areas;
>
> (b) base its siting and service allocation proposals on the city's long-range policies and strategies, sound planning, zoning, budgetary principles, and local and citywide land use and service delivery plans;
>
> (c) expand public participation by creating an open and systematic planning process;
>
> (d) foster consensus building;
>
> (e) plan for the fair distribution among communities of facilities providing local or neighborhood services in accordance with relative needs among communities for those services;
>
> (f) lessen disparities among communities in the level of responsibility each bears for facilities serving citywide or regional needs;
>
> (g) preserve the social fabric of the city's diverse neighborhoods by avoiding undue concentrations of institutional uses in residential areas; and
>
> (h) promote government accountability by fully considering all potential negative effects, mitigating them as much as possible and monitoring neighborhood impacts of facilities once they are built.[21]

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[20] *Silver v. Dinkins*, 158 Misc. 2d 550, 601, N.Y.S.2d 366, 369 (Sup. Ct. N.Y. Co. 1993); *Wallabout Community Association v. City of New York*, 2004 WL 2480017, at *1-2 (Sup. Ct. N.Y. Co. 2004).

[21] New York City Municipal Code, Charter and Rules, 62 R.C.N.Y. 6, Appendix A, Art. 2. As one New York State Supreme Court Justice made plain, these factors must be properly evaluated and considered; "[t]o pay lip service to these factors is not enough." *Silver*, 601 N.Y.S.2d at 369.

The Fair Share Criteria are designed "to foster neighborhood stability and revitalization by furthering the fair distribution among communities of city facilities."[22] The Fair Share Criteria assure that the City will:

> further the fair distribution among communities of the burdens and benefits associated with city facilities, consistent with community needs for services and efficient and cost effective delivery of services and with due regard for the social and economic impacts of such facilities upon the areas surrounding the sites.[23]

Manhattan Valley already provides more than 40% of the affordable housing on the entire Upper West Side (which such computation doesn't even include the transitional shelters, supportive special needs housing, and social service facilities for the homeless, drug addicted MICA and other special-needs populations).[24]

In addition, as of 2014, there were at least 28 operating community-based facilities in the Manhattan Valley neighborhood. This includes sixteen (16) residential facilities, which consist of homeless shelters, mental health facilities, and chemical dependency facilities. Aside from the residences, there are also at least nine (9) clinics in Manhattan Valley, five (5) of which serve those with mental health issues, and four (4) of which serve those with chemical dependencies. In addition, there are at least two (2) walk-in soup kitchens and/or food pantries. When compared with other communities throughout the Five Boroughs, it becomes clear that Manhattan Valley already bears far more than its "fair share" of community supportive facilities. *See* Table 1 on the following pages.

[22] *Silver*, 601 N.Y.S.2d at 369 (*citing* New York City Charter, §203(a)).

[23] *Silver*, 601 N.Y.S.2d at 369 (*citing* New York City Charter, §203(a)).

[24] *See Community Board 7 Affordable Housing Database,* www.nyc.gov/html/mancb7/downloads/pdf/affordable_housing_db.pdf.

Table 1
Comparison of Community Facilities
in Manhattan Valley and
Other Neighborhoods

Manhattan Valley	population	**26,000**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:	2	2	10	3	8	3	**28**	0.0011	0.11%

Sutton Place	population	**7,351**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:			2			1	**3**	0.0004	0.04%

BK Heights	population	**20,256**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:	4	3				1	**8**	0.0004	0.04%

Park Slope	population	**44,379**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:	3	1	9	0	2	2	**17**	0.0004	0.04%

SoHo	population	**8,602**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:			2			1	**3**	0.0003	0.03%

Todt Hill	population	**11,000**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:			2			1	**3**	0.0003	0.03%

Battery Park City	population	**13,386**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:			2			1	**3**	0.0002	0.02%

South Slope	population	**17,026**						**Fraction**	**Percent**
	Clinics MH	**Clinics CD**	**Res MH**	**Res CD**	**Res Home**	**Other**	**TOTAL**		
Totals:	1		1		1		**3**	0.0002	0.02%

Community Facililty figures from DCP "Selected Facilities and Program Sites: Shapefile;" population figures from 2010 census, the most recent available, aggregated by census tract.

Table 1 (cont'd)
Comparison of Community Facilities
in Manhattan Valley and
Other Neighborhoods

Tribeca	population	17,016						Fraction	Percent
	Clinics MH	Clinics CD	Res MH	Res CD	Res Home	Other	TOTAL		
Totals:	0	0	0	0	0	0	**0**	0.0000	0.00%

Riverdale	population	14,924						Fraction	Percent
	Clinics MH	Clinics CD	Res MH	Res CD	Res Home	Other	TOTAL		
Totals:	0	0	0	0	0	0	**0**	0.0000	0.00%

Key:

Clinics MH	Outpatient mental health & developmental disability
Clinics CD	Outpatient chemical dependency, narcotics, substance abuse & methadone treatment
Res MH	Residential & inpatient mental health & developmental disability
Res CD	Residential & inpatient chemical dependency, narcotics, and substance abuse
Res Home	Residences for homeless individuals & families, including shelters, SRO's, transient housing
Other	Food pantries, Soup kitchens

Community Facililty figures from DCP "Selected Facilities and Program Sites: Shapefile;" population figures from 2010 census, the most recent available, aggregated by census tract.

Indeed, as reflected in Table I, New York City includes many neighborhoods, including TriBeCa, Riverdale, and Sutton Place, that do not include *any* supportive community facilities. In other communities, the population far exceeds that of Manhattan Valley, and yet they have far fewer supportive community facilities. *See, e.g.,* Park Slope (Population, 44,379 with 17 facilities, whereas Manhattan Valley has a population of 26,000 with 28 facilities).

Under the circumstances, a Fair Share Hearing is required, as is an alternative site analysis.[25] Further, in view of the sampling of alternate sites listed below, it would be advisable for the City (now) to reconsider its selection of the Proposed Site rather than subjecting the parties to the cost and inconvenience of the ULURP process and possible litigation.

III. MANY ALTERNATE SITES FOR AFFORDABLE HOUSING DEVELOPMENT PROJECTS EXIST

Rather than the Proposed Site, there are many other City-owned properties that are suitable alternatives. The Municipal Arts Society ("MAS") recently completed a study detailing City-owned and leased properties throughout the five boroughs of New York City to ascertain plot and land utilization and resources (*See* Exhibit 3, Excerpts of MAS, "Public Assets: City-Owned and Leased Properties" ("MAS Report")).[26] The MAS Report shows that City-owned and leased properties account for almost one-third of New York City's land area (MAS Report). Of the 14,003 City-owned and leased properties, there are more than 3,000 properties with *no current use* (MAS Report, at 16).

As part of the analysis contained in this Memorandum, we conducted a preliminary evaluation of City-owned properties rather than simply assuming that each would satisfy WSFSSH's programmatic needs and objectives. Based upon that evaluation, and after taking into consideration the attributes of the Proposed Site, we have accumulated a list of the following 10 alternate project sites which should satisfy WSFSSH's needs, while assisting the City in achieving its housing objectives – all without disrupting the surrounding community:

---

[25] *Silver*, 601 N.Y.S.2d at 368.

[26] MAS is a well-established and highly-respected, non-partisan non-profit organization. Since 1893, MAS "has been dedicated to safeguarding the City's past while advancing the best ideas for tomorrow." (MAS Website http://www.mas.org/ourwork/). By "[l]everaging [its] network of urban planners, architects, elected officials, activists, and developers, MAS has helped shape the future of New York for over 120 years." (MAS Website, http://www.mas.org/ourwork/).

Alternate Project Sites[27]					
	Boro	**Address/ Description**	**Lot Area (Sq. Ft.)**	**Zoning**	**Additional Information**
1	MN	20 Amsterdam Ave. (currently used as PS 191, scheduled for relocation and thus available for re-use in 2017)[28]	52,575	R8	Near Columbus Circle, 66th Street - Lincoln Center Subway Stations. Note: An R8 zoning designation does not suffer from the same restrictions relative to building height as an R8B zoning district, where the Proposed Site is located. Accordingly, this property offers a considerable advantage over the Proposed Site.
2	BK	1555 Bedford Ave. (Bedford Armory)	122,180	R6	Near Franklin Ave. and Nostrand Ave. Subway Stations. If the property were to be designed with an appropriate "open-area" and the building were to be given due consideration to the sky-exposure plane, the facility could be built to a height of at least 13 stories, and include a substantial parking facility and garden.
3	BK	10th Ave. and 37th St. (Former South Brooklyn Railway ROW)	42,250	M1-2	Residential area on next block. Near 9th Ave. Subway Station. Note: Although situated in an M1-2 zone, WSFSSH should be able to obtain a zoning variance. Certainly, the Board of Standards and Appeals has granted variances in manufacturing zones previously (*see, e.g.,* 256-02-BZ, *160 Imlay St.*), even with respect to for-profit businesses, for which the standard of proof is higher.

[27]This listing is intended to be representative, not exhaustive.

[28]We recognize that this facility was recently slated for use as another school (PS 452). However, our review of the site has confirmed that it is large enough to accommodate both uses simultaneously. And there is precedent for such an arrangement. For example, a plan for a 241-unit affordable housing tower to be built on top of a three-story base consisting of a school and other community amenities at the former site of PS 31 in the Bronx was recently approved and supported by Mayor de Blasio and other city officials. *See* https://cre.nyrej.com/nyc-hpd-hdc-select-dev-team-425-grand- concourse-joint-venture-trinity-financial-mbd-dattner-architect. Indeed, Mayor de Blasio is quoted in the aforementioned article as pointing out the PS 31 Plan is "a model for all housing development in New York's future." *See* https://cre.nyrej.com/nyc-hpd-hdc-select-dev-team-425- grand-concourse-joint-venture-trinity-financial-mbd-dattner-architect. It is noteworthy that Dattner Architects, the architect for the PS 31 plan in the Bronx, is the same architect that was hired by WSFSSH on this proposed Project.

4	BK	2327 Neptune Ave.	68,224	R5	Former Neptune Pumping Station. Near Coney Island Stillwell Ave. Subway Station. Note: Although subject to a more restrictive height limit, the property benefits from a considerably larger lot-size which, coupled with the floor area ratio, allows for more square footage than the Proposed Site.
5	MN	2367 5th Ave. (369th Regiment Armory)	100,575	M1-1	5-story building suitable for partial conversion. Near 145th St. Subway Station. Note: Although designated a landmark, the building may be suitable for adaptive re-use, while, of course, preserving its landmark features. Under the Landmarks Preservation Commission's recently relaxed standard for granting Certificates of Appropriateness, permission for such work should not be difficult to obtain.
6	BX	1250 East 229th Street (Edenwald Community Center Complex)	327,284	R5	Six buildings presently occupy 10% of the property. Some of these were, in the past, used for a school. The site is suitable for redevelopment as combination of school and housing. Near Baychester Ave. Subway Station.
7	BX	1899 Needham Ave. (Open area south of Edenwald Community Center Complex) Block 4890 Lot 2	96,642	R5	Suitable for redevelopment as combination of school and housing. Near Baychester Ave. Subway Station.
8	BX	2050 Bartow Ave.	148,000	C4-3	Co-op City. Existing senior housing on part of site. Express bus stops at Site (Bx6, Bx12).
9	QNS	Open area (between Albert Road and N. Conduit Ave.) Block 11558 Lot 1	52,600	R4-1	Near Aqueduct-North Conduit Ave. Subway Station.
10	SI	Schley Ave. (Open Area between Sampson Ave. and Miles Ave.) Block 4617 Lot 6	50,407	R2	Close proximity to local shopping center. Near SIR Station. Near local and express bus stops (X7, X8, S54).

