

**Draft Scope of Work for a
Draft Environmental Impact Statement for
570 Fifth Avenue
CEQR No. 22DCP100M**

A. INTRODUCTION

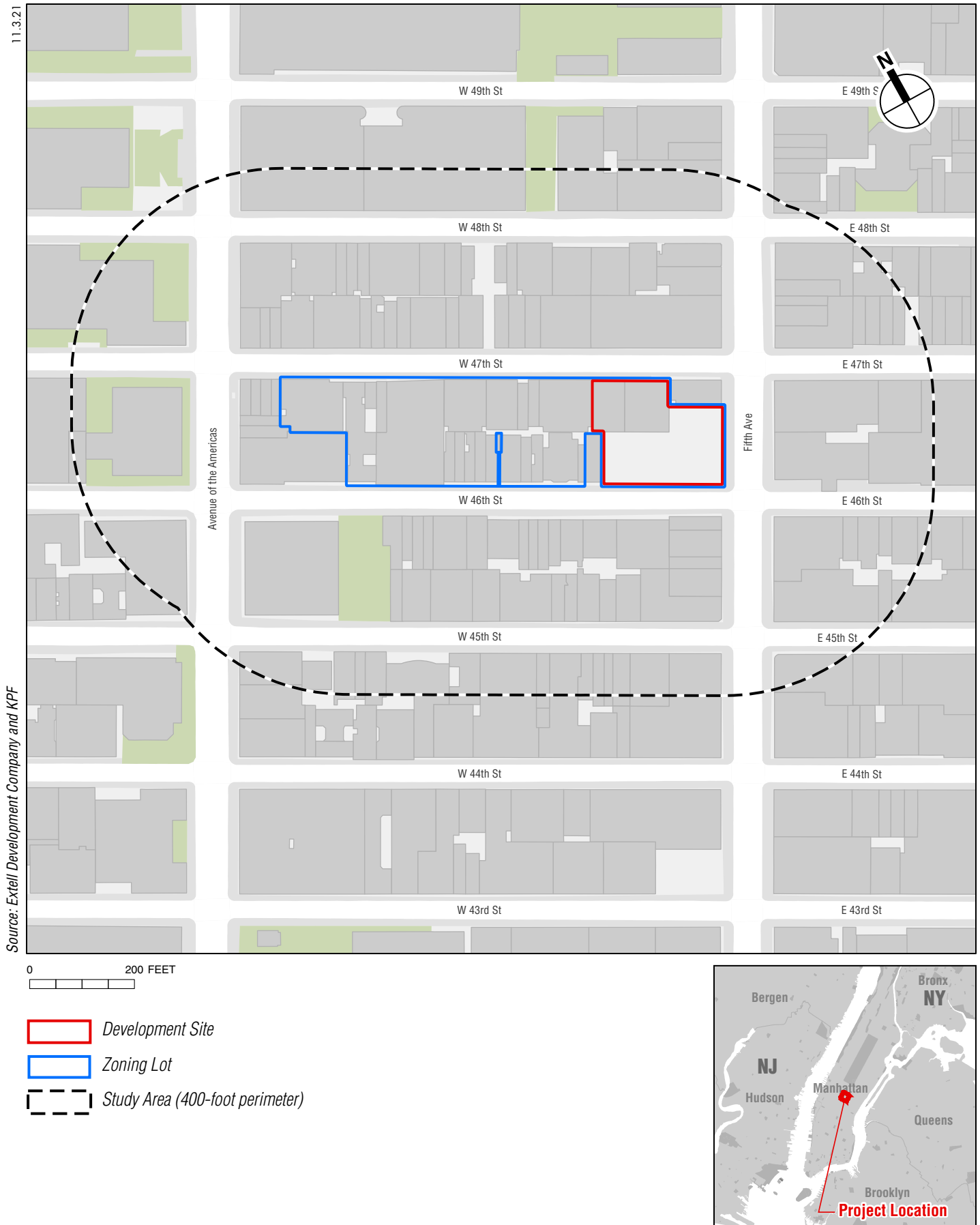
This Draft Scope of Work (“Draft Scope”) outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed new building (the “Proposed Project”) at 570 Fifth Avenue. 46/47 Owner LLC (the “Applicant”) is requesting zoning text amendments and special permits pursuant to the amended zoning text (the “Proposed Actions”) from the City Planning Commission (CPC) to facilitate the redevelopment of the Proposed Development Site with the Proposed Project. With the Proposed Actions, the Applicant would develop an Office building with a maximum floor area of approximately 1,543,759 gross square feet (gsf)—or an alternative development—a Residential/Hotel development with a maximum floor area of approximately 1,462,174 gsf at 570 Fifth Avenue (the “Proposed Development Site”). The Proposed Development Site comprises Block 1262, Lots 29, 30, 31, 32, 33, 34, 35, 37, 38, 39, 42, 45, and 130. It is located on the west side of Fifth Avenue between West 46th and West 47th Streets in Midtown in Manhattan Community District 5. Beyond the Proposed Development Site, the zoning lot will occupy most of the remainder of Block 1262, including Lots 9, 17-21, 23-24, 48, 52-54, 56, 63, former 67,¹ 117, 123, 127, 1701-1818 (see **Figure 1**).²

To accomplish the Proposed Project, the Applicant is requesting several actions from CPC, including zoning text amendments to Section 81-066 of the Zoning Resolution and three special permits pursuant to amended zoning text to modify various sections of the Zoning Resolution, as detailed below, under “Actions Necessary to Facilitate the Proposed Project.”

The New York City Department of City Planning (DCP), acting on behalf of CPC, will be the lead agency for environmental review. Based on the Environmental Assessment Statement (EAS) that has been prepared, the lead agency has determined that the Proposed Actions have the potential to result in significant adverse environmental impacts, requiring that an EIS be prepared. Scoping is the first step in the preparation of the EIS and provides an early opportunity for the public and other agencies to be involved in the EIS process. It is intended to determine the range of issues and considerations to be evaluated in the EIS. This Draft Scope of Work includes a description of

¹ Current Lots 0100, 0120-0204, 206, 0205, 0208, 0210, 0212, 0301-0305, 0307, 0309, 0310, 0312, 0401, 0402, 0404-0407, 0409, 0411, 0500-0504, 0506, 0507, 0510-0512, 0601-0603, 0701-0704, 0706, 0707-0709, 0801, 0802, 0805, 0807, 0808, 1614, 0809, 0901, 0902, 0904, 0906, 0908, 0912, 1001, 1603, 1604, 1002, 1004, 1007, 1009, 1010-1012, 1101-1105, 1107, 1109-1112, 1114, 1201-1204, 1206, 1209-1214, 1300, 1301, 1401-1409, 1501, 1502, 1504-1506, 1508, 1510, 1512, 1514, 1601, 1602, 1610, 1612.

² Excluded from the Proposed Development Site and zoning lot are Lots 1, 22, 27, 41, 72-77.



EXTELL 570 FIFTH AVENUE

Project Location
Figure 1

the Proposed Project and the actions necessary for its implementation, presents the proposed framework for the EIS analysis, and discusses the procedures to be followed in the preparation of the Draft EIS (DEIS). The 2020 *City Environmental Quality Review (CEQR) Technical Manual* will serve as a general guide on the methodologies and impact criteria for evaluating the Proposed Actions' effects on the various areas of environmental analysis.

B. PROJECT DESCRIPTION

DESCRIPTION OF THE PROPOSED DEVELOPMENT SITE AND ZONING LOT

The Proposed Development Site is located on the west side of Fifth Avenue between West 46th and West 47th Streets in Midtown in Manhattan Community District 5 (see **Figure 1**). It is occupied by 11 vacant lots (Block 1262, Lots 29, 30, 31, 32, 33, 34, 35, 37, 38, 39, and 130) and two tax lots (Block 1262, Lots 42 and 45) that contain buildings. The two buildings are 13 to 15 stories (approximately 173' to 204' tall) and together comprise approximately 149,968 gsf. These two buildings are vacant and in the process of being demolished. The Proposed Development Site has a lot area of approximately 43,011 square feet (sf) with approximately 150 feet of frontage on Fifth Avenue, approximately 228 feet of frontage on West 46th Street, and approximately 150 feet of frontage on West 47th Street. There are no existing curb cuts or parking spaces on the Proposed Development Site.

The eastern portion of the Proposed Development Site (within 150 feet of Fifth Avenue) is located in a C5-3 district within the Fifth Avenue Subdistrict of the Special Midtown District. The western portion of the Proposed Development Site (beyond 150 feet of Fifth Avenue) is located in a C6-4.5 district within the Special Midtown District (see **Figure 2**).

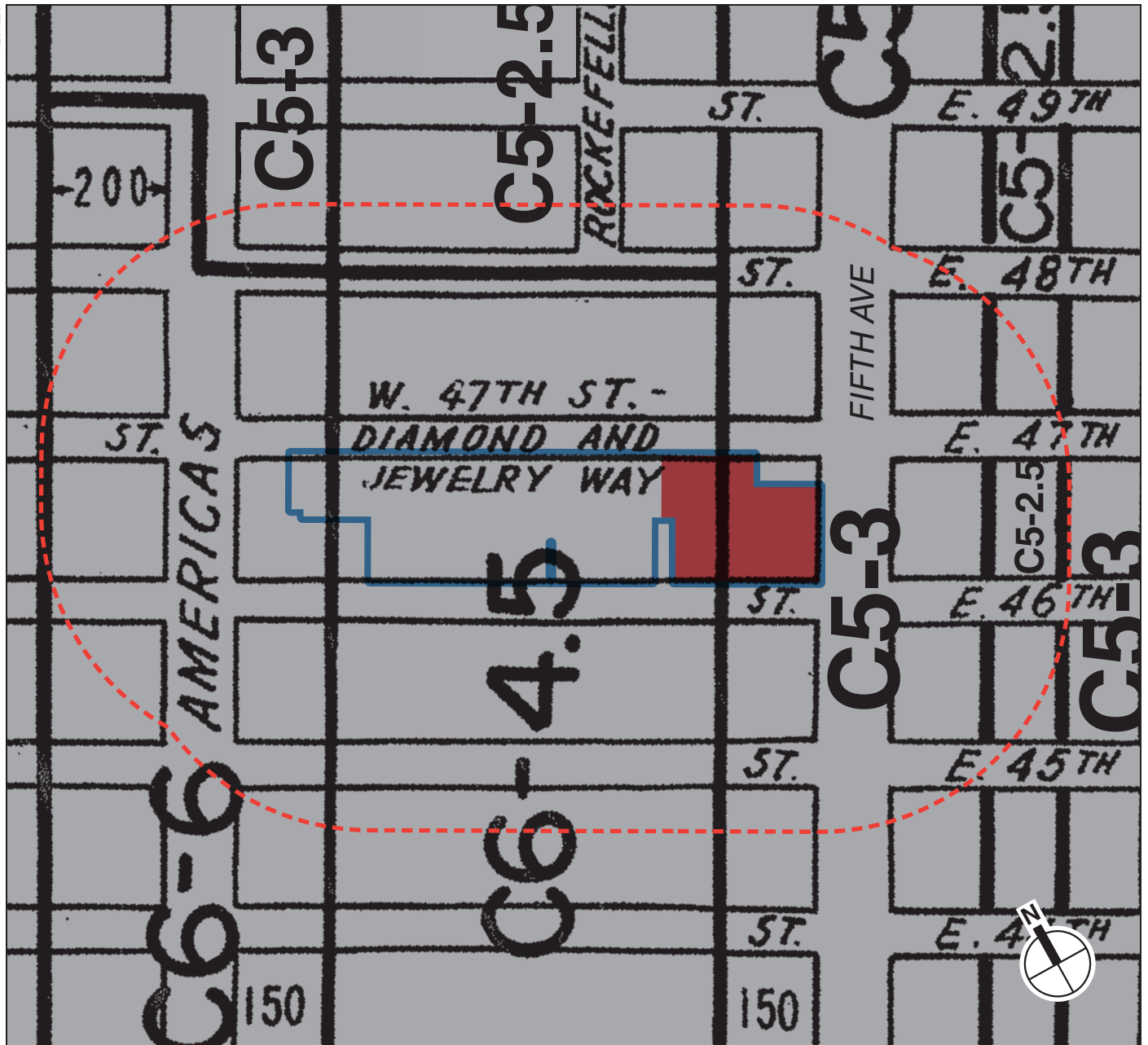
Beyond the Proposed Development Site, the zoning lot will occupy most of the remainder of Block 1262, including Lots 9, 17-21, 23-24, 48, 52-54, 56, 63, former 67³, 117, 123, 127, 1701-1818.⁴ The buildings on these lots include the 34-story International Gem Tower, mid-rise (10- to 16-story) commercial and office buildings, and low rise (5- to 6-story) mixed residential and commercial buildings. An expansion of up to 2,632 gsf (2,500 zsf) of the existing hotel use would be permitted at Lot 9. Other than this permitted expansion, other properties located on the zoning lot are not considered as potential development sites because all unused base and bonus floor area would be transferred to the Proposed Development Site. As such, no new development on the remainder of the zoning lot or in the study area would be facilitated by the Proposed Actions.

