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Project Description

This chapter provides descriptive information about the requested discretionary land use action(s) and the development project that would be facilitated by the requested actions. The purpose of this chapter is to convey project information relevant to the environmental review.

Introduction

BP 347 Madison Associates, LLC, (BP) and the Metropolitan Transportation Authority (MTA) are seeking from the City Planning Commission (CPC) two Vanderbilt Corridor Subarea special permits, pursuant to Zoning Resolution § 81-633 (Grand Central public realm improvements) and 81-634 (modifications to bulk regulations and mandatory district plan elements), in order to redevelop the property located at 341-347 Madison Avenue (the Project Site).

Located within the Vanderbilt Corridor and Grand Central Core Area of the Special Midtown District's East Midtown Subdistrict, the Project Site is owned by the Metropolitan Transportation Authority (MTA), from whom BP is seeking approval of a net lease on the property. These actions (issuance of the special permits and approval of the net lease) together comprise the Proposed Action, and MTA and BP are referred to, collectively, as the Applicant.

The Proposed Action would facilitate the redevelopment of the Project Site with the Proposed Project, a new, approximately 925,630-gross-square-foot (gsf) commercial office building up to 1,050 feet tall (including the bulkhead), with ground floor retail uses and below-grade space (i.e., mechanical and back-of-house space). The project would provide transportation improvements on-site that create new pedestrian access to, and egress from, the Long Island Rail Road (LIRR) East Side Access (ESA) concourse (the existing connection from 45th Street to the Grand Central Terminal (GCT) Roosevelt Passageway would remain adjacent to the site at 52 Vanderbilt). It would also provide off-site improvements that would improve passenger

circulation at the Grand Central – 42nd Street Subway Station, including improvements to passenger connections to the IRT Flushing Line (#7 Train) platform.

The Proposed Actions will undergo coordinated review under the State Environmental Quality Review Act (SEQRA) and the City Environmental Quality Review (CEQR) regulations and guidelines, with the New York City Department of City Planning (DCP) serving as lead agency on behalf of the CPC.

This chapter provides a summary and description of the Proposed Action, the Project Site's location, existing conditions, project purpose and need, Proposed Project, reasonable worst-case development scenario (RWCDs) under the No-Action and With-Action conditions, and public review process required for approval of the Proposed Action. The analyses following this chapter examine the potential for the Proposed Action to result in significant adverse environmental impacts in accordance with the appropriate guidance provided in the *2020 New York City Environmental Quality Review Technical Manual (2020 CEQR Technical Manual)* and the **Final Scope of Work**.

Project Site and the Vanderbilt Corridor

The Project Site is a 25,104-sf parcel comprised of Lots 23, 24, 25, and 48 on Block 1279 in the East Midtown neighborhood of Manhattan, within Community District 5 (with a portion of the proposed off-site public realm improvements extending into Community District 6) (see **Figure 1-1**). Block 1279 is bounded by Madison Avenue to the west, Vanderbilt Avenue to the east, East 44th Street to the south, and East 45th Street to the north. The Project Site consists of the western portion of Block 1279, fronting on Madison Avenue, and contains three 13- to 20-story buildings that previously served as the headquarters of the MTA and a ventilation structure for MTA's ESA project, which is currently under construction with an anticipated completion in 2022. The ESA will bring LIRR service from the main line in Queens directly into a new concourse below GCT. The buildings that used to contain the MTA headquarters total 351,871 gsf of commercial office and retail space that is now vacant.

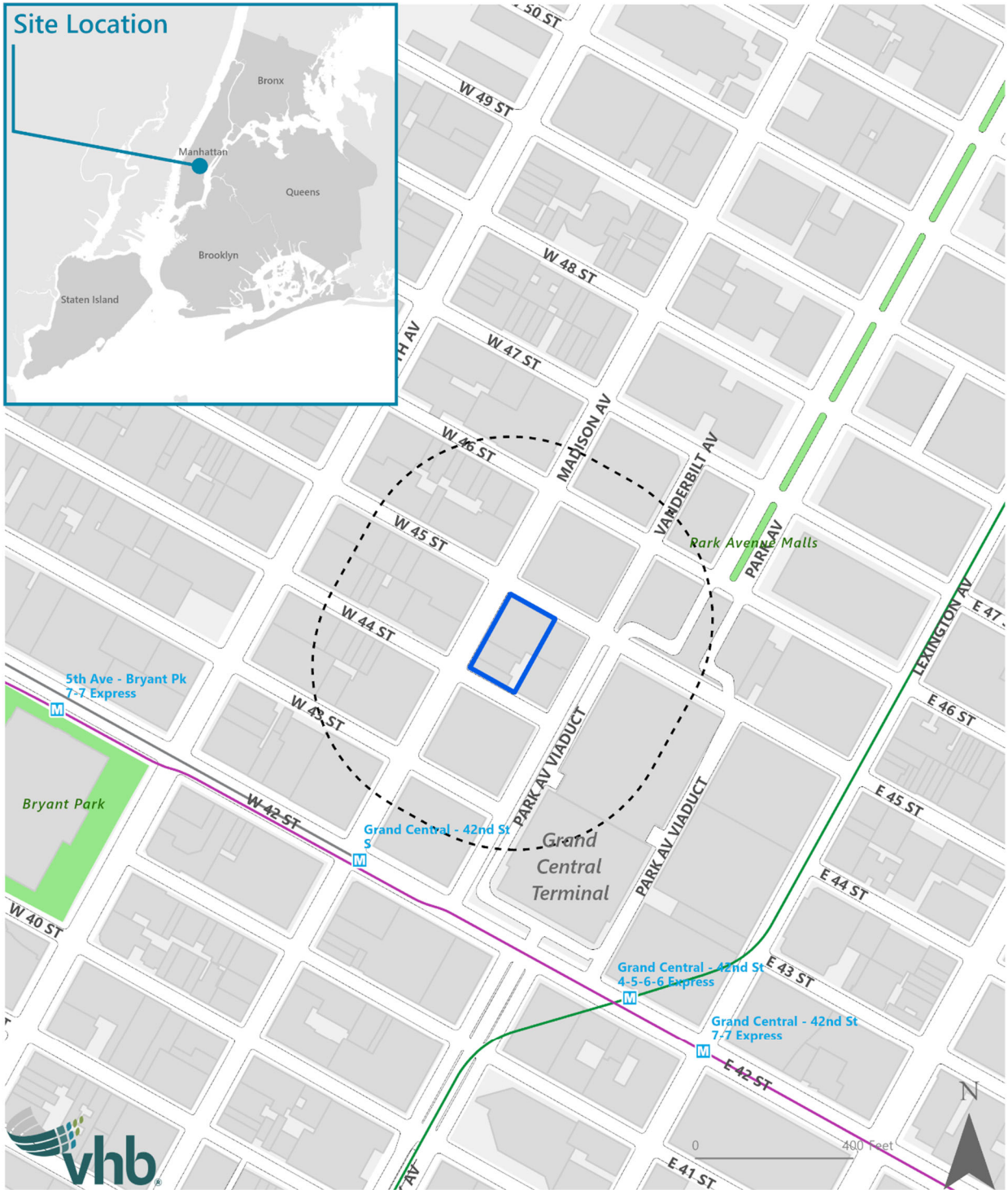
In addition to the three MTA buildings and the ventilation structure, Block 1279 contains a commercial building and the Yale Club. All five buildings on the block were constructed between 1916 and 1926 and range in height from 13 to 22 stories. The surrounding land uses are predominantly commercial with large-scale office, retail and hotel uses, and GCT.

