

May 8th, 2011

City Planning

Mayor Michael Bloomberg
City Hall
New York, NY 10007
fax: (212) 312-0700

Dear Mayor Bloomberg:

I am writing to you as a member of the Mercer-Houston Dog Run Association and as a voting member of the Downtown NYC Community. The MHDR has been a vital and integral element on the corner of Mercer and Houston for 30 years, currently on land owned by the City/DOT. It is used by members, but also enjoyed by the non-dog community at large. The proposed NYU2031 project would displace the MHDR to the west side of the present Coles Gymnasium to NYU owned land, directly affecting the public use and enjoyment of the run. I strongly urge you NOT to support NYU's revised massive expansion plan in the Village, and not to approve the precedent-setting approvals they are seeking to move ahead. The revised plan is still totally wrong for this neighborhood and totally unacceptable for the limited "green space" that is currently enjoyed by voting, tax-paying residents, to be utilized for private institution use.

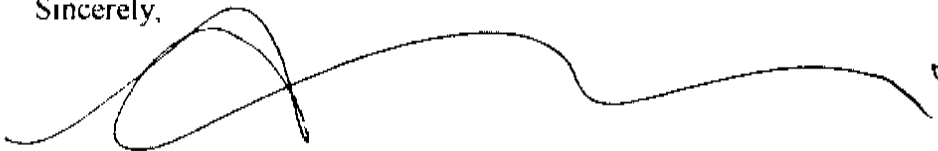
NYU's plan to add 2 million square feet of space around Washington Square Park and another 1 million square feet throughout surrounding neighborhoods would have a devastating impact – oversaturating neighborhoods which are already oversaturated with NYU facilities.

The means by which NYU is seeking to do this are equally disturbing. Lifting zoning requirements to preserve open space in one of the most park-starved areas in New York City, changing residential zoning to commercial, transferring public land to a private institution, and removing urban renewal deed restrictions, as NYU is requesting, would be just plain wrong.

There are better alternatives for the city, for NYU, and for the Village if NYU is to expand. Community leaders in the Financial District have asked NYU to consider their area for expansion, where NYU's academic, cultural, and housing facilities would be welcome and are needed. Growth potential in the Financial District is nearly limitless, while historic and predominantly residential neighborhoods like the Village, East Village, and NoHo clearly have their limits, which NYU has more than met.

I hope you will protect the character of our neighborhood and not support NYU's bid to overbuild and undo long-standing neighborhood zoning protections.

Sincerely,



Annie Balliro

285 Mott Street #A7 New York, NY 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Veto the NYU 2031 plan and support our NYC community
Date: Monday, May 23, 2011 10:55:03 AM
Attachments: [MHDR LETTER 2.doc](#)

From: Balliro, Annie (Sr. Director of Brand Philanthropy) [mailto:Annie_Balliro@hardrock.com]
Sent: Sunday, May 22, 2011 8:50 PM
To: ROBERT DOBRUSKIN; Balliro, Annie (Sr. Director of Brand Philanthropy)
Subject: Veto the NYU 2031 plan and support our NYC community

May 22nd , 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Dear Mr Dobruskin:

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predominantly residential neighborhoods like the Village, East Village, and NoHo clearly have their limits, which NYU has more than met.

As a member of the **Mercer-Houston Dog Run Association**, and neighborhood resident, I urge you that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous—and negative— impact upon the Village. I also hope you will protect the character of our neighborhood and not support NYU's bid to overbuild and undo long-standing neighborhood zoning protections.

Sincerely,

Annie Balliro

285 Mott Street #A7

New York, NY 10012

Confidentiality: This e-mail, including any attachments, is intended for the named recipient only and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify sender immediately by reply and delete all copies of the e-mail. Do not otherwise disclose, store or copy the contents.

Virus Warning: HRC has taken precautions to minimize the risk of transmitting software viruses, however we advise you to carry out your own virus checks on any attachment to this message.

May 22nd , 2011

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Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

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Sincerely,

Annie Balliro

285 Mott Street #A7

New York, NY 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:53:41 AM

-----Original Message-----

From: spam@alecbrownstein.com [<mailto:spam@alecbrownstein.com>] On Behalf Of a b
Sent: Monday, May 23, 2011 10:02 AM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

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- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the Mercer-Houston Dog Run is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the Mercer-Houston Dog Run to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the Mercer-Houston Dog Run would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.
- The EIS should study the effects of the negative effects of noise generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the Mercer-Houston Dog Run.

Thank you for your attention to this matter.

Sincerely,

Alexander Brownstein
298 Mulberry Street, 3L
New York, NY 10012

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Friday, May 20, 2011 5:31:15 PM

From: Amy Harlib [mailto:aharlib@earthlink.net]
Sent: Friday, May 20, 2011 5:30 PM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

aharlib@earthlink.net

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

NYU NEEDS A LOT MORE OVERSIGHT!

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Amy Harlib

212 West 22nd St. #2N

N.Y., NY 10011

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Wednesday, June 01, 2011 11:01:45 AM

From: Amy Harlib [mailto:aharlib@earthlink.net]
Sent: Wednesday, June 01, 2011 2:22 AM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

aharlib@earthlink.net

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

Curb NYU's overreaching!

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Thank you for your attention to this matter.

Sincerely,

Amy Harlib

212 West 22nd St. #2N

N.Y., NY 10011

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: NYU Core ULURP CEQR No. 11 DCP121M
Date: Tuesday, May 31, 2011 10:25:11 AM

From: bcahnclay@gmail.com [mailto:bcahnclay@gmail.com]
Sent: Friday, May 27, 2011 2:36 PM
To: ROBERT DOBRUSKIN
Subject: NYU Core ULURP CEQR No. 11 DCP121M

Dear City Planners,

I am writing as a 30-year resident of Greenwich Village, an NYU Alumna, a member of the Alumni Association, and a member of the LaGuardia Corner Gardens. I am not anti-NYU. I belong to the Coles and Palladium gyms, use Bobst Library, attend functions at the King Juan Carlos Center and exhibitions at the Grey Art Gallery. I am very pleased to be a member of the NYU community.

However, I feel this massive construction project will not benefit either the NYU community, or the neighborhood. It is simply too much density for this area. I chose to live in the Village because it was mostly low-rise, and more open than the rest of Manhattan.

Visitors to the LaGuardia Corner Gardens are so appreciative that the garden is there. Whenever it is open to the public, many people take advantage of it. The gardeners are very knowledgeable about the plants and flowers, and visitors use them as a resource.

Although Washington Square Park is only a few blocks away, it is often so packed with people, and so noisy, that it is difficult to relax there. The LaGuardia Corner Gardens provide a necessary function in the neighborhood, and it would be a terrible shame to destroy them.

While an NYU spokesperson said they are not planning to demolish the garden, I don't see how it would be possible to build a 14-story tower a few feet away without destroying it.

There are many other neighborhoods in the city that would welcome NYU into their midst. Please ask them to consider some of these proposals for this massive construction project.

Sincerely,
Barbara Cahn
(MA Steinhardt (SEHNAP) 1983)

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:52:57 AM

From: Peter Dog [mailto:benitaraphan1@gmail.com]
Sent: Monday, May 23, 2011 10:17 AM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Benita Raphan
The John Adams
101 West 12 Street (7-Z)
NYC, NY 10011

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

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Thank you for your attention to this matter.

Sincerely,

Benita Raphan

Board Member: Mercer-Houston Dog Run

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement f.or NYU Core ULURP, CEQR No 11DCP121
Date: Friday, May 20, 2011 5:14:07 PM

From: c.grauer@att.net [mailto:c.grauer@att.net]
Sent: Friday, May 20, 2011 3:59 PM
To: ROBERT DOBRUSKIN; ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement f.or NYU Core ULURP, CEQR No 11DCP121

5/20/11

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

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Thank you for your attention to this matter.

Sincerely,

Crista Grauer

523 Broadway, NYC 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Cc: [CELESTE EVANS](#)
Subject: Fw: Mercer Houston dog run
Date: Monday, June 06, 2011 11:27:28 AM

----- Original Message -----

From: Cy O'Neal [<mailto:coneal@friendsindeed.org>]
Sent: Monday, June 06, 2011 09:55 AM
To: ROBERT DOBRUSKIN
Subject: Mercer Houston dog run

June 6, 2011

Robert Dobruskin
Environmental Assessment & Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Dear Mr. Dobruskin,

I would like to add my voice to the all of those who protest NYU's take-over of the land that now houses the Mercer-Houston dog run, as well as a children's playground, etc.

The dog run has been there for 30 years, it's an iconic part of our neighborhood. Before I had a dog of my own, I used to stand at the fence and watch the dogs play as do hundreds of other people during the week. It's a happy sight! NYU would like to move us (more than 300 of us) to a much smaller site in the middle of Silver Towers where we would not be seen from the street and where it would be impossible to attract new members - they wouldn't know we were there - not to mention how the residents of Silver Towers might feel about dogs barking right under their windows.

The Mercer Houston Dog Run not only provides a great service there is a strong quality-of-life factor. That stretch of land which NYU would obliterate is made up of air, light, space, sky, and many beautiful trees (one, in particular, is certainly one of the most magnificent cherry trees in New York City). These are things to

be cherished. Not things to be sacrificed to, yet another, enormous claustrophobia-inducing high-rise. When consent was given to build Silver Towers, we were promised that the open areas surrounding them would remain untouched. That promise must be kept!

All of us who live in this area are constantly disheartened as we watch NYU gobble up every bit of space they can get their hands on. I'm sure you would agree that everything must not be about real estate and commerce. Already we constantly watch as businesses close to be replaced by yet another high-priced boutique. Quality-of-life matters greatly and we need our public representatives to protect us.

I sincerely and humbly request that you give this matter your most serious attention.

We need your help.

Warm Regards,

Cynthia O'Neal
292 Lafayette Atreet #5E
Neew York, NY 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 31, 2011 2:43:56 PM

From: Ponce, Carlos (FO-WFC) [mailto:carlos_ponce@ml.com]
Sent: Tuesday, May 31, 2011 2:04 PM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 31 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

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· The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.

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Thank you for your attention to this matter.

Sincerely,

Carlos Ponce

200 Mercer Street, Apt 2B

New York, NY 10012

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From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Regarding: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 31, 2011 4:50:53 PM

From: Carl Schnedeker [mailto:carlo31b@yahoo.com]
Sent: Tuesday, May 31, 2011 4:04 PM
To: ROBERT DOBRUSKIN
Subject: Regarding: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 31, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.
- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from

demolition, digging, and construction.

- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.
- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Carl Schnedeker
183 East Second Street
New York, NY 10009

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: SAVE THE RUN!
Date: Tuesday, May 31, 2011 10:21:21 AM

-----Original Message-----

From: Claudia Silver [<mailto:claudiasilver@nyc.rr.com>]
Sent: Sunday, May 29, 2011 9:35 AM
To: ROBERT DOBRUSKIN
Subject: SAVE THE RUN!

Dear Mr. Dobrus,

Please reject NYUs plan to destroy our run at Mercer and Houston. This public space is vital for our community. It is GREEN space as well and we don't want to see it destroyed by NYUs plan for development.

Thank you.

Claudia Silver

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Mercer-Houston Dog Run
Date: Wednesday, May 25, 2011 11:35:39 AM

-----Original Message-----

From: Charles [<mailto:travelmagnate7@gmail.com>]
Sent: Wednesday, May 25, 2011 9:38 AM
To: ROBERT DOBRUSKIN
Subject: Mercer-Houston Dog Run

Dear Mr. Dobruskin,

As a SoHo resident and member of the Mercer-Houston Dog Run, I am writing to urge you to rethink the proposed NYU expansion. I am sure you have and will be told many times the nuts and bolts of why that expansion is a poor idea (as well as its opposing arguments). I don't know if anything else might be of importance to you as you weigh this decision, but I thought I would explain why I personally am on the side of the MHDR.

The Run itself is a haven where like-minded dog owners, people of every background imaginable, can meet and socialize. This is to say nothing of what it does for the dogs themselves who relish the chance to run, play, and interact safely with other dogs. While there are other dog parks in the New York, the MHDR stands alone. The owners must apply, go through orientation, pay a fee, and take personal responsibility for the upkeep of the run itself. This means that members not only take pride in that area and the neighborhood in general, but care deeply for their animals. It's a very particular (and valuable) community of people who find common ground going above and beyond for their pets. Destroying that community goes against the very core of what this neighborhood has always represented.

Beyond that, the open space on Mercer makes that street a relative breath of fresh air. As SoHo continues its gentrification and the pedestrian population density continues to rise, the chance to walk unencumbered both physically and visually diminishes. Developing the open areas on that block would starve the neighborhood of one of the last reprieves from urban life. Not only would it change the character of the neighborhood for the worse, it would lessen the morale of some of the area's most vibrant citizens.

On any given day, thousands of people stop outside the Dog Run to simply watch the animals play. They do this with a sense of joy and enthusiasm. Why? Because it's positive and there's nothing else like it anywhere around.

The neighborhood needs the dog run. It's a fixture, as much a cultural pillar as The Angelika theater across the street. People go out of their way to attend the MHDR the same way they do The Anglelika.. Why is that? I believe both represent something wonderful about New York, and this part of New York in particular: people are having a unique shared experience they can't have anywhere else.

Surely these are things that must be considered when weighing a decision this vast. I have no doubt there are very tangible benefits to the development of this area. However, there is also the intellectual, social, and intangible human capital that makes this part of the city thrive. The MHDR is very much a part of that intangible human (and canine) capital.

I urge you to take this into consideration.

Thank you for your time.

Best,

Charles Wooten

25 May 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

DEPT OF CITY PLANNING
RECEIVED
2011 MAY 31 AM 11:33
ENVIRONMENTAL REVIEW DIV.

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

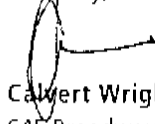
Dear Mr. Dobruskin:

As a member of the Mercer-Houston Dog Run Association, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the Mercer-Houston Dog Run is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the Mercer-Houston Dog Run to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the Mercer-Houston Dog Run would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.
- The EIS should study the effects of the negative effects of noise generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the Mercer-Houston Dog Run.

Thank you for your attention to this matter.

Sincerely,


Calvert Wright
645 Broadway, 5th Flr
New York, NY 10012



NEW YORK UNIVERSITY

A private university in the public service

College of Arts and Science

Department of Art History
100 Washington Square East, Silver Center 303
New York, New York 10003-6688
telephone: 212 998 8180
fax: 212 995 4182

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

DEPT OF CITY PLANNING
RECEIVED
2011 MAY 31 AM 11:33
ENVIRONMENTAL REVIEW DIV.

Dear Mr. Dobruskin,

March 23, 2011

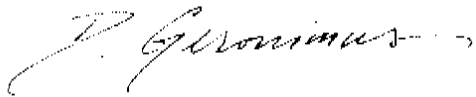
As a member of the 300-member families-strong Mercer-Houston Dog Run Association, a neighborhood resident AND a member of the NYU faculty, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous -- and irreversibly negative -- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the Mercer-Houston Dog Run is connected to a series of open spaces, continuing up the block. This enhances the **sense of openness and accessibility presented by the unenclosed, green space**. The proposed development moves the Mercer-Houston Dog Run to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. **The planned development would drastically alter the neighborhood to an imbalanced, single institution's use**. A direct effect of the proposed NYU project would be that the use of the Mercer-Houston Dog Run would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. As a result, **public access would be severely limited**. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.
- No less importantly, the EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately

might cause the closing of the Mercer-Houston Dog Run. In fact, I am *convinced* that it would spell the end of our community Run.

Thank you for your attention to this matter.

Sincerely,



Dennis Geronimus
Associate Professor of Art History
New York University

Home address:
2 Washington Sq. Village, #3M
NY, NY 10012.
dvg2@nyu.edu

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:52:25 AM

From: dan oberlander [mailto:dan@oberlanderassociates.com]
Sent: Monday, May 23, 2011 10:18 AM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

As a member of the **Mercer-Houston Dog Run Association**, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

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- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the **Mercer-Houston Dog Run** would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People, who do not know it exists, would never find it unless they walked

between the buildings. New members are first attracted by their immediate visual experience as they walk by.

· The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the **Mercer-Houston Dog Run**.

Thank you for your attention to this matter.

Sincerely,

Dan Oberlander

202 Thompson St #1

N.Y. N.Y. 10012

From: ROBERT DOBRUSKIN
To: DIANE MCCARTHY; HANNAH FISCHER-BAUM
Cc: CELESTE EVANS
Subject: Fw: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Friday, June 03, 2011 8:01:21 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

From: Travis, Dianne [mailto:Dianne.Travis@corcoran.com]
Sent: Thursday, June 02, 2011 02:59 PM
To: rdubrus@planning.nyc.gov <rdubrus@planning.nyc.gov>
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

As a member of the Mercer-Houston Dog Run Association, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

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- The EIS should study the effects of the negative effects of noise generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the Mercer-Houston Dog Run.

Thank you for your attention to this matter.

Sincerely,
Dianne Travis
60 E 8th Street
New York, NY 10003



Dianne Travis
Associate Broker
Corcoran
d: (212) 500-7002
f: (212) 230-7343
c: (646) 522-7894
36 East 12th Street, New York NY, 10003
dtravis@corcoran.com

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From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Need for preservation of our Greenwich Village Community.
Date: Monday, May 23, 2011 10:54:16 AM

From: Eileen Ain [mailto:dreileenain@gmail.com]
Sent: Monday, May 23, 2011 8:59 AM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org; EileenAin
Subject: Need for preservation of our Greenwich Village Community.

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact
Statement for NYU Core ULURP, CEQR
No. 11DCP121M

Dear Mr. Dobruskin:

I am a flutist and psychotherapist, and my garden on LaGuardia Place is my hope for the neighborhood. As people pass by, hear the music, and take time to smell the roses (I have yellow Golden roses) they are finally having the peace they need to think clearly and compassionately in a city that is hoping to have more trees. Over the years, I do not understand why the sense of expansion here is so important when there are other places, close by to the Village, my neighborhood, that need the boost and

traffic to stimulate their business, one example being the Financial District that caters to the working environment, rather than a neighborly sense of being.

Thus, I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better

utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.

- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.
- The EIS should measure the impact of the proposed rezoning and

developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.

- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Dr. Eileen J. Ain

28 East 10th Street

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 24, 2011 10:24:38 AM

From: Ellen Horan [mailto:horanel@aol.com]
Sent: Monday, May 23, 2011 7:24 PM
To: ROBERT DOBRUSKIN
Cc: Ellen Horan
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

-- The EIS must study the effects of Parkland Alienation in the transfer of any portion of the NYC owned property to NYU, specifically that of Mercer, LaGuardia and Bleecker street strips, currently used as community green and recreational open spaces.

Please read this letter that was forwarded to your Director with no response, in August 2010.

CAAN Community Action Alliance on NYU 2031, August 26, 2010

Re; City Owned Property, Open Space as Parkland on Mercer Street, LaGuardia Place, and Bleecker Street

Dear Mayor Bloomberg, Borough President Stringer, Director Burden, Commissioner Benepe, Gommissioner Sadik-Khan, and Chair Hamilton:

- We formally request the transfer of the four city-owned strips along Mercer Street and LaGuardia Place, as well as the strips between Mercer and LaGuardia on Bleecker Street and on West Third, to be completed by remapping the land from roadbed to parkland. The future jurisdiction would be New York City Department of Parks and Recreation.

This transfer process was voted and approved as early as 1967 by the City Planning Commission, the Manhattan Borough President and Community Board 2. Because the approved transfer was never completed, documentation shows subsequent resolutions in 1979, 1995, and 2004. According to past Parks Commissioner Henry Stern, "NYU won't grant consent and is blocking the move." The Villager, "Strip Poker on superblocks, does NYU hold the cards?" 6/23-29, 2004

These strips supplement the only nearby public park and playground at Washington Square.

Central downtown Manhattan is underserved by park space, with Community Board 2 having only .04 acres of open space per thousand people, the second lowest amount of open space in Manhattan, well below the benchmark of 2.5 acres per thousand people.*

These strips are approximately 2.4 acres of open green space, covered by parks, playgrounds, a community dog run and community created gardens. Over a period of 30 years, community residents banded together to create and maintain these public facilities. They are used by thousands of community residents and visitors each year. Besides amenities such as a dog run and children's play areas, they offer a mature overhang of foliage, fruit trees and urban wildlife. School children from nearby Children's Aid Society, Little Red Schoolhouse, PS 41, Cooke Academy, and Blue Man School are taught about food production in a program offered by volunteer community gardeners.

We fear that the city intends to sell this land to NYU, or use the roadbed for construction hosting areas, or 'trade' these strips for community amenities elsewhere. None of these options is acceptable.