DESCRIPTION OF SURROUNDING AREA

The blocks surrounding the Proposed Development Site contain a mix of high density commercial and office uses, mixed residential and commercial uses, industrial and manufacturing uses, institutional uses (churches), parking facilities, and ground floor retail/commercial uses.

³ Current Lots 0100, 0120-0204, 206, 0205, 0208, 0210, 0212, 0301-0305, 0307, 0309, 0310, 0312, 0401, 0402, 0404-0407, 0409, 0411, 0500-0504, 0506, 0507, 0510-0512, 0601-0603, 0701-0704, 0706, 0707-0709, 0801, 0802, 0805, 0807, 0808, 1614, 0809, 0901, 0902, 0904, 0906, 0908, 0912, 1001, 1603, 1604, 1002, 1004, 1007, 1009, 1010-1012, 1101-1105, 1107, 1109-1112, 1114, 1201-1204, 1206, 1209-1214, 1300, 1301, 1401-1409, 1501, 1502, 1504-1506, 1508, 1510, 1512, 1514, 1601, 1602, 1610, 1612.

⁴ Excluded from the Proposed Development Site and zoning lot are Lots 1, 22, 27, 41, 72-77.



-  Development Site
-  Zoning Lot
-  Study Area (400-foot perimeter)
-  Zoning District Boundaries

0 200 FEET

The built character of the surrounding area includes larger commercial office buildings and residential buildings, including the 22- to 70-story commercial office buildings at Rockefeller Center between West 48th and West 50th Streets between Fifth and Sixth Avenues; multiple 13- to 38-story commercial office buildings along Fifth Avenue; mid-block mid-rise (8- to 12-story) commercial and office buildings and smaller, low-rise (4- to 6-story) residential buildings, many with ground floor retail; and several taller (40- to 54-story) office buildings that are located on Sixth Avenue. In addition, St. Patrick's Cathedral occupies the block bounded by Fifth and Madison Avenues between East 50th and East 51st Streets.

Public transit serving the area includes the B/D/F/M subway lines on Sixth Avenue, with a stop at 47th-50th Streets/Rockefeller Center, and the Lexington Avenue Subway, which has stops at Grand Central-42nd Street and East 51st Street. Buses serving the area include north and south bound buses on Fifth, Sixth, and Madison Avenues, including LTD and Express buses; and the M55 crosstown bus (east bound on West 44th Street). Citibike stations also serve the area, with nearby stations at 48th Street and Fifth Avenue, 44th Street and Fifth Avenue, and 45th Street and Sixth Avenue.

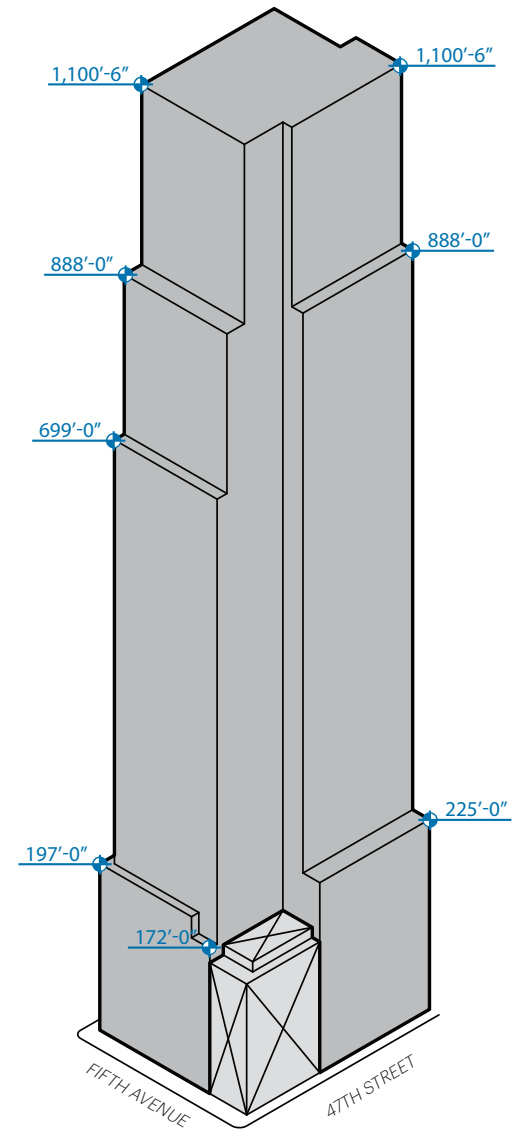
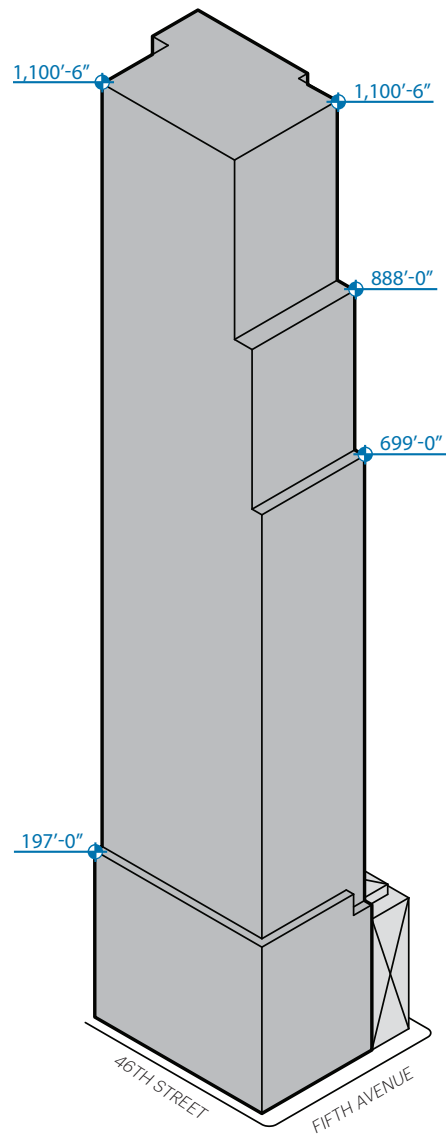
DESCRIPTION OF THE PROPOSED PROJECT

The proposed development (the Office development) is an office building with a maximum floor area of approximately 1,543,759 gsf (approximately 1,176,012 zsf), including approximately 1,466,174 gsf (approximately 1,162,559 zsf) of office space, including an up to 20,000-gsf event space, and approximately 77,585 gsf (approximately 13,453 zsf) of retail space, of which approximately 62,637 gsf is below grade. The Proposed Actions would also permit an expansion of up to 2,632 gsf of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the same zoning lot as the Proposed Development Site. The building would have its primary office entrance on Fifth Avenue. At the base, the building would have a recessed area that would be set back from the midblock Fifth Avenue frontage by approximately 5 feet; the office entrance would be set within this recessed area. Primary retail entrances would be on Fifth Avenue and secondary retail entrances would be on West 46th and West 47th Streets. An entrance for the upper floor up to 20,000-gsf event space would be located at the western end of the building on West 47th Street. An approximately 20-foot-wide porte cochere at the ground level would provide access to a north-south drop off driveway that would extend through the western part of the building. The porte cochere would have a curb cut on both West 46th and West 47th Streets. Three accessory parking spaces would be located adjacent to the porte cochere. Two loading docks with a single curb cut would be located east of the porte cochere on West 46th Street. The loading docks would have truck lifts that would provide access to the building's below grade loading berths. Twenty accessory parking spaces would be located in the building's basement level. Service entrances would be on both West 46th and West 47th Streets (see **Figures 3 and 4**).

An alternative development scenario—the Residential/Hotel development—would be a mixed-use building with a maximum floor area of approximately 1,462,174 gsf (approximately 1,176,012 zsf), including approximately 988,283 gsf (approximately 800,866 zsf) of hotel space (or approximately 1,520 hotel rooms⁵), approximately 397,878 gsf (approximately 324,841 zsf) of

⁵ The Proposed Actions would also permit an expansion of up to 2,632 gsf (or approximately 4 hotel rooms) of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the

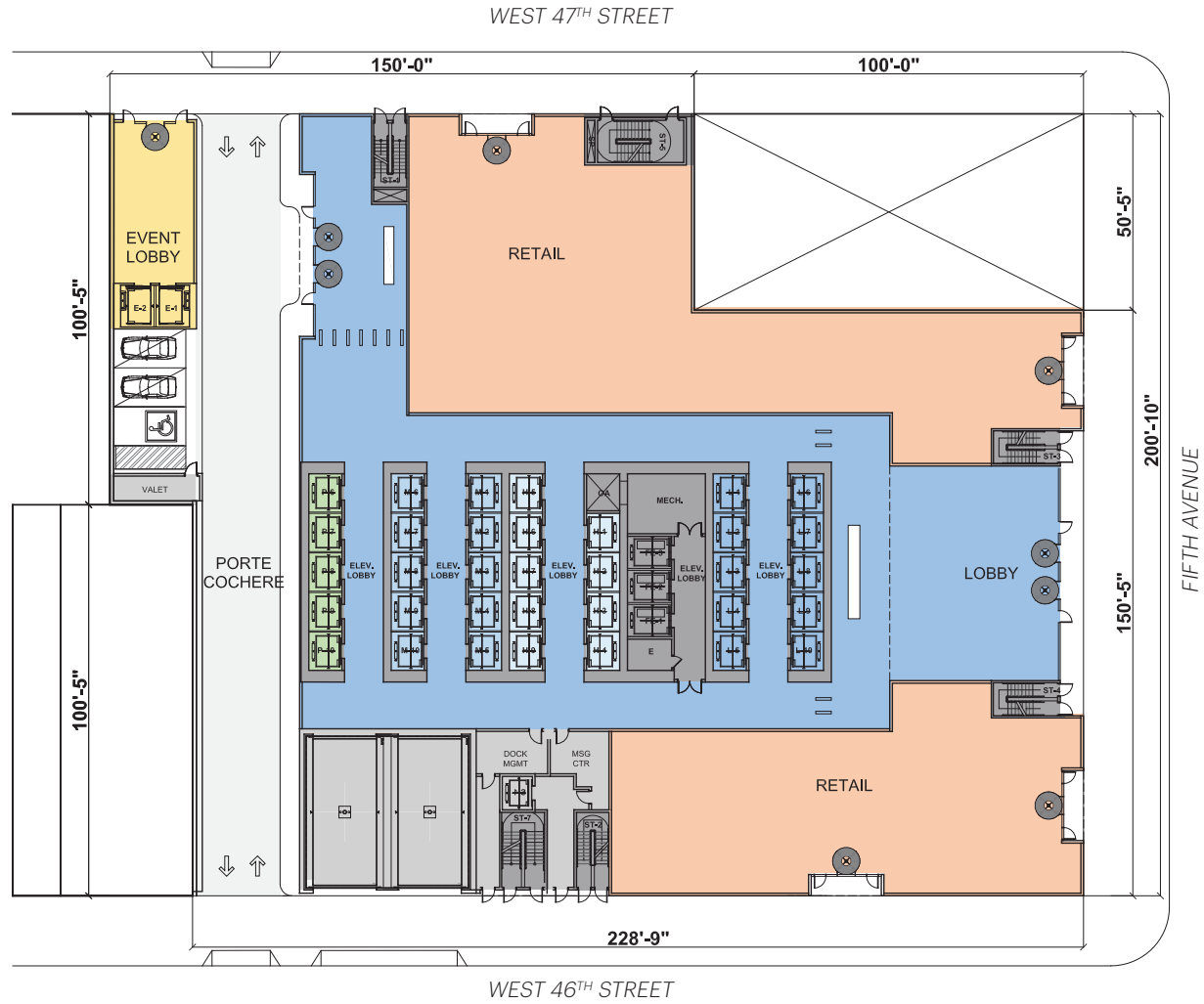
Source: Extell Development Company and KPF



NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

EXTELL 570 FIFTH AVENUE

Proposed Project – Single Building Envelope
Figure 3



NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

residential space (or approximately 468 dwelling units [DUs]), and approximately 76,013 gsf (approximately 50,305 zsf) of retail space, of which approximately 20,119 gsf is below grade. The Proposed Actions would also permit an expansion of up to 2,632 gsf of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the same zoning lot as the Proposed Development Site. The building would not have any recessed areas at the ground floor apart from the building entrances which would be recessed by approximately 5 feet from the property line. On West 46th Street, the building would have a residential entrance and an ancillary hotel access point; the hotel's primary entrance would be on West 47th Street. Retail entrances would be located on Fifth Avenue and West 46th Street. An approximately 20-foot-wide porte cochere at the ground level would provide access to a north-south drop off driveway that would extend through the western part of the building. The porte cochere would have a curb cut on both West 46th and West 47th Streets. Seven accessory parking spaces would be located adjacent to the porte cochere. The Residential/Hotel building would have a two-bay loading dock with a single wide curb cut at the western end of the building on West 47th Street. The loading docks would have truck lifts that would provide access to the building's below grade loading berths. Twenty accessory parking spaces would be located in the basement level. Service entrances would be on both West 46th and West 47th Streets (see **Figures 3 and 5**).

The Proposed Actions would permit development of a building, as shown in **Figure 3**, of up to 1,100 feet tall with a base of up to 197 feet on Fifth Avenue and West 46th Street and up to 225 feet on West 47th Street. The tower would set back from the base with additional setbacks at a height of approximately 699 feet and at a height of approximately 888 feet. In both scenarios, the building's massing would fit within this single building envelope.

ACTIONS NECESSARY TO FACILITATE THE PROPOSED PROJECT

To facilitate the Proposed Project, a number of approvals are required, including discretionary actions that are subject to CEQR. The Proposed Project is also subject to the City's Uniform Land Use Review Procedure (ULURP). The lead agency for the environmental review is the Department of City Planning (DCP). The Applicant is requesting the following actions:

- (1) Zoning text amendments, including amendments to Section 81-066.⁶
- (2) Special permit pursuant to Section 66-512 to permit:
 - (a) a floor area bonus for mass transit station improvements (the Fifth Avenue and 53rd Street Station; see **Figure 6**)
- (3) Special permit pursuant to amended ZR Section 81-066 to permit modifications, including:
 - (a) the transfer of floor area across district boundaries;
 - (b) modifications to other bulk and use regulations, including but not limited to, the daylight evaluation/daylight compensation regulations (ZR 81-26 & 81-27);
 - (c) modifications to the maximum street wall height (ZR 81-43, 81-83, & 81-262[b]);

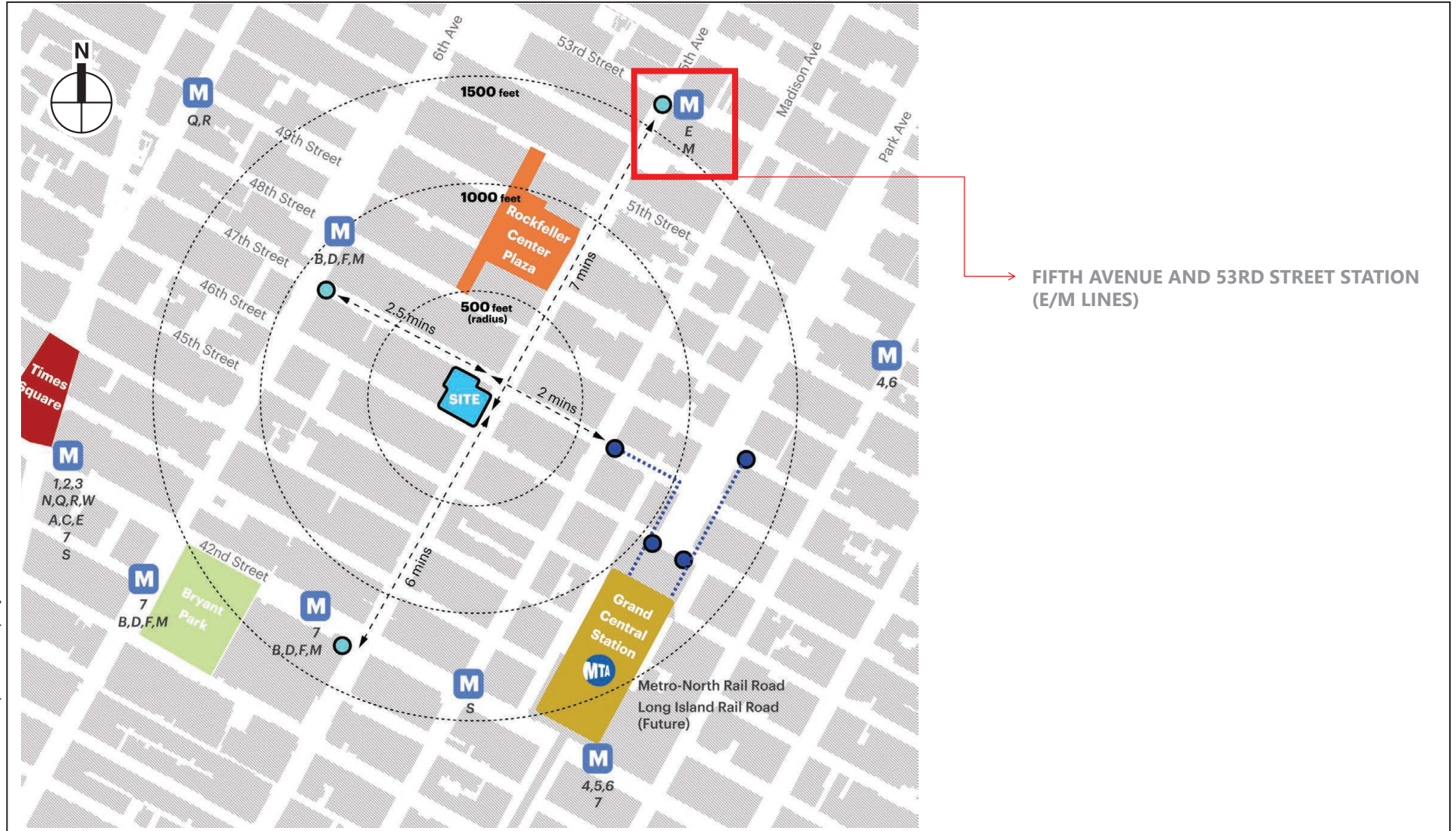
same zoning lot as the Proposed Development Site. Therefore, a total of 1,524 hotel rooms would be analyzed.

⁶ Other than the Proposed Development Site, no potential or projected development sites have been identified within the area where the text amendment would be available. However, as described below in "Conceptual Analysis," a conceptual analysis of the proposed text amendment will be undertaken.



NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

Ground Floor Plan – Residential/Hotel Scenario
Figure 5



NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

- (d) modifications to the regulations governing major building entrances and maximum lobby widths on Fifth Avenue (ZR 81-42, 81-47[b][2] & 81-84[a]);
 - (e) modifications to the minimum retail space requirements applicable within the Fifth Avenue Subdistrict (ZR 81-82[b]);
 - (f) modifications to pedestrian circulation space requirements (ZR 81-45 & 37-50);
 - (g) modifications to building entrance recess area requirements (ZR 37-53(b));
 - (h) modifications to the location of floors that can be occupied by commercial uses (ZR 32-422);
 - (i) modifications to curb cut regulations (ZR 13-242, 81-44);
 - (j) modifications to parking regulations (ZR 81-84(b)) and screening requirements (ZR 13-221); and
 - (k) modifications to the maximum signage area, height and illumination regulations within the Fifth Avenue Subdistrict (ZR 32-642 & 81-141).
- (4) Special permit pursuant to ZR 74-802 to allow transient hotel use.

C. PURPOSE AND NEED OF THE PROPOSED ACTIONS

The primary purpose of the Proposed Actions is to facilitate the development of an Office building or a Residential/Hotel building that will be part of the continued revitalization of Midtown Manhattan. The Proposed Actions would modify the Zoning for Accessibility zoning regulations and the underlying use and bulk regulations. This would allow for development of a distinctive tower with larger, optimally sized floor plates that meets the needs of contemporary commercial tenants (i.e., generous column spacing, large ceiling heights, and upgraded mechanical systems). With the Proposed Actions, the resulting building—under either development scenario—would have a base that is consistent with the base heights of other nearby buildings while complementing the large buildings that characterize the Fifth Avenue blockfronts in this area of Midtown Manhattan.

The Proposed Actions would also result in substantial upgrades to transit infrastructure and accessibility. Specifically, the Proposed Actions would redevelop portions of the Fifth Avenue and 53rd Street Station (E/M lines) and would result in the station becoming ADA accessible (see **Figure 6**). The station improvements would include a new street entrance on East 53rd Street east of Fifth Avenue; a new stair from mezzanine to upper platform and a new stair from upper platform to lower platform; an ADA elevator from mezzanine to upper platform and to lower platform; an ADA elevator from street to upper and lower passageways; two escalators from mezzanine to upper platform; a new mezzanine area under East 53rd Street with fare control to accommodate a street entrance and new access core; and a new access core between platforms and street level to accommodate escalators, elevators, and stairs. In doing so, the Proposed Actions would result in significant transit improvements, facilitate the development of a new commercial building in a transit rich, high-density area, and support New York City’s long-term economic growth.

D. ANALYSIS FRAMEWORK

The lead agency is required to take a “hard look” at the environmental impacts of proposed actions and, to the maximum extent practicable, avoid or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An EIS

is a comprehensive document used to systematically consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action.

This section outlines the conditions to be examined in the EIS.