The Project Site is zoned C5-3, a high-density commercial district that is intended for Central Business Districts with large-scale office and retail establishments. The C5-3 zoning allows for a basic maximum floor area ratio (FAR) of 15 for commercial and community facility uses and up to 10 FAR of residential uses.

The Project Site is also located within the Special Midtown District, East Midtown Subdistrict, Grand Central Core Area, and Vanderbilt Corridor. Additionally, the areas immediately surrounding the Vanderbilt Corridor ~~was~~were the subject of a 2017 approved City-sponsored zoning action, analyzed in the *Greater East Midtown Rezoning Final Environmental Impact Statement* (CEQR # 17DCP001M).

The Vanderbilt Corridor spans the blocks from East 42nd Street to the south to East 47th Street to the north, between Madison and Vanderbilt Avenues (~~Block~~Blocks 1277, 1278, 1279, 1281, and 1282).

Figure 1-1 Site Location Map



- Project Site
- 4 / 5 / 6 Subway Line
- S Subway Line
- 400 Foot Radius
- 7 Subway Line
- B / D / F / M Subway Line
- M Subway Station

Overall, the Vanderbilt Corridor is predominantly developed with commercial uses. Two blocks are fully occupied by large office towers. 335 Madison Avenue, between East 43rd and East 44th Streets (Block 1278, Lot 20), is developed with a 28-story office tower. Originally constructed in the early 20th century as the New York Biltmore Hotel, it was fully renovated with a complete façade reconstruction and interior commercial office conversion in the 1980s. 383 Madison Avenue, at the northern end of the Vanderbilt Corridor between East 46th and East 47th Streets (Block 1282, Lot 21) contains a 47-story office tower completed in the early 2000s.

The remaining properties within the Vanderbilt Corridor contain older commercial buildings. Adjacent to the Project Site are two properties (Block 1279, Lots 28 and 45) fronting on Vanderbilt Avenue with buildings that date from the early 20th century: a 20-story office building (52 Vanderbilt Avenue) and the Yale Club, a 22-story building containing clubhouse facilities (dining rooms, banquet halls, athletic facilities, and a library) and guestroom lodgings. The block between East 45th and East 46th Streets (Block 1281, Lot 21) contains the Roosevelt Hotel, a 19-story, 1,015-room hotel building dating from the 1920s.

GCT, located southeast of the Project Site, is one of the City's primary transportation hubs carrying the Metro-North commuter rail system and several subway lines, and is itself a major tourist attraction. The blocks surrounding GCT contain some of the largest office towers in the East Midtown area, including the 59-story MetLife Building (formerly the Pan Am Building) located immediately to the north of the Terminal. 42nd Street in particular is a major office tower corridor, with large buildings such as the 47-story W.R. Grace Building, the 53-story Lincoln Building (also known as One Grand Central Place), the 52-story Chanin Building, and the 77-story Chrysler Building. Smaller 12- to 20-story office buildings are generally located in midblock areas. The approximately 60-story One Vanderbilt building at 42nd Street and Vanderbilt Avenue is expected to be completed in 2021.

Background

As a result of the 2015 Vanderbilt Corridor rezoning, the FAR of sites within the Vanderbilt Corridor subarea may be increased by up to 15 FAR (for a total of 30 FAR) through the provision of certain public realm improvements (the "Grand Central Public Realm Improvement Bonus"), through transfer of development rights from designated landmarks within the Grand Central Subdistrict, or through a combination of public realm improvements and transfer from landmarks.