Instead the City of New York should embrace this request for protection as consistent with Mayor Bloomberg's visionary urban-environmental plan: PlaNYC--A Greener, Greater New York, and preserve this greenbelt with 60+ mature trees. The strips were created with the sweat equity of a neighborhood, and are a tribute to the principles of Jane Jacobs and many urban planners who have followed.

We request that the Mercer and LaGuardia and Bleecker strips be swiftly transferred to permanently protected parkland and open space.

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 24, 2011 10:24:21 AM

From: Ellen Horan [mailto:horanel@aol.com]
Sent: Monday, May 23, 2011 7:40 PM
To: ROBERT DOBRUSKIN
Cc: Ellen Horan
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

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Re; City Owned Property, Open Space as Parkland on Mercer Street, LaGuardia Place, and Bleecker Street

Dear Mayor Bloomberg, Borough President Stringer, Director Burden, Commissioner Benepe, Gommissioner Sadik-Khan, and Chair Hamilton:

- We formally request the transfer of the four city-owned strips along Mercer Street and LaGuardia Place, as well as the strips between Mercer and LaGuardia on Bleecker Street and on West Third, to be completed by remapping the land from roadbed to parkland. The future jurisdiction would be New York City Department of Parks and Recreation.

This transfer process was voted and approved as early as 1967 by the City Planning Commission, the Manhattan Borough President and Community Board 2. Because the approved transfer was never completed, documentation shows subsequent resolutions in 1979, 1995, and 2004. According to past Parks Commissioner Henry Stern, "NYU won't grant consent and is blocking the move." The Villager, "Strip Poker on superblocks, does NYU hold the cards?" 6/23-29, 2004

These strips supplement the only nearby public park and playground at Washington Square. Central downtown Manhattan is underserved by park space, with Community Board 2 having only .04 acres of open space per thousand people, the second lowest amount of open space in Manhattan, well below the benchmark of 2.5 acres per thousand people.*

These strips are approximately 2.4 acres of open green space, covered by parks, playgrounds, a community dog run and community created gardens. Over a period of 30 years, community residents banded together to create and maintain these public facilities. They are used by thousands of community residents and visitors each year. Besides amenities such as a dog run and children's play areas, they offer a mature overhang of foliage, fruit trees and urban wildlife. School children from nearby Children's Aid Society, Little Red Schoolhouse, PS 41, Cooke Academy, and Blue Man School are taught about food production in a program offered by volunteer community gardeners.

We fear that the city intends to sell this land to NYU, or use the roadbed for construction hosting areas, or 'trade' these strips for community amenities elsewhere. None of these options is acceptable.

Instead the City of New York should embrace this request for protection as consistent with Mayor Bloomberg's visionary urban-environmental plan: PlaNYC--A Greener, Greater New York, and preserve this greenbelt with 60+ mature trees. The strips were created with the sweat equity of a neighborhood, and are a tribute to the principles of Jane Jacobs and many urban planners who have followed.

We request that the Mercer and LaGuardia and Bleecker strips be swiftly transferred to permanently protected parkland and open space.
Signed by members of CAAN2031

comments submitted by
Ellen Horan
Vice Chair,
La Guardia Corner Gardens
Bleecker Street and LaGuardia Place

home address:
50 Battery Place 5F
New York, NY 10280
horanel@aol.com
212-982-2884
917-742-2370
<http://www.31BondStreet.com>

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 24, 2011 10:24:05 AM

From: Ellen Horan [mailto:horanel@aol.com]
Sent: Monday, May 23, 2011 8:34 PM
To: ROBERT DOBRUSKIN
Cc: Ellen Horan
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

Please incorporate these comments in your Study for NYU Core ULURP.

Natural Resources:

STUDY effect of pit excavation and soil removal in Superblocks:

- absorption of rainwater and storm water runoff
- diversion and impact on underground streams and groundwater.
- effect of mature trees and root systems destroyed on rainwater diversion.
- effects to air quality from removal of mature canopy of trees.
- effect of deep earth removal, pit construction, on all natural resources in a 500' radius from
- effect on Mature trees, plantings, wildlife, springs, groundwater)

Natural Resources: Effect of removal of existing natural landscape and flowering plantings and trees on Monarch Butterfly migration paths.

Natural Resources: Effect of wind tunnels created by newly proposed buildings to Community Gardens, and other natural resources and plantings within 500' radius of each building.

Land Use, Zoning, and Public Policy:

Study the effect of the ratio and overcrowding of current Parks as exists in current configuration.

Study the effect of proposed increase of student and university populations to daily projected visitors to NYC Public Parks, specifically Washington Square Park.

Study the effect of proposed increase of Public School students, (900students + 75 staff) on

daily usage and crowding of NYC Public Parks. (Specifically Washington Square Park).

Study the numbers of children and elderly, per capita, in area of Washington Square Park, and effect of reduced park access due to additional daily populations.

Shadows:

Conduct Shadow studies to map Effect of shadows from new construction and obstructing sunlight to all current open space areas.

Conduct shadow studies to map effect of shadows: in particular upon currently designated public open space areas, Community Gardens, and play areas and study effect on seasonal growth pattern to existing trees and perennial plantings.

Study shadow effects on all plants on Community strips along LaGuardia Place, Mercer Street, 505 LaGuardia Gardens, Bleecker Street and West Third Street.

Air Quality

Study of Air quality, summer and winter, from Increased congestion, traffic and human, on **Ground-level ozone levels** (a highly reactive form of oxygen that is formed from pollutants reacting with sunlight) -- which also worsens asthma and can lead to premature mortality.

Air Quality studies, Both Summer and Winter from increase of particulate matter during construction term. (pollen, dust, elemental carbon.)

Both Summer and Winter studies of air quality from permanently proposed buildings to emissions increases of increases of particulate matter, elemental carbon, dust (air pollution)

Both Summer and Winter studies of air quality from proposed increase of daily human traffic (crowds) and all vehicular traffic, of particulate matter, elemental carbon, dust (air pollution)

Greenhouse Gas Emissions: Effect of removal of 171 Trees on ability to convert pollution and green house gas emissions and filter carbon dioxide from air.

Greenhouse Gas Emissions: Effect of increase of vehicles during construction period to increase of current Greenhouse emissions.

Socionomic Conditions:

REPORT on the exact number of elderly persons/person's with disabilities that reside in the residences within a 500' - 1 mile scope of the construction.

STUDY Effect of long term construction on the impact of elderly, and person's with disabilities, including reduced mobility due to transportation disruption, sidewalk closings, passageway closings, thruways, street closings.

Ellen Horan
50 Battery Place 5F
New York, NY 10280
horanel@aol.com
212-982-2884
917-742-2370
<http://www.31BondStreet.com>

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 24, 2011 10:23:47 AM

From: Ellen Horan [mailto:horanel@aol.com]
Sent: Monday, May 23, 2011 9:02 PM
To: ROBERT DOBRUSKIN
Cc: Ellen Horan
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

Please incorporate these comments in your Study for NYU Core ULURP.

Re: LMDC's World Trade Center's Memorial Project's Green Guidelines:
http://www.renewnyc.com/content/pdfs/Memorial_Sustainable_Design_Guidelines.pdf
and New York State Battery Park City Authority's [*Commercial / Institutional Environmental Guidelines*](#)

The Standards of Environmental Study in Greenwich Village should meet these State and New York City extended guidelines:

Please include the following:

Site Management:

1.2 Landscape and Roof Design to Reduce "Heat Islands"

1.3 Alternative Transportation

2.0 Water Conservation

2.1 General Provisions

2.2 Storm Water Management

2.3 Water Use Reduction

2.4 Innovative Water Technologies

2.5 Water Efficient & Responsible Landscaping Practices

3.0 Energy Efficiency

3.1 General Provisions

3.2 Maximize Energy Efficiency

3.3 Modeling for Energy Performance

3.4 Renewable Energy

3.5 Green Power Sources

- 4.0 Conserving Materials and Resources
 - 4.1 General Provisions
 - 4.2 Storage & Collection of Recyclables
 - 4.3 Construction Waste & Resource Reuse
 - 4.4 Recycled Content
 - 4.5 Local/Regional Materials
 - 4.6 Renewable & Rapidly Renewable Materials
 - 4.7 Forest Management
 - 4.8 CFC Elimination

- 5.0 Enhanced Indoor Environment Quality (IEQ)
 - 5.1 General Provisions
 - 5.2 Indoor Air Quality (IAQ)
 - 5.3 Select Low Emitting Materials
 - 5.4 Controllability of Systems
 - 5.5 Lighting & Daylighting

Ellen Horan
50 Battery Place 5F
New York, NY 10280
horanel@aol.com
212-982-2884
917-742-2370
<http://www.31BondStreet.com>

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: ENVIRONMENTAL IMPACT STATEMENT re: NYU 2031 proposal
Date: Wednesday, May 25, 2011 10:40:55 AM

From: Emily Howell [mailto:ebnewell1@me.com]
Sent: Wednesday, May 25, 2011 10:39 AM
To: ROBERT DOBRUSKIN
Subject: ENVIRONMENTAL IMPACT STATEMENT re: NYU 2031 proposal

Dear Mr. Dobruskin:

I was unable to attend yesterday's City Planning meeting concerning NYU 2031 proposal, but I would like to voice my concern as a resident.

I would like to add support for an Environmental Impact study of NYUs proposed construction. I wonder if you are considering all ramifications of such a large scale project on our neighborhood? There are several key areas which have been addressed by other neighbors; however, there is one that effects the lives of those who live, sleep, and work in the village - it is **noise**.

Noise Pollution should be added to the enviromental impact study as it will increase during the construction of this project and after the buidling/s are completed.

In order to maintain a neighborhood, we seek to maintain a peaceful sanctuary for a few hours a day, and with this project it will add more noise from machines to dump trucks to exhaust fans.

Thanks for your time and dedication to New York City.

Warm Regards,
Emily Howell

Emily B. Howell
309 East Fifth Street #15
NY, NY 10003

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 24, 2011 12:37:55 PM

From: Elyn Zimmerman [mailto:elynzimmerman@gmail.com]
Sent: Tuesday, May 24, 2011 12:00 PM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Mr. Dobruskin,

As a neighborhood resident and a member of the [Mercer-Houston Dog Run Association](#), I am writing to urge that revisions be made to the scope of work for the draft of the Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and potentially negative-- impact on the neighborhood. The EIS should study the impact upon neighborhood character, as the planned developments would alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The new development would drastically alter the neighborhood to an imbalanced, single institution's use.

Among many other issues, I believe that the NYU's draft review fails to adequately address the following issues in regard to the [Mercer-Houston Dog Run](#).

- Presently the [Mercer-Houston Dog Run](#) is connected to a series of public spaces, continuing up the block. This enhances the public, open feeling along the pedestrian streets. The proposed development moves the [Mercer-Houston Dog Run](#) - already a very small dog run compared to others in the city - to an even smaller, confined space. The dog run is of course for dogs... but just as important, it is for their owners who enjoy the sense of open space, light and air as much as their animal companions.
- One direct effect of the proposed NYU project would be that the new location of the [Mercer-Houston Dog Run](#) would NOT be public. Public access would be severely limited. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. New members are first attracted by their immediate visual experience as they walk by.
- The EIS should study the potential for the negative effects of noise generated from the relocated dog run on residents of Silver Towers. After 30 years as a vibrant facet of the community, noise was never a factor because of the current location of the dog run. Moving it to a location that might compromise its neighbors could ultimately cause the closing of the [Mercer-Houston Dog Run](#).

The many changes in NYC's character by the Bloomberg administration have made the city more livable... bike lanes, traffic islands turned into seating areas, new parks, tot lots and open spaces, reduced car traffic on the narrow, crowded downtown streets.

Surely these amenities should also be extended to New Yorkers who enjoy the company of

their companion animals and the exercise and coming together that a dog run brings to both the dogs and their responsible owners.

Thank you for your attention to this matter.

Sincerely,

Elyn Zimmerman

elynzimmerman@gmail.com

www.elynzimmerman.com

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Save the Mercer Houston Dog Run Please!
Date: Tuesday, May 24, 2011 10:23:03 AM

From: Faye Armon [mailto:fayedazzle@yahoo.com]
Sent: Tuesday, May 24, 2011 10:12 AM
To: ROBERT DOBRUSKIN
Subject: Save the Mercer Houston Dog Run Please!

May 24, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR
No. 11DCP121M

Dear Mr. Dobruskin:

As a member of the **Mercer-Houston Dog Run Association**, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the **Mercer-Houston Dog Run** is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the **Mercer-Houston Dog Run** to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the **Mercer-Houston Dog Run** would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run.

Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.

· The EIS should study the effects of the negative effects of noise generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the **Mercer-Houston Dog Run**.

Thank you for your attention to this matter.

Sincerely,
Faye Armon
146 Mulberry Street, #4
New York, NY 10013

Gwen Akin
55 Prince Street
New York, NY 10012
gwenakin@earthlink.net

DEPT OF CITY PLANNING
RECEIVED
2011 MAY 26 PM 1:29
ENVIRONMENTAL REVIEW DIV.

May 23, 2011

Dear Mr. Dobruskin:

As a member of the Mercer-Houston Dog Run Association, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

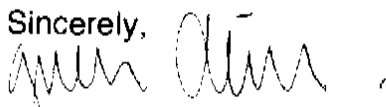
The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the Mercer-Houston Dog Run is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the Mercer-Houston Dog Run to a smaller, virtual space.

The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the Mercer-Houston Dog Run would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.

• The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the Mercer-Houston Dog Run.

Thank you for your attention to this matter.

Sincerely,



Gwen Akin

160 Bleecker Street, Apt 6KE
New York, N.Y. 10012
24 May 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP,
CEQR No. 11DCP121M

Dear Mr. Dobruskin:

As a resident of The Village since 1972 and formerly the Resident Chair of the Bleecker Area Merchants' and Residents' Association for the past 3 years – the block association which includes the Superblocks – I have serious concerns for our neighborhood...concerns which result in the following requests for detailed environmental analyses.

1. The effect the excessive increase in population will have on the existing community

Can the Support Services (the First Responders) maintain the same level of public safety with the increase in population (approximately double the population within the 2 block area).

first responders -

ability to accommodate the increase in population

lack of access to the tenants of Washington Sq. Village, 505 LaGuardia and Silver Towers'

safety -

increase in student population

crime - underage drinking, drugs

increase in pedestrians

medical

NO Hospital

2. The effect the constant construction will have on the existing community
The effect of the loss of quality of life on the population

environment-

pollution - air quality

congestion, detours

health of residents

i.e. allergies, asthma, emphysema, compromised lungs

Scope of Draft Environmental Impact Statement for NYU Core ULURP,
CEQR No. 11DCP121M
(continued)

depletion of the underground water levels
building foundations, trees
vermin

noise-
detours, congestion (both vehicles and pedestrians), horns honking

safety/first responders
ability to respond to emergencies from Bleecker and Mercer Streets and from LaGuardia Place

3. The effect on the Neighborhood

relocation of supermarket
hardship on the elderly and physically challenged members of the community

change in demographics
change in community, businesses
change in character of neighborhood
the effect it will have on the existing merchants
the effect it will have on the tourist trade and the City's revenues

school
pollution - idling buses
safety

Stringent studies must be conducted to ascertain the impact NYU's 2031 Plan will have on a community whose population will be nearly doubled within a 2 block area and which is already overburdened with vehicular and pedestrian traffic and that is already endangered by existing without fully staffed police and fire departments and without a fully operation hospital and trauma center to service lower Manhattan.

Sincerely,

Judith Callet
212-475-1852

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: NYU
Date: Tuesday, May 31, 2011 2:44:16 PM

From: Janis Donnaud [mailto:jdonnaud@aol.com]
Sent: Tuesday, May 31, 2011 1:45 PM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: NYU

Janis A. Donnaud
22 Grove St. #1B
NYC, NY 10014

May 31, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendously negative impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices

would significantly diminish the university's purported need for additional faculty housing.

- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.
- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.
- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter. I urge you to consider all aspects of NYU's proposed changes to our neighborhood, many of which will have an incredibly negative impact on all who live, work, and play in Greenwich Village.

Sincerely,

Janis A. Donnaud

**22 Grove St. #1B
NYC, NY 10014**

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: NYU expansion plan
Date: Monday, May 23, 2011 10:56:51 AM

-----Original Message-----

From: jtdinnyc@netzero.net [<mailto:jtdinnyc@netzero.net>]
Sent: Friday, May 20, 2011 6:59 PM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: NYU expansion plan

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.

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The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.

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The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.

The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

John T. Doyle
303 W 11 St 3E
NY, NY 10014
212-691-4097

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Cc: [CELESTE EVANS](#)
Subject: Fw: Mercer Houston Dog Run
Date: Friday, June 03, 2011 8:02:19 PM

From: JAMES GIBBS [mailto:james@nabo.com]
Sent: Thursday, June 02, 2011 12:00 PM
To: ROBERT DOBRUSKIN
Cc: Beth Gottlieb <info@mercerhoustondogrun.org>
Subject: Mercer Houston Dog Run

Dear Mr. Dobruskin

I am writing to ask you to please reject the NYU plan to take back the public space along Mercer Street north of Houston. I am a member of the Mercer Houston Dog Run, and it is a key part of my quality of life; I use the run every day, usually twice a day. The run is a unique partnership that provides service to *and oversight* of resident dog owners through an involved, all-volunteer board that manages the run and run membership. This allows the run to keep records and ensure that all dogs are vaccinated and licensed according the NYC laws, that they stay healthy, and that problem dogs or dogs that might become aggressive are treated and trained.

I have seen the board many times guide an owner to have their dog re-trained to make them safe and courteous canine members of the community. In addition, dogs that become sick with contagious diseases like Giardia (which can be transmitted to humans) are immediately identified and treatment is required by the board. This is unlike the other city-run dog parks, which provide a space for exercise but do not have the organization to enforce such rules or wield such a positive influence among their users. Nearly every dog owner in the neighborhood mentions that when they take their dog to the washington square run, the dog gets ill. The MHDRA should be a model for other dog runs, and not made a sacrifice to NYU's agenda of continuous, never-ending expansion.

If NYU succeeds in their attempts to renege on the space along Mercer Street with the promise of some future space being developed elsewhere, this unique organization may not survive. At best, if NYU follows through on their promises this time (if, and if) we may end up with another generic dog run, and lose this valuable model and part of our community. Even this might not be guaranteed as their plans 'evolve' over time.

In addition, the park spaces to the north of the dog run have been allowed to fall into disrepair by NYU in violation of their agreement to maintain them. These spaces are used daily despite the disrepair, but they would be an even better asset to the community if NYU had fulfilled its promises to keep them clean and maintain them.

Finally, as a resident and community member generally, and aside from my love for the dog run, I feel that NYU must not be allowed to expand further in our neighborhood. Greenwich village is very close to becoming simply a "college town"

as it is. This unique part of our city is collapsing into the single demographic of students, with their particular needs and desires being served to the exclusion of much else. Ultimately this is *not a benefit to even the students*; did they really choose to study in our great city only to find the same chain stores they would find in any mid-size city in America?

If NYU needs to continue expanding, they should be encouraged to do it in areas of the city that need and want the development, and not in the already vibrant, busy, historic village. If they succeed in gaining approval for this plan, they will present another in a few years, and then another. I believe NYU will not stop expanding until they are stopped by the city.

Thank you for your time, attention, and your service to New York,

Sincerely,

James Gibbs
178 Prince Street, #2
New York, NY 10012

Janice Pargh
176 Thompson Street - 3C
New York City 10012
(212) 477-3327

May 23, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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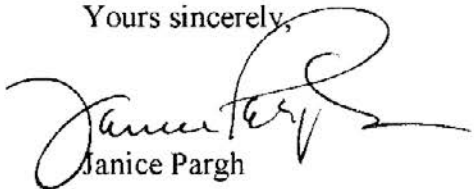
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The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.

The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Yours sincerely,



Janice Pargh

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Mercer Houston Dog Run
Date: Monday, May 23, 2011 12:07:03 PM

From: Whalen, Julia (NYC-RC) [mailto:Julia.Whalen@mccann.com]
Sent: Monday, May 23, 2011 11:04 AM
To: ROBERT DOBRUSKIN
Subject: Mercer Houston Dog Run

Dear Mr. Dobruskin:

As a member of the **Mercer-Houston Dog Run Association**, and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the **Mercer-Houston Dog Run** is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the **Mercer-Houston Dog Run** to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the **Mercer-Houston Dog Run** would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.
- The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the **Mercer-Houston Dog Run**.

Thank you for your attention to this matter.