REASONABLE WORST CASE DEVELOPMENT SCENARIO (RWCDs)

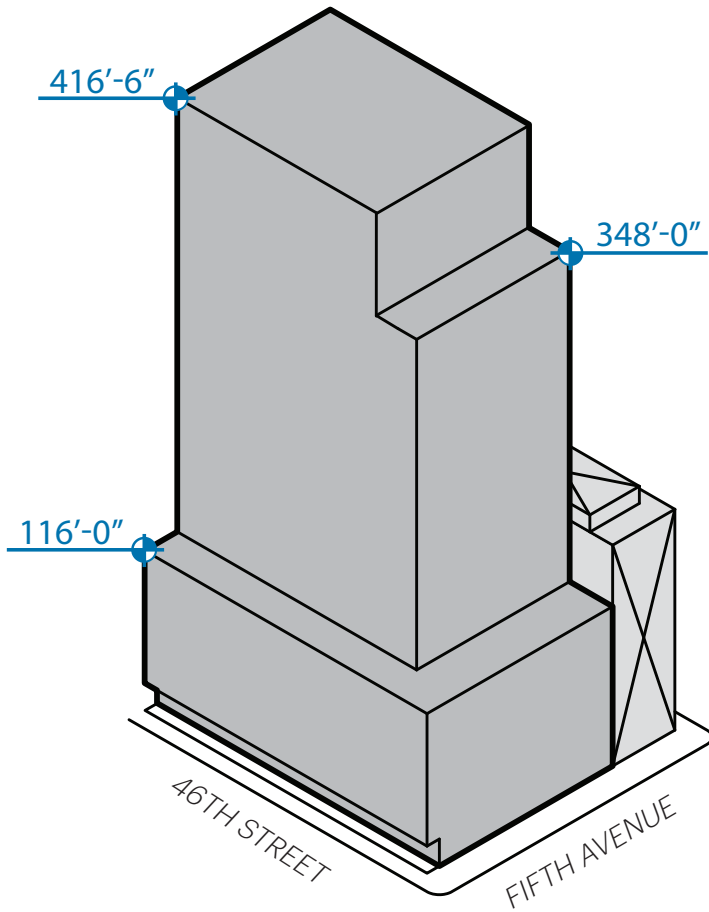
In order to assess the possible effects of the Proposed Actions, a Reasonable Worst-Case Development Scenario (RWCDs) was developed to account for existing conditions, the Future without the Proposed Actions (No Action condition) and the Future with the Proposed Actions (With Action condition). The incremental difference between the future No Action condition and future With Action condition serves as the basis for identifying potential environmental impacts, as described below. For this EIS, two With Action conditions will be analyzed: a With Action Office development and a With Action Residential/Hotel development.

ANALYSIS YEAR

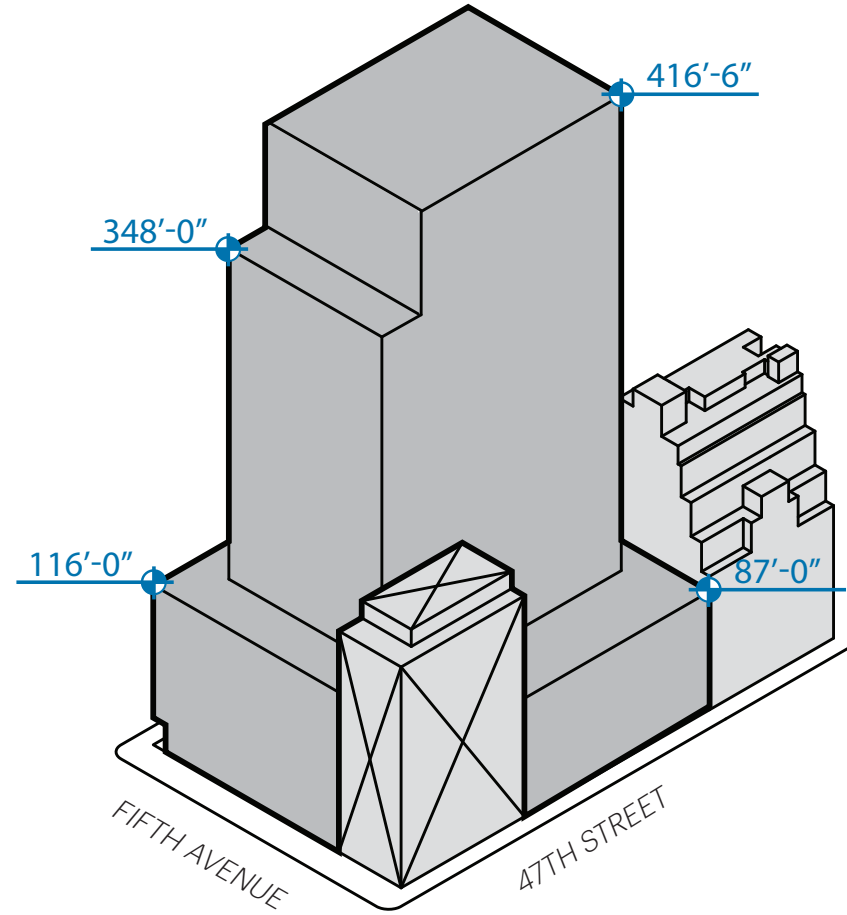
The Proposed Project—either the Office development or the Residential/Hotel development—would be constructed in a single phase, with construction anticipated to begin in 2023 and be complete and occupied in 2028 (for a total of approximately 54 months). Under both With Action development scenarios, it is anticipated that construction would include excavation and foundation (approximately 12 months); superstructure and exteriors (approximately 28 months); and interiors (approximately 28 months). The superstructure and exteriors construction would be undertaken following the start of the excavation and foundation stage and would overlap for approximately 3 months. The interiors would be undertaken following the start of the superstructure and exteriors construction stage and would overlap for approximately 11 months. The ongoing demolition work will be completed prior to the start of the excavation and foundation stage.

THE FUTURE WITHOUT THE PROPOSED ACTIONS (NO ACTION CONDITION)

Absent the Proposed Actions, in the No Action condition, the Applicant would develop a 24-story office building that would have a maximum height of approximately 417 feet tall. The No Action Office building would have a maximum floor area of approximately 747,956 gsf (approximately 596,437 zsf), including approximately 663,492 gsf (approximately 553,397 zsf) of office space and approximately 84,464 gsf (approximately 43,040 zsf) of retail space. The No Action Office building would have a tower that would set back from the approximately 116-foot-tall base, with an additional setback on Fifth Avenue at a height of approximately 348 feet. The building's footprint would be recessed from West 46th Street and the retail entrances would be recessed from West 47th Street and Fifth Avenue by approximately 10 feet at the ground floor to meet pedestrian circulation requirements. The building's primary retail entrance would be on Fifth Avenue, with secondary retail entrances on both West 46th and West 47th Streets. The building's office entrance would be from West 46th Street. Two loading docks with a single curb cut would be on the western end of the building on West 46th Street. The loading docks would have truck lifts that would provide access to the building's below grade loading berths. Service entrances would be on West 46th Street (see **Figures 7 and 8**).



Southeast Corner



Northeast Corner

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY



NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

The No Action scenario was established assuming an Office building could be developed absent the additional zsf acquired through a subway bonus and absent other discretionary actions.

THE FUTURE WITH THE PROPOSED ACTIONS (WITH ACTION CONDITION)

As noted above, two alternative With Action development programs will be analyzed in the EIS: the With Action Office Scenario and the With Action Residential/Hotel Scenario.

The With Action Office development would be a new building containing approximately 1,543,759 gsf, including approximately 1,466,174 gsf of office space and approximately 77,585 gsf of retail space. The Proposed Actions would also permit an expansion of up to 2,632 gsf of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the same zoning lot as the Proposed Development Site. The building would have its primary office entrance on Fifth Avenue. At the base, the building would have a recessed area that would be set back from the midblock Fifth Avenue frontage by approximately 5 feet; the office entrance would be set within this recessed area. Primary retail entrances would be on Fifth Avenue and secondary retail entrances would be on West 46th and West 47th Streets. An entrance for an upper floor up to 20,000-gsf event space would be located at the western end of the building on West 47th Street. An approximately 20-foot-wide porte cochere at the ground level would provide access to a north-south drop off driveway that would extend through the western part of the building. The porte cochere would have a curb cut on both West 46th and West 47th Streets. Three accessory parking spaces would be located adjacent to the porte cochere. Two loading docks with a single curb cut would be located east of the porte cochere on West 46th Street. The loading docks would have truck lifts that would provide access to the building's below grade loading berths. Twenty accessory parking spaces would be located in the basement level. Service entrances would be on West 46th Street (see **Figures 3 and 4**).

The With Action Residential/Hotel development would be a new mixed-use building containing approximately 1,462,174 gsf, including approximately 988,283 gsf of hotel space (or approximately 1,520 hotel rooms⁷), approximately 397,878 gsf of residential space (or approximately 468 DUs), and approximately 76,013 gsf of retail space. The Proposed Actions would also permit an expansion of up to 2,632 gsf (or approximately 4 hotel rooms) of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the same zoning lot as the Proposed Development Site. The building would not have any recessed areas at the ground floor apart from the building entrances which would be recessed by approximately 5 feet from the property line. On West 46th Street, the building would have a residential entrance and an ancillary hotel access point; the hotel's primary entrance would be on West 47th Street. Retail entrances would be located on Fifth Avenue and West 46th Street. An approximately 20-foot-wide porte cochere at the ground level would provide access to a north-south drop off driveway that would extend through the western part of the building. The porte cochere would have a curb cut on both West 46th and West 47th Streets. Seven accessory parking spaces would be located adjacent to the porte cochere. The Residential/Hotel building would have a two-bay loading dock with a single wide curb cut at the western end of the building on West 47th Street.

⁷ The Proposed Actions would also permit an expansion of up to 2,632 gsf (or approximately 4 hotel rooms) of the existing hotel use on Lot 9, which is not part of the Proposed Development Site, but is part of the same zoning lot as the Proposed Development Site. Therefore, a total of 1,524 hotel rooms would be analyzed.

The curb cut would be shared with the driveway access point. The loading docks would have truck lifts that would provide access to the building's below grade loading berths. Twenty accessory parking spaces would be located in the basement level. Service entrances would be on both West 46th and West Streets (see **Figures 3 and 5**).

The Proposed Actions would permit development of a building, as shown in **Figure 3**, of up to 1,100 feet tall with a base of up to 197 feet on Fifth Avenue and West 46th Street and up to 225 feet on West 47th Street. The tower would set back from the base with additional setbacks at a height of approximately 699 feet and at a height of approximately 888 feet. In both scenarios, the building's massing would fit within this single zoning envelope and therefore, this single envelope would be analyzed for both the With Action Office and With Action Residential/Hotel Scenarios.

The changes in floor area between the No Action condition and the two With Action conditions are shown below on **Table 1**.

CONCEPTUAL ANALYSIS OF SPECIAL PERMITS

The Proposed Actions, as discussed above, include zoning text amendments and special permits (see "Actions Necessary to Facilitate the Proposed Project," for a full description of the Proposed Actions). Among the proposed actions would be a text amendment creating a special permit to modify the Zoning for Accessibility (ZFA) provision that caps bonuses at 20 percent for bonuses over 200,000 sf of floor area and use and bulk regulations. The proposed special permit would be available on zoning lots larger than 60,000 sf that are located within the Fifth Avenue Subdistrict. Because it is not possible to predict whether this special permit would be pursued on any applicable site in the future, a conceptual analysis will be presented to generically assess the potential environmental impacts that could result from development on sites that meet the criteria for applicability pursuant to the special permit. The conceptual analysis will consider the potential environmental effects of the use of this new special permit, and will include a comparison of those effects with those identified under the RWCDs for the Proposed Actions.

CITY ENVIRONMENTAL QUALITY REVIEW AND SCOPING

The Proposed Actions are classified as Type 1 as defined under 6 NYCRR 617.4 and NYC Executive Order 91 or 1977, as amended, and are subject to environmental review in accordance with CEQR guidelines. An EAS was completed on January 10, 2022. The EAS analyzes the Proposed Actions' potential to generate significant adverse environmental impacts. A Positive Declaration, issued on January 10, 2022, established that the Proposed Actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS.