The Project Site was the subject of a 2013 Request for Proposals (RFP) to transfer the site to a developer as a private redevelopment opportunity. Boston Properties was conditionally designated as the developer for the site. In 2018, the MTA board approved the demolition of the existing buildings, which was subject to a Negative Declaration under SEQRA.

The *Vanderbilt Corridor FEIS* analyzed two build years, 2021 and 2033, and assumed that, absent the rezoning, both the One Vanderbilt site and the Project Site would be developed by 2021, while the remaining sites on Block 1279 and 1281 would not be redeveloped until 2033. In the *Vanderbilt Corridor FEIS*, Chapter 19, Conceptual Analysis (completed in March 2015), the redevelopment of the Project Site with a new 30 FAR building was analyzed pursuant to CEQR methodology.

Proposed Action

The Proposed Action includes the following discretionary actions:

Special Permits

The Applicant is seeking two Grand Central Public Realm Improvement Bonus special permits (pursuant to Zoning Resolution § 81-633 and 81-634) available for developments within the Vanderbilt Corridor subarea that provide public realm improvements in the form of pedestrian and mass transit circulation improvements in and around GCT. See **Figure 1-2** and **Figure 1-3** for diagrams illustrating waivers.

Specifically, the application requests:

1. A special permit to increase the maximum permitted floor area ratio in connection with Grand Central public realm improvements (Zoning Resolution Section 81-633); and
2. A special permit to modify certain mandatory district plan elements, the street wall height, height and setback regulation, and curb cut regulations (Zoning Resolution Section 81-634), with respect to the following:
 - a. Retail Continuity
 - Length of street frontage occupied by lobby space, entrance space, and/or building entrances exceed the lesser of 40 feet or 25% of the total street frontage (ZR Section 81-42)
 - b. Street Wall Height and Continuity
 - Street wall height exceeds the maximum permitted street wall height of 150 feet along all frontages (ZR Section 81-671)
 - Below the maximum street wall height of 150 feet, street wall regulations waived along Madison Avenue and East 45th Street at the northwest corner of the Proposed Project (ZR Sections 81-671 and 81-43)
 - c. Height and Setback
 - Building does not comply with the Alternative Height and Setback Regulations of ZR Section 81-27 (Daylight Evaluation), as modified by the Special Height and Setback Requirements of Section 81-661 (Height and setback modifications for buildings in the Grand Central Core Area) (ZR Sections 81-27 and 81-661)
 - d. Major Building Entrance and Building Lobby Entrance Requirements
 - Major building entrance is not provided on a narrow street frontage. (ZR Section 81-47(b)(2))
 - Building lobby entrance is not provided on a narrow street frontage (ZR Section 81-674(b))
 - Building entrance recess area exceeds the maximum length of 40 feet measured parallel to the street line (ZR Sections 81-674(b) and 37-53(b)(1))
 - Building entrance recess areas have depths of less than 10 feet along Madison Avenue (ZR Sections 81-674(b) and 37-53(b))

- e. Curb Cuts and Loading Berth Provisions
 - Loading berth is not arranged to permit head-in and head-out truck movements to and from the zoning lot (ZR Section 81-675(a))
 - The curb cut on East 44th Street exceeds the maximum width of a curb cut, including splays, of 25 feet (ZR Section 81-675(b))

Metropolitan Transportation Authority (MTA) Approval of Net Lease

An additional action needed for the Proposed Project is MTA's approval and execution of a 99-year lease from the MTA to BP (or its designee). In considering this proposed lease, the MTA is acting as an involved agency under CEQR and SEQRA.