Sincerely,

Julia Whalen

Julia Whalen

VP, Account Group Supervisor
Regan Campbell Ward
Ideas that Go Everywhere
150 East 42nd Street, 16th Floor
New York, NY 10017
646-742-2108 office
917-553-4712 cell

This message contains information which may be confidential and privileged. Unless you are the intended recipient (or authorized to receive this message for the intended recipient), you may not use, copy, disseminate or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail, and delete the message. Thank you very much.

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 2:22:51 PM

From: Kathryn Grooms [mailto:kathryngrooms@gmail.com]
Sent: Monday, May 23, 2011 2:23 PM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

5/23/11

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Dear Mr. Dobruskin:

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· The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the **Mercer-Houston Dog Run**.

Thank you for your attention to this matter.

Sincerely,

*Kathryn Grooms
60 E 8th Street Apt 18D
New York, NY 10003*

2 June 2011
Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

DEPT OF CITY PLANNING
RECEIVED
2011 JUN -7 AM 9:54
ENVIRONMENTAL REVIEW DIV.

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

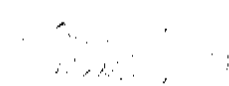
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Thank you for your attention to this matter.

Sincerely,

Katherine Wong


285 Lafayette Street, 6D, NY NY 10012

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: NYU
Date: Monday, May 23, 2011 10:51:25 AM

From: Laurel Elliott [mailto:laurel@dvbny.com]
Sent: Monday, May 23, 2011 10:40 AM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: NYU

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
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- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Laurel Elliott
59 West 12t St.
New York, NY 10011

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: NYU
Date: Wednesday, June 01, 2011 11:01:30 AM

From: L L [mailto:lisa1ray1@verizon.net]
Sent: Wednesday, June 01, 2011 1:54 AM
To: ROBERT DOBRUSKIN
Subject: NYU

May 30, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I am a resident for over 30 years and was extremely active in reclaiming the vitality of this neighborhood in the early 1990's. I am also a graduate of NYU. Many promises and "community" spaces were never fulfilled or maintained by NYU as they agreed to, and that were stipulations for other agreements and **special privileges** that were granted. This fact alone should prevent the granting of any additional special considerations. The residents in this neighborhood have put up with **constant construction bombardment** (such as noise, vibration, street closures, filthy air, traffic, lost parking) for years at our expense and their benefit. The city infrastructure for water, electric and telephone lines is already stressed here. **We are a diverse neighborhood.** We are not an institution or solely a busy business district. Yes, our local businesses do benefit from people being here. **BUT**, the sidewalks can not handle more pedestrians at night, and the streets (ESPECIALLY BLEECKER ST.) frequently get backed up with traffic from Broadway west to 7th Avenue by day. For years the public playgrounds are mostly under construction, keyed or in ill maintained by NYU. We have 1 supermarket remaining for Village South and SOHO and NYU wants that gone. Our hospital complex was taken away (and is available, space that did house an institution!). For many years NYU, local businesses and residents co-habitated. Voices and concerns were listened to. The childrens toddler swimming pool on Thompson St. is cold late in the day from the unforeseen shadows upon it created by the SOHO Trump Hotel built last year to its west. Does a decent quality of life no longer have a value in this city?

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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Thank you for your attention to this matter.

Sincerely,

Lisa Goldberg

184 Thompson St. NYC, NY 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#)
Cc: [HANNAH FISCHER-BAUM](#)
Subject: FW: Environmental Impact statement for NYU
Date: Friday, May 20, 2011 5:02:30 PM

-----Original Message-----

From: linda lusskin [<mailto:ljlus@earthlink.net>]
Sent: Friday, May 20, 2011 4:26 PM
To: ROBERT DOBRUSKIN
Subject: Environmental Impact statement for NYU

May 20, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP,
CEQR No. 11DCP121M

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Thank you for your attention to this matter.

Sincerely,

Linda Lusskin

61 Jane Street #1A

New York, NY 10014

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: NYU Environmental Impact Study
Date: Wednesday, May 25, 2011 2:38:06 PM

From: Michael R. Fisher [mailto:openny@rcn.com]
Sent: Wednesday, May 25, 2011 2:33 PM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: NYU Environmental Impact Study

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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Thank you for your attention to this matter.

Sincerely,

Michael R. Fisher
45 Christopher Street, #16-C
New York, NY 10014-3587

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:53:22 AM

From: mcoffey123@gmail.com [mailto:mcoffey123@gmail.com] **On Behalf Of** Mo and Jeremy Coffey
Sent: Monday, May 23, 2011 10:05 AM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

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Thank you for your attention to this matter.

Sincerely,
Moschell & Jeremy Coffey
89 Bleecker St. - Apt. 1E
New York, NY 10012

Miriam Kaplan
3 Washington Square Village
New York, NY 10012

06 JUN 2011

Mr Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, NY 10007-1216

RE: NYU Core
CEQR No. 11DCP121M
Comments on Draft Scope of Work

Dear Mr. Dobruskin:

On the following pages is an expansion of the comments I made
at the 24 MAY 2011 Public Scoping Hearing on NYU's Draft Scope
for its EIS Statement.

Miriam Kaplan

My name is Miriam Kaplan.
I live at 3 Washington Square Village.
I want to address several issues.

A. Purposes of Residential Districts

NYU is seeking to have the zoning of the two superblocks changed from R7-2 to C1-7. C1-7 has an applicable Residential Zoning of R8, which permits about double the FAR and requires about half the Open Space Ratio of R7-2.

Chapter 21 of the Zoning Resolution - General Purposes of Residential Districts - addresses the reasons for having Residence Districts and lists nine of the goals of such districting.

One of the goals is
"to protect residential areas . . . against congestion by regulating the density of population and the bulk of buildings" (¶1 d).

NYU is seeking the rezoning so that it can add structures and residents to the two superblocks which would lead to an increase in both congestion and human density.

This attempt to betray the intent and purpose of the Zoning Resolution should not be allowed to proceed as it would set a dangerous precedent for zoning in New York City.

Another goal (¶1i) includes among other things
"to promote stability of residential development, to protect the character of the district. . ."

Both of the superblocks which are the subject of this EIS were built with an eye to matching the density of the residential area to their west. And even though the buildings went high, they never overwhelmed the adjacent neighborhood.

NYU's plans, with its eye on matching the character of the area to the east, definitely would overwhelm the residential neighborhood. Furthermore on the north block, the plan to insert two large buildings between the existing buildings, to eliminate the garden and to eliminate the driveways, would totally destroy the residential character of the Washington Square Village complex. On the South Block, the addition of a 1400 bed student dormitory would totally overwhelm the character of the neighborhood.

Therefore, changing the effective residential zoning of the two superblocks would contravene the goals of Residential Districting.

How can NYU justify a request which would violate the stated purposes of zoning ?

B. Purposes of Commercial Districts

Chapter 31 of the Zoning Resolution - General Purposes of Commercial Districts - addresses the reasons for having Residence Districts and lists eleven of the goals of such districting.

Eight of these goals are concerned with providing space, etc, and protection, etc for retail / commercial development. The remainder are concerned with building development.

None of the goals suggest that commercial districting should be

or could be used as a ploy by an educational institution in order

- to change the applicable residential zoning to the detriment of the existing structures,
 - to add mostly Community Facility structures rather than Commercial,
 - to add retail space to the lower floors of existing residential buildings (as indicated by the intention to re-clad the first two floors of the WSV buildings (Draft Scope, p.7) and as indicated in NYU Plan 2031: Chapter 6 - The Core, p.165).
 - and to eliminate the need of providing garage space for the planned additional residential units (C1-7 does not require parking spaces
- http://home2.nyc.gov/html/dcp/html/zone/zh_c1_c2.shtml)

What NYU claims it needs is classroom space and student housing. The hotel and the retail space are not essential to those needs. Without the hotel and retail space, there is no need for rezoning to commercial.

In the light of NYU's claimed true needs, how does the university justify its request for a change of zoning from residential to commercial in direct contravention of the purposes of commercial districting ?

C. Open Space

The North Block was built before the Zoning Resolution was enacted in 1961. But it was built according to the Tower-in-the-Park paradigm which favored providing more open space on a lot by allowing buildings to go high, provided the density met some criterion. The South Block was built after the ZR was enacted and strictly met the Open Space requirements as specified in that document.

It would seem that the open space on the two blocks belongs to the buildings. Just as the yard of a private home belongs to the home. It is private open space.

NYU, in addition to trying to reduce the amount of open space required for the buildings by seeking a change in zoning, wants to completely deprive the buildings on the North Block of their open space by converting that space into publicly accessible open space.

This would not only take something away from the buildings that belongs to them, but it would also expose the residents of the buildings to noise, invasion of privacy, and lack of security.

On what grounds does NYU justify taking the open space away from the buildings ?

D. Transient Parking

NYU plans to reduce the size of the garage in the North Block and in the process to eliminate 200 transient parking spots.

There are only two other garages within the 400' study area:

- the garage on Broadway and Astor place which has a capacity for 250 cars;
- the garage on Thompson Street between Bleecker and West 3rd Streets with a capacity of 235 cars.

Therefore, eliminating 200 transient parking spots would reduce the availability of transient parking by almost 30% while at the

same time the addition of residential housing and the hotel would lead to an increased demand for parking.

NYU should provide an analysis of what the demand for transient parking would be and a plan on how it is to be accommodated.

E. General Large Scale Development (GLSD)

As the Zoning Resolution stands, a GLSD can only be built in a commercial or a manufacturing district provided there are no existing buildings on the lot - except in certain cases which do not apply to a C1-7 district.

Clearly the Zoning Resolution requires amendment if NYU is to get a GLSD for the two superblocks. We require that NYU provide full and complete particulars of all planned amendments to the Zoning Resolution and any other planned changes, modifications or additions to existing legislation.

Furthermore, we are of the opinion that any such changes in the definition of a GLSD or the formulation of some other kind of Development would be counter to the intent and purpose of the Zoning Resolution as it would facilitate the violation of the goals of the Zoning Resolution.

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: NYU expansion
Date: Friday, May 27, 2011 10:21:12 AM

From: maryanne kuzniar [mailto:maryannekuzniar@gmail.com]
Sent: Friday, May 27, 2011 8:52 AM
To: ROBERT DOBRUSKIN
Subject: NYU expansion

Good morning, I would like to make you aware of how strongly the village community is against the NYU expansion plan. It is built on the assumption that the fat cat always wins. This is an abuse of power, and will ruin the village feeling that is so special. I suggest you take seriously this appeal by the village habitants. Thank you Maryanne Kuzniar, resident

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Cc: [CELESTE EVANS](#)
Subject: Fw: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Friday, June 03, 2011 8:04:36 PM

From: Necia Refes [mailto:maughter2@gmail.com]
Sent: Wednesday, June 01, 2011 09:00 PM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

June 1, 2011

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

As I born New Yorker I am deeply saddened to see how many beautifully crafted buildings from the 18th and 19th century are carelessly torn down to make room for new buildings that are soulless and detract from the neighborhoods. New York's history crumbles before my eyes.

In Europe and the Netherlands they cherish and glorify the beauty of their past by incorporating their history into modern day life. What happened to our can-do attitude and our willingness to embrace our past?

I do not understand allowing NYU to obliterate neighborhoods with their dorm-buildings. I strongly request that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.
- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo

Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.

- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.
- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Necia Refes
67 E. 2 St.
New York, NY 10003



APA NY Metro Chapter Draft Statement on the NYU 2021 Master Plan, May 2011
CEQR #: 11DCP121M

The New York Metro Chapter of the American Planning Association appreciates the opportunity to provide professional input on the proposed NYU Master Plan currently before the New York City Planning Commission. We are a professional and educational association of more than 1,450 planners working in New York City, Long Island, Westchester, and the lower Hudson Valley. The professional planners of the APA New York Metro Chapter support the growth of high quality educational facilities within the city and are interested in working with New York University on its expansion plans.

The Chapter recognizes that expansion of higher education facilities in New York City has tremendous value in the range of expertise these institutions attract, their ability to contribute to a diversified workforce, and the long-term benefits from providing a pipeline of future talent. The downside of a university's presence can occur when that institution strives to be insular and wall itself off from the rest of the city, losing connection and context. A particular strength of NYU is that it is an urban university, providing a unique and integral role within New York City and of the communities of Greenwich Village and Lower Manhattan. As planners, we look to NYU to continue its efforts to integrate its Main Campus within its Greenwich Village context, in terms of design, access, open space, sustainability, and commitments to its neighbors.

The Chapter applauds NYU on its extensive public outreach to community associations, elected officials, and the general public, especially by providing a local space where anyone can see the plans and models, and provide input. To further support these efforts, the Chapter recommends NYU provide additional evidence of their need for a 50% expansion of space in 25 years. While details about which departments are recommended for which locations are understandably in flux for such a long-term plan, the overall demand for such extensive expansion deserves additional explanation.

The Chapter appreciates NYU's efforts on the following elements (and offers additional considerations):

- Reducing the height and mass of initially proposed buildings;
- Prioritizing circulation from the corners into the super blocks;
- Proposed reduction of on-site parking spaces from 620 to 380. (We recommend investigation into further reducing this supply in support of the City's goals and NYU's location in a transit-rich environment.);
- Recognition that NYU's goals must work within the context of an existing neighborhood. (To further this objective, the lower 6th Avenue and Hudson Square manufacturing zones should be reconsidered for expansion if NYU truly wishes to have most of its facilities within a 10-minute walk.)
- Acknowledgement that NYU's plans require a long-term solution, but must not be overly disruptive in the short-term, and developing a phased plan that maintains all existing community facilities and services throughout implementation. (A schedule for community reporting should be established, to maintain open communication throughout the life of the plan's implementation and minimize construction impacts.)

The New York Metro Chapter recommends NYU revisit the following elements to maximize integration within the neighborhood and re-present an updated plan to receive additional support:

- A significant part of the justification for the expansion is the dire need for additional academic space, especially when compared with the space provided by universities of the same stature. However, the university's argument becomes weakened with the inclusion of a hotel as part of early phases. We would have expected the addition of residential and academic spaces as the first priority and the hotel dilutes that effort. Additionally, a university hotel tends to insulate the university by supplying all of their needs themselves, as opposed to relying on the community to provide some of those requirements and thereby fostering a higher level of interaction.
- Buildings should be accessible from both the street as well as from internal space, assuring the high level of interaction with pedestrians. The entrances to the "boomerang buildings" should be reevaluated in the context, ensuring at least that there will be an active streetscape along the public street frontage and active, transparent fenestration facing the central open space.
- The height and bulk of the eastern "boomerang building" should also be reconsidered to ensure it will not overpower and shadow existing structures.
- The massing of the "zipper building" and the hotel along Mercer Street is a cause of some concern as it seems to be excessive and tends to reinforce the fortress mentality separating school properties from others. Additional time should devote to finding solutions which would assure that the massing is more gracious and possibly porous in how it relates to adjacent non-university spaces.
- Consideration of potential impacts to Houston Street of vehicular access and loading for the proposed hotel.
- Assurance that the "pergolas" at the Washington Square Village corridor entrances are removed to assure a more welcoming public walk to the central open space, and assurances that the entrances to the central open space along LaGuardia Place and Mercer Street will not be gated.
- Design and use requirements should be memorialized (e.g. with the City) to ensure that the planned open spaces and public school remain a resource for both the city and university.
- There are serious questions about the status and use of the publicly-owned open spaces along LaGuardia Place, and the small parcels on Bleeker and West Third Streets. Community Board 2 has raised questions about these parcels and a group of organizations has applied under Section 197-c to map these as park land. Additional dialogue should be conducted to determine the outcome of these spaces with careful coordination with New York City of "publicly-accessible, privately-owned open space."
- The Plan specifies to achieve LEED Silver certification at a minimum and adaptive reuse when possible. A more significant push for sustainability assurance at the building, block, and neighborhood level should be provided, with more significant requirements for energy efficiency.
- Since the Plan is now in the CEQR phase on the Draft Scope of Work, it is important that adequate study be given alternatives including: a) a lower density alternative to consider the degree of impact of the proposed development; and b) mapping the current DOT strips as parkland instead of privatization.

The APA New York Metro Chapter thanks New York University for the opportunity to provide this input. We look forward to continue coordinating to result in a plan that works for both the University and New York City.

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:56:11 AM

From: Paolo Alippi [<mailto:paolo.alippi@gmail.com>]
Sent: Saturday, May 21, 2011 11:56 AM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.
- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.
- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.
- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

Sincerely,

Paolo Alippi

184 thompson street, atp 4T

10012 Manhattan

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: NYU expansion plans
Date: Friday, May 27, 2011 10:22:05 AM

-----Original Message-----

From: Pamela Brown [<mailto:pmb691@mac.com>]
Sent: Friday, May 27, 2011 10:16 AM
To: ROBERT DOBRUSKIN
Subject: NYU expansion plans

It's like the university that ate the Village.
As a member of Laguardia Garden, I strongly
object to NYU's overdevelopment. Besides
losing the garden, we will lose trees, light,
common space, and all the things that make
the Village the Village. I sincerely hope you
will vote against NYU's proposals.

Pamela M Brown
458 West 23rd St. #1BR
New York, NY 10011

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH MARCUS](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 4:11:44 PM

From: Patricia Colorio [mailto:Patricia.Colorio@saatchiny.com]
Sent: Monday, May 23, 2011 3:44 PM
To: ROBERT DOBRUSKIN
Subject: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 23rd, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR
No. 11DCP121M

Dear Mr. Dobruskin:

As a member of the [Mercer-Houston Dog Run Association](#), and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous--and negative-- impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the diminishing open spaces of the Super Blocks. Presently the [Mercer-Houston Dog Run](#) is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the [Mercer-Houston Dog Run](#) to a smaller, virtually hidden space.
- The EIS should study the impact upon neighborhood character, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the [Mercer-Houston Dog Run](#) would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local

dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.

· The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the **Mercer-Houston Dog Run**.

Thank you for your attention to this matter.

Sincerely,

*Patricia Colorio
152 Thompson Street
New York City, NY 10012*

Disclaimer

The information in this email and any attachments may contain proprietary and confidential information that is intended for the addressee(s) only. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, retention or use of the contents of this information is prohibited. When addressed to our clients or vendors, any information contained in this e-mail or any attachments is subject to the terms and conditions in any governing contract. If you have received this e-mail in error, please immediately contact the sender and delete the e-mail.

June 6, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216
By Fax to: (212) 720-3495

Subject: Scope of Work for “NYU Core Project” (CEQR No. 11DCP121M)

I am writing to request that the City Planning Commission add a further task to the Environmental Impact Statement (EIS) for “NYU Core Project” (CEQR No. 11DCP121M), a consequence of the project not addressed by NYU’s Draft Scope of Work, and overlooked by many community groups as well: **the impact on local civic engagement** from transferring to NYU lands and facilities that are currently managed by local community groups.

NYU’s Project includes the demapping and transfer to NYU of several so-called “green strips:” along the west side of Mercer Street, between Houston and W. 4th St.; along the west side of LaGuardia Place, between Bleecker and W. 3rd, and along the south side of Bleecker, between LaGuardia Place and Mercer. Several community organizations have for many years raised funds for and managed the green strips under agreements with the Department of Transportation, which controls the lands for the city. For example:

- The Mercer-Houston Dog Run Association manages the dog-run (<http://www.mercerhoustondogrun.org/>)
- The Lower Manhattan Neighbors' Organization Inc., known as LMNO(P)) and Mercer Playground Association manages the playground on Mercer between Houston and West Third (<http://www.nycgovparks.org/parks/M295/highlights/6491>)
- The Friends of Laguardia Place manages the park on LaGuardia Place, with now-mature trees and a famous statue of Fiorello LaGuardia.

These groups and many local residents have already expressed great concern about the potential loss of the community facilities (dog run, parks, playgrounds). In response, NYU has incorporated into its project some NYU-run parks, playgrounds, and a dog run, after NYU has built underground academic facilities beneath these strips. I and other community members are concerned, especially given NYU’s track record, that these commitments will eventually be rescinded, and that the community will lose access to these areas or they will not be properly maintained (e.g., terminated public access to Coles roof, locked and decrepit playground next to Coles, etc.).

However, **regardless of how well NYU preserves the quality and public accessibility of these facilities, NYU ownership will bring to an end the community organization and activity that has developed to support and manage them. This will be a tremendous loss to the community in terms of civic engagement and social capital,**

but it is one that might have been overlooked given everyone's concern over the potential loss of the facilities themselves.