CONCLUSION

The people of Manhattan Valley believe in and support the development of supportive, low-income and senior housing facilities. As shown above, Manhattan Valley has already demonstrated a willingness to absorb such facilities and welcome their residents into the community. But the circumstances here reflect that, in this instance, adding the facility proposed by WSFSSH and supported by the de Blasio administration would further overburden the community, result in serious environmental harm, pose health risks to community residents, cause adverse socio-economic impacts and create the sort of disruption that the State Environmental Quality Review Act, City Environmental Quality Review, the Zoning Resolution, and the Fair Share Criteria are designed to avoid.

We recognize that the Uniform Land-Use Review Procedure (ULURP) is intended to afford residents the opportunity to participate in the process of evaluating projects such as this one, but, as reflected above, New Yorkers are savvy enough to distinguish between making their voices heard and causing the City to listen. Participation in the ULURP process rarely, if ever, results in outcomes favorable to communities. And, in any event, commencement of the ULURP process would presuppose a level of mayoral support for this Project that this Memorandum and the proof annexed to it make plain would be entirely inappropriate.

There are many other more appropriate project sites available in New York City – particularly in areas which have fewer or, in several instances, no supportive community developments. It is time for the City to stop using Manhattan Valley and other Upper West Side communities as its "municipal basement," and to begin applying the Fair Share Criteria to facilitate a more balanced distribution of supportive community development across the neighborhoods comprising the Five Boroughs. New York City law requires nothing less. And the people of Manhattan Valley, who have already repeatedly done their part and more, intend to insist upon it.

Exhibit 1

SAVE MANHATTAN VALLEY

PO Box 552
New York, New York 10025-9998
info@SaveManhattanValley.org
http://www.savemanhattanvalley.org/
@savemahattanvalley
/savemanhattanvalley

In coalition with: The West Side Federation of Neighborhood and Block Associations: The North West Central Park Multi Block Association, The Dominican Sunday Group, and The Duke Ellington Boulevard Neighborhood Association.

TO: **All Concerned**
RE: **PETITION with 1,730 signatures (158 pages)**
SUBMITTED: **January 2017 - this petition remains active with updates to follow**

We are opposed to the proposal in its present form by the City of New York and West Side Federation for Senior and Supportive Housing and partners (collectively, WSFFSSH) to destroy an important community resource by demolishing three City owned garages on West 108th Street and replace them with a community facility that would be so tall it would violate the existing 8B protective zoning law for new buildings in Manhattan Valley (passed in 2007) and that would drastically change the character of the neighborhood.

Worse, the garages that would be lost, service 800 Manhattan Valley residents (many have used these garages for thirty years), as well as merchants, the Central Park Ambulance Volunteer Unit, St. Luke's Hospital workers, Columbia staff, and others. They offer 725 monthly spaces, and more than 100 daily spaces. With little street parking, and prohibitive costs at non-City owned garages, lower income garage tenants, families and business owners will be hit especially hard. We know of no other instance when WSFSSH has demolished an essential community resource to construct a new facility against the wishes of the neighborhood. We find this unacceptable

And, worst of all, neither the City nor WSFFSSH has analyzed the likely and significant adverse environmental impacts that the conversion of this space would have on the neighborhood which include: increased traffic, more traffic accidents as distracted drivers scour the streets for available parking spaces, air pollution from idling, double-parked cars, population impacts, shadow impacts from the new facility on school yards and playgrounds, noise pollution, and the potential release of lead and other ambient particulates during the years of construction. We oppose the demolition of buildings with lead across the street from a public school without doing a full environmental review that is made available to our community before certification of any application to the City Planning Department. Dust produced during demolition and construction is particularly harmful to children's health and well-being.

We oppose this plan to construct a 400 unit complex without working with our community, without considering the impact on our community that already bears more than its Fair Share compared to the rest of the Upper West Side (Manhattan Valley hosts 40% of the affordable housing on the UWS) and which excludes moderate and middle-income people.

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Exhibit 1A

SIGNATURE PAGES REDACTED

Exhibit 2

Privileged and Confidential

Review of Existing Conditions and Effects Under the "With-Action" Condition

Proposed Parking Garage Demolition and Residential Building Construction
West 108th St. between Amsterdam Ave. and Columbus Ave, Upper West Side, Manhattan

GHD | 135 Raritan Center Parkway Suite 5 Edison New Jersey 08837

11124585 | Report No 1 | February 2017

Table of Contents

1. Scope of this Report 1
2. Executive Summary 1
3. Methodology and Assessments of Effects of the "With-Action" Condition 3
   - 3.1 Increased Rate of Traffic Accidents – on-Street Parking 3
   - 3.2 Increased Demand for Off-Street Parking 4
   - 3.3 Economic and Cultural Effects 5
   - 3.4 Air Quality and Greenhouse Gas Emissions 6
   - 3.5 Hazardous Materials 8
   - 3.6 Potential Environmental Concerns in Soil and Groundwater 10
   - 3.7 Potential Environmental Concerns in Parking Garage Building Materials 13
   - 3.8 Tier I and Tier II Shadow Assessment 16
4. Additional Concerns Identified in the CEQR Technical Manual 17
5. Conclusions 17

Table Index

Table 1 Greenhouse Gas Emissions Calculation Summary 7

Figure Index

Figure 1 CEQR – Tier II Shadow Assessment

Attachment Index

Attachment A Findings – Review of Nelson/Nygaard Traffic Study

1. Scope of this Report

GHD Services, Inc. (GHD) prepared this Report which includes an expert review of available background documents and an assessment of selected technical areas that are listed in the City Environmental Quality Review (CEQR) Technical Manual dated March 14, 2014. The Report identifies negative impacts on the community that would result under the with-action condition: demolishing three parking garages and constructing two 11-story buildings and a six-story building in the footprint of the former garages. Portions of the 11-story buildings will be seven stories and nine stories. The garages are all located in the block bordered by West 108th Street, West 109th Street, Amsterdam Avenue, and Columbus Avenue. Specifically, the parking garages are designated as 103, 143, and 151 West 108th Street. The proposed demolition and construction work would be completed in two phases, with Phase I including the demolition of three properties, including two of the parking garages, and Phase II including demolition of the final parking garage (103 West 108th Street). One 11-story building would be constructed during Phase I on the site of the three westernmost properties, and a second 11-story building would be constructed during Phase II at 103 West 108th Street.

Background documents that were available for review include the following:

- A drawing prepared by GZA Geoenvironmental (GZA), entitled "Sampling Location Plan", and dated February 2016;
- "West 108th Street Development Parking Study", prepared by Nelson/Nygaard dated March 2016 and revised June 2016;
- Sanborn Maps dated 1897 and 1933;
- Historical aerial photographs dated 1953, 1954, 1966, 1974, 1979, 1980, 1987, 1995, 2004, 2006, 2008, 2009, 2010, 2011, 2012, and 2013;
- Dattner Architects Presentation dated June 15, 2016; and,
- "103-107 and 143-159 West 108th Street, New York, New York – Phase I Environmental Site Assessment" (Phase I ESA), prepared by AKRF dated June 2015.

2. Executive Summary

The with-action condition is contrary to New York City policies and zoning amendments, including the following:

- Zoning Amendment N 130105 ZRM;
- 2015 Pedestrian Action Plan Vision Zero; and,
- Establishment of Special Enhanced Commercial Districts 2 and 3 (aka, EC-2 and EC-3).

Should the project to demolish the parking garages along West 108th Street be completed (with-action condition), a number of significant negative impacts would likely occur. The following is a list of some of these impacts:

TRAFFIC-RELATED IMPACTS

- At a time when the New York City Mayor's Office of Sustainability has set aggressive goals for reducing greenhouse gas emissions, the with-action scenario will generate over 410 tons of excess greenhouse gas emissions annually at and in the vicinity of West 108th Street. Prolonged exposure to carbon dioxide emissions has been shown to cause health effects including the following: increased lung dead space volume; increased blood pressure; erratic and abnormal behavior; and, premature death. Although more study is needed, the current estimate is up to 800 premature deaths across the United States annually due to carbon dioxide exposure (0.03% increased risk of premature death each year).
- At a time when Mayor DeBlasio has implemented, with its "Vision Zero" policy (The **2015 *Pedestrian Safety Action Plan Vision Zero)***, changes designed to minimize significant pedestrian injuries and deaths, the increased number of drivers looking for parking will likely increase such injuries and deaths in the vicinity of the project site at West 108th Street and as far west as Broadway. Children attending a neighboring middle school are particularly at risk of pedestrian knock-downs as distracted and frustrated motorists search in vain for parking;
- Increased demand for off-street parking, including at a lot that services Mount Sinai St. Luke's Hospital visitors;
- Reduction in car-sharing opportunities, including the current car-sharing program at the parking garage at 143 West 108th Street;

DEMOLITION-RELATED IMPACTS

- During demolition and construction, increased exposure to residents, passersby, and workers to such carcinogens as benzene and polychlorinated biphenyls, which are currently trapped in the soil and groundwater below the existing parking garages. These carcinogenic materials would be released during demolition and construction.
- Increased exposure to children, both residents and students at the Booker T. Washington Middle School, to lead that is currently contained in soil under the parking garages and in paint used at the parking garages. Lead exposure during demolition has been linked to higher concentrations of lead in children's blood and learning disabilities. Among the general adult population, lead exposure can also cause anemia and damage to the central nervous system, kidneys, and immune system.
- Release of airborne asbestos fibers, which are known to cause lung cancer, mesothelioma, and asbestosis. There is no known safe exposure duration or frequency to asbestos fibers, and asbestos is present in at least the 103 West 108th Street parking garage; currently, the asbestos is contained within building materials, but upon demolition of the parking garage, the asbestos fibers would be released into air.
- Vapors under the current parking garages would migrate upwards and into the proposed residential buildings. Exposure to the carcinogen benzene and other volatile organic vapors is limited now, due to the use of the land for parking garages, but the vapor exposure would be more significant once the proposed residential buildings are constructed.

NEW CONSTRUCTION-RELATED IMPACTS

- Loss of reasonable and expected use and enjoyment of the adjacent parks located on the north and south side of West 108th Street. Construction of the taller residential buildings will also result in an additional shadow cast over the parks, which are Sunlight-Sensitive Resources.

Note that certain of these construction impacts may be ameliorated to a limited extent by best practices during construction and demolition. For example, best practices for lead-based paint removal include moistening the painted surfaces prior to demolition. However, while this practice may reduce the concentration of lead in airborne dust, studies have shown that lead concentrations remain elevated in airborne dust even after moistening.

3. Methodology and Assessments of Effects of the "With-Action" Condition

Sections 3.1 through 3.8 provide the data, calculations, references, and studies that GHD relied upon in determining the negative impacts that would result from the with-action condition.

TRAFFIC-RELATED IMPACTS

3.1 Increased Rate of Traffic Accidents – on-Street Parking

Reducing parking facilities at 108th Street will result in an immediate increased demand for on-street parking. On-street parking spaces in the vicinity of West 108th Street are already at a premium, as shown in the street-level Google Earth photo below.

Studies show that looking for parking spaces leads to unnecessary driving and air emissions and to distracted driving. The group Transportation Alternatives, which is based in New York City,

determined that drivers seeking parking spots account for 28% of traffic in Soho and 45% in Park Slope. While other parts of Manhattan have had lower rates (minimum rate of 8%), this still accounts for dozens of excess miles driven each day while drivers circle the block looking for available parking. Increased driving means increased vehicle emissions, increased pedestrian and resident exposure to vehicle emissions, and excess greenhouse gas emissions.