Table 1

Reasonable Worst Case Development Scenario for Analysis

Use	No Action	With Action			
		Office	Increment	Residential/Hotel	Increment
Building Height (ft)	417	860	443	1,100	683
Number of Floors	24	47	23	78	54
Building (overall gsf)	747,956	Proposed Development Site: 1,543,759 ¹ (total gsf with Lot 9 = 1,546,391)	Proposed Development Site: 795,803 ¹	Proposed Development Site: 1,462,174 ¹ (total gsf with Lot 9 = 1,464,806)	Proposed Development Site: 714,218 ¹
Commercial (gsf)	747,956	1,543,759	795,803	1,066,928	318,972
Office	663,492	1,446,174	782,682	0	-663,492
Retail	84,464	77,585	-6,879	76,013	-8,451
Event Space	0	20,000	20,000	0	0
Hotel	0	0	0	988,283	988,283
*Hotel (gsf) on Lot 9	0	2,632	2,632	2,632	2,632
Residential (gsf)	0	0	0	397,878	397,878
Dwelling Units (DUs)	0	0	0	468	468
Hotel Rooms (includes 4 hotel rooms on Lot 9)	0	0	0	1,524	1,524
Workers	2,908	6,099 ²	3,191 ²	736 ²	-2,172 ²
Residents	0	0	0	768	768
Non-Residents/Not Workers	211	194 ³	-17 ³	190 ³	-21 ³
Parking Spaces	0	23	23	27	27
Notes: ¹ In both With Action scenarios, an expansion of up to 2,632 gsf (2,500 zsf) of the existing hotel use (or approximately 4 hotel rooms) would be permitted at Lot 9. ² Calculations include workers associated with the permitted hotel expansion on Lot 9. ³ Calculations include non-residents/non-workers associated with the permitted hotel expansion on Lot 9. As per CEQR, the number of DUs assumes 850 sf/DU; the number of hotel rooms assumes 650 sf/hotel room; 1 worker per 3 hotel rooms; 1 worker per 333 sf of retail space and 1 worker per 250 sf of office space. The residential population was determined by multiplying the 468 DU count for the With Action Residential/Hotel building by the average household size of 1.64 according to PUMA for Manhattan CD 5 (2017 ACS 1-Year data). Sources: RWCDs Memorandum and information provided by the Applicant.					

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Actions. The process allows other agencies and the public a voice in framing the scope of the EIS. The scoping document sets 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 give their comments to the lead agency. The public, interested agencies, Manhattan Community District 5, and elected officials are invited to comment on the Draft Scope, either in writing or orally, at a public scoping meeting to be held on February 10, 2022. In support of the City's efforts to contain the spread of COVID-19, DCP will hold the public scoping meeting remotely. Comments received during the Draft Scope's public meeting and written comments

received by February 22, 2022 will be considered and incorporated as appropriate into the Final Scope of Work (the “Final Scope”). The lead agency will oversee preparation of the Final Scope, which will incorporate all relevant comments on the Draft Scope and revise the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The DEIS will be prepared in accordance with the Final Scope and in conformance with all applicable laws and regulations, including 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.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use applications 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. A Final EIS (FEIS) will be prepared that will respond to all substantive comments on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by decision makers to evaluate CEQR findings, which will address project impacts and proposed mitigation measures in deciding whether to approve the requested discretionary actions with or without modifications.

E. SCOPE OF WORK FOR THE EIS

The environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and mitigate where practicable, 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 proposed scope of work for each technical area to be analyzed in the EIS as follows.

Based on the EAS, the Proposed Actions do not meet the criteria warranting analysis of natural resources, and no significant adverse impacts to natural resources would occur with the Proposed Actions. The EIS will include detailed analysis in the technical areas where the Proposed Actions would potentially result in significant adverse impacts, based on the findings of the EAS. The scope of work and the proposed impact assessment criteria below are based on the methodologies and guidance set forth in the *CEQR Technical Manual*.

The EIS will contain the following:

- A description of the Proposed Actions and their environmental setting;
- A statement of the environmental impacts of the Proposed Actions, including short- and long-term effects and typical associated environmental effects;
- An identification of any 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 if the Proposed Actions are implemented; and

- A description of measures proposed to minimize or fully mitigate any significant adverse environmental impacts.

TASK 1: PROJECT DESCRIPTION

The Project Description will identify and explain the Proposed Actions and the purpose and need for the Proposed Actions. It will also describe the Proposed Project. It will contain a brief discussion of current conditions on the Proposed Development Site and in the surrounding area; the No Action (as-of-right) development program; the proposed development program for both an Office development and a Residential/Hotel development; a description of the proposed site plan and the height and bulk of the proposed building; and figures to depict the Proposed Project. It will also include a description of the approvals required and the approvals process. The analytical framework, including the No Action development and other planned projects in the study area, will also be included in this chapter. The figures will present key project elements, such as a site/ground floor plan, elevations, and views of the proposed project in its surrounding neighborhood context.

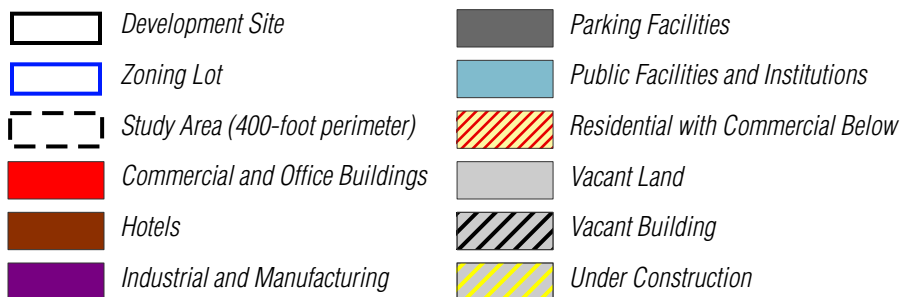
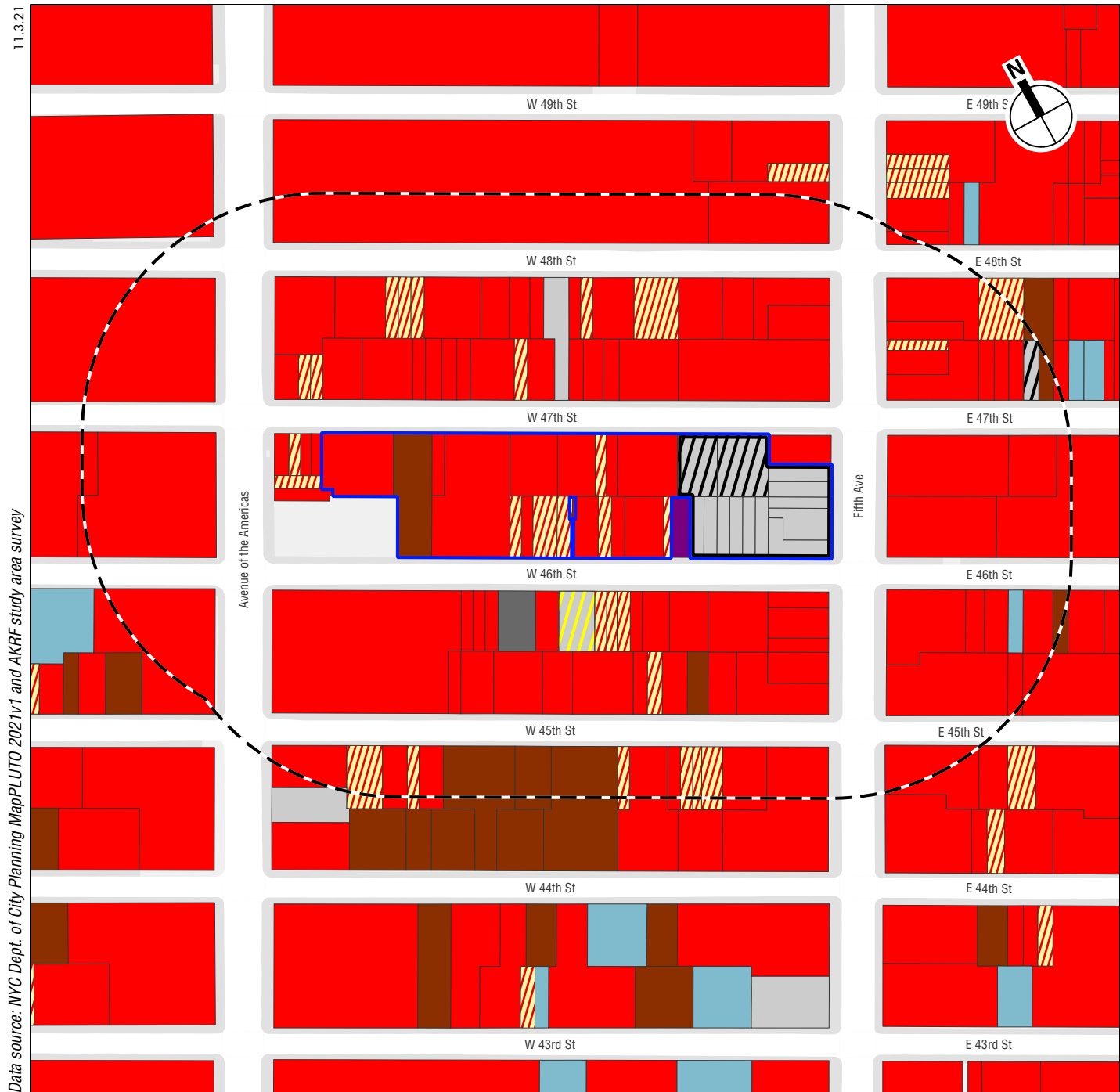
This chapter will also include a section describing the transit improvements that are being provided in order to obtain the subway bonus.

The Project Description will include appropriate materials from the Uniform Land Use Review Procedure (ULURP) application. It will describe the role of the lead agency for CEQR as well as the environmental review and ULURP processes.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

This analysis will consider the effects of the Proposed Actions in terms of land use compatibility and trends in zoning and public policy. It will also provide a baseline for other analyses in the EIS. Specifically, the assessment will:

- Describe predominant land use patterns in the study area, including recent development trends for the 400-foot study area (see **Figure 9**).
- Provide a zoning map and discuss existing zoning and any recent zoning actions in the study area.
- Summarize other public policies that may apply to the Proposed Development Site and study area.
- Describe conditions on the Proposed Development Site absent the Proposed Actions. Prepare a list of other projects expected to be built in the study area that would be completed before or concurrent with the Proposed Project. 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 area, including plans for public improvements.
- Describe the Proposed Actions and provide an assessment of the impacts of the Proposed Actions and Proposed Project on land use and land use trends, zoning, and public policy for both the Office development and the Residential/Hotel development. Consider the effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policy initiatives, and the effect of the Proposed Project on development trends and conditions in the area.



Existing Land Use
Figure 9

TASK 3: SOCIOECONOMIC CONDITIONS

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed project would result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry. The proposed actions would not result in any direct residential or business displacement, as existing uses would be displaced irrespective of the proposed project. Similarly, the proposed actions would not result in the displacement of uses that could result in adverse effects on a specific industry. However, the proposed actions would result in incremental development that exceeds CEQR thresholds for preliminary assessments of indirect residential and business displacement. The following describes the anticipated scope for these two areas of socioeconomic concern.

INDIRECT RESIDENTIAL DISPLACEMENT

The Proposed Actions under the Residential/Hotel Scenario would introduce over 200 residential DUs, which is the CEQR threshold for assessment. The concern with respect to indirect residential displacement is whether the Proposed Actions could lead to increases in property values, and thus rents, making it difficult for some residents to afford their homes. The objective of the indirect residential displacement assessment is to determine whether the Proposed Actions would either introduce a trend or accelerate a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change.

The assessment will use the most recent available U.S. Census data, as well as current real estate market data to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population, housing rents, and average and median household income. Following *CEQR Technical Manual* guidelines, the analysis will start with a preliminary assessment, which entails the following step-by-step evaluation:

- **Step 1:** Determine if the Residential/Hotel Scenario would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.
- **Step 2:** Determine if the Residential/Hotel Scenario's population is large enough to affect real estate market conditions in the study area. If the population increase is greater than 5 percent in the study area as a whole or within any identified subareas, then Step 3 will be conducted.
- **Step 3:** Consider whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to indirect residential displacement, then a detailed analysis will be conducted. The detailed analysis would utilize more in-depth demographic analysis and a field survey to characterize existing population and housing conditions; identify populations at risk for displacement; and assess potential impacts on any identified population at risk.