As Harvard political scientist Robert Putnam argued in his celebrated 2000 book *Bowling Alone: The Collapse and Revival of American Community* (Simon and Schuster), in-person social intercourse is a vital underpinning of democracy and public engagement. When people organize to support and oversee local facilities and activities like schools, Little League organizations, parks, or dog runs, this not only has the obvious positive effect on these local resources, it also brings people together in discussion, debate, and cooperative relationships that otherwise might never occur. Working with one's neighbors on issues of common interest is not only very rewarding activity, it also has valuable spill-over effects, heightening public interest and knowledge about local politics, trust in their political system, and political involvement. Putnam calls these activities "civic engagement," and *Bowling Alone* laments its long decline since the 1950s, and he attributes to it decreasing voter turnout and trust in government. Other research has found that civic engagement and a more knowledgeable citizenry also promote good government, lower corruption, and economic productivity.

Even if NYU preserves the quality and accessibility of these community facilities, what will be the consequences of its ownership for the civic engagement that they have generated? Even if NYU offers to preserve local involvement, will citizens be as likely to donate their time and energy to facilities that they do not govern or that the city does not own? Will they be as likely to trust NYU in a partnership of oversight as much as they would trust the NYC city government? If not, will public engagement wither, along with the civic engagement and other positive effects from that engagement?

Civic engagement falls under several of the "task categories" of an EIS, but I think the most relevant would be:

- Land Use, Zoning and Public Policy
- Community Facilities and Services
- Open Space
- Historic and Cultural Resources
- Neighborhood Character

I am grateful for your consideration of this issue, and inclusion of it in the EIS.

Sincerely,

Peter Liberman
505 LaGuardia Pl. #29D
New York NY 10012
liberman@qc.cuny.edu
212 614-1801

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: NYU Scope Comment
Date: Tuesday, May 31, 2011 2:43:40 PM

From: Randy Jones [mailto:nyc1961rtj@hotmail.com]
Sent: Tuesday, May 31, 2011 2:11 PM
To: ROBERT DOBRUSKIN
Subject:

5.31.11 Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

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Thank you for your attention to this matter.

Sincerely,

Randy Jones
249 Sullivan Street #6
New York, NY 10012

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Tuesday, May 31, 2011 10:20:56 AM

From: Roger Kim [mailto:rogerkim@yahoo.com]
Sent: Sunday, May 29, 2011 3:41 PM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

May 29, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

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Sincerely,

Roger Kim

*108 Wooster St, Apt 2C
New York, NY 10012
Email: rogerikim@yahoo.com*

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 3:31:11 PM

From: Rhoma Mostel [mailto:rhomam@mac.com]
Sent: Monday, May 23, 2011 3:21 PM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

In advance of tomorrow's May 24, 2011 hearing, I wish to have the following comments on environmental impact considered by the panel.

I basically see the following overriding issues, however they're incorporated.

*light
density
air quality and effect on respiratory rates
construction and noise
temperature adjustments
monolithic institution versus diversity of institutions
historic character of Village and its other, non-NYU institutions*

Here are my specific comments

Land Use, Zoning, and Public Policy:

Effect of decrease of diversity among neighborhood institutions
Effect of monopoly on uses of existing land if given over to a single institution.

Socioeconomic conditions:

Effect of increase of transient population on our area
Increase in narcotics in neighborhood (NYU students have a track record)
Effect on loss of "neighborhood" and "neighborly" feeling
Effect on census count of decreasing permanent resident population and allocation of federal resources to the city

Community Facilities and Services:

Effect of increase in NYU-only community facilities and decrease in community-access facilities

Open Space:

Effect of loss of mature trees on air quality and general sense of livability
Effect of loss of mature plantings on sense of stability and community pride
Effect of loss of sky on general health and well-being
Effect on migrating bird population by increasing towers and windows and decreasing ledges and natural areas for hibernation
Effect of loss of historical memory of the seasons
Effect of inability for elderly and disabled residents to draw sustenance from mature local trees, community and other gardens

Shadows:

Effect on public safety of darker streets caused by shadows cast by taller, denser buildings
Effect on ability to grow vegetables, roses, and other flowers in community garden
Effect on flowering and fruiting cycle of more than 30-year old apple and crabapple trees

Historic and Cultural Resources:

Effect of concentration of all resources in one monolithic entity
Effect of diminishing experiences, contributions, and pride of non-academic members of the community

Urban Design and Visual Resources:

Effect on historic character and mix and interplay of high-rise and low-rise
Effect on inadequate bedrock to support an increase in towers

Natural Resources:

Effect on water supply and electric power grid

Effect on ability of have 20 minutes of Vitamin E daily by taking a walk in the neighborhood

Effect on air quality of destruction of mature trees and mature plantings during heat of summer

Effect on monarch butterfly population, dependent on certain host plants in community garden

Effect on endangered bee populations, necessary for pollination and cultivation of fruit crops elsewhere in the state, by destroying bee-loving plants in community garden.

Hazardous Materials:

Effect of breathing hazardous chemicals and materials during construction period

Effect of monitoring of air quality and air alerts on "civilian" population in neighborhood

Effect of potential breathing and asthma rates being exacerbated in a neighborhood which has shown higher respiratory problems than average after 9/11.

Infrastructure:

Effect on ease of ambulance and other emergency services to deliver adequate and timely care

Transportation:

Effect of raising density and undermining already underserved MTA local bus routes, compromised by MTA changes of June 27, 2011.

Effect of traffic congestion due to extra taxis, pedestrians, and subway riders.

Effect of increased population on already crowded streets, saturated with bikers, scooters, messengers, baby carriages, tourists, and residents

Effect on senior population of inability to navigate streets and provide own services such as grocery shopping due to increase in pedestrian and other traffic

Air Quality:

Effect on air quality, especially with global warming

Effect of raising local summer temperatures due to destruction of mature trees, taller and denser buildings

Noise:

Effect of noise pollution on area and surrounding area

Public Health:

Effect of increase in young, drinking-age population on other residents' ability to safely navigate streets. See also issues of air quality and transportation

Neighborhood Character:

Effect of zoning change on neighborhood character

Construction Impacts:

Effect on elderly and disabled of blocked roadways, especially in winter's icy periods.

Effect of increasing distances to travel for grocery shopping

Effect of traveling for daily groceries through torn-up and treacherous streets and possibly dangerous air quality

Effect of increased accidents and lawsuits arising from too much construction in a small, concentrated space

Effect on local population of loss of sky through construction of additional high-rise buildings

I am firmly opposed to any construction on the superblocks, to any destruction of publicly owned greenspace, and to any further torture inflicted on a historic community which should treasure the very things that make this neighborhood of such cultural and present value. An academic institution purporting to be an educational institution has no business destroying the very cultural and historic environment it feeds upon.

Rhoma Mostel

tidalflats@mac.com

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Friday, May 27, 2011 10:20:48 AM

From: Rhoma Mostel [mailto:rhomam@mac.com]
Sent: Friday, May 27, 2011 7:44 AM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Attention: City Planning Commission

I have already testified in the afternoon session of May 24, and handed the committee a copy of my notes, but I wish to add some remarks to my testimony as a result of having spoken and attended that session.

It seems to me that the argument that NYU is good for the local economy bears close scrutiny. *It is always a mistake to turn a neighborhood into a company town.* Witness what is happening to CB1 right now, because of its over-reliance on the financial services industry. Also, when St. Vincent's Hospital closed, all the satellite businesses suffered and will eventually disappear. When Toyota or GM closes a plant down in a place, that town is left with nothing.

Is NYU too big to fail already? Isn't expansion its doom, and doom for Greenwich Village? It certainly is doom for a residential neighborhood where a multiplicity of institutions co-exist. I cannot emphasize this enough. Reliance on a single employer is dangerous for a community and a city. That thought and those precedents should affect city planning decisions.

Thank you.

Rhoma Mostel
tidalflats@mac.com

From: ROBERT DOBRUSKIN
To: DIANE MCCARTHY; HANNAH FISCHER-BAUM
Cc: CELESTE EVANS
Subject: Fw: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, June 06, 2011 4:59:13 PM

From: b p [mailto:rplutzker@hotmail.com]
Sent: Monday, June 06, 2011 12:42 PM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org <gvshp@gvshp.org>
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.
- The EIS should measure the impact that the proposed rezonings would have on surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.
- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open

space.

- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter

Sincerely,

Robert B. Plutzker

11 %th Avenue

New York, NY 10003

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March 21, 2011

Mayor Michael Bloomberg
City Hall
New York, NY 10007

Dear Mayor Bloomberg:

I strongly urge you NOT to support NYU's revised massive expansion plan in the Village, and not to approve the precedent-setting approvals they are seeking to move ahead. The revised plan is still totally wrong for this neighborhood.

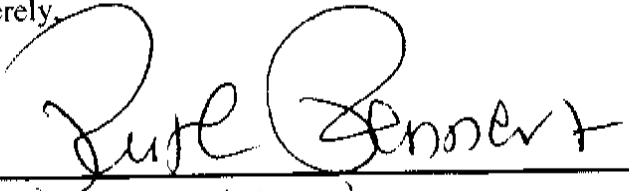
NYU's plan to add 2 million square feet of space around Washington Square Park and another 1 million square feet throughout surrounding neighborhoods would have a devastating impact – oversaturating neighborhoods which are already oversaturated with NYU facilities.

The means by which NYU is seeking to do this are equally disturbing. Lifting zoning requirements to preserve open space in one of the most park-starved areas in New York City, changing residential zoning to commercial, transferring public land to a private institution, and removing urban renewal deed restrictions, as NYU is requesting, would be just plain wrong.

There are better alternatives for the city, for NYU, and for the Village if NYU is to expand. Community leaders in the Financial District have asked NYU to consider their area for expansion, where NYU's academic, cultural, and housing facilities would be welcome and are needed. Growth potential in the Financial District is nearly limitless, while historic and predominantly residential neighborhoods like the Village, East Village, and NoHo clearly have their limits, which NYU has more than met.

I hope you will protect the character of our neighborhood and not support NYU's bid to overbuild and undo long-standing neighborhood zoning protections.

Sincerely,



3 WSV Apt 12S

NYC NY 10012

rennert@ruthrennert.com

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Mercer-Houston Dog Run
Date: Monday, May 23, 2011 12:06:47 PM

From: Burden, Steven [mailto:steve.burden@med.nyu.edu]
Sent: Monday, May 23, 2011 11:14 AM
To: ROBERT DOBRUSKIN
Subject: Mercer-Houston Dog Run

May 23, 2011
Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007
e-mail: rdobrus@planning.nyc.gov

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR
No. 11DCP121M

Dear Mr. Dobruskin:

As a member of the **Mercer-Houston Dog Run Association**, and neighborhood resident, I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous, negative impact upon Greenwich Village. I believe that the NYU's draft review fails to adequately address the following areas:

1. The EIS should measure the real impact of the proposed rezoning and development of the Super Blocks on the diminishing open space of Greenwich Village. Presently the **Mercer-Houston Dog Run** is connected to a series of open spaces that continue further up the block, which enhances the unenclosed, green space feeling of the neighborhood. The proposed development moves the **Mercer-Houston Dog Run** to a smaller, virtually hidden space, which would severely diminish the quality of the area.
2. The EIS should study the impact upon neighborhood character, as the planned development would forever and negatively alter the neighborhood. Presently, we have a diverse and multi-faceted community, some of whom directly participate in the dog run and others who enjoy the dog run simply by walking by, stopping and enjoying the sight of frolicking dogs at play. This enjoyment is important and hard to replace; diminishing the quality of this small open space, at the same time that other

cities are expanding their open spaces, is the wrong direction to take. The planned development would drastically alter the neighborhood to an imbalanced, single institution's use, ignoring the needs of the larger community. A direct effect of the proposed NYU project would be to irreparably alter the **Mercer-Houston Dog Run** and diminish the open space that currently serves a diverse population of people in Greenwich Village. By virtually hiding the dog run among high rise buildings the quality of the space for the **Mercer-Houston Dog Run** would be dramatically diminished, and this would inevitably lead to substantially fewer people using and enjoying the **Mercer-Houston Dog Run** and decreasing the quality of life for many in the Greenwich Village area. Moreover, their need for a dog run would not vanish but spill over elsewhere, placing further demands and public cost for other dog runs in the area. Moreover, as new members are usually attracted to the dog run by first strolling by, hiding the dog run between high rise buildings will decrease the number of new members, which will similarly place increased demand and public cost for other dog runs.

3. The EIS should study the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how this new noise would significantly impact them. After 30 years as a vibrant facet of the community, this neglected or 'unforeseen' consequence might ultimately cause the closing of the **Mercer-Houston Dog Run**, further damaging the Greenwich Village neighborhood.

Thank you for your attention to this matter.

Sincerely,

Steven Burden
37 Washington Square West
Apt. 8B
N.Y., N.Y. 10011

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From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Subject: FW: Mercer Houston dog run
Date: Monday, May 23, 2011 10:52:02 AM

-----Original Message-----

From: Saad Jallad [<mailto:saadjallad@crepeaway.com>]
Sent: Monday, May 23, 2011 10:33 AM
To: ROBERT DOBRUSKIN
Subject: Mercer Houston dog run

Mr. Robert,

I have been living at 300 mercer for 9 years. I have watched simba grow from a puppy to a father at the mercer Houston dog run.

It would be a shame to lose that precious space for an Nyu building that's big enough already.

Regards,
Sj

Sent from my iPhone

One New York Plaza
New York, New York 10004-1980
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Fax: +1.212.859.4000
www.friedfrank.com



Direct Line: 212-859-8780
Fax: 859-4000
Stephen.Lefkowitz@friedfrank.com

May 31, 2011

By Email and By Hand

Mr. Robert Dobruskin
Chief, Environmental Assessment and Review Division
Department of City Planning
22 Reade Street
Room 4E
New York, NY 10007

Re: CEQR No. 11DCP121M

Dear Mr. Dobruskin:

Please find enclosed comments to the proposed Scope of Work for the Environmental Impact Statement for the above-captioned matter (New York University, applicant). These comments are submitted on behalf of LaGuardia Corner Garden, Friends of LaGuardia Place, Lower Manhattan Neighbors Organization, and Mercer-Houston Dog Run Association, the four not-for-profit groups that currently maintain and operate the public open spaces described in the Scope of Work.

Very truly yours,

A handwritten signature in black ink, appearing to be "SL", written over a horizontal line.

Stephen Lefkowitz

SL:vm
Enclosures

May 31, 2011

Comments on Draft Scope of Work (CEQR 11 DCP 121M)

1. Describe the existing public and private open spaces on the two Superblocks – uses, users, intensity of use. Under the “no build” scenario, please show the following areas as “Existing Open Space”: On the Northern Superblock, “WSV Interior Gardens,” “WSV Playground;” On the Southern Superblock, “Silver Towers Tree Grove,” “University Village Plaza.” Revise existing open space calculations accordingly.
2. Detail the location, size and amenities of the private open spaces proposed as replacements for existing public and private open spaces, and any proposed change in use and anticipated change in user populations.
3. Provide a time line showing the dates on which each of the existing Superblock open spaces will be taken out of service, including for construction staging, and when, under the proposal, replacement open spaces will be provided. Describe the impacts of the loss of open spaces during any periods when such spaces will not be provided and the measures proposed to mitigate the loss of open space during those periods. Describe the impacts on study area open spaces (e.g., Washington Square Park) during any period when Superblock open spaces will be taken out of service and replacement spaces have not yet been provided. Describe any measures proposed to mitigate these impacts. Describe measures which will be undertaken to assure that open space “downtimes” will not exceed the periods set forth in the project schedule. Describe how such undertakings will be documented and enforced.
4. Enumerate and describe (by species and caliper) any trees that will be removed under the proposal and the new trees that will be planted under the proposal. Where below grade construction under the open spaces is proposed, describe the amount of soil cover that will be provided above the proposed below grade improvements, and the type and caliper of trees that will be planted.
5. Describe impacts of construction, including construction staging, on the use of existing and proposed open spaces – noise, traffic, air quality and accessibility. Describe the

- impacts of project construction on study area open spaces (e.g. Washington Square Park) and the time periods when construction impacts are expected to occur. Describe measures that will be undertaken to mitigate these impacts, and the documentation and enforcement of such undertakings.
6. Describe the impacts of the proposed development on the quality and accessibility of existing and proposed open spaces, including impact of increased population on the Superblocks (both workers and residents), increased pedestrian and vehicular traffic, and private vs. public ownership and control of the open spaces.
 7. Describe the impact of shadows on existing and proposed open spaces resulting from the proposed development. Describe alternatives and/or mitigation such as reducing the heights of proposed new buildings or introducing a setback at heights required under the current zoning. (Include the heights of mechanical penthouses in analyzing these impacts and proposed mitigation.)
 8. As an alternative to the massing of buildings proposed by applicant on the Superblocks, analyze the heights and setbacks that would be required if (a) the waivers sought by applicant under the LSGD were not granted, and (b) if the LaGuardia Place and Mercer Street “strips” remain as mapped streets under the “no build” alternative.
 9. Maintenance and operation of open spaces. Under the “no build” alternative, describe the current operation and maintenance of the open spaces on the Superblocks and the not-for-profit groups that maintain same (LaGuardia Corner Garden, Friends of LaGuardia Place, Lower Manhattan Neighbors Organization, Mercer-Houston Dog Run Association). Under the proposal, describe who will maintain and operate the proposed private open spaces, including any commitments that the applicant proposes to make for such maintenance and operation. Describe how such commitments will be documented and enforced.
 10. As an alternative to applicant’s proposal for the demapping, alienation and development of the existing public open spaces, analyze the proposal made by the not-for-profit groups which currently operate and maintain the open spaces to retain these spaces in public ownership and to map them as New York City parkland. (See attached letter dated March 14, 2011 to Commissioner Adrian Benepe.) Compare this alternative to the

proposal in terms of permitted uses, construction, alienation, public access, generation of zoning floor area, and compliance with New York City Zoning Resolution requirements for open space and the required heights and setbacks of buildings proposed by applicant.

11. As an alternative to applicant's proposal for the demapping, alienation and development of the existing public open spaces, analyze the demapping of only below grade space beneath the Mercer strips between 3rd and Bleecker Streets and Bleecker and Houston Streets and the LaGuardia Place strips between 3rd and Bleecker Streets, and the conveyance to applicant of a below-grade fee interest or easement, leaving the area on and above grade in public ownership and mapping the same as New York City parkland.
12. As an alternative to applicant's proposal to demolish the Sasaki-designed open space in the Northern Superblock, consider the restoration of the original WSV open space per the Sasaki plan, and designating it as a New York City landmark.
13. Describe the proposal for and location of the proposed "temporary gymnasium" in the Northern Superblock, its impacts on existing open spaces and the expected schedule for the construction and demolition of this structure.
14. Describe HPD deed restrictions on the Superblocks that will be eliminated under the proposal and, as an alternative, the continuation of such deed restrictions under the "no build" scenario.

Direct Line: 212-859-8780
Fax: 859-4000
Stephen.Lefkowitz@friedfrank.com

March 14, 2011

Commissioner Adrian Benepe
The Arsenal
Central Park
New York, NY 10021

Re: Greenwich Village Public Open Spaces

Dear Commissioner Benepe:

We represent the following organizations which have operated and maintained publicly-owned open spaces within the Greenwich Village community for many years: LaGuardia Corner Garden (the Corner Garden); Friends of LaGuardia Place (LaGuardia Park); Lower Manhattan Neighbors' Organization, Inc ("LMNO(P)") (Mercer Street Playground); Mercer-Houston Dog Run Association (the Dog Run). On behalf of these organizations we plan to apply, under section 197-c of the City Charter, to map as City park land these open spaces, as well as the Time Landscape on LaGuardia Place and several smaller parcels of publicly-owned open space on Bleecker and West Third Streets. The purpose of this letter is to set forth the reasons why our clients believe these spaces should be permanently maintained as green, open spaces accessible to the public, and to urge you to join in an application to map these spaces as New York City park land. The facts concerning these publicly-owned open spaces and the organizations that have maintained them are as follows:

LAGUARDIA CORNER GARDEN

LaGuardia Corner Garden is an award-winning Community Garden on the southeastern corner of Bleecker Street and LaGuardia Place. It was created in 1981 by a group of volunteers and has been maintained since then by a not-for-profit entity created for this purpose. The Garden has trees, shrubs and perennials that attract a wide variety of bird species, butterflies and bees. The Garden is registered with the Department of Parks and Recreation ("DPR") under its Green Thumb program and is a designated Backyard Wildlife Habitat and Monarch Waystation. Over the last 30 years, the LaGuardia Corner Garden has operated under various City licenses and leases issued by the Department of Transportation which, we understand, has jurisdiction over this property. The Garden is open to the public from April through November, with

seating for visitors, and provides a welcome respite from its urban surroundings. The not-for-profit group supplies all plant materials, topsoil, mulch, etc., and maintains the plumbing and irrigation systems, the fencing, paths and walkways, benches, etc., and performs trash removal and pest control. All of the costs are paid out of member dues, donations and grants. The City does not provide any services, maintenance or funding. For 30 years, the Garden has been maintained as public open space, without any cost to the City.