Increased driving distance also translates to increased accidents. Although the drivers looking for parking spaces are not speeding, they are distracted. Accident rates and other statistics for drivers distracted while looking for a parking space are not readily available, but the conditions in the vicinity of West 108th Street (high density of pedestrians, high density of motor vehicles, and drivers distracted while looking for a parking space) are similar to parking lots. State Farm estimates that 1 in 5 traffic accidents take place in parking lots. Among the five most frequent causes is drivers paying more attention to finding a parking spot than to driving safely. Other studies (Stark, 2012; Insurance Institute for Highway Safety) estimate that between 15% and 30% of severe pedestrian injuries caused by vehicle-pedestrian collisions occur in parking lots. Further, even though the drivers looking for parking are driving slowly, over 3 in 5 vehicle-pedestrian accidents result in significant injury (Stark, 2012). GHD fully expects that demolishing the parking garages will result in increasing vehicle-vehicle and vehicle-pedestrian accidents – and significant injuries - in the neighborhood at and surrounding West 108th Street.

This is particularly concerning insofar as the area with the most significant increase in traffic congestion owing to the loss of available off-street parking will be directly adjacent and in close proximity to a middle school exposing young children to the increased risk of pedestrian knock-downs caused by distracted motorists in search of on-street parking, the availability of which is extremely limited even now.

3.2 Increased Demand for Off-Street Parking

The net effect of adding residential housing and reducing off-street parking is to displace parking to on-street parking and nearby parking garages. Effects of the increased demand for on-street parking on accident rates are discussed in Section 3.1. The alternative off-street parking (i.e., garages) will not meet the increased demand for parking. Please see Attachment A, which summarizes the findings of GHD's traffic engineer regarding parking resources in the vicinity of West 108th Street.

Even if the remaining parking garages in the area were to prove sufficient to accommodate the displaced vehicles (and they will not be sufficient), the reviewed resources do not offer information regarding the effect on pedestrian traffic. The 2015 *Pedestrian Safety Action Plan Vision Zero (*2015 Pedestrian Plan*)* identified Broadway as a Priority Roadway. Priority Roadways were identified based on traffic density and the high number of automobile accidents and fatalities relative to other roads in Manhattan. Over 8% of the alternative parking spaces are located west of Broadway, which is identified as a Priority Roadway in the 2015 Pedestrian Plan. The high number of traffic accidents along Broadway will be exacerbated as residents who now park on the east side of Broadway will be forced to garages west of Broadway and will cross Broadway to return home. The 2015 Pedestrian Plan recommends that "larger-scale engineering projects can provide pedestrians with shorter crossing distances and safer routes to cross the street, while more effectively managing all traffic movements". Moving available parking to locations further away from residential

neighborhoods, including potentially re-routing pedestrians across Broadway, is not in accordance with the 2015 Pedestrian Plan recommendation. Certainly, at a minimum, pedestrian safety accommodations would be necessary under the with-action condition. GHD has not been informed that any safety accommodations are planned as part of the with-action condition.

The Manhattan Core Public Parking Study concludes that, among other things, even *before* the loss of the parking garages and the hundreds of off-site parking that would be occasioned by their demolition, "limited amounts of new parking are still needed." Also, "the supply of existing off-street spaces in which these cars can park is expected to continue to decline as surface lots and garages are redeveloped." In order to support economic development and to meet the needs of hospitals and sites of large public assembly, "some new parking beyond as-of-right levels will be necessary." In support of these statements, a zoning text amendment was drafted and became known as N 130105 ZRM. This zoning amendment was reviewed and overwhelmingly approved by representatives of residents in Community District 7, which is where the West 108th Street parking garages and proposed development is situated. N 130105 ZRM states that, in certain conditions, city officials should consider allocation of parking spaces beyond the 1982 maximum number of spaces per dwelling unit. Among those conditions are situations where parking deficits exist and where curbside parking is useful in support of businesses. The with-action scenario is contrary to this zoning amendment.

3.3 Economic and Cultural Effects

The CEQR Manual lists 200 residential units as the appropriate threshold for determining whether new development that is different from existing use would impact the no-action socioeconomic conditions in a neighborhood. The with-action condition includes the development of approximately 220 residential units (estimated based on calculated square footage of the proposed buildings divided by an average 750 square foot apartment size provided by the 2013 Housing Profile: New York City, NY (Issued May 2015)). As such, the with-action scenario exceeds this threshold and review of the effect on socioeconomic conditions is appropriate.

Within 0.5 miles of West 108th Street, the competition for parking is anticipated to increase under the with-action scenario. As such, the availability of on-street parking is anticipated to decrease, and this decrease in available on-street parking will have an indirect effect on usage of the nearby parks and businesses. Amsterdam Avenue at 108th is zoned as a "Special Purpose District" referred to as Special Enhanced Commercial District 2 (EC-2) and Broadway at 108th is referred to as Special Enhanced Commercial District 3 (EC-3).

According to the New York City's Mayor's Office, EC-2 was "created to maintain, over time, the general multi-store character of Amsterdam and Columbus Avenues, while promoting a varied and active retail environment. The special district provisions apply ground floor frontage limitations for most new and expanding retail and commercial establishments and residential lobbies, and retail transparency requirements for new buildings. Overall store sizes are not restricted, and stores can be laid out with any configuration, including the basement, second story, wrapping behind, or along corner frontages." EC-3 was "created to promote a varied and active retail environment while maintaining the retail continuity found along the Broadway corridor. The special district provisions apply ground floor frontage limitations for new and expanding banks and residential lobbies, and retail transparency requirements for new buildings." In developing the Special Enhanced

Commercial Districts, New York City endeavored to maintain community shops and the character of the neighborhood. Reducing the availability of parking in the immediate vicinity of the Special Enhanced Commercial District is contrary to the establishment of this zone, and the with-action condition will have an indirect economic effect on the neighborhood businesses, including a reduction in transient shopping opportunities, a substantial increase in inconvenience to consumers who use automobiles to reach shopping destinations, and adverse impacts on shopkeepers and other merchants who use their cars to commute to and from their small businesses in the area..

The parking garages cited in the Nelson/Nygaard report, entitled *West 108th Street Development Parking Study*, are used primarily by residents, who maintain month-long leases of parking spots. However, the parking in this area also supports use of Central Park, Morningside Park, the Cathedral of Saint John the Divine, among other resources. The with-action condition on parking for these socioeconomic resources needs to be considered. As a further example of this effect, the Mount Sinai St. Luke's Hospital utilizes the public parking facility at 1090 Amsterdam Avenue, which has a capacity of 135 parking spaces, according to the Nelson/Nygaard report. Although no usage statistics are provided for this parking garage in the Nelson/Nygaard report, the report claims that the displaced parking under the with-action condition will be partly absorbed by the 1090 Amsterdam Avenue lot. The study is likely correct regarding the overflow parking, and under the with-action condition, increased use of the 1090 Amsterdam Avenue lot will come at the expense of those who are visiting patients in the hospital.

3.4 Air Quality and Greenhouse Gas Emissions

The with-action condition would result in worsening air quality in Community District 7 and is contrary to the Mayor's Office of Sustainability goals for reduction in citywide greenhouse gas emissions. The with-action condition will result in an estimated 220 residential units being constructed. Based on the 2014 *CEQR Technical Manual,* this will result in an extra 1,777 daily person trips per weekday day and 2,112 daily person trips per weekend day which equals 13,107 additional trips per week (based on 8.075 person trips per dwelling unit on weekdays and 9.6 person trips per dwelling unit on weekends as stated in Table 16-2 CEQR Chapter 16 - Transportation) into and out of Community District 7. Assuming each trip is approximately 1.25 miles, which is half the length of Community District 7, this equates to a total of 16,384 miles of excess driving of excess driving each week. The U.S. Department of Transportation, Federal Transit Administration document entitled *Public Transportation's Role in Responding to Climate Change*, updated January 2010, indicates that automobiles produce approximately 0.96 pounds of carbon dioxide per mile. As such, the with-action condition would be expected to generate more than 410 tons of carbon dioxide emissions per year more than under the no-action condition. See Table 1 below for calculation details.

Table 1 Greenhouse Gas Emissions Calculation Summary

Value	Description
8,883	Additional Weekday Day Trips
+ 4,224	Additional Weekend Day Trips
= 13,107	Total Trips for 220 Dwelling Units
X 1.25	Assumption that each trip = 1.25 miles
= 16,384	Additional Miles per Week for 220 Dwelling Units
X 0.96	Pounds of Carbon Dioxide per Mile
= 15,728	Pounds of Additional Carbon Dioxide per Week
X 52	Weeks per Year
= 817,877	Pounds of Additional Carbon Dioxide per Year
/ 2,000	Pounds per Ton
= 410	Estimated Tons of Additional Carbon Dioxide per Year[1]

Note that greenhouse gas emissions have typically been thought of as a global issue. However, in the past decade or so there has been a debate about the effect of carbon dioxide emissions on local health ("Can Local 'Domes' of Carbon Dioxide Affect Local Health?" *Scientific American*, March 17, 2010). The theory is not that carbon dioxide affects residents directly, but rather that the carbon dioxide creates a "dome" that allows buildup of other, more harmful gases below the dome. Stanford University professor Mark Jacobson has published estimates that this effect could cause the premature death of 50 to 100 people per year in California and 300 to 1,000 across the continental U.S.(*Scientific American*, March 17, 2010). As such, the with-action scenario will likely result in an increased premature death rate in the vicinity of West 108th Street.

In addition, car-sharing capabilities will be reduced under the with-action scenario. Car-sharing is a relatively new concept wherein people share cars that are stationed at locations throughout the city. This arrangement allows people to obtain a car when needed and pay for its use. The car is maintained periodically by the car-sharing company. This arrangement is acknowledged to be an efficient method for utilizing parking resources and minimizing greenhouse gas emissions. However, car-sharing vehicles face restricted parking in New York City. In "Car Sharing: State of the Market and Growth Potential" by Chris Brown, dated March/April 2015: "not all cities can accommodate a free-floating [car-share] system, especially if parking is limited or difficult." As shown in the West 108th Street Development Parking Study, Nelson/Nygaard report, car-sharing operations tend to be located at parking garages, given that on-street parking is in demand and

[1] This computation does not even take into consideration the extent to which drivers will likely be forced to drive longer distances as they: (i) slowly circle blocks attempting to locate ever more scarce on-street parking (driving slowly results in higher emissions rates); and/or (ii) utilize parking locations further away from their departure and intended arrival points because of the absence of off-street and on-street parking. Were these dynamics factored into the above analysis, the computation of additional Carbon Dioxide emissions would likely be considerably more severe.

time-limited. In fact, a car-sharing operation currently exists at 143 West 108th Street, which is the site of one of the parking garages to be demolished.

Further, New York City Zoning application N 130105 ZRM acknowledges the need to manage parking spaces as a resource. The document recommends special permits to allow excess parking beyond the maximum levels established in 1982, if certain conditions are met. These conditions include 1) where a parking deficit is created by the elimination of parking spaces through proposed development and 2) where reasonable actions, including vehicle sharing, can be taken to minimize parking demand. The with-action scenario proposes changes that will certainly create a parking deficit in the immediate vicinity of West 108th Street, and possibly throughout Community District 7. Further, the demolition of these parking garages will lower the potential for carsharing opportunities, which is contrary to New York City policies.