INDIRECT BUSINESS DISPLACEMENT

Both the Office and Residential/Hotel Scenarios would introduce more than 200,000 sf of commercial uses, which is the CEQR threshold for assessment. The concern with respect to indirect business displacement is whether a project could lead to increases in property values, and thus rents, making it difficult for some businesses to afford their rent. The analysis will describe and characterize conditions and trends in employment and businesses within the study area using the most recent available data from such sources as New York State Department of Labor and the U.S. Census Bureau, as well as private sources such as ESRI Business Analyst and real estate brokerage firms, as necessary. This information will be used to consider:

- Whether the development scenarios would introduce enough of a new economic activity to alter existing economic patterns;
- Whether the development scenarios would add to the concentration of a particular sector of the local economy enough to alter or accelerate existing economic patterns; and
- Whether the development scenarios would indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to indirect business displacement, then a detailed analysis will be conducted. The detailed analysis would utilize more in-depth demographic analysis and a field survey to characterize existing business conditions; identify businesses at risk for displacement; and assess potential impacts on any identified businesses at risk.

TASK 4: OPEN SPACE

The EIS analysis will address the project's potential to directly and indirectly affect open space. For direct effects, the EIS will identify and describe (in coordination with the shadows, noise, and air quality analyses described below) any study area open spaces that could be directly affected by the Proposed Project. For the indirect effects analysis, the additional number of employees and residents would exceed both the 500-worker and 200-resident CEQR thresholds (for areas considered neither under-served nor well served by open space) requiring an open space analysis. The worker threshold would be exceeded for the Office Scenario and the resident threshold would be exceeded for the Residential/Hotel Scenario. The indirect effects analysis will be consistent with the methodology set forth in the *CEQR Technical Manual* and will consist of the following:

- Establish study areas for the analysis and calculate the total population in the study areas;
- Create an inventory of publicly accessible open spaces within a ¼-mile (worker study area) and ½-mile (resident study area) of the Proposed Development Site. This inventory will include examining these spaces for their facilities (active vs. passive use), condition (satisfactory or unsatisfactory), and utilization (crowded or not).
- Project conditions in the future without the Proposed Actions, including accounting for new commercial and residential population that would be introduced by background development projects, and accounting for any new open space resources that could come online, if any are identified as part of the compilation of No Build projects under Task 2, "Land Use, Zoning and Public Policy."

- Assess impacts of the Proposed Project based on quantified open space ratios and qualitative factors. The assessment will take into account any open space that would be created on the Proposed Development Site.
- In coordination with other tasks, identify any potential direct impacts on nearby open space from shadows, air quality, or noise generated by the Proposed Project.

A preliminary assessment will be conducted to determine the need for further analysis. If warranted, a detailed assessment will be prepared in accordance with the *CEQR Technical Manual*. If the results of the analysis identify a potential for significant adverse open space impacts, potential mitigation measures will be discussed.

TASK 5: SHADOWS

The *CEQR Technical Manual* requires a shadow study for proposed actions that would result in new structures (or additions to existing structures) greater than 50 feet in incremental height, or of any height if the Proposed Development Site is adjacent to a sunlight-sensitive resource. Under CEQR, sunlight-sensitive resources include publicly accessible parks and plazas, sunlight-dependent features of historic resources such as stained-glass windows, Greenstreets (planted areas in traffic islands), and natural resources such as water bodies and wetlands.

As noted above, in Section D, “Analysis Framework,” the Proposed Actions would facilitate the development of a building up to 1,100 feet tall, with a base of up to 197 feet on Fifth Avenue and West 46th Street and up to 225 feet on West 47th Street, with additional tower setbacks at a height of approximately 699 feet and at a height of approximately 888 feet. In both the With Action Office and the With Action Residential/Hotel scenarios, the building’s massing would fit within this single building envelope. The shadows analysis will compare the With Action building envelope to the No Action development of an approximately 417-foot-tall building. The shadows assessment will determine whether project-generated shadow could reach St. Patrick’s Cathedral, Rockefeller Plaza, or any other sunlight-sensitive resources, while accounting for existing (and future planned) intervening buildings. The potential effects of any new shadows on sunlight-sensitive resources will be assessed.

The shadows assessment will follow the methodology described in the *CEQR Technical Manual* and will include the following tasks:

- Calculate the longest possible shadow that could result from the building envelope that encompasses both With Action scenarios to determine the initial study area.
- Develop a map and database of publicly accessible open spaces, historic resources with sunlight-dependent features, and natural features located in the study area.
- Develop a three-dimensional computer model including the building envelope that encompasses both With Action scenarios, the No Action development, topography, streets, existing buildings, and the sunlight-sensitive resources developed in the preceding step.
- Using computer-modeling software, determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Actions on four representative days of the year, accounting for intervening and surrounding buildings.
- Document the analysis with graphics comparing shadows resulting from the No Action development with shadows resulting from the building envelope that encompasses both With

Action scenarios, with incremental shadow highlighted in a contrasting color. 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.
- If the results of the analysis identify a potential for significant adverse impacts, potential mitigation measures will be discussed.

TASK 6: HISTORIC AND CULTURAL RESOURCES

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if a project would have the potential to affect either archaeological or architectural resources. Since the Proposed Project requires subsurface disturbance on the Proposed Development Site, it will be necessary to analyze the potential impacts of the Proposed Project on archaeological resources. The Proposed Development Site does not contain any architectural resources, however, there are architectural resources in the surrounding area, including the designated New York City Landmark (NYCL) Fred F. French Building at 661 Fifth Avenue and the State/National Register-eligible former office building at 33-35 West 46th Street. Therefore, consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks.

The following tasks will be undertaken as part of the historic and cultural resources analysis:

- As noted in the EAS, the New York City Landmarks Preservation Commission (LPC) determined that it has no archaeological concerns for the Proposed Development Site. Therefore, no further archaeological analysis is required.
- Select the study area for architectural resources which will be the area located within 400 feet from the borders of the Proposed Development Site.
- Map and briefly describe designated architectural resources in the study area. Consistent with the guidance of the *CEQR Technical Manual*, designated architectural resources include: New York City Landmarks, Interior Landmarks, Scenic Landmarks, New York City Historic Districts; resources calendared for consideration as one of the above by LPC; resources listed on or formally determined eligible for inclusion on the State and/or National Registers of Historic Places, or contained within a district listed on or formally determined eligible for listing on the Registers; resources recommended by the New York State Board for listing on the Registers; and National Historic Landmarks.
- Conduct a field survey by an architectural historian of the study area to determine whether there are any potential architectural resources that could be affected by the Proposed Project. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. The field survey will be supplemented, as necessary, with research at relevant repositories, online sources, and current sources prepared by LPC and the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP). Determinations of eligibility from LPC will be requested for any potential architectural resources.
- Assess the potential impacts of the Proposed Actions on any identified architectural resources, including visual and contextual changes as well as any direct physical impacts. Potential impacts will be evaluated through a comparison of the future No Action condition and future

With Action condition, and a determination made as to whether any change would alter or eliminate the significant characteristics of the resource that make it important.

- If applicable, develop measures in consultation with LPC to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources.

TASK 7: URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowed by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared with a detailed analysis prepared if warranted based on the preliminary assessment. As described in the *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 obstruct view corridors, or compete with icons in the skyline.

The Proposed Actions, both for the Office and Residential/Hotel development scenarios, would be contained within one building envelope. The Proposed Actions would provide a floor area bonus, permit floor area to be transferred across district boundaries, and permit modifications to bulk and use regulations. These actions would change the urban design and visual character of the Proposed Development Site. Therefore, a preliminary assessment of urban design and visual resources will be prepared to determine whether the Proposed Actions, in comparison to the No Action condition, would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study.

The analysis will be undertaken based on the *CEQR Technical Manual* methodologies, as follows:

- Following the guidelines of the *CEQR Technical Manual*, the study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy. As necessary, the delineation of the study area will take into consideration any more distant views of the Proposed Project. A description of visual resources in the study area and view corridors, if any, will be provided.
- The assessment will include a concise narrative and graphics depicting the Proposed Development Site, the future No Action condition, and the future With Action condition under both the Office and Residential/Hotel scenarios. The assessment will present photographs, depictions of the Proposed Project, including project drawings and site plans, and view corridor assessments.
- The assessment will determine whether the Proposed Actions, in comparison to the No Action condition, would create a change in the pedestrian experience that would result in significant adverse impacts to urban design and visual resources.

A detailed urban design and visual resources analysis will be prepared if warranted based on the findings of the preliminary assessment. The detailed analysis would describe the Proposed Project and the urban design and visual resources of the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the With Action condition under both the Office and Residential/Hotel scenarios, 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 8: HAZARDOUS MATERIALS

This chapter will address the potential presence of hazardous materials, petroleum products, and/or other environmental concerns on the property, as well as necessary measures that would be required, either prior to or during construction and/or operation of the Proposed Project, to avoid significant adverse effects. A Phase I Environmental Site Assessment (ESA) has been prepared for the Proposed Development Site. The hazardous materials chapter will summarize the Phase I ESA and any other available hazardous materials studies to determine the potential for hazardous materials at the site. It is anticipated that the lead agency and the New York City Department of Environmental Protection (DEP) will require preparation of a Phase II Subsurface Investigation (laboratory analysis of soil, groundwater, and soil vapor samples) as part of the CEQR process. In advance of conducting the testing, a Work Plan for the investigation will need to be submitted to the agencies for approval. If hazardous materials are identified by the testing, DEP will require preparation of a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP) to properly mitigate any contamination during construction. The RAP/CHASP would be submitted to DEP concurrently with the Phase II report. If determined necessary by the lead agency, an (E) Designation, in accordance with the *CEQR Technical Manual*, Section 11-15 (Environmental Requirements) of the Zoning Resolution of the City of New York and Chapter 24, Title 15, of the Rules of the City of New York governing the placement of (E) Designations, will be placed on the property.

TASK 9: WATER AND SEWER INFRASTRUCTURE

According to the *CEQR Technical Manual*, an analysis of an action's impact on the water supply system should be conducted only for actions that would have exceptionally large demand for water, such as power plants, very large cooling systems, or large developments. In addition, analysis should be conducted if the project is located in an area that experiences low water pressure (e.g., areas at the end of the water supply distribution system such as the Rockaway Peninsula and Coney Island). The Proposed Actions do not meet any of these criteria, and therefore, as concluded in the EAS, an analysis of water supply is not warranted.

According to the guidelines of the *CEQR Technical Manual*, a preliminary analysis of wastewater and stormwater conveyance and treatment is warranted if a project is located in a combined sewer area and would have an incremental increase above the No Action condition of 1,000 residential units or 250,000 sf of commercial, public facility and institution and/or community facility space in Manhattan. Since the proposed actions would exceed this threshold, an analysis of wastewater and stormwater conveyance and treatment will be performed.

TASK 10: SOLID WASTE AND SANITATION

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with State policy related to the City's integrated solid waste management system. The Proposed Actions would induce new development that would require sanitation services. If a project's generation of solid waste in the With Action condition would not exceed 50 tons per week, it may be assumed that

there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. As the Proposed Project may result in a net increase of more than 50 tons per week, compared to the No Action condition, an assessment of solid waste and sanitation services is warranted. This chapter will provide an estimate of the additional solid waste expected to be generated by the Proposed Project and assesses its effects on the City's solid waste and sanitation services. This assessment will:

- Describe existing and future New York City solid waste disposal practices;
- Estimate solid waste generation by the Proposed Project for existing, No Action, and With Action conditions; and
- Assess the impacts of the Proposed Project's solid waste generation on the City's collection needs and disposal capacity. The Proposed Project's consistency with the City's Solid Waste Management Plan will also be assessed.

TASK 11: TRANSPORTATION

Based on the *CEQR Technical Manual*, further transportation analyses may be warranted if a proposed project is anticipated to result in an incremental increase of 50 or more peak hour vehicle trips, 200 or more peak hour subway/rail trips, 50 or more bus trips on a single line in one direction, or 200 or more peak hour pedestrian trips. An assessment and any required analysis will be provided in the Transportation chapter of the EIS, and will be subject to review and approval by the lead agency and, potentially, involved expert agencies, such as the New York City Department of Transportation (DOT) and New York City Transit (NYCT). For the Proposed Project, these screening assessments are expected to show that detailed analysis of traffic, transit, pedestrians, vehicle/pedestrian safety, and parking for the weekday and Saturday peak periods would be warranted. The specific transportation analysis tasks to be undertaken as part of this environmental review are outlined below.

TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS

The transportation analyses for the EIS will be included in the Transportation chapter of the EIS and will assess potential impacts associated with trip increments that could occur as a result of the Proposed Project. Travel demand projections will be prepared for the No Action Office development and the Proposed Project (for both With Action scenarios) using standard sources, such as the *CEQR Technical Manual*, DOT data, U.S. census data, approved studies, and other references. The estimates will be used to prepare the Level 1 (trip generation) and Level 2 (trip assignment) screening assessments prescribed in the *CEQR Technical Manual*. As part of this effort, an inventory of the area's existing parking supply and utilization (within ¼-mile from the Proposed Development Site) will be undertaken to determine likely locations where project-generated auto trips would be accommodated. For both With Action scenarios, the projected trips (by auto/taxi, transit, or walk/bike, and deliveries, etc.) will be assigned to the area's transportation network to identify specific transportation elements that would be subject to further detailed analyses. The Applicant has prepared a Travel Demand Factors (TDF) memorandum assessing the above thresholds, which is undergoing review. The findings of the TDF memorandum, along with relevant documentation and graphics, will be summarized in the Transportation chapter of the EIS for review and concurrence by the lead agency and, potentially, involved expert agencies, such as DOT or NYCT.

DOT is planning to implement the Fifth Avenue Complete Streets project in the future, which could potentially affect the study area's trip assignment patterns, but the exact implementation schedule has yet to be determined. In consultation with the lead agency and DOT, should this Complete Streets project be expected to be completed prior to the Proposed Project's anticipated build year, the detailed transportation analysis tasks described below will consider the program as plans for its implementation are finalized.

TRAFFIC

Based on preliminary travel demand estimates, it is anticipated that approximately 12 traffic analysis intersections would warrant detailed analysis for the weekday AM, midday, PM, and Saturday peak hours in the primary study area, although following *CEQR Technical Manual* guidelines, a detailed analysis of additional intersections may be added if warranted. Traffic volumes and relevant data at the study area intersections will be collected following *CEQR Technical Manual* guidelines. Due to the current COVID-19 conditions, the collected traffic data will be adjusted based on pre-COVID data (where available) and professional judgment to develop the appropriate baseline traffic volumes for analysis. Future No Action and With Action traffic volumes will account for background growth, projects to be developed absent the Proposed Project, as well as programming associated with the Proposed Project. The existing baseline conditions and the future No Action and With Action conditions analyses will be prepared using the *CEQR Technical Manual* analysis guidelines. If significant traffic impacts are identified for either With Action scenario, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant impacts to the extent practicable.

TRANSIT

The Proposed Development Site is served by numerous NYCT subway stations: Grand Central-42nd Street Station (No. 4, 5, 6, 7, and S trains); 47-50 Streets-Rockefeller Center Station (B, D, F, and M trains); 42nd Street-Bryant Park-Fifth Avenue Station (B, D, F, and M trains); Fifth Avenue-53rd Street Station (E and M trains), 51st Street-Lexington Avenue Station, and 49th Street-Broadway Station. The Proposed Development Site is also served by the M1, M2, M3, M4, M5, M7, M42, M50, and M55 local bus routes, and numerous inter-borough express bus routes. Based on the preliminary travel demand estimates, it is anticipated that specific subway station elements at the Grand Central and Rockefeller Center Stations would warrant detailed analysis for the weekday commuter AM and PM peak periods. If warranted, based upon final review of the TDF memorandum, additional station elements will be analyzed. However, accounting for the multiple subway line options available in the study area, a detailed subway line-haul analysis is not expected to be warranted. Due to the current COVID-19 conditions, current passenger counts would not be representative of normalized conditions. Therefore, existing baseline pedestrian data at these station analysis elements will be developed in consultation with NYCT for the weekday commuter AM and PM peak periods. Future No Action and With Action transit volumes will account for background growth, projects to be developed absent the Proposed Project, as well as programming associated with the Proposed Project. The existing baseline conditions and the future No Action and With Action conditions analyses will be prepared using the *CEQR Technical Manual* analysis guidelines. If significant subway station impacts are identified for either With Action scenario, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant impacts to the extent practicable.

For buses, based preliminary travel demand estimates and accounting for the multiple bus options available in the area surrounding the Proposed Development Site, no single bus route is expected to incur incremental trips that would exceed the *CEQR Technical Manual* analysis threshold of 50 or more peak hour bus trips in a single direction. Therefore, a detailed bus line-haul would not be warranted.

PEDESTRIANS

Project-generated pedestrian trips are expected to concentrate at the Proposed Development Site and be distributed throughout the study area. Based on preliminary travel demand estimates, it is anticipated that approximately 51 pedestrian elements (i.e., sidewalks, corners, and crosswalks) would warrant detailed analysis for a weekday, and/or Saturday peak hour condition. If warranted, based upon final review of the TDF memorandum, additional pedestrian elements will be analyzed. As with the baseline traffic volume data described above, the collected pedestrian data will be adjusted based on pre-COVID data (where available) and professional judgment to develop the appropriate baseline pedestrian volumes for analysis. Future No Action and With Action pedestrian volumes will account for background growth, projects to be developed absent the Proposed Project, as well as programming associated with the Proposed Project. The existing baseline conditions and the future No Action and With Action conditions analyses will be prepared using the *CEQR Technical Manual* analysis guidelines. If significant pedestrian impacts are identified for either With Action scenario, the Mitigation chapter of the EIS will identify transportation improvement measures to mitigate the significant impacts to the extent practicable.

VEHICULAR AND PEDESTRIAN SAFETY

Crash data for the study area intersections and other nearby sensitive locations from the most recent three-year period will be obtained from DOT. These data will be analyzed to determine if any of the studied locations may be classified (per CEQR criteria) as high vehicle or high pedestrian/bike crash locations and whether trips and changes resulting from the Proposed Project would adversely affect vehicular and pedestrian safety at these locations. If any high crash locations are identified, feasible improvement measures will be explored to alleviate potential safety issues. In addition, study area analysis locations that are not considered high crash locations per CEQR criteria will also be reviewed to determine whether they are considered Vision Zero high priority intersections or part of high priority corridors. Feasible improvement measures would also be explored at these Vision Zero high priority locations to alleviate potential safety issues.

PARKING

An off-street parking supply and utilization analysis will be performed for an area within ¼-mile of the Proposed Development Site. This would involve an inventory of existing parking levels within the ¼-mile study area. As with the traffic and pedestrian baseline data described above, the inventoried existing parking utilization levels will be further adjusted based on pre-COVID data (where available) and professional judgment to appropriately account for established baseline parking utilization levels. The parking study will then assess the parking demand of the Proposed Project, compare it to off-site parking resources within the ¼-mile study area, and identify/quantify any expected parking shortfalls. Since the Proposed Project is located in Manhattan south of 110th Street, it is in an area called Parking Zone 1 according to the *CEQR Technical Manual*. In Parking Zone 1, the inability of the off-site parking resources in the

surrounding area to accommodate the Proposed Project's future parking demands is considered a parking shortfall, but is generally not considered a significant adverse parking impact due to the magnitude of available alternative modes of transportation.

TASK 12: AIR QUALITY

Based on the screening studies conducted, the number of project-generated vehicle trips, as compared with the "no action" scenario, are not expected to exceed the 140 peak hour vehicle trip screening threshold defined in the *CEQR Technical Manual* for conducting a quantified analysis of carbon monoxide (CO) emissions from mobile sources under both the Office/Retail Scenario or Residential/Hotel Scenario. However, the proposed project may exceed the particulate matter (PM) emission screening threshold discussed in Chapter 17, Sections 210 and 311, of the *CEQR Technical Manual*. Therefore, a screening analysis of the proposed project will be performed based on the number of project-generated vehicles at intersection in the study area, the vehicle classification breakdown and DOT's functional classification for area roadways, to determine if a microscale mobile source analysis is required.

MOBILE SOURCES

A mobile source screening analysis will be conducted to determine if the number of project-generated vehicle trips exceeds the *CEQR Technical Manual* CO or PM_{2.5} analysis screening thresholds in the *CEQR Technical Manual*. If necessary, a microscale dispersion analysis will be performed at the critical intersection location(s). The EPA MOVES and AERMOD air quality models would be used to assess the CO and PM_{2.5} levels.

STATIONARY SOURCES

A screening analysis will be performed to determine whether emissions from any on-site fuel-fired equipment (e.g., boilers/hot water heaters) could potentially cause a significant adverse air quality impact. The screening procedure involves determining the distance from the exhaust point within which potential significant impacts may occur, on elevated receptors (such as open windows, air intake vents, etc.) that are of similar or greater height when compared with the height of the proposed project's exhaust stack(s). The distance within which a significant impact may occur is dependent on a number of factors, including the height of the discharge, type(s) of fuel combusted, and development size or emissions. If the screening analysis determines the potential for significant adverse air quality impacts, a refined analysis will be performed as described in the *CEQR Technical Manual*.

A review of air permit information will be performed to determine whether there are any permitted industrial sources of emissions within a 400-foot study area around the project site. If any permitted industrial sources are identified, an analysis will be performed. If required, EPA's the AERMOD dispersion model database referenced in the *CEQR Technical Manual* would be used to estimate the maximum short-term and annual concentrations of critical pollutants at sensitive receptor locations. Predicted values will be compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) reported in the New York State Department of Environmental Conservation (DEC) DAR-1 AGC/SGC Tables guidance document to determine the potential for significant impacts. Potential cumulative effects of air toxic compounds will be evaluated, if required.

One existing “large” source of emissions, as defined in the *CEQR Technical Manual*, has been identified within 1,000 feet of the study area. Therefore, a detailed stationary source analysis using the EPA AERMOD dispersion model will be performed to evaluate the potential significance of impacts from this source on the Proposed Project. Five years of recent meteorological data provided by DEC will be used, consisting of surface data from the LaGuardia Airport National Weather Service (NWS) Station and concurrent upper air data from Brookhaven, New York. Concentrations of the air contaminants of concern (e.g., PM, NO₂, and SO₂) will be determined at ground level receptors as well as elevated receptors representing floors on the proposed building under both scenarios. Predicted values will be compared with National Ambient Air Quality Standards and the City’s PM_{2.5} *de minimis* criteria.

TASK 13: GREENHOUSE GASES AND CLIMATE CHANGE

Because the Proposed Project would exceed the 350,000 gsf threshold requiring analysis of greenhouse gas emissions, in accordance with the *CEQR Technical Manual*, greenhouse gas (GHG) emissions generated by the Proposed Project for both the Office and Residential Hotel scenarios will be quantified, and an assessment of consistency with New York City’s established GHG reduction goal will be prepared. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO₂e) metric tons per year. GHG emissions other than carbon dioxide (CO₂) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential.

In addition to GHG emissions, climate change has contributed to rising sea levels and increases in storm surge and coastal flooding. An analysis of climate change is deemed warranted for projects at sites located within the 100- or 500-year flood zone. A review of the City’s flood hazard information was part of the EAS. The proposed site was found to be located over 1,000 feet outside of the nearest potential end-of-century flood hazard zone identified by the New York City Panel on Climate Change (NPCC). Therefore, the Proposed Project is unlikely to be impacted by future climate conditions, and an assessment of the potential impacts of climate change on the proposed project (e.g., sea level rise, flooding, etc.) is not warranted. However, the impacts of the urban heat island effect projected to result from global climate change and the potential future impact of on the emissions of the Proposed Project will be discussed.

Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the Proposed Project under both scenarios will be discussed, and the potential for those measures to reduce GHG emissions from the Proposed Project will be assessed to the extent practicable.