LAGUARDIA PARK

LaGuardia Park is located on the east side of LaGuardia Place, running the full City block from Bleecker Street to West Third Street. The Park is green, containing trees and ivy as well as a statue of Mayor Fiorello LaGuardia by Neil Estren, a nationally known sculptor. The Park is open to the public at all times and provides much needed open space for the community. The Park has been maintained for 25 years by a not-for-profit organization, Friends of LaGuardia Place, which was created in 1986 for this purpose. Funding is provided by membership dues, as well as public and private grants. (Given this history, it is not surprising that in a recent decision, the New York State Supreme Court said of the Friends: "... it has created and maintained public park spaces in the Greenwich Village Community ..."). In 2011, construction will start on Adrienne's Garden, a toddlers' playground to be created within the Park which will contain play equipment for young children and seating for parents and caregivers. The playground will provide a much needed community amenity and has been supported by Community Board #2, as well as DPR and DOT, and has been reviewed and approved by the Public Design Commission. The statue of Mayor LaGuardia, which was created with private funds, is a reminder of the legacy of one of New York's greatest and most popular mayors. We understand that the Park is under the jurisdiction of the DOT, but all maintenance of the Park and the statue has been provided by the not-for-profit Friends organization.

MERCER PLAYGROUND

Mercer Playground is located on the west side of Mercer Street between Bleecker Street and West Third Street. The Playground concept evolved in 1990 from the decades-long use of the area to teach children how to ride bicycles and skate, play catch and other activities. In 1995, jurisdiction was transferred from DOT to DPR. Construction of the current Playground was completed in 1998 using City funds as well as private funds raised by LMNO(P) from public and private sources including member contributions and sponsors. Maintaining the traditional use of this large open space, the Playground includes a long, snaked path for bicycling, skating and scooters, open areas for running, large boulders for climbing, a spray shower for summertime cool-down, plus seating in sun and shade. The Playground is open to the public. LMNO(P), the Lower

Manhattan Neighbors' Organization, is a not-for-profit organization created in 1992 to help design, construct, improve and maintain the Playground and other public open spaces in the Downtown community. Activities in Mercer Playground in addition to unprogrammed play include plantings, clean-ups, public art, public recreation and child-safety events. For many years, the City has treated Mercer Playground as a public park. The Playground is listed on DPR's website as a "neighborhood playground" and "one of New York's youngest parks." An "Historical Sign" erected by DPR describes the history of the Playground and its role in the community. DPR's description of the Playground concludes with: "The community can be justifiably proud in knowing that, together, they made their own backyard."

MERCER-HOUSTON DOG RUN

Mercer-Houston Dog Run is located on the west side of Mercer Street between Bleecker Street and Houston Street. It was created as part of a 1979 amendment to the Washington Square South Urban Renewal Plan which authorized construction of the NYU Coles Gymnasium. It serves approximately 300 families from Greenwich Village, NoHo and SoHo who bring their pets for exercise and play in a safe, clean environment. The Dog Run is maintained by the Mercer-Houston Dog Run Association which is a not-for profit organization created in 1981 to improve and maintain this public space. (Membership is open to anyone with a licensed pet with the required health documentation.) Association dues pay for the upkeep of the Dog Run – trash removal, clean-up, insurance, etc. The property is under the jurisdiction of DOT, but has been community maintained and operated for 30 years. It serves an important neighborhood purpose and is considered a valuable community amenity by the Community Board and other local groups. The Mercer Playground and the Dog Run were considered important factors in the City Planning Commission's and Board of Estimate's 1979 approval of the amended Urban Renewal Plan.

TIME LANDSCAPE

Time Landscape is located on the east side of LaGuardia Place, on the corner of West Houston Street. It was created in 1978 as a reconstruction of the Manhattan landscape in the early 17th Century, serving as a natural landmark of Manhattan before it was developed by the early Dutch settlers. Time Landscape has an important educational and environmental value, and DPR's website refers to this plot "as a living monument to the forest that once blanketed Manhattan." The property, owned by the City, is under the jurisdiction of the Department of Transportation and is part of DPR's "Greenstreets" program. It has been maintained over the years by volunteers who prune and tend the plantings, remove trash, etc. it is not physically accessible to the public, but is a visual amenity for the community. Together with the LaGuardia Corner Gardens and

LaGuardia Park, the Time Landscape forms a ribbon of green on the east side of LaGuardia Place stretching from Houston Street to West Third Street. Given the scale of the adjacent Silver Towers and Washington Square Village developments, preservation of these green, open spaces is critical.

ADDITIONAL PUBLIC OPEN SPACES

In addition to the spaces described above, there are three smaller, publicly-owned open spaces on Bleecker Street and West Third Street between LaGuardia Place and Mercer Street which we believe, should be preserved for the benefit of the community.

Collectively, these open spaces are an invaluable resource in a neighborhood which has too little green or open space. In some cases, they provide a venue for neighborhood children to play, in other cases, they are places of repose. They have been continuously open to the public – except for the Time Landscape which has been visually accessible to the public – in some cases for more than 30 years. They have been cared for and maintained, with the City's encouragement, by citizen groups, which have demonstrated their ability to maintain these as public parks. Some of these spaces are listed on DPR's website, or marked with DPR's plaques, inviting the public to enter and use these spaces. To all intents and purposes, these spaces have functioned as public parks and they should be preserved as public parkland. Community Board 2 has consistently called for the preservation of these open spaces and has forcefully opposed their alienation. To achieve these goals, we intend to apply to have these spaces mapped as parkland on the City map, and we urge that DPR join us as a co-applicant.

Very truly yours,

Stephen Lefkowitz

cc: Assistant Commissioner Joshua Laird
Borough Commissioner William T. Castro
Alessandro G. Olivieri, Esq.
Amanda M. Burden, Dir. DCP
Borough President Scott Stringer
Council Member Margaret Chin
Council Member Christine Quinn
Senator Tom Duane
Assembly Member Deborah Glick
CB #2 Chair Jo Hamilton
CB#2 Comm. Chair David Reck

Commissioner Adrian Benepe

**March 14, 2011
Page 5**

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Environmental Impact Statement re: NYU 2031 proposal
Date: Monday, May 23, 2011 10:55:37 AM

From: rackow@juno.com [mailto:rackow@juno.com]
Sent: Sunday, May 22, 2011 12:22 AM
To: ROBERT DOBRUSKIN
Cc: chin@council.nyc.gov; erin.drinkwater@mail.house.gov; lisa.chletcos@c-ginc.com; quinn@council.nyc.gov
Subject: Environmental Impact Statement re: NYU 2031 proposal

ENVIRONMENTAL IMPACT STATEMENT
Sylvia Rackow, 505 LaGuardia Place, NYC, 10012
May 24, 2011

As a longtime Villager, the area's environment has been very important to my family. We've experienced annual Halloween parades, annual Washington Square Art Shows, visitors/tourists for the San Gennaro and other feasts, local street fairs, park closings, Houston Street construction of many years, which brought car and truck and bus traffic down Bleecker Street (and the traffic still continues) bicycle lanes, NYU facilities construction on 3rd Street which lasted for several years, NYU Washington Square Village facility problems which required deep digging to empty an oil spill this year closing part of sidewalk, daily tour buses crowding our streets every 10-15 minutes and now NYU proposes to build millions of square feet on a two block area which is already crowded.

We Villagers request that the Environmental Impact study of NYU's proposed construction include the following;

How many years this proposed building plan will take to construct?

Environmental impact of the construction (on residents' health, nearby residences, traffic pollution, noise, air pollution, possible accidents, debris, garbage, rodents, insects, etc.)

How will landmarked green areas be protected during construction?

Impact of noise and pedestrian traffic from moving Dog Run near 100-110 Bleecker Street (if permitted to take over public lands housing dog run on Mercer Street.)

Effect of Car, taxi and truck traffic on Bleecker and on Mercer during construction.

Increased pedestrian traffic on already crowded streets from new population.

Increased parking needs of hotel and other buildings' occupants.

Impact on children in proposed public school (if built) of large crowds of older students.

Loss of parking garage in Washington Square Village and impact on streets.

Cleanliness of the impacted area before, during and after construction.

Shadows cast by newly erected buildings on other properties.

Effect of any zoning change to both residential and commercial nearby entities .

Effect on Minetta Creek which flows beneath Washington Square Village to Houston.
Page 2 Environmental Impact Statement

Maintenance plan for the upkeep of the properties.

Impact on bus,subway and other transportation of increased population.

Effect on bike lanes.

And probably most important, disturbance of rodents (rats,mice,etc.) who live in the skeletons of underground buildings

Certainly there are many more issues which need to be addressed in the Impact study. I am sure there are others who can testify to those needs.

Thank you for all courtesies extended.

ENVIRONMENTAL IMPACT STATEMENT

May 24, 2011

Dear Mr. Dobruskin:

As a longtime Villager, the area's environment has been very important to my family. We've experienced annual Halloween parades, annual Washington Square Art Shows, visitors/tourists for the San Gennaro and other feasts, local street fairs, park closings, Houston Street construction of many years, which brought car and truck and bus traffic down Bleeker Street (and the traffic still continues) bicycle lanes, NYU facilities construction on 3rd Street which lasted for several years, NYU Washington Square Village facility problems which required deep digging to empty an oil spill this year closing part of sidewalk, daily tour buses crowding our streets every 10-15 minutes, on weekends we witness enormous crowds enjoying the Village's bars and restaurants and littering our streets as out of state licensed cars race down our narrow streets; and now NYU proposes to build millions of square feet on a two block area which is already crowded. What will they do to the character of our neighborhood and our quiet enjoyment of our wonderful Greenwich Village?

We Villagers,therefore, request that the Environmental Impact study of NYU's proposed construction include the following;

How many years this proposed building plan will take to construct?

Environmental impact of the construction (on residents' health, nearby residences, traffic pollution, noise, air pollution, possible accidents, hazardous materials debris, garbage,

rodents, insects, etc.)

How will landmarked green areas be protected during construction?

Impact of noise and pedestrian traffic from moving Dog Run near 100-110 Bleecker Street (if permitted to take over public lands housing dog run on Mercer Street.)

Effect of Car, taxi and truck traffic on Bleecker and on Mercer during construction.

Increased pedestrian traffic on already crowded streets from new population.

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Impact on children in proposed public school (if built) of large crowds of older students.

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Cleanliness of the impacted area before, during and after construction.

Shadows cast by newly erected buildings on other properties.

Effect of any zoning change to both residential and commercial nearby entities .

Effect on Minetta Creek which flows beneath Washington Square Village to Houston.

Maintenance plan for the upkeep of the properties.

Impact on bus,subway and other transportation of increased population.

Effect on bike lanes.

And probably most important, disturbance of rodents (rats,mice,etc.) which live in the skeletons of underground demolished buildings' foundations.

Certainly there are many more issues which need to be addressed in the Impact study. I am sure there are others who can testify to those needs.

Thank you for all courtesies extended.

Sylvia Rackow

505 Laguardia Place-5C
New York, NY 10012

May 24,2011

From: [ROBERT DOBRUSKIN](#)
To: [DIANE MCCARTHY](#); [HANNAH FISCHER-BAUM](#)
Cc: [CELESTE EVANS](#)
Subject: Fw: NYU Core, ULURP CEQR#11 DCP 121M
Date: Monday, June 06, 2011 11:32:28 AM

----- Original Message -----

From: Susan Taylorson [<mailto:taylorson@me.com>]
Sent: Saturday, June 04, 2011 11:28 PM
To: ROBERT DOBRUSKIN
Subject: NYU Core, ULURP CEQR#11 DCP 121M

Dear Sir or Madam:

I wish to comment on NYU's so-called 2031 Plans for the super-blocks bounded by 3rd Street, Houston Street, Mercer and LaGuardia Place.

My major concern is with the very bad effect that the plans will have on open space in the area. The super-blocks are already densely populated and the plan that permits this - the tower in the park design - requires not just "towers" but also "the park" in which the towers are placed in order to be livable. NYU claims that it is going to add open space. But this claim is specious and is to be rejected as it fails to point out that the plans take away far more open space than they add and that the net effect of the plans would be to reduce the open space available to the thousands of residents of those 2 blocks to a very meagre amount.

In addition, not only would net open space be severely reduced, but the space lost is culturally most important to the residents of the superblocks and beyond. In particular, the "key park" playground would be lost to the community children and the Sasaki roof top garden - an oasis of green in the concrete surroundings - as well as the "green strips" on LaGuardia and Mercer Streets that currently belong to D.O.T. would disappear under massive concrete structures. These latter mentioned areas have been worked on by local residents over the last 30 plus years to be the attractive living breathing spots of green leaves and trees in an area that has much less open space and playgrounds than virtually any other part of New York. For this reason I am also very much against the use of the Key Park area space to build a 4 story "temporary" gym. which will increase the noise, traffic and pollution for all the residents during the time of building as well as destroying one of the few good children's playgrounds north of Canal Street and south of 4th Street. It is one of the few clean safe playgrounds for all the children of Soho and Noho as well as being essential for the children of the thousands of residents of the super-blocks themselves.

NYU does not care about open space and presents a very false image of how much would be lost if its plans are allowed to go forward. This is evident not only from their plans, but also when one sees how they have "managed" by neglect the small park and playground immediately north of the Mercer Houston Dog Run. The small playground there has been padlocked for years and the small park area is overgrown and dangerously uneven. Also, has NYU even bothered to find out whether the meandering subterranean Minnetta Brook that has caused the quite severe subsidence in this area as well as in the fire lane immediately

north of 4 Washington Square Village would present a danger to any structure built over it? The NYU plans will also cause many residents of Washington Square Village to lose their parking spots.

I am also most concerned about how the NYU plans for the northern super-block effect light in the interior apartments and noise levels. I am also concerned about the effect of the loss of the fire lanes and interior roadways will have on the ability of the emergency services to rapidly get to any emergency situation in those buildings. In my view, the problems that could result from building over the fire lanes and roads in the interior of WSV could be fatal. This should be examined closely. If fire engines cannot get into the interior of WSV they will have to be on Bleeker Street, 3rd Street or Mercer Street and this could cause severe traffic back up. This issue should be examined closely, as too should the traffic problem for moving times at the beginning and end of the semesters if the two way roads in the interior of WSV are to be removed.

The loss of light on Mercer Street that will result if the Zipper Building is allowed to go up closer to Mercer Street would also be significant. At present, the paved area in front of the entrance to Coles Gym is big enough to allow visiting teams to draw up in big buses outside Coles Gym, but this could create a pedestrian nightmare if the plaza area in front of the entrance to Coles is lost. This issue should be closely examined.

The part of the plan to move the Mercer Houston dog run closer to residential building is also very problematic. The dog run should be allowed to stay where it is where the noise of dogs does not disturb any residents. The effect of dogs barking on residents in the planned location nearer the "Silver Towers" buildings must also be examined closely.

Thank you for your attention to these concerns.

Sincerely,

Susan Taylorson Ziff

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Thursday, May 26, 2011 5:53:46 PM

From: suzanneweinstock@gmail.com [mailto:suzanneweinstock@gmail.com] **On Behalf Of** Suzanne Weinstock
Sent: Thursday, May 26, 2011 5:33 PM
To: ROBERT DOBRUSKIN
Subject: Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

5/26/11

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Dear Mr. Dobruskin:

As a member of the [Mercer-Houston Dog Run Association](#), and neighborhood resident, I am writing to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. If implemented, this proposal would have an enormous—and negative— impact upon the Village. I believe that the NYU's draft review utterly fails to adequately address the following areas:

- The EIS should measure the impact of the proposed rezoning and developments on the **diminishing open spaces** of the Super Blocks. Presently, the [Mercer-Houston Dog Run](#) is connected to a series of open spaces, continuing up the block. This enhances the unenclosed, green space feeling. The proposed development moves the [Mercer-Houston Dog Run](#) to a smaller, virtually hidden space.
- The EIS should study the **impact upon neighborhood character**, as the planned developments would forever alter the idiosyncratic sense of the neighborhood. Presently, we have a diverse and multi-faceted community. The planned development would drastically alter neighborhood to an imbalanced, single institution's use. A direct effect of the proposed NYU project would be that the use of the [Mercer-Houston Dog Run](#) would be so changed that the open space no longer serves the same user population. People simply would be less likely to know that there is a local dog run. Public access would be severely limited. Visually, the run must be accessible. To virtually hide the dog run would reduce the community's enjoyment in simply passing by. People who do not know it exists, would never find it unless they walked between the buildings. New members are first attracted by their immediate visual experience as they walk by.
- The EIS should study the effects of the **negative effects of noise** generated from the relocated dog run on residents of Silver Towers, and how the noise would significantly impact them. After 30 years as a vibrant facet of the community, this ultimately might cause the closing of the [Mercer-Houston Dog Run](#).

Thank you for your attention to this matter.

Sincerely,
Suzanne Weinstock
311 W Broadway
New York, NY 10013

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Suzanne Weinstock
Freelance Writer
Shopping and Fashion Editor, ABOVE

Work: 646-918-6172
Mobile: 646-725-8011
Email: suzanne@suzanneweinstock.com
Website: www.suzanneweinstock.com

"Fashion is not something that exists in dresses only. Fashion is in the sky, in the street, fashion has to do with ideas, the way we live, what is happening." -Coco Chanel

From: [CECILIA KUSHNER](#)
To: [HANNAH FISCHER-BAUM](#); [DIANE MCCARTHY](#)
Subject: FW: City of New York - Correspondence #1-1-645950327 Message to Agency Head, CHALL - OTHER
Date: Monday, May 23, 2011 11:01:58 AM

-----Original Message-----

From: outgoing agency
Sent: Thursday, April 14, 2011 9:57 AM
To: mtcsciq1@bb.nyc.gov
Subject: City of New York - Correspondence #1-1-645950327 Message to Agency Head, CHALL - OTHER

Your City of New York - CRM Correspondence Number is 1-1-645950327

DATE RECEIVED: 04/14/2011 09:55:47

DATE DUE: 04/28/2011 09:56:39

SOURCE: eSRM

RELATED SR# OR CASE#: N/A

EMPLOYEE NAME OR ID#: N/A

DATE/TIME OF INCIDENT:

LANGUAGE NEED:

The e-mail message below was submitted to the City of New York via NYC.gov or the 311 Call Center. It is forwarded to your agency by the 311 Customer Service Center. In accordance with the Citywide Customer Service standard, your response is due in 14 calendar days.

If this message is to a Commissioner / Agency Head and needs to be re-routed to another agency or cc to another agency, forward the email to outgoingagency@customerservice.nyc.gov. Do not make any changes to the subject line. Include any comments and it will be processed by the 311 Customer Service Center.

All other web forms are to be handled by the receiving agency.

-----Original Message-----

From: PortalAdmin@doitt.nyc.gov

Sent: 04/14/2011 09:54:52
To: sbladmp@customerservice.nyc.gov
Subject: < No Subject >

From: kandroma99@yahoo.com (Terese Coe)
Subject: Message to the Mayor

Below is the result of your feedback form. It was submitted by
Terese Coe (kandroma99@yahoo.com) on Thursday, April 14, 2011 at 09:54:52

This form resides at
<http://www.nyc.gov/html/mail/html/mayor.html>

<APP>CUSTOM
<ISSUE>OTHER</ISSUE>
<MSG>

I strongly urge you NOT to support NYU's revised massive expansion plan in the Village, and not to approve the precedent-setting approvals they are seeking to move ahead. The revised plan is totally wrong for this neighborhood.

NYU's plan to add 2 million square feet of space around Washington Square Park and another 1 million square feet throughout surrounding neighborhoods would have a devastating impact – oversaturating neighborhoods which are already oversaturated with NYU facilities.

The means by which NYU is seeking to do this are equally disturbing. Lifting zoning requirements to preserve open space in one of the most park-starved areas in New York City, changing residential zoning to commercial, transferring public land to a private institution, and removing urban renewal deed restrictions, as NYU is requesting, would be just plain wrong.

Community leaders in the Financial District have asked NYU to consider their area for expansion, where NYU's academic, cultural, and housing facilities would be welcome and are needed.

They have expanded enough! Let them go to the Financial District!

I hope you will protect the character of our neighborhood and not support NYU's bid to overbuild.