3.5 Hazardous Materials

GHD environmental experts reviewed the potential for hazardous materials to be present in the materials that comprise the parking garage and in the soil and groundwater beneath the parking garages as a result of their operation over the past almost 100 years. Our review has concluded that polychlorinated biphenyls, lead and other metals, asbestos, and polycyclic aromatic hydrocarbon (PAH) compounds may be released during demolition and construction activities, and that benzenes and other VOC's likely exist in the soil beneath the garages. So long as these materials are contained within the building materials and beneath the parking garages, they pose no threat to public health. However, when the building materials are broken and removed from the site during demolition, these hazardous materials are released, become airborne, and can cause significant health issues for nearby residents, workers, and others near the properties.

In coming to this conclusion, GHD reviewed historical documents that showed past land use at and adjacent to the parking garage sites. Then, we assessed the likely hazards associated with selected materials and land uses. Case studies of demolition sites where the hazardous substances were encountered in building materials are offered, as are the potential health effects of the hazardous materials.

This historic land use review was completed by assessing Sanborn Maps dated 1897 and 1933, historic aerial photographs available online via Historicaerials.com, and the Phase I ESA. During this review there was no specific information found that identified what the land use was in this area prior to 1897.

It is important to note that the Phase I ESA, while conforming to the minimum requirements of ASTM Standard 1527, did not conclusively demonstrate the presence or absence of non-scope issues that are commonly included in Phase I ESA reports. Such non-scope issues include lead-based paint and asbestos. Further, the Phase I ESA identified a number of environmental concerns and recommended that these issues be further evaluated by completion of a Phase II ESA. However, the Phase II ESA has not been initiated.

Sanborn Fire Insurance Map Dated 1897

The Sanborn Fire Insurance Map dated 1897, identifies the locations of all three parking garages that currently exist as being "Brick building with frame cornice". In 1897, the buildings are smaller

than the current garages indicating that they had not yet been built. In addition, it identifies the area which is currently 103 West 108th, New York, NY as "Iron Works".

Sanborn Fire Insurance Map Dated 1933

The Sanborn Fire Insurance Map dated 1933, identifies that all three parking garages existed. The three garages are identified as being "Brick building with frame cornice" and each is noted "Garage" on the map and have a similar size to the current garages indicating they are the same structures.

Historic Aerials

The historic aerial photograph record available online was reviewed via Historicaerials.com. This record includes the following years: 1953, 1954, 1966, 1974, 1979, 1980, 1987, 1995, 2004, 2006, 2008, 2009, 2010, 2011, 2012, and 2013. From 1953 to 2013 there is no noticeable land use change for these properties and the three existing garages are shown in all aerial photographs as being similar size and appearance.

Phase I ESA

The following is a summary of land uses identified in the Phase I ESA based on review of 23 Sanborn Fire Insurance Maps from 1902 to 2005. These land uses typically result in the presence of hazardous materials in soil and groundwater that persist, even when the original industrial buildings and infrastructure have been demolished.

"To summarize, the historical Sanborn maps indicated that the Property was occupied prior to 1902 by dwellings at 143 -159 West 108th Street, and a paints and storage building at 103-107 West 108th Street. The historical buildings were demolished at various times between 1902 and 1920, with the exception of the building at 145 West 108th Street, which was demolished around 1980. Buildings consistent with the current structures on the project site were shown on the 1951 map.

The maps showed buried gasoline tanks at the existing garages. Tanks were identified at three of the four Property lots: two gas tanks at 103-107 West 108th Street in 1951, three 550-gallon buried gasoline tanks at 143 West 108th Street between 1951 and 2005, and four 550-gallon gasoline tanks at 151-159 West 108th Street between 1951 and 2005." As noted below in Section 3.6, a number of these tanks may remain buried at the properties.

The Phase I ESA continues, "The surrounding area was mixed-use throughout its history, with mostly commercial and residential uses, some auto-related uses and factories in the mid-20th century, and some educational uses in the middle and late 20th century. Land uses in the surrounding area with the potential to affect subsurface conditions beneath the Property included factories, paints and storage facility, auto repair, and garages and filling stations with gasoline USTs, including the historic gasoline tank noted in the current playground between the Property lots." In addition, the Phase I ESA indicates that all three garages were historically used as automotive repair/servicing facilities, which are associated with certain chlorinated and carcinogenic VOCs.

3.6 Potential Environmental Concerns in Soil and Groundwater

Specific land uses and structures typically result in releases of specific hazardous materials. This section identifies selected land uses and structures that are known to be or to have been present at or adjacent to the parking garages. This section also evaluates the harmful effects of exposure to these hazardous materials.

Underground Storage Tanks (USTs)

According to the Environmental Protection Agency (EPA), there are approximately 563,000 active USTs (at approximately 202,000 sites) which are regulated by the UST technical regulations and since 1984 more than 1.8 million USTs have been properly closed. There is a potential that USTs installed to support the garages or other uses are still present and may be uncovered during any demolition activities. In addition, there is the potential of disturbing an unknown deteriorating UST which could result in the release of petroleum or other hazardous substance into the soil and groundwater.

The Phase I ESA identified USTs that were previously used to store gasoline at 103-107 West 108th Street (two USTs), 143 West 108th Street (three USTs), 151-159 West 108th Street (four USTs), and the surrounding area (number of USTs not reported). The USTs at 103-107 and 143 West 108th Street were reportedly used from at least 1951, and the USTs may or may not remain. The four USTs at 151-159 are believed to remain in place, as gauges for the tanks were observed during site reconnaissance activities in early 2015. Note that the USTs at 143 and 151-159 West 108th Street were situated beneath the building footprint. The status of other USTs in the area is unknown.

The US Environmental Protection Agency (EPA) notes that prior to regulations in the mid-1980s, the majority of USTs were steel, single-wall tanks. These USTs corroded and released materials into the soil and groundwater. The U.S. Department of Transportation tracks UST discharge statistics for locations throughout the United States. More than a half million discharges from USTs have been documented throughout the United States, and an alarming 71,000+ releases have not been completely cleaned up. The ages of the USTs at all three parking garages make a release of gasoline from at least one of the USTs almost certain, and the gasoline contamination is unlikely to have been completely cleaned up, as the building floor and foundation would constrain soil excavation.

The Phase I ESA recommends that additional investigation of soil and groundwater impacts is warranted in connection with the listed USTs. Should such investigation indicate (the likely) soil contamination, demolishing the buildings and constructing residential buildings would create a number of exposure issues:

- Conversion of the parking garages, which are relatively open to the outside atmosphere, to residential buildings will tend to concentrate any volatile organic vapors indoors. The vapors that are generated from gasoline contamination below the building may seep into the building through cracks in the foundation or utility pipe penetrations through the foundation. The EPA's document entitled "What You Should Know about Vapor Intrusion" warns that "people may experience eye and respiratory irritation, headaches, and/or nausea."

- Vapors of certain compounds known to be associated with gasoline contamination, such as benzene, are known carcinogens. The exposure to low concentrations of benzene for a long period of time can raise the risk of developing certain types of cancer, as documented in the EPA paper "What You Should Know about Vapor Intrusion."
- So long as the gasoline contamination remains below the existing buildings, there is little risk of exposure except by vapor intrusion. However, building demolition and subsequent subsurface work will mobilize the vapors and contaminated soil. Subsurface work is a necessary part of construction, as most utility lines are installed underground and foundations may be required to the top of bedrock. As such, workers and passerby will be exposed to vapors. The concentration of benzene vapors for construction workers is as low as 1 part per million (ppm), as governed by the Occupational Safety and Health Administration (OSHA) regulations. The Center for Disease Control's document "Facts about Benzene" provides information regarding the effects of benzene on the human body and the symptoms of benzene exposure. Benzene generally causes human cells not to work properly: for example, benzene "can cause bone marrow not to produce enough red blood cells, which can lead to anemia." Symptoms of benzene vapor exposure range from drowsiness and dizziness to rapid heartbeat to headaches to unconsciousness and death.
- Given that the gasoline was stored and used at these parking garages before the mid-1980s, it is likely that the gasoline contained organic lead. Organic lead is potentially more toxic even than benzene, with exposure limits to skin and mucous membranes of as low as 0.075 ppm. Tetraethyl lead, one of the forms of organic lead, targets such important organs and systems as the central nervous system, the eyes, and the kidneys. Symptoms of exposure range from insomnia and lassitude to anxiety and tremors to weight loss to confusion and hallucinations and finally to coma.

In summary, USTs that stored gasoline are known to be present at the parking garages. Given the age of the USTs, there is a high likelihood of a release of gasoline and gasoline contamination below the parking garages. So long as the parking garages remain in place, the effect on human health is likely to be low: the parking garages are well ventilated and the duration of any one person's exposure to any vapors that may seep into the building is limited to a work shift. However, replacement of the parking garages with residential properties would result in vapor accumulation and longer and more frequent exposure to vapors by residents. Further, the demolition of the buildings would expose workers and passerby to the contamination that is currently trapped beneath the parking garages. Components of gasoline are known carcinogens, and exposure at even relatively low concentrations – one part per million or less – has been shown to cause health issues.

Hydraulic Lifts/Automotive Repair/Servicing Facilities/Floor Sumps

The Phase I ESA identified that historically the 103 Parking Garage was an auto repair facility, the 143 Parking Garage was a Cadillac Service Station, and that there were indications that 151 Parking Garage was also used as an auto repair facility and in-ground hydraulic lifts may have existed at all three buildings. The current operator at 143 Parking Garage stated that he believed in-ground hydraulic lifts existed for previous building uses. In addition the following concerns were identified:

- 103 Parking Garage – Current operator stated that there used to be 55-gallon drums, car batteries, and waste oil throughout the building.
- 143 Parking Garage – Currently there are above ground hydraulic lifts in use to store vehicles at the parking garage. There are floor drains and a large sump noted. The discharge point is unknown.

Numerous chemicals are stored, used, and disposed in the process of servicing vehicles including fuels (gasoline, diesel, etc.), hydraulic oils, brake fluid, coolant, and waste oil. These substances can include heavy metals, Semi-volatile Organic Compounds (SVOCs), Polychlorinated Biphenyls (PCBs), and/or Volatile Organic Compounds (VOCs) that are toxic. It is unknown where these substances may have migrated if disposed at the sump located at 143 Parking Garage or through cracks in the foundations at any of the building locations; however, it is likely over the time that the buildings have existed that discharges have impacted the fill material beneath them.

Fill Material beneath Parking Garages

The Phase I ESA identifies the potential that lead, PCBs, and/or Asbestos-Containing Materials could exist in the fill material beneath the parking garages. If contaminants are uncovered this could lead to exposure and health concerns as described below in Section 2.6 for lead, PCBs, and/or Asbestos-Containing Materials from the fill material. These contaminants would likely have been placed prior to constructing the buildings; however, additional contaminants may have been disposed via the floor drains/sumps or cracks in the building foundations. Contaminants could also include VOCs, SVOCs, and/or heavy metals among others. If these toxic contaminants exist, they may be uncovered during demolition activities. The demolition of the buildings would expose workers and others in the vicinity to any contamination that is currently trapped beneath the parking garages.

Steel Manufacturing

The 1897 Sanborn Map identified the current property that is located at 103 West 108th as "Iron Works" indicating that this property was potentially used to process iron ore before environmental regulations were in place or the negative consequences of production were common knowledge. Processes included in iron and steel manufacturing include steelmaking, vacuum degassing, ladle metallurgy, casting, hot forming, forging, and finishing processes. Byproducts of iron works operations include slag, which is a source of heavy metals and PAH compounds. The heavy metals are not limited to iron, as metals such as copper, lead, and nickel are common impurities in iron ore. Additionally, the fuel source for melting the ore was typically fuel oil No. 2 (approximately the same consistency as disel fuel) or No. 4 or diesel fuel.