Figure 1-2 Proposed Ground Floor Plan with Zoning Waivers

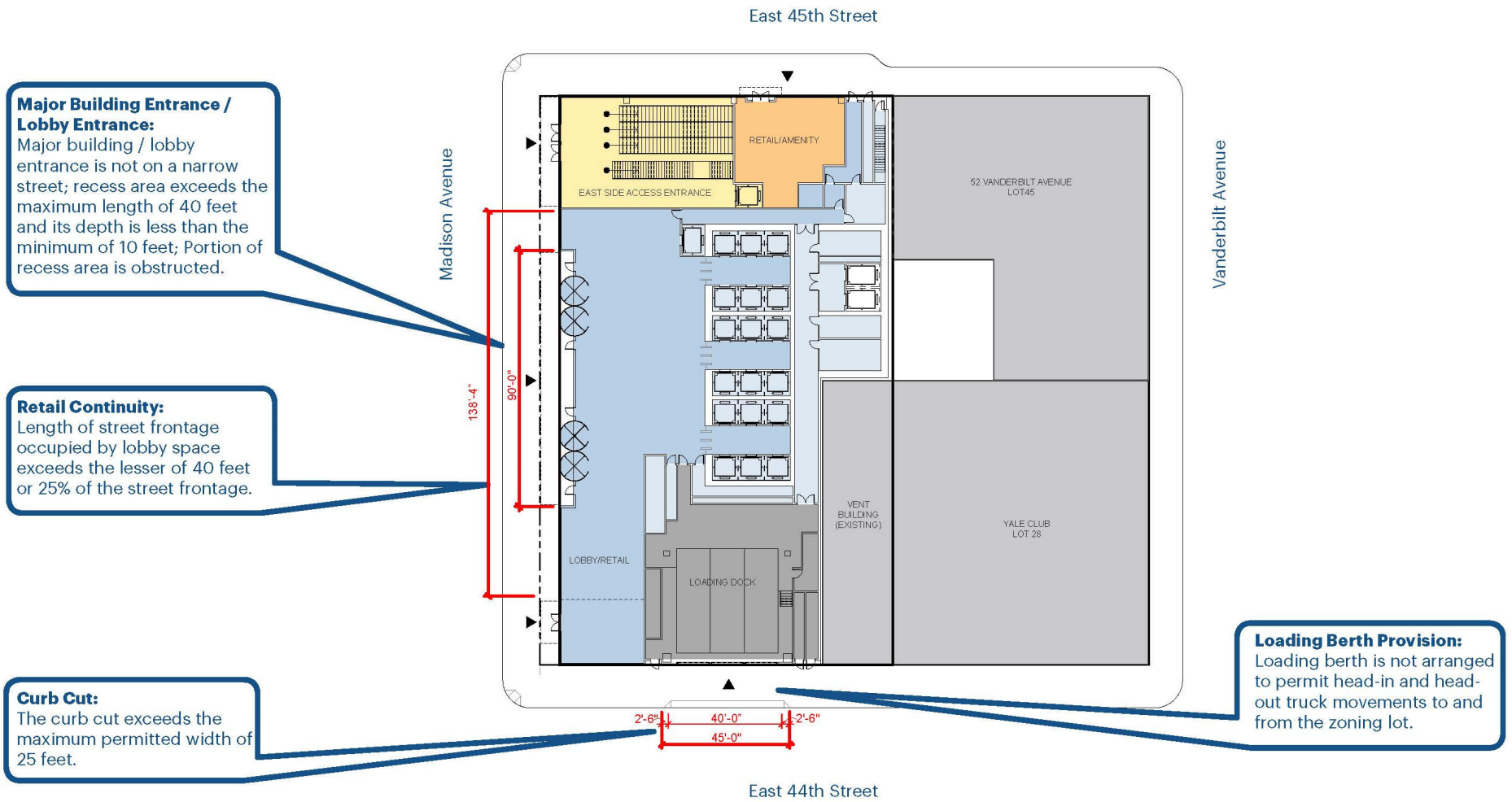
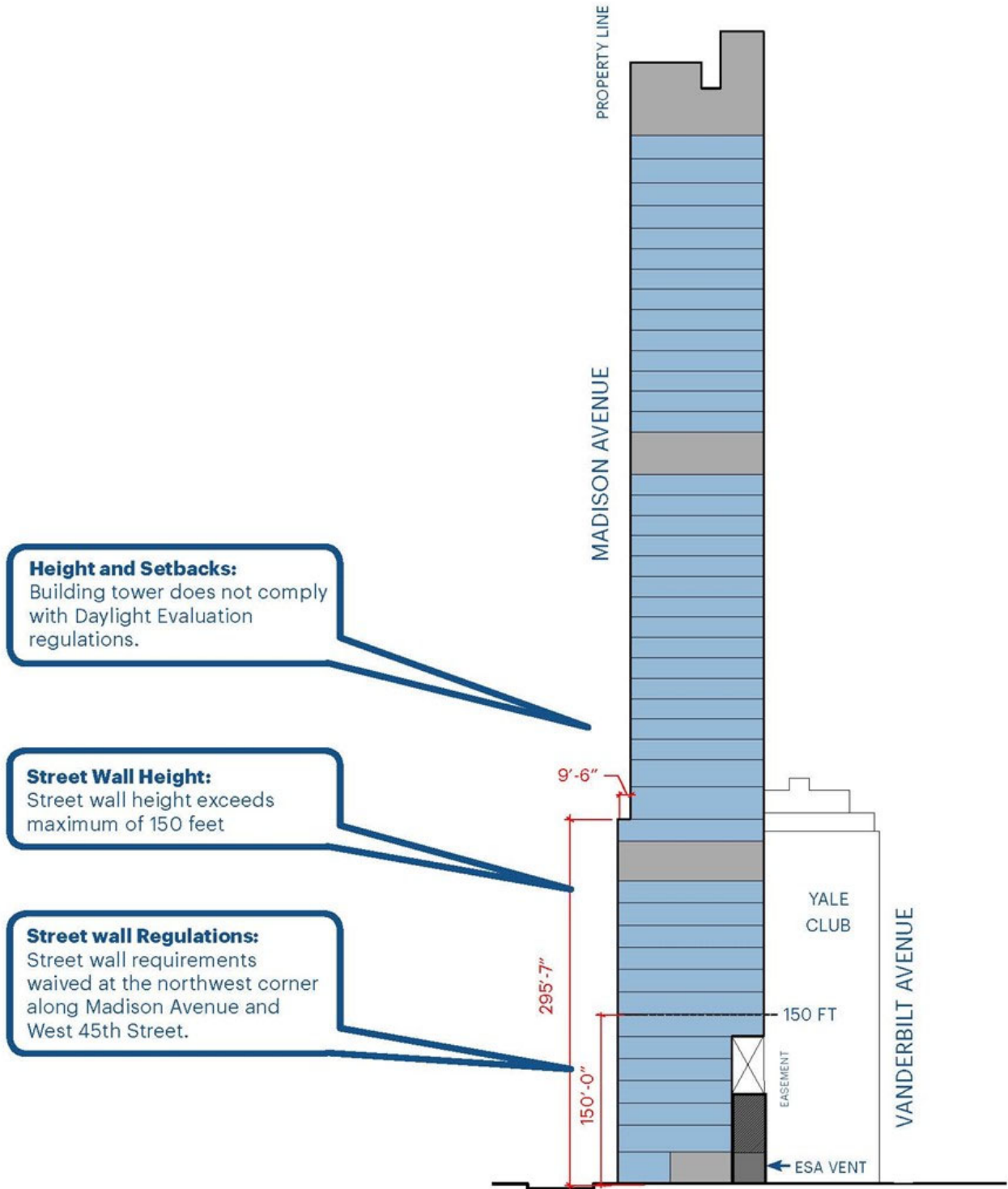