Sincerely,

Terese Coe
</MSG>
<PREFIX>Ms</PREFIX>
<FIRST>Terese</FIRST>
<LAST>Coe</LAST>
<ADDR1>99 MacDougal St 13</ADDR1>
<CITY>NY</CITY>
<STATE>NY</STATE>
<ZIP>10012</ZIP>
<COUNTRY>United States</COUNTRY>
<PHONE_B>212-777-0497</PHONE_B>
<EMAIL>kandroma99@yahoo.com</EMAIL>
</APP>

REMOTE_HOST: 69.86.148.249

HTTP_ADDR: 69.86.148.249
HTTP_USER_AGENT: Mozilla/5.0 (Macintosh; U; PPC Mac OS X 10.5; en-US; rv:1.9.2.16)
Gecko/20110319 Firefox/3.6.16
REMOTE_USER: null

From: [ROBERT DOBRUSKIN](mailto:ROBERT.DOBRUSKIN)
To: [DIANE MCCARTHY](mailto:DIANE.MCCARTHY); [HANNAH FISCHER-BAUM](mailto:HANNAH.FISCHER-BAUM)
Subject: FW: Scope of Draft Environmental Impact statement for NYU Core ULURP, CEQR No. 11DCP121M
Date: Monday, May 23, 2011 10:56:28 AM

From: Terese Coe [<mailto:kandroma@gmail.com>]
Sent: Friday, May 20, 2011 11:12 PM
To: ROBERT DOBRUSKIN
Cc: gvshp@gvshp.org
Subject: Scope of Draft Environmental Impact statement for NYU Core ULURP, CEQR No. 11DCP121M

May 20, 2011

Robert Dobruskin
Environmental Assessment and Review
Department of City Planning
22 Reade Street, Fourth Floor
New York, NY 10007

Re: Scope of Draft Environmental Impact Statement for NYU Core ULURP, CEQR No. 11DCP121M

Dear Mr. Dobruskin:

I write to urge that revisions be made to the scope of work for draft Environmental Impact Statement for NYU's project. This proposal, if implemented, would have a tremendous impact upon the Village, and I believe that the NYU's draft review fails to adequately cover many important areas. These include:

- The EIS should measure the impact of any and all developments which could result from the rezoning NYU is requesting, not simply the developments they now say they will construct if the rezoning is approved.
- The EIS should examine, as an alternative to NYU building more academic space in the area, better utilizing the space which they currently have. Much of NYU's academic space goes unused on Fridays. Thus by simply making use of the space on Friday, they could increase their effective available space by up to 25%.
- The EIS should examine, as an alternative to NYU building more faculty housing in the area, better utilizing the faculty housing in the proposed rezoning area which they already have. NYU has been warehousing apartments in Washington Square Village and Silver Towers, and over the years has decreased the number of apartments in these complexes by combining more and more existing units into a smaller and smaller number of larger and larger units. Reversing or even ending these practices would significantly diminish the university's purported need for additional faculty housing.
- The EIS should measure the impact that the proposed rezonings would have on

surrounding historic resources, including the proposed South Village Historic District, the NoHo and SoHo Historic Districts, and the State and National Register-eligible NoHo Historic District Extension. That should include shadows which the new developments would cast upon them, blocked views of them, increased development pressure upon them, and the risk of physical damage to them by years of vibration from demolition, digging, and construction.

- The EIS should measure the impact of the proposed rezoning and developments on the immediate historic resources of Silver Towers/University Village and Washington Square Village and their open space. That should include compromised views of these structures, and shadows cast upon the little remaining open space.
- The EIS should study the impact upon neighborhood character, as the planned developments would undeniably irreversibly alter neighborhood character. It would do so by so drastically altering the balance of institutional uses, and uses connected to a single institution, in what is an otherwise currently diverse and multi-faceted community.
- The EIS should study alternatives which include zoning changes allowing development on some but not all of the proposed sites, and at densities lower than that which NYU has proposed.

Thank you for your attention to this matter.

NYU seems to think it has some manifest destiny in this area, that is destiny to destroy the little left of the Old Village in Noho. They're big enough already--they don't own Greenwich Village! Part of the environment is the residents, and residents are against heir neverending construction of behemoths for the luxury housing for this alleged "nonprofit."

Sincerely,

Terese Coe

99 MacDougal St. Apt. 13

New York, NY 10012

To: Mr. Robert Dobruskin, AICP, Director rdobrus@planning.nyc.gov
Environmental Assessment and Review Division
NYC Department of City Planning, 22 Reade Street, Room 4E
New York, New York 10007-1216

From: Concerned Residents of Washington Square Village **Date:** June 2, 2011

Subject: NYU Plan 2031

Concerned Residents of Washington Square Village oppose the building of the two massive NYU buildings within the current Washington Square Village Complex because the Garden, Children's Playground, and Garage will be destroyed. The vital importance of these structures are as follows:

The Garden, a prize-winning one and one-half acre is a unique private **Amenity** providing an essential open space for the residents of Washington Square Village to enjoy, beautifully integrated within the four buildings.

The Children's Playground was built many years ago specifically as an **Amenity** for the families living in Washington Square Village, with later access granted to tenants in the nearby Silver Towers and individuals in the community. The Playground, known today as the *Key Park*, was redesigned several years ago through the initiative of resident families, who also ensured retaining its mature tree plantings.

The Garage was part of the original design of the complex and was built as an **Amenity** for the tenants living in Washington Square Village. Through the cooperation of the WSVTA and NYU, a variance application was granted to allow transient parking.

Concerned Residents of Washington Square Village - Reject New York University's plan to destroy the *GARDEN*, this city's unique urban landscape. Appreciated by generations of tenants, it has also received worldwide landscape design recognition. The Garden ensures air space and light for the enclosing apartment blocks and the buildings protect the Garden from winter and summer climate extremes, traffic noise and exhaust.

Concerned Residents of Washington Square Village - Reject New York University's plan to replace our *KEY PARK Playground* with a *TEMPORARY GYM*, as stated by Lynne Brown, a V.P. at NYU, reported in the Washington Square News, Monday, March 21, 2011. There is no such thing as a *TEMPORARY GYM*. Its foundation will be solidly built to support the 18+story kidney-shaped replacement building planned for this site.

Concerned Residents of Washington Square Village - Reject the proposed changes to the *GARAGE*, namely, the proposed single entrance and egress under 2 Washington Square Village and lessening the number of cars able to be parked there. This change will eliminate access to all other buildings and cause a safety issue of walking through the NYU academic space to access residential buildings.

Concerned Residents of Washington Square Village - Reject New York University's plan to put a 10+ story kidney-shaped building on the LaGuardia side of Washington Square Village, thereby destroying the existing restaurants, stores, and LaGuardia Park. Furthermore, these two massive buildings within the confines of Washington Square Village are said to include academic classrooms, science labs, a theatre complex with rehearsals and performances. They will also bring thousands of individuals into a residential community, along with noise, lights 24/7, trash, and security issues.

In summary, these are the reasons the Concerned Residents of Washington Square Village Reject the destruction of our unique residential community environment, abundant in light, air, space and beauty, which is our common Amenity.

To: New York City Planning Commission
From: Board of Directors, 505 LaGuardia Place (contact: Peter Liberman, pjliberman@gmail.com)
Date: May 24, 2011
Subject: Scope of Work for NYU's ULURP Environmental Impact Statement

We represent 175 families living at 505 LaGuardia Place (505), an apartment building situated in the southern superblock in NYU's proposed "NYU 2031" development plan. We would be grateful if the City Planning Commission would add several tasks missing from NYU's April 15, 2011 "Draft Scope of Work" (DSW) for its Environmental Impact Statement.

We feel all the issues discussed below could affect the health, safety, and quality of life of our community, and should be made part of the environmental impact review. **Our greatest and urgent concern, however, is the plan's impact on housing affordability and resultant displacement of residents, which we discuss in Task 2 and Task 3 (pp. 1-2, highlighted in bold).**

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

To what extent does the proposed development challenge NYC's longstanding policy of maintaining affordable housing, and keeping buildings like 505 in the Mitchell-Lama program? NYU's DSW only proposes to investigate the impact on indirect residential displacement of changes in the neighborhood real estate market arising from additional population. We feel it is also essential to investigate the impact on affordability caused by three other changes sought by "NYU 2031":

1. Zoning changes,
2. Elimination of (or any change to) deed restrictions, and
3. Dissolution or emendation of the existing Large Scale Residential Development.

Further reasons for concern about the impact of these actions on affordable housing and the viability of a Mitchell-Lama cooperative development are discussed below.

To what extent does the proposed development depart, in spirit as well as in letter, from the vision of urban planning and residential livability that led to the current mix of open space and building height?

To what extent do the proposed development block views and invade privacy of those in neighboring buildings?

To what extent is the development unfavorable to the quality of life of the seniors residing in the superblocks? To what extent do they conflict with city policies aiming to protect the quality of life of people who have made such great contributions to the city and neighborhood?

To what extent will the proposed development, by changing the demographics of the superblocks, affect the mix of local retail businesses, with those catering to the influx of college freshmen (nightlife, fast food, chain stores) driving out those catering to seniors and other demographics (supermarkets, pharmacies, quieter restaurants)?

TASK 3: SOCIOECONOMIC CONDITIONS

First, how will the proposed zoning changes affect property values in the development area, and in turn how would these changes affect residential displacement? As

mentioned, NYU's DSW only proposes to investigate the impact on indirect residential displacement of changes in the neighborhood real estate market arising from additional population. But there are other ways in which the plan could affect affordability and social displacement. For example, 505 is a Mitchell-Lama cooperative development project, representing some of the only moderate-income housing units in an extremely expensive area. However, 505's land lease with NYU provides for periodic rent resets, the first occurring in 2014, up to 6% percent on the appraised market value of the vacant land. Thus anything that affects land values will affect affordability.

Will the proposed zoning change affect the market value of vacant land, by affecting the permitted size and density of development on that land? As 505 (like other Mitchell-Lama developments) are financially self-sustaining, any increase in land rent resulting in from zoning changes would require increased maintenance charges to residents. Because Mitchell-Lama program only admits residents with incomes in a limited range significant increases in maintenance charges may be unaffordable to most. Thus, what are the plan's risks for the large-scale displacement of residence and even bankruptcy and termination of a Mitchell-Lama cooperative development project? We feel it is essential that the environmental impact statement address the impact on affordability of the proposed zoning changes.

Second, how will any proposed elimination or modification of deed restrictions affect residential displacement, by affecting the market value of property covered by those restrictions? One of the Plan's proposed actions is the "Elimination of New York City Department of Housing Preservation and Development (HPD) Deed Restrictions on Blocks 524 and 533." Yet the DSW makes no provision to investigate the impact of this action on affordability and residential displacement. For example, if the deed restrictions limit what can be built on a property, they also limit the property's market value, which in turn limits future land rent increases for 505 in 2014 and beyond. How might altering any current deed restrictions affect affordability and residential displacement? How many current residents would be financially compelled to leave, and what are the risks of bankruptcy and the dissolution of the 505 Mitchell-Lama cooperative development project? As with the plan's zoning changes, we feel it is essential that the environmental impact statement address the impact of the plan's lifting of deed restrictions on affordability of these proposed changes.

Third, how will any proposed dissolution or emendation of the existing Large Scale Residential Development affect residential displacement? What are the implications of any proposed dissolution or emendation of the existing Large Scale Residential Development on affordability and residential displacement, including effects caused by changes in the market value of property covered by the existing Large Scale Residential Development?

What is the impact of an influx of college freshmen and NYU faculty on the current healthy balance of families, students, working people, and seniors in the immediate vicinity? How will this affect the sense of community that current residents of the superblocks enjoy?

TASK 4: COMMUNITY FACILITIES

How will increased population from proposed development impact schools? The Public Schools serving the area are already overcrowded, including annual wait lists for kindergarten.

TASK 5: OPEN SPACE

What will be the impact on open space and population density in the Plan's "Proposed Development Area," i.e., the two superblocks, and what is the impact within each superblock? The Plan appears to have a major impact on open space, because it both adds new large buildings and many people to an area already underserved with open space. The DSW provides for analyzing open space, but only in the "Residential Open Space Study Area Boundary" indicated on the map on p.31 of the DSW. But it is also—arguably more—essential to understand how the plan will affect each of the two superblocks, where the impact of the new development and added population would be heaviest. A glance at the map on p. 31 shows that the superblocks represent a tiny proportion of the whole "Residential Open Space Study Area Boundary." On the southern block alone the plan calls for a dormitory of up to 1750 beds, 260 faculty housing units, a 600-student school, a hotel, and academic facilities. Considering the impact of the plan's open space and population density impact in only a broader area would be very misleading, overlooking its far greater impact on the most heavily affected blocks.

We don't have population figures for the superblocks, but we have a rough sense of the population impact alone by examining the likely increase in the population of a somewhat larger area for which census figures are available: an increase of 50-100%. The area bounded by LaGuardia, Broadway, Houston, and W. 4th (known as census tract 550) had a 2010 census population of 4204. The plan could add up to 1750 college freshmen and roughly 1000 added faculty family residents (assuming average family size of four per family). This is just the increase in residents: it is also important to estimate

the impact of the additional employees, students, transient hotel guests, and other visitors utilizing the proposed primary school, hotel, gym, and other academic facilities.

How will the planned primary school affect open space on the southern Superblock? Children need open areas to play during recess, and often congregate in open areas near their school at the end of the school day. What space will be provided for the influx of 600-800 school children on this block?

How will construction on the Morton-Williams supermarket site affect the use and enjoyment of the plaza in front of 505? Will the loss of light and view corridors diminish this area, with particular hardship for limited mobility populations in the building who cannot easily utilize open areas further from their building?

How does the population/open space ratio of the neighborhood compare to other areas of the city, before and after the proposed development?

Washington Square Park serves our community with open, green space. Will the expansion precipitate overcrowding and excessive utilization of the park?

TASK 6: SHADOWS

How would the shadows cast by new multi-story buildings affect the landmarked landscaping of the southern superblock, including grass surrounding the historically and culturally significant Bust of Sylvette?

What shadows would be cast on the windows of buildings near any new multi-story buildings?

What are the physiological and psychological impacts of reducing access to natural light on the residents of this community?

TASK 7: HISTORICAL AND CULTURAL RESOURCES

How will the expansion impact on availability of cultural programming, including current community efforts to create new community facilities? NYU's great potential for bringing cultural resources to the community has not been fully fulfilled. The University had promised to make Coles Gym available to residents and to create a children's play area. The former became available only at limited hours and the latter never materialized. At the same time, the University's presence and space utilization makes it harder for community cultural facilities to take root.

How will the expansion affect plans to replace the Children's Aid Society at the same or an alternate location? With the prospective closure of the Children's Aid Society, our area will be bereft of any Community Center.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES.

To what extent does the architectural value of the landmarked University Village complex depend on the open feel afforded by open space around the towers and by low-level surrounding buildings? How would the complex's architectural value be affected by the addition of large buildings nearby?

Will zoning changes allow for the erection of commercial billboards? This has been a source of visual pollution in the zoning districts surrounding us.

TASK 9: NATURAL RESOURCES

How will the expansion affect the amount of green space?

How will the expansion affect the many trees, including the mature trees which offer the greatest shade and natural beauty?

How would the plan affect the habitat and viability of the red-tailed hawks that have developed, rather precariously, in the neighborhood? Red-tailed hawks are a majestic species rarely seen in urban areas, and thus treasured by bird-watchers and other community members. Red-tailed hawks have been seen for the last few years in the development area, and this spring even nested on the edge of Washington Square Park. How would the Plan (particularly the addition of large buildings, the diminution of park space, the removal of mature trees, the increase in population density, and poisons used to control rodents brought from additional garbage flows) affect their viability?

TASK 10: HAZARDOUS MATERIALS

Will the expansion increase the amount of hazardous materials stored or utilized by NYU laboratories and other facilities in our area? How will the expansion impact safeguard measures?

TASK 13: ENERGY

How will the new facilities affect the availability of steam heat? NYU sells or delivers steam heat to many buildings in the area that do not have steam-generation capacity. Would steam needs continue to be met with additional demand from new development?

How will construction affect the availability of steam heat?

TASK 14: TRANSPORTATION

How will the additional residents and facilities affect automobile traffic?

How will automobile traffic be affected by drivers circling looking for parking, to the extent that the plan decreases garage and other parking spots?

How would the increased pedestrian traffic from added residents, a hotel, schools, and academic and other facilities, affect the ability of populations with limited mobility (seniors, handicapped, small children, etc.) to utilize sidewalks and crosswalks? This should be analyzed during periods of peak traffic—between college classes, such as the start and end of school day for the primary school—as well as average use at different times of the day.

How will the increased traffic, particularly at peak times, affect accessibility to residences? This is a particular concern to 505, the entrance of which directly faces the proposed school/dormitory on the current supermarket site.

Would the greater population overload public transportation, particularly bus services, which have been cut back in recent years.

How will the expansion affect traffic and safety on Bleecker Street and other streets around our block? Bleecker Street in particular is frequently congested already, and the Houston/LaGuardia Place intersection has been particularly dangerous?

How will additional truck deliveries be accommodated without additional congestion and pollution?

What will the impact be on residential and residential guest parking?

TASK 15: AIR QUALITY

Will delivery trucks and additional buses resulting from the expansion utilize diesel fuel? If so, how much additional particulate will be generated into our air?

TASK 16: GREENHOUSE GAS EMISSIONS

What are the likely greenhouse gas emissions from the proposed school, from idling school buses and cars picking up and dropping off children? This should be estimated with the actual idling averages rather than based on legally mandated idling restrictions.

What are the likely greenhouse gas emissions from additional automobile traffic?

What are the likely greenhouse gas emissions from the proposed school, from idling school buses and cars picking up and dropping off children?

TASK 17: NOISE

Late night loud revelry and shouting has been a major problem to our community. How will the expansion and resolving expanded temporary population not exacerbate this problem?

Will resulting traffic exponentially generate additional horn-honking and other noise?

Building systems from University buildings in particular have significantly increased the ambient noise in our area. Will systems of any new buildings exacerbate this problem?

TASK 18: PUBLIC HEALTH

How would access to buildings for ambulance and emergency responders be affected by automobile traffic? How would this affect ambulance response time?

How would access to buildings for ambulance and emergency responders be affected by construction?

How would health be affected by stress resulting from years of construction? Would seniors be particularly affected?

What are the risks of injury from debris or falls due to heightened winds, particularly for small children and seniors?

How will the burden on local emergency rooms (diminished by the closing of St. Vincents) be affected by the added population to the neighborhood?

How would the ability of seniors living in 505 to shop for groceries and bring them home be affected by the closing of the Morton-Williams supermarket, both during construction and after the completion of the proposed plan? Would dependence on more distant supermarkets be a hardship?

Can the local police precinct be expected to provide adequate police coverage for an expanded population?

TASK 19: NEIGHBORHOOD CHARACTER

How would the changed population density affect neighborhood character?

How would the changed population demographics affect neighborhood character?

How would the addition of large buildings affect neighborhood character?

TASK 20: CONSTRUCTION IMPACTS

How would construction affect the stability of buildings and adjacent structures like plazas?

How will the following concerns about construction be addressed?

1. Need for a Construction Coordinating Center, similar to one successfully utilized in Lower Manhattan, but on a smaller scale.
2. Public information dissemination.
3. Use of ULSD (ultra low sulfur diesel) and other low emission construction devices and vehicles.
4. Use of state-of-the-art sound treatment.
5. Hours – Avoidance of evenings, weekends, public and religious holidays.
6. Parking –Avoiding construction vehicles and workers' private cars taking up parking space.
7. Maintaining emergency vehicle access.
8. Preventing early morning, arrival and set-up noise.
9. Using trained, union labor.
10. State-of-the-art falling debris prevention.
11. Avoiding light trespass from construction site night spotlights.
12. Construction site security.
13. Rodent control.

TASK 22: ALTERNATIVES

What would be the impact of development that maintained the current height of the Morton Williams supermarket building and the Coles gym?

OTHER TASKS: IMPACT ON WIND

How would wind patterns be affected by new buildings? Abnormally high winds are sometimes created by large buildings in close proximity, which compress air into narrow gaps between the buildings.

How would wind patterns affect noise, stability of windows and exterior window screens, flying debris?

OTHER TASKS: RISKS TO CHILDREN IN THE PRIMARY SCHOOL

What are the potential hazards to primary school children attending school in such close proximity to college freshmen, who are young adults living on their own for the first time?