Among the heavy metals is lead, which is known to cause a number of mild to severe health effects. The health effects of lead are summarized in Section 3.7, below. Copper exposure can cause irritation of the mucous membranes, dizziness, and nausea. The health effects linked to exposure of nickel in soil or dust depend on the nickel compound contacted/inhaled. In more toxic and less soluble forms, nickel exposure can cause chronic bronchitis, reduced lung function, and cancer of the lung and nasal sinus. Effects of exposure to fuel oils are variable and depend on the chemical composition of the petroleum product. In general, petroleum products can irritate mucous membranes and the respiratory system and can cause headaches, dizziness, and/or drowsiness.

Brewery Concerns

The 1933 Sanborn Map identified the current property that is identified as Anibal Aviles Playground on Figure 1 and located between the two properties that are proposed to be re-developed, as the former Lion Brewery. While the brewing operation itself is not believed to have caused impacts, ancillary operations may have resulted in the presence of hazardous materials at this property. The most likely hazardous material is petroleum product that was used to produce heat which is an important component of the brewing process. Heating was typically accomplished using diesel or No. 2 Fuel Oil that was stored in aboveground or underground tanks. Further, volatile or semi-volatile organic materials compounds could potentially have impacted groundwater, including groundwater beneath the parking garages. While not critical so long as the parking garages are in place, a change in land use would result in vapor intrusion that would affect residents' health.

3.7 Potential Environmental Concerns in Parking Garage Building Materials

The following are a list of potential concerns associated with the materials used during construction of the parking garages if the garages are demolished. These are based on known common materials used during construction at the approximate timeframe (1897-1933) the parking garages were constructed. Further, the Phase I ESA identifies building materials observed in the parking garages that commonly contain asbestos or PCBs. Given that the parking garages are decades old, pain in the buildings is likely to contain lead, and the potential for lead-based pain is also noted in the Phase I ESA.

Asbestos-Containing Materials

Asbestos is a mineral fiber that occurs naturally in rock and soil and because of its fiber strength and heat resistance it has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of other building materials including roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products. Asbestos started being used in the late 1860s and by the 1870s was being sold on a mass scale. Asbestos has been mixed into concrete since the 1870s, and it is also commonly found in roofing materials. Exposure occurs when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air which may occur during demolition work if asbestos-containing materials are present. Exposure to asbestos is known to increase the risk of developing lung disease with disease symptoms usually taking many years to develop following exposure. Three major health effects associated with asbestos exposure are lung cancer, mesothelioma (rare cancer found in the thin lining of the lungs, chest, abdomen, and heart), and asbestosis (progressive long-term non cancer disease of the lungs). Asbestos has been classified by the EPA as a Group A known human carcinogen. Asbestos is likely in building materials at all the parking garages, but it was reported to be present specifically in the furnace room at the 103 West 108th Street Parking Garage.

Typical concentrations in indoor air when asbestos is released from building materials including insulation and ceiling and floor tiles ranges from 0.001 to 0.2 fibers per cubic centimeter. This number could be higher during demolition activities depending on the level of disturbance and mitigation methods deployed. For comparison, the OSHA regulations state that the Permissible

Exposure Limit (PEL) for asbestos is 0.1 fiber per cubic centimeter of air as an eight-hour time-weighted average (TWA), with an excursion limit (EL) of 1.0 asbestos fibers per cubic centimeter over a 30-minute period.

Polychlorinated Biphenyl (PCB) Containing Caulking

Polychlorinated Biphenyls (PCBs) are a group of man-made organic chemicals which are known as chlorinated hydrocarbons. The number and location of chlorine atoms determines many of the physical and chemical properties. They have no known taste or smell and can range from oily to waxy solid. PCBs were manufactured domestically from 1929 until 1979 when manufacturing was banned. PCBs range in toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. PCBs were used for hundreds of different industrial and commercial applications due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties. One of these applications was as an additive to caulking to improve the flexibility of the material increase the resistance to mechanical erosion, and improve adhesion to other building materials. Additionally, PCBs improved the non-flammability, chemical stability, electrical insulating properties, and flexibility of the caulk.

According to the EPA, caulking that was placed between 1950 and 1979 may contain as much as 40 percent PCBs and can emit PCBs into the surrounding air. The following PEL and TWA regulatory limits exist under OSHA for PCBs: 1) Chlorodiphenyl (42% Chlorine) = 1 mg/m^3 and 2) Chlorodiphenyl (54% Chlorine) = 1 mg/m^3. PCBs from caulk may also contaminate adjacent materials such as concrete, masonry, or wood. EPA has only found the chemical in caulk in large older buildings. If the caulking in these garages was replaced from 1950 to 1979 is likely that it contains PCBs and that the surrounding building materials could also be impacted by the PCBs. These would have to be removed using methods to ensure a lower volume of dust, absence of heat, and protection of workers, the environment, and public.

PCBs can cause a variety of adverse and interrelated health effects including cancer and other issues related to the immune system, reproductive system, nervous system, and endocrine system. There is evidence from studies in humans that supports the potential carcinogenic and non-carcinogenic effects of PCBs. The following case studies document the presence of PCBs in building materials and also the requirements for handling and disposing of the PCB-containing materials.

Case Study 1 (Sinitsky 2013) – New York City has examined PCB contamination in many of its public school as a result of the following case. Investigating for PCBs in school's started at Jessie Isador Straus School located in the Upper West Side on West 70th Street which is within close proximity to the three parking garages. In 2008, it was discovered that there may have been PCBs in the caulk around the windows when they were being replaced. The windows and caulking were replaced without following any procedures for removal or disposal of PCB impacted materials. As a result the Daily News investigated other schools in New York City and found that six out of the nine they investigated had caulk that contained PCBs which led to further investigation by the City and EPA to discover that over 20 schools in the New York City area contained caulking with PCBs. This indicates PCB caulk is present in large older buildings like the parking garages in the New York City area.

Case Study 2 (Sinitsky 2013) – At the University of Massachusetts, Amherst there were samples of PCB caulk that were tested for PCBs with results below the 50 ppm federal standard for caulk. As a result of the low PCB detection they decided to test the concrete adjacent to the PCB caulk which returned some results above the 50 ppm threshold and were treated as a PCB bulk product waste. PCB bulk waste means it is derived from products manufactured to contain PCBs in a non-liquid state at 50 ppm or greater. This case indicates that concrete impacted with PCB caulk has the potential to have to be treated as PCB bulk waste if impacted.

Lead and Lead Paint

Lead and lead compounds have been used in a wide variety of products used for building materials including paint, ceramics, pipes and plumbing materials, and solders. Lead is a potential concern in the fill material beneath the building and in the paint. Lead-based paint use was banned in 1978 by the Toxic Substances Control Act. With few exceptions, if a building was constructed before 1978 it is highly likely to contain lead paint. These coatings are often hidden under more recent paint layers and may not pose a health threat until disturbed (for example, during building demolition). Lead paint becomes a concern as it deteriorates becoming friable or if it is disturbed as it would be during demolition activities leaving paint chips and dust in the air. People can inhale lead dust by spending time in areas where lead-based paint is deteriorating, and during renovation or repair work that disturbs painted surfaces in buildings.

EPA states that lead exposure "affects the nervous system and can cause a range of health effects, from behavioral to problems and learning disabilities, to seizures and death" and "lead from paint is the most common cause of lead poisoning". The degree of damage is dependent on the amount of lead taken into the body over time as lead bio-accumulates in tissue. Lead poisoning has been linked to anemia, central nervous system, kidney and immune system damage, and learning disabilities. Lead can be toxic to humans and animals causing many different negative health effects. Children under the age of six and fetuses exposed through lead in their mother's blood are most susceptible. Preventative Medicine (1993), states that the equivalent of only three granules of lead dust can begin to poison a child. Studies reported in the Journal of the National Medical Association have linked demolition activities to increased lead exposure in children. Children with high levels of lead can suffer from damage to the brain and nervous system, behavior and learning problems, slowed growth, hearing problems, headaches, anemia, and rare cases of acute poisoning can lead to seizures, coma, and death. Lead accumulates in bodies over time and is stored in the bones with calcium. It is then released from the bones during pregnancy as the maternal calcium is used to form the bones of the developing fetus. Lead can also be transferred from the mother to fetus through blood. The effects of mothers having high levels of lead include increased miscarriages, premature or low birth weights, brain damage, decreased mental abilities and learning difficulties, and/or reduced child growth.

According to The National Institute for Occupational Safety and Health (NIOSH) the Recommended Exposure Limit (REL) for lead is a Time Weighted Average of 50 micrograms per cubic meter of air (µg/m3) over 8-hours. The required (OSHA) Permissible Exposure Limit (PEL) for lead is also no greater than 50 µg/m3 averaged over an 8-hour period. The PEL is reduced for shifts longer than 8 hours by the equation PEL = 400/hours worked. The required OSHA PEL action level for lead in general industry and the construction industry is a Time Weighted Average of 30 µg/m3 over 8-

hours. Some studies suggest that the current OSHA PEL and NIOSH REL may be too high to protect against certain health effects.

The Phase I ESA identifies lead to be a potential concern within the fill material beneath the current parking garage buildings and within the paint as lead-based paint. Given the age of the buildings it is likely that lead-based paint is present. If lead is present in the paint or fill material, it should not pose a concern unless exposed or disturbed as would be the case during any proposed demolition activities. Demolition of the buildings, however, would almost certainly expose workers, passersby, neighborhood residents and anyone else who happens to be in the vicinity when the lead is disturbed, including and especially young children who attend nearby schools) to the potential contamination that is likely trapped beneath the parking garages and under subsequent coatings of paint.

Lead-based paint is a concern throughout New York City. New York City's Department of Housing Preservation and Development, which is responsible for New York City's many multi-unit residential buildings, began recording housing and maintenance code violations in an online database from November 2013 through January 2016. During this time they issued more than 10,000 violations for dangerous lead paint conditions in New York City buildings according to HuffPost/WNYC.

3.8 Tier I and Tier II Shadow Assessment

Chapter eight of the CEQR Manual states that direct sunlight exposure becomes an increasingly scarce resource as additional development occurs in New York City. Specific criteria are applied to determine whether different phases of shadow analysis are required in a particular case. A Tier I shadow assessment is required when construction results in a building at least 50 feet higher than the original building or the proposed construction is located adjacent to, or across the street from a Sunlight-Sensitive Resource. A Tier II shadow assessment is required when a Sunlight-Sensitive Resource is located within the longest shadow area. Tier I and Tier II Shadow Assessments were completed as part of this review since there were two playground areas which are described as Sunlight-Sensitive Resources of Concern located adjacent to the proposed 11-story buildings. Both of these areas will be affected by the longer shadow cast by the proposed 11-story buildings. As part of the Tier I screening assessment, the longest shadow study area is determined by multiplying the maximum height of the proposed structure by 4.3. The Tier II screening assessment then removes the triangular area in the south which is the area that will not be affected by shadow.

It is important to note that the documents that GHD reviewed do not include actual building plans. It is entirely possible that the design will change and that the buildings will be taller by at least 50 feet. Alternatively, the roof height of the proposed buildings could be some 30 feet taller than the current parking garages and would reach the 50-foot threshold when mechanical rooms are considered. As such, GHD considers the shadow analysis conducted to be the minimum shadow that would occur under the with-action scenario.