Figure 1-3 Proposed Massing Diagram with Waivers



Proposed Project and With-Action Condition

As mentioned above, the Proposed Action would permit the redevelopment of the Project Site with the Proposed Project, a new, commercial office and retail building up to 1,050 feet tall. The building would have a total floor area of 925,630 gsf. As noted in **Table 1-1**, the building would contain primarily commercial office space, with retail, a circulation area to access the ESA terminal located below the Project Site, and below-grade space (i.e. mechanical and back-of-house space) (see **Figure 1-2** and **Figure 1-3**). For analysis purposes, the Proposed Project represents the future With-Action development scenario (the With-Action condition). The permitted zoning floor area for the Project Site is 30 FAR, utilizing the Grand Central Public Realm Improvement Bonus. The design of the Proposed Project's building would achieve a sidewalk width of 15 feet along 45th Street and 20 feet on Madison Avenue.

As part of its application, the ~~applicant~~Applicant has proposed the creation of new pedestrian access to, and egress from, the LIRR ESA concourse (the existing connection from 45th Street to the GCT Roosevelt Passageway would remain adjacent to the site at 52 Vanderbilt). The proposed project also includes circulation improvements at the Grand Central – 42nd Street Subway Station, including improvements to passenger connections to the IRT Flushing Line (#7 Train) platform. Specific improvements ~~include~~include:

- › **On-site transit infrastructure to provide access from the LIRR ESA Terminal.** This improvement includes the creation of three new 40-inch-wide escalators, a new 6-foot-wide stair, a new ADA accessible elevator and a new 25-foot-high entrance area at the northwest corner of the Project Site (see **Figure 1-4**).
- › **Off-site improvements to be provided by the MTA in the vicinity of the Flushing Line (#7 Train).** This would include the widening of two platform stairs at the east end of the platform, the widening of two stairs that connect the uptown Lexington Line platform to a passageway to the Flushing Line platform, and the extension of an existing transfer passageway and a new stair between the passageway extension and the Flushing Line platform (See **Figure 1-5**).

The Proposed Actions will undergo coordinated review under SEQRA and CEQR regulations and guidelines, with the DCP serving as lead agency on behalf of the CPC.

Figure 1-4 Proposed ESA Improvements

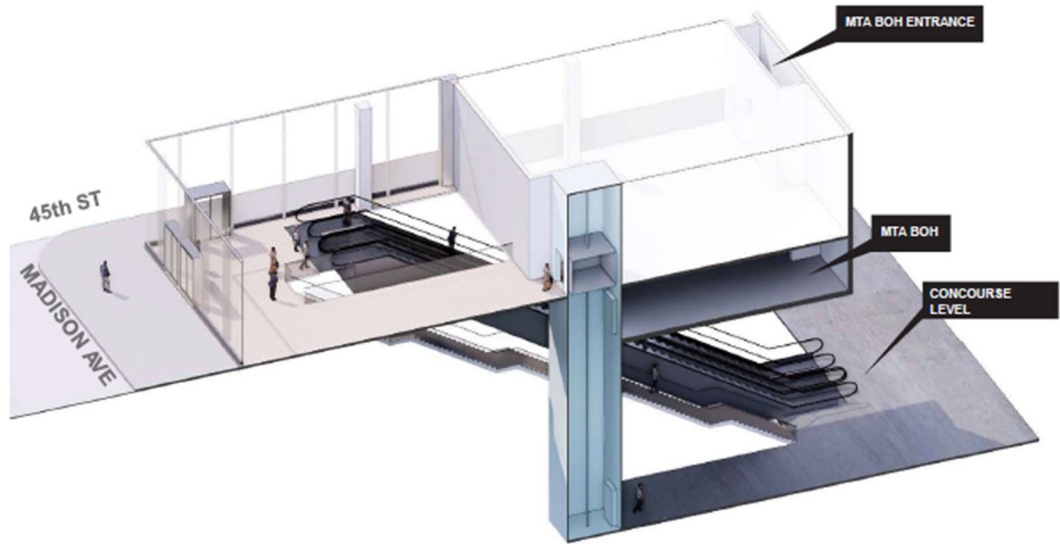
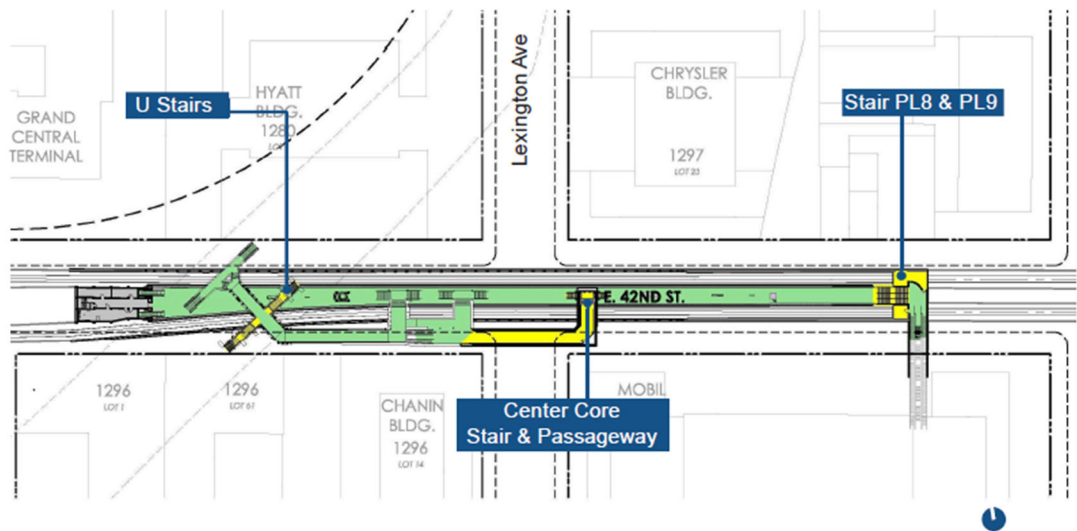