Ann Warner Arlen / 147 Sullivan Street - No.1A / New York, New York 10012

TEL: 1-212-475-5976 / aarlen@nyc.rr.com

May 24, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216

RE: **NYU Core**
CEQR No. 11DCP121M
Comments on Draft Scope of Work

Dear Mr. Dobruskin:

Council Member Alan J. Gerson's Local Law 77 requires that nonroad vehicles rebuilding the Ground Zero area are fueled only by Ultra Low Sulfur Diesel in conjunction with Best Available Technology filtration.

In Greenwich Village, we do not have the benefit of this protective law. Yet, with the exigency upon us of a 19-year construction period projected by NYU, we will need equally forceful preventive protections from nonroad vehicle diesel emissions if NYU's Village expansion project goes forward.

EPA requires that nonroad vehicles of current manufacture meet the ULSD/Best Available Technology standard, but it grandfathered in existing dirty diesel engines.


In the Scope, NYU should evaluate specifying in its construction contracts excluding dirty diesel nonroad vehicles by employing a level playing field requirement that all of its construction contractors and sub-contractors use vehicles fueled by Ultra Low Sulfur diesel fuel and be equipped with Best Available Technology filtration (as part of the engine and not as an end-of-the-tailpipe retrofit, which is not prevention but remediation).

Without these preventive protections, Village children born at the beginning of the NYU project would be at continuous risk of exposure to the ongoing respiratory burden from nonroad vehicles of a construction phase lasting for 19 years, the entire period of their growth into adulthood.

In that NYU's approach is not preventive when prevention is possible, NYU's Draft Scope of Work does not adequately address this key concern regarding children's exposure to the elevated health burden of diesel fumes/particulates, asthma-inducing dust, polycyclic aromatic hydrocarbons (PAHs) and elevated ozone over the 19-year construction period. Preventive requirements for nonroad vehicles are not mentioned. Instead, NYU relies on remediation: "various measures during construction that would minimize to the extent practicable the effects of construction" and "best available tailpipe reduction technologies" [Task 20, Page 47].

NYU has an important opportunity with this large project to take the lead with a green technology commitment for the benefit of the children of Greenwich Village.

Respectfully yours,



Ann Warner Arlen

Environment Committee Chair, CB2 Manhattan 1989 – 2003

I urge revisions he made to the scope for draft Environmental Impact Statement of work for NYU's project specifically with regard to the two superblocks. The proposal, if implemented, would have a tremendously negative impact on this area. I believe that NYU's draft review fails to adequately cover its effect upon the population density and the use of open space of the area so as to irrevocably alter its present neighborhood character. Specifically the plans would just about double number of square feet of buildings now on the site. New buildings would include a hotel, a dormitory a new gymnasium and two large academic structures on what is now open space. If built as proposed, the resultant population density of the area would approach that of mid-town with resultant strain on pedestrian and vehicular traffic, public transit, sanitation, and policing requirements to maintain public order among many other considerations. I do not think that any of these issues have been adequately address by the Environmental Impact Statement of the University.

As a second but equally important issue, the garden of Washington Square Village, an award winning modernist structure designed by the noted landscape architect Hideo Sasaki would be obliterated. At present, this carefully and meticulously designed roof garden of three or so acres is an oasis of quiet reflection and a retreat from the hum and bustle of the streets. Its flower gardens, fountain, shrubbery and cherry and willow trees not only give space and refuge for us human folk but also for the indigenous and migratory song birds and even the occasional red-tailed hawk. The argument that the University proffers that the space is "underutilized" is specious on its face. The garden is obviously not Washington Square and was never designed to be. It is what it is and is a real gem for what it is. The many people who use it appreciate its worth and it has been cited repeatedly and throughout its existence in a whole host of architectural books journals along with the entire Washington Square Village complex, as that rare example of the "Tower in the Park" as envisioned by LeCourbisier which works and functions as it is supposed to. Architectural critics whose specialty is modernist landscape architecture have called it "endangered" because of the University's present designs on it. The desirability of Washington Square Village as a prestigious residence would be severely compromised if it were to be destroyed. Such destruction would not, I believe, be in the best long term interest of New York University, particularly if it sees itself, as it says it does, as the "steward" of the village and its heritage.

Allan A. Horland, M.D.

Co-executive, Washington Square Village Tenant's Association

24 May 2011



May 24, 2011

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Executive Director

Att: Robert Dobruskin, Director
Environmental Assessment & Review Division
New York City Department of City Planning
22 Rcade Street, 4E
New York, NY 10007

The New York Chapter of the American Institute of Architects is pleased to offer comments on the Draft Scope of Work issued by the Department of City Planning to prepare a draft environmental impact statement for the NYU Core Project (CEQR No 11DCP121M) and subsequent ULURP application. The Chapter has its offices and exhibition space, the Center for Architecture, at 536 LaGuardia Place, immediately across from the Proposed Development Area and more specifically Washington Square Village as identified in the Draft Scope of Work. We have been neighbors here since 2003.

We recognize New York University's need to expand to accommodate additional students, faculty and academic facilities to continue to provide a world class education to thousands of students. This growth must happen in order for NYU to remain competitive with other institutions. Since the proposal involves adding considerable program area to the neighborhood, it is critical to design the individual buildings so that they have both their own identities and are carefully knit into the existing urban fabric to accomplish this goal.

The proposals for the 'LaGuardia Building' and the 'Mercer Building' are a positive addition because their placement will open up the ground plane to the community potentially allowing greater access which will invite a greater number of people to the courtyard area. The inclusion of new amenities, including the Washington Square Village play garden, public lawn, tricycle garden and the LaGuardia Play Garden will potentially add to the enjoyment of the space for many in the community. It is also positive that the large bulk of these buildings will be located below-grade to limit the height and bulk of the buildings above-grade. These two buildings can be viewed as a spatial counterpoint to the distinctive slab buildings that make up Washington Square Village. We would offer that the bulk and the height of the 'Mercer Building' requires further study.

The addition of street wall retail at the 'Zipper Building' will activate and enliven Mercer Street to enhance the experience of the public. For far too long this area has been isolated and disconnected from the surrounding community creating a street void of pedestrians. We are concerned about the bulk and massing of the three largest towers on the northern most part of the 'Zipper Building'. Some consideration should be given to these tallest towers being repositioned on the site and their relationship to Silver Tower 1 reconsidered.

In closing, we thank you for the opportunity to provide comments on the Draft Scope of Work for this important project.

Sincerely,

Margaret O'Donoghue Castillo, AIA, LEED
2011 Chapter President

Fredric Bell, FAIA
Executive Director

I have studied and taught in universities my whole life. I have a PhD from NYU's English Dept. And I, like many of my neighbors, have lived in my neighborhood for decades--43 years on Washington Place.

This university is without parallel as it swallows up more and more of one of the oldest and most interesting cultural areas of the city, refusing all limits. The density of students now makes it difficult for residents to use our own neighborhood, to even walk on our streets. NYU's push for vast new construction would create an unimaginable concentration of students. You bet "the overall change to the pedestrian experience [of public space] is likely to be substantial ! " There are "lesser density alternatives," like the Financial District or Roosevelt Island, to re-locate some programs---as, long ago, NYU wisely added a Bronx campus when it felt it had outgrown its Village origins. With its own buses to transport students the short distances, it's unconscionable to further diminish the public space of our area's residents. In addition, wall-to-wall students will totally destroy what's left of the neighborhood's character.

So will the requested change of zoning to line Washington Place with tawdry retail stores--duplicating (and competing with) 8th St and also Broadway--just to provide the university with more money. It calls us the "Commercial Overlay Area." For a university that aspires to be Harvard or Yale, imagine Harvard Yard filled with donut and clothing stores. It's equally tacky to commercialize a dignified old street unnecessarily, in total disregard to the intense opposition of its residents, and what they feel is the nature of their block.

NYU wraps itself in the glory of Greenwich Village as a lure to students--while it is destroying the Village in its disregard for everything but itself and its own endless expansion, whatever the cost. In a city where wealthy and powerful interests run so much, we are fighting for our streets and our lives here, and hope the City ~~Commission~~ ^{PLANNING COMMISSION} members hear us.

Barbara Quart
Washington Place Block Association

COMMENTS AT THE HEARING OF THE NEW YORK CITY PLANNING COMMISSION ON NYU'S DRAFT SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT STATEMENT FOR THE NYU CORE, MAY 24, 2011, BY CONSTANCE DONDORE, COORDINATOR, 15 WASHINGTON PLACE TENANTS' COMMITTEE

My name is Constance Dondore. I am a member of the Washington Place Block Association and Coordinator of the Tenants' Committee of 15 Washington Place, where I have lived for more than 37 years. 15 Washington Place is within the proposed Commercial Overlay Area of NYU's 2031 plan.

I want to take just a moment to thank Community Board 2 for the extensive and thoughtful response it has made to NYU's Draft Scope of Work. I believe it reflects very well the immense concerns of the community.

My remarks today refer to the Commercial Overlay Area of NYU's draft scope of work, where I live.

I am confused by the statement under the heading Project Description on p. 4 of the Draft Scope of Work that the Commercial Overlay Area ... "is generally characterized by NYU academic and dormitory buildings, as well as four non-NYU residential buildings." Omitted from this description are the two residential buildings owned by NYU—14 and 15 Washington Place. Why have they been omitted? Are they considered dormitories? They house a number of community residents and are a crucial part of the mix of residential, academic, and commercial elements that lend our neighborhood its character. Given that four out of the five sites proposed for commercial development in the Commercial Overlay Area are actually on Washington Place, and a planned tea room on the corner of Washington Place and Greene Street is not even in this count, an analysis should be made of the impact on the residents' quality of life and the changing character of the neighborhood which such a direct and sizeable increase in commercialization would bring about.

Most important is the information about the future of 15 Washington Place. From NYU's Draft Scope of Work, we know that 15 Washington Place is one of the five sites proposed for commercial ground floor development if the requested zoning change is approved. We also know, from p. 23, that even without the zoning change, NYU plans a renovation and building addition that would convert the approximately 74,000 sf residential building into a 129,000 sf academic building. Yet NYU's draft scope also states, under the heading SocioEconomic Conditions: Direct Residential Displacement, that the proposed actions would not directly displace any residents from the project site. How can you convert 15

Washington Place into an academic building, either with or without a commercial storefront, unless you displace the residents? 15 Washington Place is the only building located within the total scope of the proposed actions, actually within the 2031 plans, where residents will be displaced.

We have long-term residents, some elderly and infirm, who have lived here for many decades and raised their families in this building. Are they to lose their homes at this stage of their lives? We have residents who are rent-controlled or rent-stabilized. And we have current and retired NYU staff, current NYU faculty, and post-doctoral students with families within our residential community. What is to become of us? Where are we to go? This study must include an analysis of the impact of this displacement on all our residents, and on the character of our neighborhood. There must be a study of the particular ramifications for those who are elderly, rent-controlled or rent-stabilized. It must include an explanation of what will happen to us and when. 15 Washington Place is our home and this neighborhood is our life, and both are in jeopardy.

Thank you.

Community Action Alliance on NYU 2031

7 East 8th Street, #335, New York, NY 10003

www.caan2031.org

May 24, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216

Comments on Draft Scope of Work: NYU, CEQR No. 11DCP121M

My name is Martin Tessler, Co-Chair of the Community Action Alliance on NYU 2031. Our organization is made up of more than 30 community organizations, including buildings, block associations, political clubs, historic preservation organizations and umbrella groups.

Overall, our position is that NYU's Draft Scope of Work represents a plan that will devastate the character, history and uniqueness of Greenwich Village. While the CEQR Manual breaks down impacts into technical categories, we'd like to stress that the impact of NYU's 2031 Plan cannot be grasped by looking at each detail but must be evaluated in its totality. And this impact is the total destruction of a community in favor of a campus. For a detailed examination of NYU's scope of work for each of the CEQR categories, we commend and support Community Board 2's extensive examination and recommendations.

The simple fact is that NYU's 2031 Plan changes the diverse nature of the Village – it's a place for artists, writers, bankers, bohemians, businesspeople and students; where black, white, brown, yellow and every combination blend; where elderly, adult, young and newborn, straight and LGBTQ interact, and where every income level co-exists including ultra-wealthy, working class and financially struggling. We all live in a delightful and carefully preserved balance. NYU is certainly part of this mix, but this Plan displaces the existing diversity in favor of becoming nothing more than an NYU campus with inconvenient residents that are at best ignored, and at worst walked around - and sometimes even pushed out of the way.

We of the Community Alliance do not ask NYU to stop growing, we simply ask for recognition that there is a point of "too much" in a defined area and that point has already been reached. Changing zoning to allow more buildings, students, faculty and workers to be jammed in where they are already at a reasonable maximum, taking our streetside public parks to replace them with interior pathways for students to rush between classes, and changing the restrictions freely entered into are all actions that are not necessary for NYU to grow. These actions will forever deprive the world of the Greenwich Village that they come to see, experience, and live in. There are other options so close by that are already zoned for just the type of growth that NYU seeks, and that welcome NYU with open arms – we ask that NYU expand their reach rather than overwhelm one overburdened neighborhood.

We of the Community Alliance ask the City Planning Commission to recognize the unique treasure of Greenwich Village in its totality, which is so much greater than the sum of its parts.

Thank you.

Terri Cude and Martin Tessler,
Co-Chairpersons

Member Organizations

15 Washington Place Tenants' Committee

200 Mercer Street

605 LaGuardia Place

530 LaGuardia Place

552 LaGuardia Place

77 Bleecker Street

88 Bleecker Street

Bleecker Area Merchants and Residents Association

Central Village Block Association

Downtown Independent Democrats

East 10th Street Block Association

East Square Neighbors

Friends of NoHo

Greenwich Village Block Associations

Greenwich Village Society for Historic Preservation

Grove Street Block Association

Horatio Street Association

LaGuardia Corner Garden

Mercer-Houston Dog Run Association

Mercer Street Block Association

Mulry Angle/West 11th Street Block Association

Perry Street Block Association

Public School Parents Advocacy Committee

Superblocks Coalition

Village Reform Democratic Club

Village Residents Alliance

Washington Place Block Association

Washington Square Auxiliary American Legion Post 1212

Washington Square Village Tenants Association

West 10th Street Block Association

West 12th Street Block Association

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May 24, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216

RE: **NYU Core**
CEQR No. 11DCP121M
Comments on Draft Scope of Work

Dear Mr. Dobruskin:

Community Board No. 2, Manhattan ("CB2"), at its May 19, 2011 Full Board meeting, voted approval of the following testimony to be submitted to the New York City Department of City Planning at its May 24, 2011, Public Scoping Hearing for the above project.

New York University ("NYU") has anticipated a significant expansion of its facilities and holdings in our community district for over six years. CB2 held numerous public meetings with the University to learn about their stated needs, and offered, along with members of the community, meaningful input as to concerns about the appropriateness of the proposed development and potential impacts.

In 2006, CB2 joined representatives from NYU, local elected officials, other community boards, and community groups in the Community Task Force on NYU Development ("Task Force"), convened by Manhattan Borough President Scott Stringer. The Task Force developed a set of unanimously accepted Planning Principles (attached as Appendix A), which were based on a premise first articulated by NYU President John Sexton in 2004, that Greenwich Village is a "fragile ecosystem" and the University must not overwhelm the historic neighborhood that is their home campus. The Task Force met for over three years and made many specific recommendations about urban design, quality of life, sustainability, community planning process and accountability.

In July 2010, CB2 began its own review process of NYU Plan 2031. Since that time, we have hosted eight public hearings and forums, and two public working meetings, in addition to receiving testimony from many hundreds of people about the University's proposals. This document derives from: a careful consideration of this extensive input.

We understand that NYU makes an important contribution to the economy and status of New York City, and that they want to grow in order to maintain their status as a premier institution of higher learning and internationally respected research. However, this is the largest development project to ever come before CB2, and the overwhelming reaction from our board and the community has been that NYU's proposal to add two and a half million square feet of new academic, dormitory, residential, retail and hotel uses in the heart of Greenwich Village, will forever change the character of this iconic neighborhood.

Our comments here are limited to the scope of study for the Draft Environmental Impact Statement ("DEIS"), to be prepared in advance of certification of a Uniform Land Use Review Process ("ULURP"). We begin with general comments and concerns about the actions being proposed, and then follow with specific requests for further study in each of the nineteen categories of potential impacts in the Project Area, as outlined in the NYC CEQR Technical Manual, and then end with a consideration of alternatives.

I. CONTEXT OF THE PROJECT

New York University has been a part of Greenwich Village since their founding in 1831. The University moved to the Bronx in the early decades of the 20th Century, but began a return to the neighborhood after World War II. In the 1960's they acquired the property between Mercer Street and La Guardia Place, West 3rd and Houston Streets, the "Proposed Development Area," with zoning and deed restrictions that defined these blocks as residential, and made subsequent agreements to become the stewards of the auxiliary open spaces.

In the 1970's, NYU decided to make the Washington Square area its main campus, and started an aggressive campaign to buy properties in the Washington Square Park "core." Over the years, this has led to increasingly strained community/university relations. Long time residents of what was once a vibrant, diversified neighborhood feel as if they live on a college campus. Further, NYU has enlarged and modified many of the existing buildings, designed new buildings that are not in keeping with the historic quality of the area, taken over and then neglected public space, and ignored the damaging impact of incessant construction on the quality of life for residents and businesses.

Currently the University owns or leases 10.8 million sf of space in the immediate Washington Square neighborhood. This proposal seeks to increase their dominance by another 25%. More alarming still is that all of the increase occurs in two residential superblocs, currently housing approximately 2000 families. Not only will these superblocs be asked to absorb two million sf in above-ground development, they will see the addition of an estimated 1400 dormitory students, 260 faculty families, 150 transient hotel rooms, up to 800 public school children, and the thousands of visitors associated with a conference center, an expanded gym facility and over a million square feet of new academic space. All of these new uses come at the cost of losing open space, light and air, historic view corridors and quality of life issues associated with increased noise, congestion and pollution.

The prospect of a delicately balanced, stable neighborhood that is largely residential, intimate in character, and historical in context, being overwhelmed by the proposed influx of exceptionally tall, bulky buildings, additional and augmented campus uses, and swelled populations makes it essential that we carefully evaluate all of the potential impacts of this project

II. GENERAL COMMENTS

In order to facilitate the increased bulk and density, and new uses that NYU is requesting in the Project Area (comprised of a Proposed Development Area and a Commercial Overlay Area), the city must approve a series of discretionary actions. It is important to evaluate these requests in the context of the University's stated goals.

NYU says that it has grown precipitously in the period from 1990 to 2005, and that their "facilities are severely overburdened." Their goal is to "de-compress" the strain on services in the Washington Square campus by embarking on a program of "serious upgrade(s) and improvement(s) in facilities" in order to sustain the quality of its educational offerings. Three actions help to facilitate this goal.

1. Change in Zoning in Proposed Development Area

The plan calls for a blanket re-zoning of the Proposed Development Area from R7-2 to C1-7. Our community is generally comprised of low-scale and low-density neighborhoods, and the existing R7-2 designation is one of the largest zoning envelopes in our district. The height and bulk allowed by a C1-7 (an R8 equivalent) zoning may be appropriate in midtown or downtown, but not in the historic core of Greenwich Village. Further, most of the uses being proposed in this area are allowable under the community facility bonus, and we have not heard an adequate explanation as to why their goals could not be accomplished with targeted commercial overlays. A hotel is a possible exception, but we are not convinced that a hotel is central component to the stated goal of "decompressing" the core in order to maintain academic excellence.

2. Large Scale General Development Special Permit

The plan also calls for dissolving the current Large Scale Residential Development (LSRD) on the southern superblock in the Proposed Development Area, and replacing it with a Large Scale General Development Special Permit (LSGD) that covers both the northern and southern superblock. We have not been able to determine from the Draft Scope the purpose of the LSGD, so it is difficult to comment. The plans are undefined and vague, and sorely lacking in specific detail, so how can we responsibly evaluate the impact of the entire project? We are especially concerned that the boundaries have not yet been determined, that the area covered is too large, and that the development would take place in two distinct phases over twenty years.

3. Deed Restrictions

The two superblocks in the Proposed Development Area were created under the Title I, Urban Renewal program to provide quality housing for the neighborhood. The plan specified the amount of land that could be covered by buildings, with the understanding that the remaining open space would compensate for the height of the buildings. Because of significant amendments to the plans, the Deed Restrictions are now set to expire 10 years from now, in 2021. Accelerating massive development violates the expectations of the residents and businesses in the area, who have made lifestyle and financial choices based on the terms of these restrictions.

NYU also cites that "enhance[ing] public recreational opportunities in the Proposed Development Area" is another goal of the project. They claim that there will be a "net increase in the amount of publicly accessible open space." However this is accomplished only by acquiring open space that is currently publicly owned, and very much in the public realm, as well as utilizing space that is already available to the public.