As shown in Figure 1, there are three existing parking garages which are 3, 4 and 5 stories high. It is assumed that each floor is 12.5 ft, which results in an existing longest shadow length of 37.5 feet, 50 feet, and 62.5 feet, respectively. The proposed buildings are 11 stories high, which conservatively assuming 10 feet per floor, results in a shadow length of 110 feet. The existing and proposed shadows are both shown on Figure 1. This Tier II Shadow Assessment identified that the

proposed 11-story building located at 103 West 8th, New York, NY would cast a shadow over the adjacent Sunlight-Sensitive Resource, which is identified as Booker T. Washington playground and sports fields. This will reduce the amount of sunlight the playground receives and will result in the playground's and sports field's being in darkness at least part of the day, thereby reducing the enjoyment of the playground and fields.

4. Additional Concerns Identified in the CEQR Technical Manual

Noise

Displacement of parking resources will route more vehicular traffic through some neighborhoods, and the effect on noise should be considered.

Transportation

Displacement of parking and the proposed residential development will stress existing subway and mass transit systems in Community District 7, and the effect on these systems merits assessment.

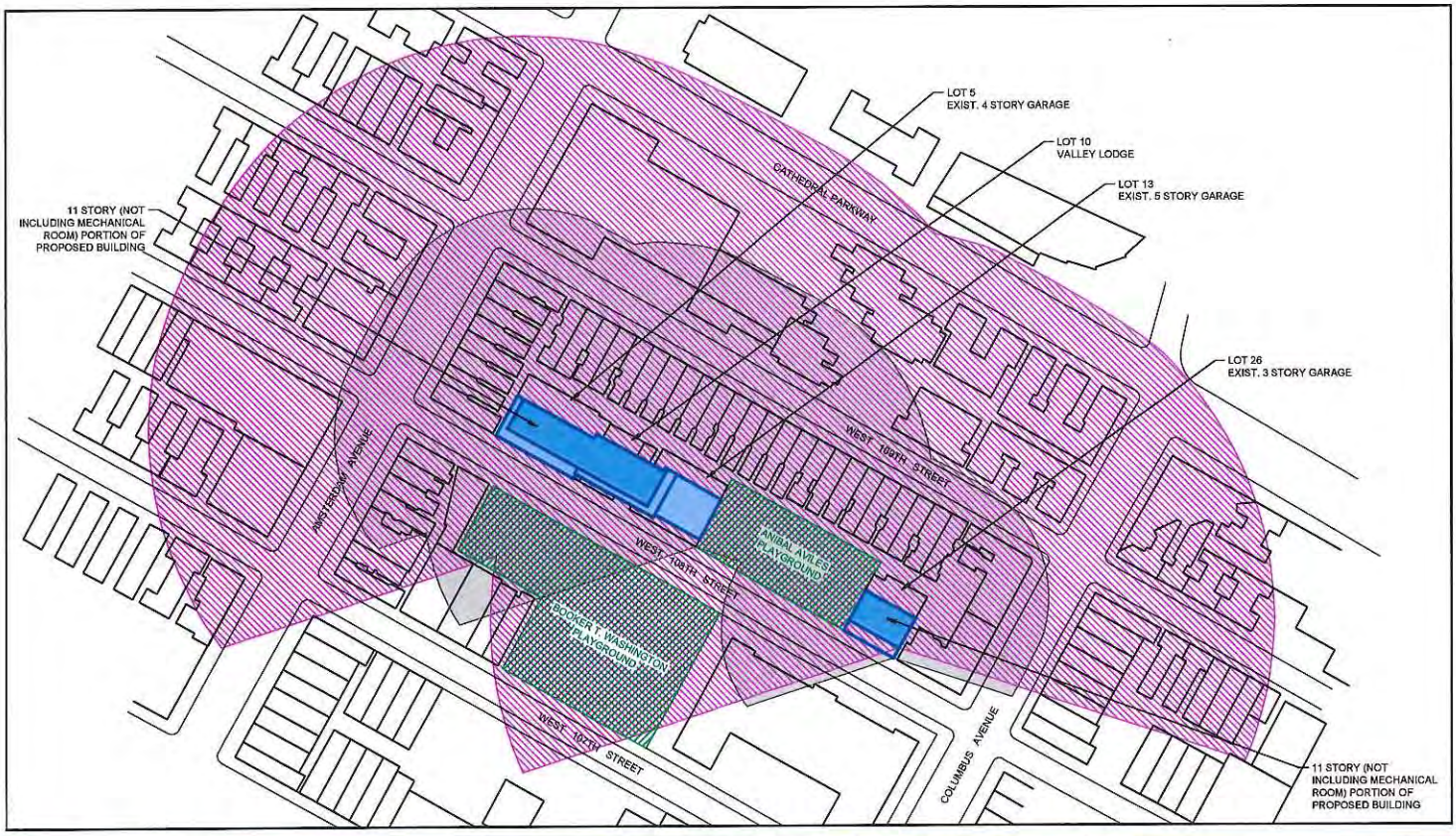
Community Facilities and Services

People using the cultural and park resources in Community District 7 will find less available on-street and off-street parking under the with-action condition. As such, these resources may be less available to the public. This effect should be studied and included in a future parking study.

5. Conclusions

GHD has identified significant concerns with regards to traffic conditions, air quality/greenhouse gas emissions, socioeconomic conditions, and hazardous materials under the with-action, as compared to the no-action, scenario. So long as the parking garages remain in place, current traffic patterns, subway and mass transit use, and areas suitable for development of car-sharing (and the carsharing operation already situated in one of the parking garages) would remain relatively unchanged. The with-action scenario is contrary to a number of New York City policies. Proceeding as planned under the with-action scenario will result in a parking space deficit that will threaten air quality, pedestrian safety, traffic and congestion, and have economic consequences for business in the Special Enhanced Commercial Districts EC-2 and EC-3 along Amsterdam and Columbus Avenues. Further, hazardous materials that are currently encapsulated in the parking garage structures or beneath the parking garages would be mobilized during demolition. Many of these substances are carcinogenic and/or are associated with significant health effects, including impairment of the lungs, kidneys, central nervous system, and immune system. Exposure to lead is linked to learning disabilities in children; it is significant that there is a middle school adjacent to the proposed demolition and construction area. In summary, the with-action condition will have negative impacts on the residents at West 108th Street, the students at Booker T. Washington Middle School, pedestrians in the vicinity of West 108th Street, and visitors to the parks and nearby socioeconomic resources.

Figure



0 60 120ft

LEGEND

- EXISTING PARKING GARAGE SHADOW (NO ACTION CONDITION)
- PROPOSED BUILDING OUTLINE (LESS THAN 11-STORY BUILDING)
- SHADOW (WITH ACTION CONDITION) RESULTING FROM 11-STORY BUILDING CONSTRUCTION

GHD

108TH AVENUE PARKING GARAGES
NEW YORK, NEW YORK
SHADOW STUDY

11124585-01
Dec 15, 2016

CEQR - TIER II SHADOW ASSESSMENT

FIGURE 1

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Attachment A
Findings – Review of Nelson/Nygaard Traffic Study

Memorandum

1 March 2017

To:	Arlie Weigley AW	Ref. No.:	11124585
From:	William Maria, P.Eng	Tel:	905-814-4397
CC:	File		

Subject: Engineering Technical Review – West 108th Street Parking Study

This memorandum summarizes our review of the March 2016 Nelson/Nygaard Parking Study (Study), as revised in June 2016, for the West 108th Street Development as well as other documents. The purpose of the Study was to research the existing parking conditions and potential future parking considerations from the development of affordable housing on two lots currently owned by the New York City Department of Housing Preservation and Development and one lot owned by West Side Federation for Senior and Supportive Housing. The documents reviewed in addition to the Study include the affidavit of Fred Roy Schoenberg (parking garage operator) and the Consumer Affairs Garage Licenses for each of the three parking garages located at 103, 143, and 151 West 108th Street in New York City. Based on the affidavit, the number of parking customers at the 143 and 151 parking garages was **undercounted** in the Study. These two garages have a total capacity of 600 parking spots, and the actual number of customers for the two garages includes 595 monthly parking customers and 100 transient customers that use the parking spots when the monthly customers' vehicles are not parked in the garages. The 103 West 108th Street parking garage has a total of 125 parking spots available with approximately 90 spots utilized based on the Study. Combined, the garages are utilized by 785 customers on a daily basis at the three parking garages. Thus, the conclusions set forth in the Study are not based upon accurate information.

As further outlined below, the Study also does not provide sufficient data and analysis of the potential impacts from replacing the existing parking garages with new affordable housing. In particular, the Study does not address how the existing parking spaces can be adequately replaced or absorbed by the local parking supply without significant impacts. And lastly, the Study does not take into consideration other factors, such as the extent to which the weather likely impacted the data collected and the use of neighboring garages.

Existing Use and Capacity

The Study used a reasonable methodology when completing the inventory and occupancy count of existing parking spaces in each of the parking garages, however, each of the surveys were completed during the same week.

A more prudent approach would have been to complete the surveys over several days and over a period of at least two weeks in order to minimize impacts from vacations, weather conditions, and other potentially significant factors. As noted in the Study, a snowstorm on January 23, 2016 deposited 27.3 inches of snow in New York City. The snow accumulation certainly affected the number of people using the parking garage.

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Consideration should have been given to completing the Study at a time when the weather was more representative of typical conditions.

Local Parking Supply

The local parking supply reviewed within the Study includes an area within approximately 12 blocks of the West 108th Street garages (Catchment Area). Given the zip code data provided, this area seems appropriate and within a reasonable walking distance to the garages. However, no data is provided on the existing utilization of these parking garages and whether or not there is sufficient reserve capacity to accommodate as many as 785 vehicles that currently park at the 108th Street garages on a daily basis.

The Study also identifies existing car share vehicles available at garages throughout the Catchment Area. These vehicles provide a viable alternative to car ownership should any of the existing garage users decide to not continue owning a vehicle. Based on the pricing data provided in the Study, the West 108th Street garages are significantly less expensive than the average rates for monthly parking within the Catchment Area. The Study does not address the viability of the local parking supply replacing the lost parking spaces due to the increased costs.

The Study included an added section titled "Local Parking Supply Survey" (p.12). This section demonstrates that the additional available parking capacity in the Catchment Area Parking Supply is insufficient to accommodate the displacement of monthly parking spaces as a result of the demolition of the West 108th Street Garages. The West 108th Street Garages have a total capacity of 725 spaces. The Study determined that at peak usage the 103 West 108th Street parking garage contained 91 vehicles. The affidavit indicated that 595 of the spaces in the parking garages located at 143 and 151 West 108th Street are utilized. As such, 686 of the parking spaces in the three West 108th Street parking garages are utilized by monthly customers at any given time.

As per the results of the Local Parking Supply Survey, approximately 4.9% of monthly spaces in Catchment Area garages are vacant. The Local Parking Supply Survey further indicates that the Catchment Area total parking capacity, excluding the three West 108th Street parking garages, is 2871 spaces. Assuming 4.9% are vacant, it is assumed that a vacancy of 115 parking spaces exists in the Catchment Area. Therefore if the 686 utilized spaces at West 108th Street Garages were displaced, there would be a theoretical shortfall of 571 Catchment Area parking spaces. The majority of survey respondents noted that they would not likely be willing or able to do reserve spaces for future use. It is expected that the existing on-street parking supply would not have sufficient vacancy to accommodate these 571 displaced parking spots. This may pose a serious concern to long-term residents/employees in the area, who may rely on monthly rented parking as their long-term and sole means of parking.

Further, the affidavit prepared by the owner of the 143 and 151 West 108th Street parking garages reported that 100 additional vehicles park in these two garages on a daily basis. These users park on a short-term basis during trips to local resources, including Columbia University, Mount Sinai-St. Luke's Hospital, and the New Jewish Home. Note that the proximity to Central Park and businesses along Amsterdam Avenue, for example, suggest that some of these additional visitors also use these resources. Displacement of the parking spaces will affect the enjoyment and utilization of these important resources.