The GHG analysis will consist of the following subtasks:

GREENHOUSE GAS EMISSIONS EVALUATION

- Direct Emissions—GHG emissions from on-site boilers used for heat and hot water, natural gas used for cooking, and fuel used for on-site electricity generation, if any, will be quantified. Emissions will be based on available information regarding the expected fuel use under the proposed project or the carbon intensity factors specified in the *CEQR Technical Manual* for components where such information is not available. Comparison of the carbon intensity factors of the proposed project to the City’s future intensity limits for buildings over 25,000 sf.

- Indirect Emissions—GHG emissions from purchased electricity and/or steam generated off-site and consumed on-site during the operation of development pursuant to the proposed project will be estimated.
- Indirect Mobile Source Emissions—GHG emissions from vehicle trips to and from the project area will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
- Emissions from construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered.
- Design features and operational measures to reduce energy use and GHG emissions from development pursuant to the proposed project will be discussed and quantified to the extent that information is available.
- Consistency with the City’s GHG reduction goal will be assessed. While the City’s overall goal is to reduce GHG emissions by 30 percent below 2005 levels by 2025 and net zero emissions by 2050, individual project consistency is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the proposed project’s carbon footprint.
- Consistency with recently passed New York City and New York State climate legislation will be assessed. New York City’s Climate Mobilization Act and New York State’s Climate Leadership and Community Protection Act have established additional GHG reduction goals along with required emission reduction measures (i.e., building emission intensities, and requirements for rooftop solar photovoltaic installation where practicable).

TASK 14: NOISE

The noise analysis will examine the potential for impacts on sensitive land uses (including surrounding residences and commercial office uses) that could be affected by changes in noise resulting from the Proposed Project. The scope of work detailed below contains the standard elements that contribute to a CEQR noise study: selection of receptor sites; measurement of existing noise levels; prediction of future noise levels both with and without the proposed project; impact evaluation; specifying building attenuation needed to satisfy CEQR building attenuation requirements; and the examination of noise abatement measures (where necessary). The methodologies used for this analysis will be consistent with the methodologies contained in the *CEQR Technical Manual*. No detailed analysis of potential noise impacts due to mechanical equipment will be performed, since it is assumed that mechanical equipment for both the Office Scenario and the Residential/Hotel Scenario would be designed to meet applicable regulations, such as NYC Noise Control Code and NYC Department of Buildings Code and therefore will not result in significant adverse noise impacts.

Specifically, the proposed work program will include the following tasks:

- Select appropriate noise descriptors. The A-weighted L_{eq} and L_{10} levels will be the primary noise descriptors used for the impact analysis.

- Select noise receptor locations. Three (3) receptor locations will be selected in proximity to the site of the proposed project and/or along roadways leading to and from the project site.
- Determine existing noise levels. Existing noise levels shall be measured at each of the receptor locations over a 20-minute time period during each of the typical weekday AM, midday, and PM as well as possibly the Saturday midday/afternoon peak periods. Measurements shall be made using Type I instrumentation and measured quantities shall include A-weighted and 1/3-octave band L_{eq} , L_1 , L_{10} , L_{90} , L_{min} , and L_{max} noise levels. These measurements shall provide baseline levels.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine existing noise levels. Due to the ongoing COVID-19 pandemic resulting in atypical levels of vehicular traffic activity, field measurements of noise levels may not represent expected noise exposure at the Proposed Development Site. Traffic volumes counted concurrently with the noise level measurements will be compared to existing condition traffic volumes developed as part of the Transportation analysis (see Task 11, “Transportation”) and if they are comparable, the measured levels will be used to represent the existing condition. Otherwise, “existing condition” noise levels would be established by adjusting measured to reflect the existing condition vehicular traffic volumes established in the Transportation analysis. The specific methodology and technical approach for the establishment of existing condition noise levels will be described in a memorandum submitted to the lead agency for comment and approval.
- Based on the traffic studies conducted for Task 11, “Transportation,” a screening analysis will be conducted to determine whether there are any locations where there is the potential for the Proposed Project to result in significant noise impacts (i.e., doubling Noise Passenger Car Equivalents [PCEs]) due to project-generated traffic. Due to the high volumes of existing traffic on roadways adjacent to the project site, project-generated traffic is not expected to result in significant noise level increases.
- Determine future noise levels without and with the proposed project. At each of the receptor locations identified above, determine noise levels without and with the proposed project using existing noise levels, acoustical fundamentals, and mathematical models. The analysis will evaluate noise levels for either the Office or Residential/Hotel Scenario, depending on which scenario has the greater potential to result in increased noise levels.
- Compare noise levels with standards, guidelines, and other impact evaluation criteria. Compare existing noise levels and future noise levels, both with and without the proposed project, with various noise standards, guidelines, and other appropriate noise criteria.
- Determine amount of building attenuation required. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined for both the Office Scenario and Residential/Hotel Scenario. Measured values will be compared to appropriate standards and guideline levels. Recommendations regarding general noise attenuation measures needed for the proposed project to achieve compliance with standards and guideline levels will be made.

TASK 15: NEIGHBORHOOD CHARACTER

Neighborhood character is determined by a number of factors, such as land use, urban design, visual resources, historic resources, socioeconomic conditions, traffic, and noise. Methodologies outlined in the *CEQR Technical Manual* will be used to provide a preliminary assessment of neighborhood character. This assessment would include:

- Based on other technical analyses, describe the predominant factors that contribute to defining the character of the neighborhood surrounding the Proposed Development Site and study area.
- Based on planned development projects, public policy initiatives, and planned public improvements, summarize changes that can be expected in the character of the area in the future without the Proposed Actions.
- 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 required based on the preliminary assessment, a detailed assessment of the Proposed Actions' effects on neighborhood character will be prepared.

TASK 16: CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. This assessment will describe the anticipated construction schedule and logistics, discuss on-site activities, and provide estimates of construction workers and truck deliveries.

The Office and Residential/Hotel development scenarios are expected to have comparable effects on construction impacts; however, for purposes of the construction assessment, the development scenario that is projected to generate the most overall site activity would be used to determine potential construction impacts from the Proposed Project. Because the construction duration of the Proposed Project is anticipated to be approximately 54 months and is considered long-term (i.e., greater than two years), in accordance with the *CEQR Technical Manual*, construction of the Proposed Project could have substantial and extended construction effects.

Technical areas to be assessed include the following:

- **Transportation Systems.** This assessment will consider losses of off-street parking, lanes, and sidewalks adjacent to the Proposed Development Site and, if applicable, off-site subway improvements. The assessment will also consider the effects on other transportation services (i.e., transit and pedestrian circulation) during the construction periods and identify the increase in vehicle trips from construction workers and trucks. Based on the trip projections of activities associated with peak construction for the Proposed Project, an assessment of potential impacts during construction will be provided. This scope will include a Level-1 (Trip Generation) screening assessment to determine if the *CEQR Technical Manual* quantified transportation analyses thresholds (50 or more vehicle-trips and/or 200 or more transit/pedestrian trips during a given peak hour) are exceeded. If this effort identifies the need for a Level-2 (Trip Assignment) screening assessment or a separate detailed analysis, it would be undertaken.

- **Air Quality.** A detailed dispersion analysis of construction sources will be performed to determine the potential for air quality impacts on sensitive receptor locations. Air pollutant sources would include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators) and trucks operating on-site, construction-generated traffic on local roadways, as well as onsite activities (e.g., excavation, demolition) that generate dust. The pollutants of concern include CO, PM, and NO₂. The potential for significant impacts will be determined by a comparison of the model predicted concentrations to NAAQS, or by comparison of the predicted increase in concentrations to applicable interim guidance thresholds. The air quality analysis will also include a discussion of the strategies to reduce project related air pollutant emissions associated with construction activities.

Noise and Vibration. The noise section will contain a quantitative (modeling) analysis of noise from the Proposed Project's construction activity. Appropriate recommendations will be made to comply with DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code. The detailed analysis will estimate construction noise levels based on projected activity and equipment usage for various stages of construction on the project site. The projected construction noise levels will be compared to existing condition noise levels as determined by the operational noise analysis and augmented by mathematical models and projections as necessary. The noise analysis will identify potential construction noise impacts based on the intensity, duration, and location of emissions relative to nearby sensitive locations. As necessary, feasible and practicable project-specific control measures to further reduce construction noise disruption to the surrounding community will be considered.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. The construction vibration assessment will include the determination of critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration reduction options will be proposed.

- **Other Technical Areas.** Other areas of environmental assessment for potential construction-related impacts will be analyzed, including but not limited to: historic and cultural resources, hazardous materials, open space, socioeconomic conditions, land use, and neighborhood character.

TASK 17: PUBLIC HEALTH

According to the *CEQR Technical Manual*, a public health analysis is warranted if a project would result in a significant unmitigated adverse impact in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any of these technical areas, and the lead agency determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas, in accordance with *CEQR Technical Manual* guidelines.

TASK 18: ALTERNATIVES

An Alternatives analysis will be provided and will examine reasonable and feasible options that avoid or reduce project-related significant adverse impacts, while achieving the goals and

objectives of the Proposed Actions. The alternatives are usually defined once the full extent of the Proposed Actions' impacts have been identified. However, as required by CEQR, the alternatives analyzed must include a No Action Alternative, which would assume an as-of-right building program. The chapter may also include an alternative(s) that adjusts the square footages of the uses within the Proposed Project and reduces any significant adverse impacts identified in the EIS analyses. If the Proposed Actions result in unmitigated significant adverse impacts, the EIS would also include a No Unmitigated Impacts Alternative. The alternatives analyses will be qualitative, except where significant adverse impacts of the Proposed Project have been identified, or if an alternative with fewer overall impacts would nevertheless have new significant adverse impacts.

TASK 19: MITIGATION

Where significant impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts. This chapter will describe the practicable measures that could mitigate those impacts. These measures will be developed and coordinated with the responsible City and/or State agencies, as necessary. Where impacts cannot be fully mitigated, they will be disclosed as unavoidable adverse impacts.

TASK 20: UNAVOIDABLE ADVERSE IMPACTS

The Unavoidable Adverse Impacts analysis summarizes any significant adverse impacts that are unavoidable if a proposed action is implemented regardless of the mitigation employed (or if mitigation is impossible).

TASK 21: CONCEPTUAL ANALYSIS

The Proposed Actions, as discussed above, include text amendments and special permits (see "Actions Necessary to Facilitate the Proposed Project," above, for a full description of the Proposed Actions). Among the Proposed Actions would be a text amendment creating a special permit to modify the Zoning for Accessibility (ZFA) provision that caps bonuses at 20 percent for bonuses over 200,000 sf of floor area and use and bulk regulations. The proposed special permit would be available on zoning lots larger than 60,000 sf that are located within the Fifth Avenue Subdistrict. Other than the Proposed Development Site, no other potential or projected development sites have been identified within the area where the text amendment would be available. However, because it is not possible to predict whether this special permit would be pursued on any applicable site in the future, a conceptual analysis will be presented to generically assess the potential environmental impacts that could result from development on sites that meet the criteria for applicability pursuant to the special permit. The conceptual analysis will consider the potential environmental effects of the use of this new special permit, and will include a comparison of those effects with those identified under the RWCDS for the Proposed Actions.

TASK 22: EIS SUMMARY CHAPTERS

In accordance with the *CEQR Technical Manual*, the EIS would include the following summary chapters, where appropriate to the Proposed Actions:

Growth-Inducing Aspects of the Proposed Actions: which generally refer to "secondary" impacts of a proposed action that trigger further development.

Irreversible and Irretrievable Commitments of Resources: which summarizes a proposed action 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 long term.

Any significant impacts for which no mitigation can be implemented will be presented as Unavoidable Adverse Impacts.

TASK 23: EXECUTIVE SUMMARY

The EIS will include an Executive Summary, which will summarize relevant material from the body of the EIS to describe the Proposed Actions, their environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Actions. *