Figure 1-5 Proposed Flushing Line Improvements



Project Purpose and Need

The Proposed Action would permit an increase in the maximum floor area ratio, and modifications to certain bulk regulations and mandatory district plan elements, in order to facilitate the development of a first-class office and retail building on the site of the former MTA Headquarters on Madison Avenue. It would further the City's economic development goals for the Vanderbilt Corridor within the Special Midtown District, a transit-accessible area, and the principal commercial business district in Manhattan. The Proposed Action

would provide for commercial development in an area that is well-served by mass transit and create an opportunity for significant revenue generation for the MTA.

The Proposed Project would provide transportation improvements at the GCT complex, including (i) the creation of new pedestrian access to, and egress from, the LIRR ESA concourse; and (ii) off-site improvements to passenger connections to the Flushing Line platform of the Grand Central – 42nd Street Subway Station. Overall, these improvements would serve to relieve pedestrian congestion and circulation constraints at the GCT complex.

These transportation, planning, and economic development goals would be realized in connection with the development of a first-class office and retail building. The Proposed Action would permit modifications to the maximum street wall heights and height and setback regulations, thus allowing for a distinctive tower design while accommodating larger, optimally sized floor plates. The Proposed Action would also include modifications to mandatory district plan elements to facilitate better site planning and enhanced pedestrian circulation within the district. As a result, the Proposed Action would result in an improved distribution of bulk that is harmonious with the mandatory district plan element strategy and the height and setback goals of the Special Midtown District.

Analysis Framework and Reasonable Worst-Case Development Scenario

The *2020 CEQR Technical Manual* will serve as guidance on the methodologies and impact criteria for evaluating the potential environmental effects of the proposed development that would result from the Proposed Action. As the Proposed Project would be complete and operational in 2026, the environmental setting for analysis is not the current environment, but the future environment. To the extent that the Proposed Action allows for a range of possible scenarios that are considered reasonable and likely, the scenario with the most severe environmental impacts will be chosen for CEQR analysis. This is considered to be the reasonable worst-case development scenario (RWCDS), the use of which ensures that, regardless of which scenario actually occurs, its impacts would be no worse than those considered in the environmental review. The CEQR assessment examines the incremental differences between the RWCDS of the future without the Proposed Action in place (No-Action condition) and the future with the Proposed Action in place and the associated operation of the Proposed Project (With-Action condition).

For the purpose of the environmental analyses, the No-Action condition represents the future absent the Proposed Action and serves as the baseline by which the proposed project (or With-Action condition) is compared to determine the potential for significant environmental impacts. The difference between the No-Action and With-Action conditions represents the increment to be analyzed in the CEQR process.

The Proposed Action would facilitate development on the Project Site as well as off-site transit improvements at Grand Central – 42nd Street Subway Station. The amount and size of development on the Project Site would be governed by the regulations of East Midtown Subdistrict, as amended, as well as the controls of the Special Permits granted for the new building. Accordingly, the difference between the No-Action and With-Action conditions, for purposes of this EIS, consists of the increment between development on the Project Site without the Proposed Action and with the Proposed Action.

Future No-Action Condition

Absent the Proposed Project, in the future No-Action condition, the RWCDs assumes that after the current buildings are demolished, a 15 FAR, 477,599 gsf commercial office and retail building would be constructed. The building would contain 6,144 gsf of ground floor retail space, 411,540 gsf of commercial office space above, and 56,848 sf of below-grade and mechanical space. It would also include an easement for possible future ESA circulation, to be built by the MTA. The building would be 472 feet high and 30 stories and feature a tower on a 114-foot-tall podium. The tower would have one set back at 194 feet. The ventilation structure on Lot 25 would remain under existing conditions (see **Figure 1-6** and **Figure 1-7**).