Additionally, as per the CEQR manual, projects that would substantially increase the vehicle miles travelled in a large area may require mesoscale analyses of Air Quality. Since the loss of parking spaces will result in vehicles travelling to other parking garages, there may be a significant impact to the mobile source air quality due to the redistribution of traffic. This analysis was not included in the Study.

Feasibility of On-Site Parking Replacement

The Study estimated the number of parking spaces that could be replaced on-site based on the parking facility type ranges from 40 spaces to 118 spaces, assuming that on-site professionals and other employees of the facility do not use these spaces, and assuming further that those who are not patronizing or visiting the facility would be permitted to access the garage. Even accepting those assumptions, it would leave a shortfall of 453 to 531 parking spaces within the Catchment Area. It is also unclear whether the 100 short-term users who currently utilize the parking garages would have access to these 40 to 118 parking spaces given that there would be more competition for parking spaces at this location than exists now in the three West 108th Street parking garages.

The analysis also estimated construction costs based on comparable design and construction options from other sites. Based on the projected monthly fees at the full tax rate (180% to 320% higher than existing average), any amount of parking within the proposed site would be costly, and it would be difficult to recover that infrastructure cost.

Exhibit 3

PUBLIC ASSETS

City-Owned and Leased Properties

The Municipal Art Society of New York
MASNYC

The Municipal Art Society of New York (MAS) is pleased to present this report, *Public Assets: City-Owned and Leased Properties (Public Assets)*, and its accompanying online mapping tool on the MAS website (www.mas.org/colp).

Why is this important?

Public Assets provides easily accessible information about 14,000 city-owned properties across the five boroughs. Totaling approximately 43,000 acres, they comprise an area comparable to the size of Brooklyn (which, if an independent city, would be the fourth largest in the United States!). These properties range from large to small and are located in the center of neighborhoods as well as along the city's waterfronts and borders. They are part of New York City's residential, commercial, and industrial fabric and are integral to the character, development, and sustainability of the city today and in the future.

Who should use this information?

New Yorkers, municipal agencies, developers, researchers, students, planners, designers, preservationists, environmentalists, and city visitors – in other words, anyone interested in the city of today and tomorrow.

Forty-three thousand acres is an extraordinary amount of land, for New York City or any other city. As we confront the challenges of rising population and density, climate change, infrastructure development, and social equity, *Public Assets* provides a detailed view of city-owned land – a key to understanding the city and achieving its potential.

Gina Pollara
President

The City of New York owns or leases over 14,000 properties, encompassing an area approximately the size of Brooklyn. Given the extent of these holdings, planning practitioners, decision makers, and citizens need the means to understand how to maximize their public benefit and equitable potential.

The Municipal Art Society of New York (MAS) presents *Public Assets: City-Owned and Leased Properties (Public Assets)*, a report and online mapping tool, to provide comprehensive land use, zoning, and geographic information derived from two city datasets, MapPLUTO™ and City Owned and Leased Properties 2014 (COLP). MAS envisions the release of *Public Assets* as the first step in an ongoing process designed to improve our public assets and contribute to a healthier, more dynamic, and inclusive New York City.

Public Assets presents a snapshot of how city-owned and leased properties relate to several key issues: the environment, infrastructure, landmarks, population, and neighborhood rezonings.

City-owned and leased properties are underutilized.

22% are classified as having no current use, accounting for approximately 1,800 acres, an area more than double the size of Central Park.

City-owned and leased properties are at a high risk for flood events now and in the future.

64% or 26,786 acres, are either completely or partially located within the 100-year floodplain. Sixty-six percent of the surface area will face high risk of coastal flooding hazards by 2050. Seventy-five percent are within the city and state-regulated coastal zone.

City-owned and leased properties protect wildlife.

~5% are either themselves designated tidal wetlands or partially within a tidal wetland.

City-owned and leased properties are toxic and cause pollution.

247 are fully or partially designated as New York State environmental remediation sites, 87 of which are enrolled in a NYSDEC State Superfund or Brownfield Cleanup program. Sixty percent are located within combined sewer areas.

City-owned and leased properties are accessible.

64% are within one-half mile of a subway station and 90 percent are within one-fourth mile of a bus stop.

City-owned and leased properties are historic.

665 fall under the purview of the Landmarks Preservation Commission, 47 of which are characterized as having no current use.

City-owned and leased properties are located in low density, low income areas.

71% are located in census tracts less dense than the citywide average. 6,969 (totaling 15,511 acres) are located within census tracts with low median household incomes.

City-owned properties provide opportunities for redevelopment.

~8% Approximately eight percent are located in rezoning areas, including 1,864 individual parcels consisting of 2,500 acres. Twenty-two percent do not have a current use.

The extent of New York's 14,000 city-owned and leased properties is a veritable "sixth borough." Examining these holdings and evaluating opportunities for their protection, enhancement, and development should be a priority of this and any future administration.

MAS believes that true equity in the city's planning and land-use decisions can only be achieved through an informed and engaged public. *Public Assets* is a measurable step toward achieving that goal.

General Use

As shown in Table 1 and Figure 2, the COLP dataset categorizes properties into four general groups: (i) properties with no current use, (ii) properties with a residential use, (iii) properties with a current use that is not residential and (iv) property used for parks and open space.

As shown in Figure 9, the general use categories are divided into 19 use types, which are further divided into 223 individual use codes.

Properties Classified as Having No Current Use

According to the COLP dataset, approximately 22 percent of city-owned and leased properties are classified as having no current use. Properties under this classification account for approximately 1,800 acres, an area more than double the size of Central Park. Approximately one-third of these properties have an area of less than 1,000 square feet, which greatly restricts their development potential as individual lots.

Properties with no current use are further classified into four categories: (i) non-residential structure with no use, (ii) vacant land with no use, (iii) land under water with no use, and (iv) not determined. With a total of 2,726 lots, the majority of properties with no current use are classified as "vacant land with no use."

The COLP dataset classifies 78 properties as a nonresidential structure with no use. Figure 3 shows a property in this classification, the former Rockaway Court House in Queens. This property is currently managed by DCAS. 2,726 properties are vacant land with no use. Figure 4 is an example of a property in this classification in the Brownsville neighborhood of Brooklyn, also managed by DCAS. 76 properties are classified as land under water with no use. Figure 5 shows a property in this classification, adjacent to FDR Drive in Lower Manhattan. This property is managed by the Department of Small Business Services (SBS). The COLP dataset classifies 282 properties having no current use as "not determined." Figure 6 shows a property, highlighted in red, with this classification in East New York, Brooklyn. It is currently managed by the Department of Housing Preservation and Development (HPD).

Properties Committed for Sale or Long-Term Lease

The COLP dataset includes information on properties that are committed for sale or long-term lease (defined by DCAS as any lease with a term of one or more years). 1,727 properties totaling approximately 1,700 acres are committed for sale or long-term lease. 1,256, or 70 percent, of these properties are classified as having no current use. 253 properties, approximately 15 percent, have a residential use, and 218, approximately 13 percent, are categorized as a current use other than residential.

Properties committed for sale or long-term lease with no use are distributed throughout the city. However, some areas contain disproportionate concentrations, a scenario that could affect future development in certain neighborhoods. As an example, Figure 7 shows a high concentration these properties in Harlem, Manhattan. Figure 8 shows these types of properties in the Brooklyn neighborhoods of Brownsville and East New York.

Table 1. City-Owned and Leased Properties by General Use Categories

General Use Category	Number of Properties	Area in Square Feet	Area in Acres
Properties with no current use	3,162	79,784,531	1,832
Properties with current use (non residential)	4,030	724,791,642	16,639
Properties with current use (residential)	1,371	102,746,371	2,359
Parks and open space	5,440	947,679,998	21,756
Total**	**14,003**	**1,855,002,543**	**42,585**

Source: COLP 2014 v2 042315 NYC Department of City Planning

*With the exception of Residential, No Use, Final Commitment-Disposition, Lease Out, all properties with a current use are included in the general use types from the list below. The City's dataset further divides the general use types into 223 use codes, the majority of which are also classified under properties with a current use.

**Totals have been rounded to the nearest whole number.

Jurisdiction: Who Manages What?

City-owned and leased properties are managed by several city agencies. As shown in Table 2, 75 percent of these properties are managed by the Department of Parks and Recreation (DPR), Department of Citywide Administrative Services (DCAS), Department of Education (DOE), Department of Housing Preservation and Development (HPD), and the New York City Housing Authority (NYCHA). The remaining 25 percent are managed by the Department of Environmental Protection (DEP), Department of Small Business Services (SBS), Metropolitan Transportation Authority (MTA), New York Police Department (NYPD), and the Fire Department of New York City (FDNY), among others.

Department of Citywide Administrative Services (DCAS)

DCAS oversees the purchase, sale, and lease of properties and the transfer of land to other city agencies or the private sector. DCAS manages 14 percent of city-owned and leased properties. More than 80 percent of these properties are classified as no use with a non-residential structure.

Department of Education (DOE)

DOE is the largest school district in the United States, serving 1.1 million students in over 1,800 schools. DOE manages approximately 1,500 city-owned properties totaling 3,600 acres. Ten percent of city-owned and leased properties are managed by DOE. With the exception of two parcels, which do not have a current use, all properties under DOE management are classified as academic, office, or recreational uses.

Department of Housing Preservation and Development (HPD)

HPD is responsible for promoting and preserving affordable housing. The agency manages 10 percent of city-owned and leased properties. Almost 70 percent of property managed by HPD is classified as having no current use. Seventeen percent is used for residential purposes. Over 95 percent of properties under HPD's jurisdiction are committed for sale or long-term lease.

New York City Housing Authority (NYCHA)

NYCHA manages almost 9 percent of the city's owned and leased properties, over 85 percent of which are used for residential purposes (i.e., contain an in-use residential structure). The remaining properties are classified as open space, outdoor parking, or recreation centers.

Department of Parks and Recreation (DPR)

Over 30 percent of the city's owned and leased properties are managed by the DPR. The agency manages approximately 15,700 acres of parks, playgrounds, and open space, an area equivalent in size to Manhattan. Many large parcels, including Central Park in Manhattan, Van Cortlandt Park and Pelham Bay in the Bronx, Flushing Meadows Corona Park in Queens, and others are co-managed by a second agency, usually the Department of Cultural Affairs (DCLA), or in some cases the Department of Sanitation (DSNY) and FDNY.

Other Agencies

The remaining 25 percent of city-owned and leased properties, accounting for approximately 14,500 acres, are managed by DEP, SBS, MTA, and FDNY, among many others.