Figure 1-6 No-Action Massing

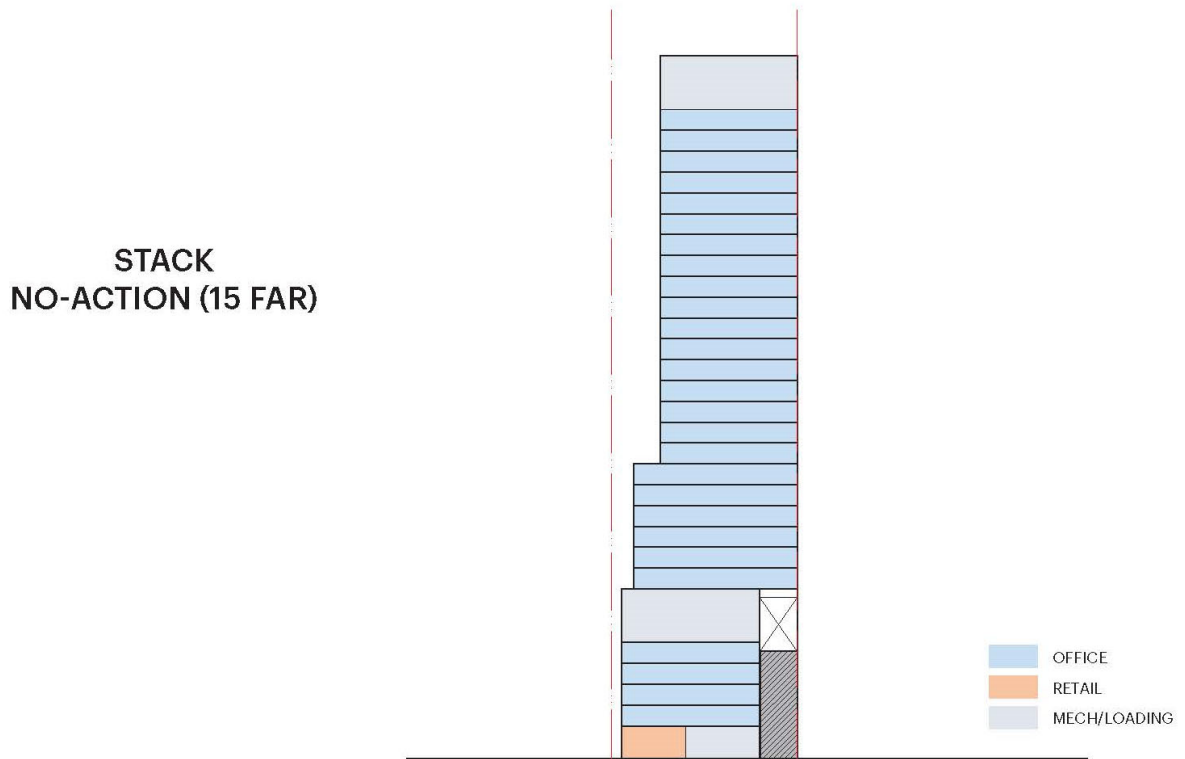


Figure 1-7 No-Action Ground Floor Plan



Future With-Action Condition

As detailed above, the future With-Action condition assumes that the Proposed Project would consist of a 30 FAR commercial office and retail building with a total of 925,630 gsf (753,120 zsf). The building would be approximately 55 stories tall and reach up to 1,050 feet (see **Figure 1-3**). The building would be a tower on a podium, with the podium reaching approximately 321 feet. The proposed increment for analysis is described below in **Table 1-1**.

Table 1-1 Reasonable Worst-Case Development Scenario

Use	Existing	No-Action		With-Action		Increment	
		GSF	Employees	GSF	Employees	GSF	Employees
Office	0	411,540	1,646	832,613	3,330	421,073	1,684
Retail	0	6,144	18	5,357	16	-787	(2)
Circulation Space	0	N/A ¹	-	2,372	-	2,372	-
Mechanical	0	56,848	-	85,288	-	28,440	-
Total GSF	0	474,532	1,664	925,630	3,346	451,098	1,682

Note: Employee assumptions based on 1 employee per 250 sf of office space, 1 employee per 333.33 sf of retail space

¹ Under the No-Action condition, an easement of approximately 3,067 feet would be reserved on the ground floor for an ESA entrance to be built after the build year of 2026.

The building would be a tower on a podium. In response to comments during the public review process (and following the public hearing on the DEIS), it is proposed that the maximum height of the podium or the street wall of the building would be reduced to approximately 295 feet (from approximately 321 feet).

Increment for Analysis

In total, the With-Action condition would result in a net increase of 451,098 gsf over the No-Action scenario, with approximately 421,073 gsf dedicated to commercial office space, a reduction of 787 gsf in local retail space, an increase in transit circulation space by 2,372 gsf, and an increase in the overall mechanical space by 28,440 gsf (see **Table 1-1**). Future development will be controlled by the requested discretionary actions. Therefore, the Proposed Project would be limited to the development described above, and the summary in **Table 1-1** represents the reasonable worst-case development scenario.

Analysis Year (Build Year)

The build year for the Proposed Project is 2026.¹

Public Review Process

The Applicant requires the Proposed Action to implement the Proposed Project. The Proposed Action is subject to both ULURP and CEQR.

The City's ULURP process, mandated by Sections 197-c and 197-d of the New York City Charter, is designed to allow public review of ULURP applications at four levels: Community Board, Borough President, the CPC, and the City Council. The procedure has mandated time limits for review at each stage to ensure a maximum review period of approximately seven months. The process begins with certification by DCP that the ULURP application is complete. The application is then referred to the relevant Community Board (in this case Manhattan Community Board (CB) 5). The Community Board has up to 60 days to review and discuss the proposal, hold a public hearing, and adopt an advisory resolution on the ULURP application. The Borough President then has up to 30 days to review the application. CPC then has up to 60 days, during which time a public hearing is held on the ULURP application. If approved by the CPC, the application is then forwarded to the City Council, which has 50 days to review the ULURP application, during which time a ULURP/CEQR public hearing is held. Comments made at the Draft EIS (DEIS) public hearing and subsequent comment period (the record for commenting remains open for ten days after the hearing to receive written comments) are incorporated into a Final EIS (FEIS). The FEIS must be completed at least ten days before CPC makes its decision on the application. The CPC may approve, approve with modifications or deny the application. If the ULURP application is approved, or approved with modifications, it moves forward to the City Council for review. The City

¹ Due to economic conditions, the start of construction could be delayed. In this instance, completion of the proposed building and the Flushing line improvements both could be completed at a later date, but construction of the East Side Access entrance would still occur on the timeline presented in the FEIS and would be completed by 2026. It is expected that if there are construction delays for the proposed building due to conditions in the Midtown office market, that the No-Action projects in the surrounding area will also be affected by conditions in the Midtown office market and would similarly delay the start of construction. Therefore, there would be no notable changes to the study area conditions assessed for the construction period and there would be no material changes to the conclusions of the FEIS analyses.

Council has 50 days to review the application and during this time will hold a public hearing on the proposed action. The Council may approve, approve with modifications or deny the application. If the Council proposes a modification to the proposed action, the ULURP review process is extended for 15 days, providing time for a CPC determination on whether the proposed modification is within the scope of the environmental review and ULURP review. If it is, then the Council may proceed with the modification; if not, then the Council may only vote on the actions as approved by the CPC. Following the Council's vote, the Mayor has five days in which to veto the Council's actions. The City Council may override the mayoral veto within 10 days.

City Environmental Quality Review (CEQR)

CEQR is a process by which agencies review discretionary actions for the purpose of identifying the impacts those actions may have on the environment. The City of New York established CEQR regulations in accordance with SEQRA. Pursuant to the SEQRA (Article 8 of the Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City has established rules for its own environmental quality review in Executive Order 91 of 1977, as amended, and 62 RCNY Chapter 5, the Rules of Procedure for CEQR. The environmental review process provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to propose reasonable alternatives, and to identify, and when practicable mitigate, significant adverse environmental impacts. CEQR rules guide environmental review, as follows:

- › *Establish a Lead Agency.* Under CEQR, the "lead agency" is the public entity responsible for conducting environmental review. In accordance with CEQR rules (62 RCNY §5-03), DCP, acting on behalf of the CPC, is serving as the CEQR lead agency for environmental review and will coordinate the review of the Proposed Actions, with the MTA acting as an involved agency.
- › *Environmental Review and Determination of Significance.* The lead agency determines whether the proposed action(s) may have a significant impact on the environmental environment. To do so, DCP, in this case, evaluated an Environmental Assessment Statement (EAS) dated July 23, 2020 for the Proposed Action. Based on information contained in the EAS, and as the Proposed Action is classified as a "Type I Action," DCP determined that the Proposed Action may have a significant adverse impact on the environment, as defined by statute, and issued a Positive Declaration on July 23, 2020, requiring that an EIS be prepared in conformance with all applicable laws and regulations.
- › *Scoping.* Along with its issuance of a Positive Declaration, DCP issued a Draft Scope of Work for the EIS, dated July 24, 2020, marking the beginning of the comment period on the Draft Scope. "Scoping," or creating the scope of work, is the process of identifying the environmental impact analysis areas, the methodologies to be used, the key issues to be studied, and creating an opportunity for others to comment on the study areas, methodologies, and areas of analysis presented in the scoping document. CEQR requires a public scoping meeting as part of the process. A public scoping meeting was held on August 27, 2020 at 2:00pm and, in support of the City's efforts to contain the spread of COVID-19, the public scoping meeting was held remotely. The public review period for agencies and the public to review and comment on the Draft Scope of Work was open

through September 8, 2020. Modifications to the Draft Scope of Work for the project's EIS were made as a result of public and interested agency input during the scoping process. A Final Scope of Work document for the Proposed Project was issued on May 3, 2021.

- › *Draft Environmental Impact Statement (DEIS).* ~~This~~The DEIS was prepared in accordance with the Final Scope of Work and followed the methodologies and criteria for determining significant adverse impacts in the *CEQR Technical Manual*. The lead agency reviewed all aspects of the document, calling on other City and state agencies to participate where the agency's expertise is relevant. Once the lead agency was satisfied that the DEIS was complete, it issued a Notice of Completion and circulated the DEIS for public review.
- › *Public Review.* Publication of the DEIS and issuance of the Notice of Completion signals the start of the public review period. During this time, the public has the opportunity to review and comment on the DEIS either in writing or at a public hearing convened for the purpose of receiving such comments. When the CEQR process is coordinated with the ULURP process, the public hearings are held jointly. A public hearing was held on the DEIS in conjunction with the CPC hearing on the ULURP application, on August 18, 2021. All substantive comments received at the hearing ~~become~~became part of the CEQR record and ~~must be~~are summarized and responded to in ~~the~~this FEIS.
- › *Final Environmental Impact Statement (FEIS).* After the close of the public comment period for the DEIS, ~~the~~on August 30, 2021, this FEIS ~~is~~was prepared. ~~The~~This FEIS ~~must address~~addresses relevant comments on the DEIS, either in a separate chapter or in changes to the body of the text, graphics and tables. Once the lead agency ~~determines~~determined that the FEIS ~~is~~was complete, it ~~will issue~~issued the Notice of Completion and ~~circulate~~circulated the FEIS.
- › *Findings.* To document that the responsible public decision-makers have taken a hard look at the environmental consequences of a proposed project, agencies taking discretionary actions regarding the project must adopt a formal set of written findings, reflecting their conclusions about the significant adverse environmental impacts of the project, potential alternatives, and potential mitigation measures. The findings may not be adopted until ten (10) days after the Notice of Completion has been issued for the FEIS. Once findings are adopted, the lead and involved agencies may take their actions. Accordingly, the CPC must wait at least ten days after the FEIS is complete to take action on the application.