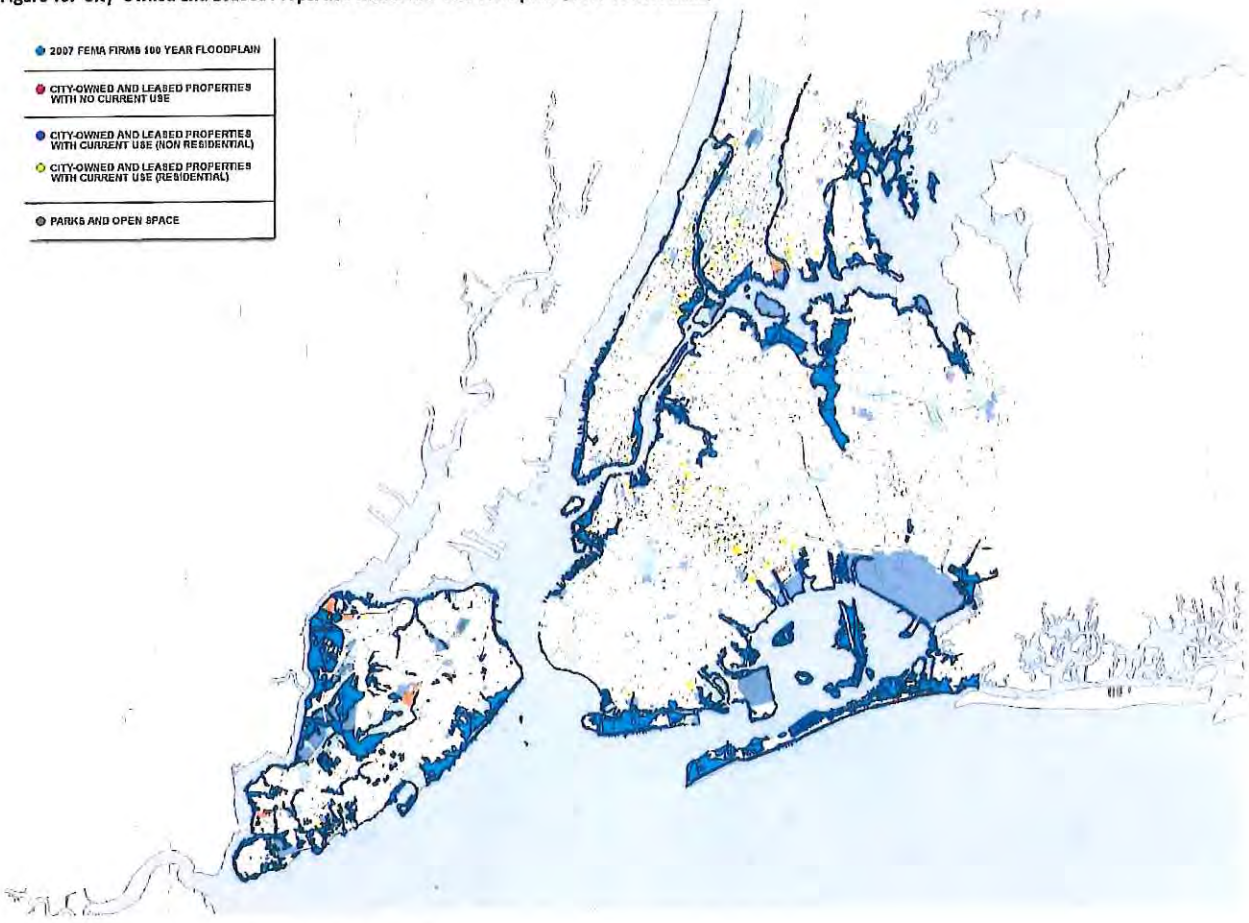
Table 2. City-Owned and Leased Properties by Agency Jurisdiction and General Use Categories

Agencies	All Properties	No Current Use	In Use (Non-Residential)	In Use (Residential)	Acres
Department of Citywide Administrative Services	1,966	1,679	287	0	5,729
Department of Education	1,499	2	1,497	0	3,590
Department of Housing Preservation and Development	1,487	1,050	177	260	702
New York City Housing Authority	1,297	4	188	1,105	2,345
Department of Parks and Recreation	4,374	1	4,373	0	15,758
Other Agencies	3,380	426	2,948	6	14,460
Total	14,003	3,162	9,470	1,371	42,585

Source: COLP 2014 v2 042315 NYC Department of City Planning

Merging the COLP and MapPLUTO™ datasets enables the online tool to provide a broad range of data within one source. The following analysis demonstrates how it can be used to evaluate site-specific land uses and development scenarios, identifies development trends, or recognizes potential development opportunities and restrictions for city-owned and leased property.

Figure 10. City-Owned and Leased Properties within 100-Year Floodplain (2007 FEMA FIRMs)



areas. The performance standard is intended to reduce peak discharges to the sewer system during rain events by requiring greater onsite storage of stormwater runoff and slower release to the sewer system. The implementation of DEP's stormwater performance standard over time is expected to provide additional capacity to the existing sewer system, thereby improving its performance.[26]

City-Owned and Leased Properties by Sewer Infrastructure

Table 7 shows city-owned and leased properties by use category and type of sewer infrastructure. As shown, over 8,300 properties covering over 16,400 acres are served by combined sewers. 35 percent of city-owned and leased properties within the combined sewer areas are classified as properties with a current use. Thirty-one percent of properties within combined sewer areas are parks.

26 Guidelines for the Design and Construction of Stormwater Management Systems http://www.nyc.gov/html/dep/pdf/green_infrastructure/stormwater_guidelines_2012_final.pdf

Subway Access

New York City's subway is the world's largest public rapid transit system. In 2015, the average daily ridership on weekdays was 5,650,610. The city has 470 stations and 1,904 entrances to access the subway system.[27] Access to public transit, primarily subways, can affect land use and development patterns. Typically, properties within one-half mile (equivalent to a 10-minute walk) are considered accessible to transit.[28]

As shown in Figure 18, 64 percent of city-owned and leased properties are located within an average 10-minute walk to a subway station entrance. As shown in Table 8, more than 74 percent of city-owned and leased properties within one-half mileof a subway station are residential. Sixty-one percent of properties with no current use are also within one-half mile of a

27 MTA Developers Download: http://web.mta.info/developers/download.html

28 NYC DCP Sustainable Communities in the Bronx: Leveraging Regional Rail for Access Growth and Opportunity: https://www1.nyc.gov/site/planning/plans/sustainable-communities/sc-bronx-metro-north.page

Figure 17. Subway Access of City-Owned and Leased Properties With No Current Use, East New York, Brooklyn

Table 7. City-Owned and Leased Properties and Sewer Infrastructure by General Use Categories

General Use Category	Combined Sewer		Other Sewer System	
	Properties	Acres	Properties	Acres
Properties with no current use	1,700	589	1,462	1,242
Properties with a current use (non residential)	2,932	5,379	1,098	11,260
Properties with a current use (residential)	1,093	1,834	278	525
Parks and open space	2,614	8,634	2,828	13,159
Total	8,339	16,436	5,666	26,186

Source: OSA NYC and COLP 2014 v2 042315 NYC Department of City Planning

subway station.

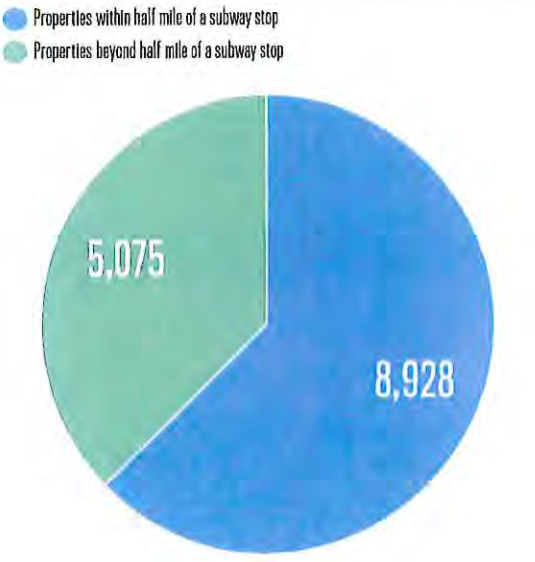
The online tool can be used to examine areas of the city with a high concentration of city-owned and leased properties having no current use that are near subway stations to evaluate potential redevelopment opportunities. For example, Figure 17 shows an area in East New York, Brooklyn, with a relatively high density of city-owned properties with no current use in close proximity to the L and 3 subway lines. As shown, over 90 percent of the properties along Livonia Avenue are within one-fourth mile of the 3 line, which is a typical five-minute walk. 91 of these properties, with a total area of 7.8 acres, are managed by HPD.

Table 8. City-Owned and Leased Properties and Subway Access by General Use Categories

General Use Category	Within one-half mile	
	Properties	Acres
Properties with no current use	1,933	595
Properties with a current use (non residential)	2,954	9,102
Properties with a current use (residential)	1,022	1,744
Parks and open space	3,019	10,230
Total	8,928	21,670

Source: NYC DOITT and COLP 2014 v2 042315 NYC Department of City Planning

Figure 18. City-Owned and Leased Properties within ½-mile of a Subway Station



MAS is pleased to present *Public Assets* at a time when the city is making significant strides toward increasing transparency in its planning and land-use actions.

Over the past year, MAS has supported legislation that would make new practical datasets available to the public for the first time. These datasets would enable citizens to track city commitments during the ULURP process, review deed restrictions placed on city-owned properties, and identify appropriate vacant land for the construction of affordable housing.

If adopted, these legislative actions would provide information and oversight on an unprecedented level. However, in an effort to expand transparency, MAS recommends that the city increase the availability of its databases, in formats that could be integrated with a variety of geospatial information.

A truly equitable New York City depends on an informed public.

Since 1893, MAS has sought to inspire, educate, and empower New Yorkers to engage in the betterment of New York City. To advance these goals in the 21st century, we assert that more resources need to be provided to keep the public up to date about planning and land-use decisions that affect the city.

A truly equitable New York City depends on an informed public. The information presented in this report and the online tool is the start of an ongoing, participatory process that ultimately will improve our public assets and contribute to a healthier, more dynamic, and inclusive New York City.

Gateway Housing

My name is Ted Houghton, and I am President of Gateway Housing, a nonprofit working to improve New York City's response to homelessness, by creating new, better transitional settings that also offer permanent affordable housing and amenities that strengthen the community.

I support the West Side Federation for Senior and Supportive Housing's proposed development, WSFSSH at West 108, because it is exactly the type of residence we should be creating, for homeless seniors, for local families and seniors who need affordable housing, and for all the residents of Manhattan Valley.

WSFSSH's new building will preserve and provide a new home for Valley Lodge, the city's most effective shelter for homeless seniors, a worthy goal in itself. But it will do much, much more. The new building will also provide 194 new, 100% permanently affordable apartments for low-income families and seniors, as well as create substantial space for healthcare and other uses that support the needs of the community.

This is not surprising, given that the sponsor of this initiative is the West Side Federation for Senior and Supportive Housing. Over twenty years ago, I had to move to Brooklyn. But for more than ten years before that, I lived here on the Upper West Side, usually within a few blocks of the WSFSSH at West 108 site. It is hard to convey how fortunate the Upper West Side has been to have a mission-driven nonprofit like WSFSSH active in its neighborhoods.

Because the story of the Upper West Side's resurgence is inseparable from the story of WSFSSH. When I lived on the Upper West Side in the 1980s, it was not as safe and well-maintained as it is today. Part of the neighborhood's dysfunction was related to the thousands of substandard Single Room Occupancy units that became housing of last resort for people with disabilities and other barriers to independence. Rather than allow these long-time neighborhood residents to be displaced by gentrification, WSFSSH bought, rehabilitated and preserved many of the SRO buildings as affordable and supportive housing, adding services and an on-site presence that transformed the buildings into stabilizing anchors that made the surrounding blocks more pleasant and more secure, while maintaining the cultural and income diversity that gives the Upper West Side its distinctive character.

Valley Lodge was one such beacon in this neighborhood. As one who lived around the corner at the time, I can attest to how this stretch of 108th street was made safer and transformed for the better with the arrival of Valley Lodge in 1988. Unfortunately, that transformation has made it increasingly difficult for our neighbors with low and fixed incomes to remain in their homes. Let's not let them be chased out of the neighborhood they love. It is time to take the next step to ensure that the Upper West Side survives the gentrification of today as well as it survived the blight of the 1980s I hope you will join your many neighbors who support this thoughtful and beneficial development, the WSFSSH at 108 residence.

Gateway Housing 588 Broadway #1208, NY NY 10012 ph. 212-697-1640 x262