4. Demapping and Disposition of City Owned Land

For many years, CB2 has asked New York City to transfer the open space strips bordering La Guardia Place and Mercer Street from the Department of Transportation to the Parks Department. Recently we passed another resolution asking for this transfer, and received the support of all of our elected officials (see Appendices B and C.) NYU has defaulted through the years on agreements with the City and the community to create and maintain public open space. It makes no sense that one of the proposed amenities of the project is to take public parkland away from the public and instead offer access to space the community *already* has access to - but will now be surrounded by buildings, and to deprive an entire generation of access to parks and playgrounds. We question whether there is an Open Space Ratio requirement that is not met without this action.

NYU states that, in the Commercial Overlay Area, an additional goal is "to bring the existing retail uses into compliance and [to] allow for the development of . . . ground floor retail uses."

5. Change of zoning in Commercial Overlay Area, east of Washington Square Park

We do not accept this goal as a rationale for rezoning six square city blocks. The existing retail uses are grandfathered, and are more than adequate to serve the needs of the community. The area is surrounded by important commercial corridors, including Broadway, Lafayette, Eighth and Bleecker Streets. Currently, there is a great deal of empty retail space in and around the area. Therefore the impacts of this action must be carefully considered. The Draft Scope of Work says that the University has intentions to develop retail in only five locations. This change could easily be accomplished by applying for Special Permits, rather than go to the extreme of an area-wide rezoning.

Finally, while not an explicitly stated goal of the project, NYU has made the offer of 100,000 sq ft for a New York City Public School a very prominent part of the proposal. This will require specific city actions.

6. Public Authorities Law Site Selection by the NYC School Construction Authority (SCA)

Our district, like so many in the city, is struggling with a shortage of public school seats at the kindergarten, elementary and middle school levels. This proposed facility could create 600-800 seats and therefore it is an element of the plan that is very interesting to us. However, the description of the process by which property would be made available to the SCA is disconcerting both because it is vague, and because it seems to be a great promise without a guarantee. First, it is unclear what kind of school our district needs to meet projected populations in 10 to 20 years, or even if such an assessment will be available to us during this ULURP process. Second, we have no assurances that SCA even wants this property, or if they have the resources in their capital plans to be able to develop it. And third, the Draft Scope states that if SCA is not ultimately willing or able to take over the site, then it will revert to NYU. This is of grave concern. If there are no specific guarantees at the time of ULURP, then all the possible alternatives for this site must be studied.

III. STUDY METHODOLOGY

We have three major concerns about the general approach of the scope for the proposed study

1. First, the Draft Scope outlines a baseline of the year 2021 in the “Future Without the Proposed Actions,” and refers to two as-of-right projects in the Commercial Overlay Area. We think it is more appropriate to analyze the plan in the entire Project Area as of 2031, when the University expects to complete all of their proposed development. This will allow a more accurate comparison of the two scenarios, and facilitate a better understanding of the impacts.

We are especially interested in an analysis of any potential community facility bonus or development rights currently available in the superblocks, any additional commercial square feet that could be built in the C1-5 overlays in the superblocks and any potential for further residential or community facility development. Such an analysis should include the reasons limiting such development.

As part of understanding all the implications of the “no-action” scenario, we insist on a more complete analysis of the “Reasonable Worst Case Development Scenario” (RWCDS). Throughout the report, the University refers to its ‘intentions’ when defining the parameters of studying the RWCDS. This is unacceptable. NYU must always look at the maximum potential development and change allowed under the actions they are requesting.

For example, in the Commercial Overlay Area, the Draft Scope refers to NYU’s desire to maintain current (academic) second floor uses, and says that they intend to convert no more than 23,236 sf to ground floor retail. We should know the impacts of the maximum that would be allowed if the area was rezoned to C1-5.

2. Second, we would like to see the Final Scope take into account both regional and local impacts when defining the study areas for each CEQR category.

NYU describes the Washington Square Campus as the Hub of a Global Network University. “Each of the main global academic portals must have a home base at the Core that serves as a gateway for faculty, students and the wider public. Thus, even NYU’s plans that disperse its facilities at locations remote from the Washington Square campus burdens the Washington Square campus with additional space demands.” This describes a major expansion of a regional facility. Many of the categories for study should therefore consider the impacts in a wider context.

At the same time, the bulk and density of the proposal will have intense impacts on the immediate Project Area. As provided for in the CEQR Technical Manual, some categories should also identify subareas for study. The current residents of the two superblocks will be the people who are most affected by the increased height, bulk, density and change of use. A quarter mile or half mile study area radius could significantly dilute the potential impacts on open space, noise, air quality and traffic, to name a few categories.

3. The character of Greenwich Village includes many intangibles related to its history, the people that choose to live and work here, its iconic stores, and vibrant arts scene. We feel that this area is unique - in the city and country, and even worldwide. We call on NYU to conduct an extensive quantitative and qualitative analysis to truly understand what this neighborhood represents.

The Draft Scope states that the proposed methodology will simply “summarize the predominant factors that contribute to defining the character of the neighborhood, including land use, zoning and public policy, open space, historic and cultural resources, urban design and visual resources, transportation, and noise.” The spirit of Greenwich Village is more than the sum of these items. It is essential to capture what this neighborhood means to residents and the millions of people

who come every year to be a part of this experience. This study requires a strong sensitivity to the fact that the proposed project has the potential to overwhelm a neighborhood, in favor of a campus.

In addition to a detailed demographic profile of the immediate neighborhood, and the core of Greenwich Village, we would like the University to expand their methodology to include surveys, in-depth interviews and focus groups with non-NYU-affiliated residents on the superblocs and in the Commercial Overlay Area, and to ensure that the results are all based on accepted research protocols for qualitative analysis.

IV. SPECIFIC COMMENTS ON TECHNICAL AREAS

I. LAND USE, ZONING AND PUBLIC POLICY

Community Board 2 notes that the Zoning Resolution's intent is to establish development and use parameters appropriate to the applicable neighborhood or blocks. CB2 is concerned that the proposed zoning actions in the project area will result in unacceptable height, bulk and density that will change a residential neighborhood into an area with more buildings and people than the neighborhood was intended to support.

Zoning :

- The details of the Large-Scale General Development (LSGD) Special Permit are an essential part of this proposal. The **Draft Scope of Work** does not properly describe the LSGD. These details must be the basis of study for all impacts and environmental consequences. Please provide the precise boundaries of the LSGD and describe the waivers and/or Zoning Resolution text amendments (may include height and setback waivers and potentially floor area and open space redistribution across zoning lot boundary lines, and court and location of use regulations) that will be needed.
- NYU's proposal includes the re-cladding of the ground floor and second floor of the Washington Square Village apartment buildings to add transparency. This seems to indicate a change of use on these floors. Please describe in detail the purpose of recladding and study the potential impacts to current tenants, especially possible displacement.
- Please provide an analysis of the current zoning requirements for open space and the open space requirements for the proposed action. Please explain how the proposed demapping of public land impacts the open space requirements.
- The proposed Commercial C1-5 Overlay District does not include a complete build out for the full amount possible of retail space. Please provide an analysis of the Reasonable Worst Case Development Scenario for the C1-5 overlay, east of Washington Square Park.
- Community Board 2 questions the appropriateness of a Commercial Overlay district that faces Washington Square Park. Please provide an analysis of a RWCD as to the impacts of potential retail on the eastern boundary of the Park.

Public Policy:

- The Urban Renewal Plan that created the original superblocks, and its subsequent amendments, established a Public Policy that shaped these blocks. This Policy was in effect for 50 years. The proposed action significantly changes the original plan. Please provide a comparative analysis of the requirements of the Urban Renewal Plan, including the Deed Restrictions, and the Proposed Action.
- The Mitchell-Lama Program that created 505 LaGuardia Place established a Public Policy for affordable housing. Please provide an analysis of the potential impacts, including the potential for indirect displacement, that the proposed action may have.
- Community Board 2 notes that the adjoining Historic Districts also constitute Public Policy. Our concerns are addressed in the section below, Historic and Cultural Resources.

PENDING:

Future Projects

The map of projects provided by NYU does not include all of the proposed projects in the Hudson Square Area. A list of these projects will soon be available as part of the Draft Scope of Work for the pending Hudson Square Rezoning, and should be included.

Zoning Projects

CB2 notes the proposed Hudson Square Rezoning and pending zoning actions at former St Vincent's Hospital site.

Policy Actions

CB2 notes the proposed SOHO BID and the planned expansion of the NOHO BID.

ALTERNATIVES:

The No Action Alternative

- Based on documents from City Planning it appears that there may be additional unused development rights available in the Proposed Development Area. The "No Action Alternative" should be fully explored. Please provide a detailed description of the maximum "as-of-right" build-out (including development allowed by Special Permit) allowed under the current zoning, and the anticipated impacts.
- The "No Action Alternative" in the Commercial Overlay District should also include the maximum "as-of-right" build-out. NYU has noted the potential for additional construction in this area.

Additional Alternatives:

- As reasonable alternative for the proposed C1-7 District please provide a comparative analysis for a district that retains the current R7-2 zoning district and uses Commercial Overlay zoning, as needed.
- As reasonable alternative for the proposed demapping and City disposition of portions of city streets, please provide an analysis of the proposed project without the demapped areas.
- As reasonable alternative for the proposed actions please provide a plan to retain the current zoning, and instead relocate new development to other areas of the City that have expressed strong interest and invited development, for example Community Board 1, Manhattan. Land-use and existing zoning regulations in areas such as the nearby Financial District would accommodate present and future expansion to and beyond 2031, and should be investigated. (see Appendix D)
- Within Community Board 2, many hotels have been built in recent years, and have indicated that they are not nearly at capacity. As reasonable alternative for the proposed Hotel please provide a plan for using excess hotel space in CB2.
- As part of the Reasonable Worst Case Development Scenario, please study the maximum allowable development in the event that the NYC SCA decides not to pursue a public school on the current Morton Williams supermarket site.

2. SOCIOECONOMIC CONDITIONS

NYU's Plan 2031 proposes a large number of changes that will affect existing residents and businesses as well as change the existing socioeconomic conditions. CB2 requests more detail on all aspects of this topic, especially including indirect displacement of residences and businesses. In addition to the studies required by CEQR and included in NYU's Draft Scope, we ask that the following be studied.

- Overall, CB2 asks that NYU provide a separate analysis of the existing demographic conditions in the Sub-Areas directly impacted by the proposed project, specifically Census Tracts 55.01 and 59, and how the proposed changes will affect these Sub-Areas*.

Direct Residential Displacement

- NYU's Draft Scope states that the proposed action will not directly displace any residents from the project site. However, page 23 of the Draft Scope states that 15 Washington Place will be converted from approximately 74,000-gsf residential into 129,000-sf academic use. Please provide a full explanation of what will happen to 14 and 15 Washington Place and any other locations that will no longer be residential under either without or with the proposed actions, the number of residents affected and what plans are being made to accommodate them.
- NYU's Draft Scope states under the proposed actions that the bottom two floors of Washington Square Village may become retail. Please provide details of what will happen to the current residents on these floors.

- Study potential for and ramifications of displacement of rent-stabilized residents by a not-for-profit University.

Indirect Residential Displacement

- Analyze the effect of increased land rent on the income-limited Mitchell-Lama housing known as 505 LaGuardia Place. A reset of the land lease occurs in 2014 which is within the proposed project period. Will the increased land lease fees cause monthly charges to become too high for some residents, thereby causing displacement?
 - On the negotiations and final pricing of the Land Lease, analyze the potential effects of the:
 - proposed zoning change
 - removal of deed restrictions/covenants on the Urban Renewal Plan
 - dissolution of the existing LSRD
- Analyze the effect of a more than 300% increase in the number of residents on the South Superblock on living conditions for those residing there – both the generally elderly population of 505 LaGuardia Place and the families with small children in the two Silver Towers, as well as the immediate neighborhood including the North Superblock and the residents of the buildings adjacent to and having frontage on both Superblocks. Will changes in living conditions cause indirect residential displacement?
- Analyze the potential for reduction in property values, causing indirect displacement and/or severe financial consequences to those who own co-operatives or condominiums adjacent to the proposed project area
 - during construction
 - after streetside green spaces have been transferred to NYU and potentially built on or under
 - after transient/community parking spaces have been removed
 - when up to 1,750 (per Draft Scope p. 26) young people with no ties or commitment to the neighborhood are added to the area
 - when a hotel facility with a transient population as well as 260 faculty residences (per Draft Scope p. 26) are added to the area
 - taking into account new shadows cast on these buildings by new NYU structures
 - across LaGuardia Place if the LaGuardia Corner Garden plants fail to thrive and/or die as a result of the shadows cast by the proposed building on the supermarket site.
- Analyze the potential increase in crime due to the enormous increase in population including young students located at the far southeastern edge of the 6th Precinct, and its effect on property values on apartments in the buildings adjacent to the Superblocks.
- Report on the square footage change in dedicated play space for toddlers and for children up to age 16, both programmed and unprogrammed, on the University Village and Washington Square Village Superblocks. Separately study both temporary and permanent replacement playground sites, and with and without the acquisition of the city-owned open space strips. Report on how the changes will affect families on and adjacent to these blocks as well as property values.
- Explain how a project that will affect so many residents in such a concentrated area can be justified, and what demographic changes can be expected when the population of students and faculty are dramatically increased thereby changing the proportions from that found in the

existing residential population.

- Report on rent-stabilized or rent-controlled residents on both the Washington Square Village block and buildings East of Washington Square Park:
 - Do added buildings, commercial tenants and/or reduction in open space dedicated to these residents have the potential to reduce the number of these residents?
 - Is an overall reduction of this type of residents possible due to the proposed plan?
- Provide an analysis of the number of mobility-impaired and elderly people that will be affected by the move of the supermarket, including whether they will lose the independence of being able to reach the supermarket unassisted, and possibly suffer indirect displacement.
- Report on the square foot reduction of non built space on the entire University Village and Washington Square Village Superblocks, both publicly and privately owned, since the total amount of open space is an important factor in the value of owned as well as rented housing.
- Report the number of mature trees that will be destroyed as a result of the proposed plan, and its impact on the value of nearby rental and co-op housing.
- Provide clear information on plans for 14 and 15 Washington Place and any indirect residential displacement or attrition plans.
- Analyze the potential for underground water being diverted by the enormous “bathtubs” needed for the underground structures proposed for both Superblocks eroding the foundations of buildings near the Superblocks as well as possible water infiltration on sub-grade apartments and retail, and the potential for these causing a reduction in property values and/or displacement.

Direct Business Displacement

- Provide information on any retail facilities that will be removed as a result of this plan, including the existing Supermarket and the stores on the retail strip on the North Superblock, as well as any other existing businesses that will be removed or relocated.

Indirect Business Displacement

- Analyze the potential indirect displacement of existing community-oriented retail in favor of stores and other establishments serving the NYC population.
- Report on the likely increase in food-and-drink establishments in the proposed additional retail to be added under the plan, and the effects of increased alcohol-serving establishments on residents and businesses in the area.
- Analyze the potential for vacancies in the newly created retail if restrictions on liquor licenses, including both the 200-foot rule from the proposed school and the 500-foot rule from existing establishments, were to prevent new food-and-drink establishments from taking the new spaces.
- Report on the current retail vacancy rate and analyze the potential effects of adding the proposed maximum retail on existing stores and vacant space on:
 - the area east of Washington Square Park including 8th Street - a major retail thoroughfare
 - Broadway which is currently zoned for and amply supplied with retail

- Bleecker Street from Lafayette to Avenue of the Americas
 - North/South streets from Houston Street to 8th Street
 - The SoHo area from Canal Street to Houston Street
- Analyze the potential effect of new retail development on whether it would meet unmet needs for residents or compete with existing retail and longstanding iconic neighborhood merchants, and the effect on commercial rents on blocks including:
 - Washington Place and Waverly Place
 - Bleecker Street
 - on and near the Superblocks
 - Provide detailed information on the number, size and type of retail establishments that would be added if the proposed zoning were to be approved, both C1-7 on the Superblocks and C1-5 overlay on the area east of Washington Square Park, and analyze the current and future retail market saturation and rents.
 - Study the need for car and truck parking and loading docks for the proposed facilities, and whether these will impact accessibility to buildings throughout the Superblocks and on adjacent streets and the area east of Washington Square Park, and how reduction in parking and increase in traffic will impact property values.
 - Study the potential effects – including indirect displacement – on nearby established industries and uses such as the manufacturing, retail and arts communities and facilities in SoHo and NoHo.

*NOTE - from the CUPR Manual:

For projects covering a large area, it may be appropriate to create subareas for analysis if the project affects different portions of the study area in different ways. For example, if a project concentrates development opportunities in one portion of the study area, and would result in higher increases in population in that portion, it may be appropriate to analyze the subarea most likely to be affected by the concentrated development.]

3. COMMUNITY FACILITIES AND SERVICES

The Draft Scope for NYU's Plan 2031 needs to include analyses of the potential direct and indirect impacts on a variety of areas included in this category. Special attention should be paid to a careful comparison between the "No Action Alternative" and the "With Action RWUDS Alternative"

With regard to the space that NYU is offering for the public school, the language on p.6 of the Draft Scope, which states, "If SCA does not utilize the space for a public school by a yet-to-be-established date prior to 2031, NYU would utilize the 100,000 square foot space for its own academic purposes" must be revised. As stated above, under General Comments, it is essential that all potential alternatives are fully studied.

Public Schools

- Analyze how increased population will impact CB2 schools. Specifically, how many families will NYU bring to our district as part of the Plan 2031 expansion?
- Analyze and offer specific details as to how NYU is arriving at the 100,000 sq ft figure for a public school.

- Analyze what is the right level of public school (i.e., Elementary vs. Middle School.) Since Middle School is a district choice and not a zone choice, the need for a Middle School should include an analysis of district wide (D2) enrollment, school seats, but will largely be based on the growing Middle School population in the CB2 zone, and on the fact that parents and students do not have a Middle School choice in CB2.

Analyze the appropriateness of housing an undergraduate college dormitory above a public school. What are the School Construction Authority (SCA) and Department of Education protocols? Provide a clear description of the proposed school building, and information as to how the SCA and NYU will coordinate construction.

- Analyze the amount of outdoor space a state-of-the-art school would have and where it is best placed based on the grade-levels included. Per open space requirements, analyze if there is enough open space on the rooftop of the donated shell and core for a public school, and the appropriateness of a rooftop play yard. Rooftop play yards can be loud when they are filled with children. Analyze noise impacts on nearby buildings.
- Analyze the actual costs for NYU to provide both the "Shell and Core" for a public school. Are there differences in costs between an Elementary School, Middle School and/or High School.
- Analyze the possibility of NYC financially supporting the renovations of P.S. 3 and P.S. 41, which have been, and continue to be, attended by children of NYU faculty, and which are desperately in need of upgraded infrastructures compared to other zoned public schools. One or both of these schools are in need of a larger outdoor play space, a new cafeteria, a separate gymnasium, an elevator, and permanent seating in the auditorium, and so these areas should be included in a cost analysis.
- Analyze as an alternative to donating space within the core the costs of NYU financially supporting the purchase and construction of a new public school outside of the core. (e.g., 75 Morton Street which could potentially be used for both Middle and High School, Grade 6-12.)
- Analyze school completion timing. When would the school be completed, and will that coincide with the community's needs? Analyze viable mitigations if it is proven the community needs a school now. The school is a deferred benefit, so what will NYU do for the community in the meantime?
- Analyze as an alternative the costs of NYU financially supporting the construction of a community center fitted for a public school on the site in the core that the University has promised to the community. Analyze the costs to build classrooms, a book/reading area geared for children, a gym, a childcare center space, a senior center space, and a break room.
- Analyze the costs of NYU donating space for a community center in existing, or yet-to-be constructed NYU buildings.
- Analyze what protections the community has that a public school will actually be built, that SCA wants and can afford the space, *and that the space will not revert back to NYU under any circumstances.* Provide information on how the community will retain this mitigation even if DOE/SCA does not want to, or have the funds to, build the school. The DEIS states that NYU

will utilize this land if a public school is not built. What would be built there is currently unspecified. *NYU's Scope must provide alternatives that retain community ownership and use of this land promised by the University to the community.*

Fire and Ambulance

- Analyze the fire access to the middle of Washington Square Village between the proposed extra buildings, playground and superblocks overall. How will the apparent removal of the 2-way roads crossing the northern superblock and loss of access to the existing fire lanes there increase fire hazards?
- Analyze how the removal of the N/S roads on the WSV block affect the ability of ambulances to get in, get their patients loaded, and get out.
- Analyze the impact that an additional population of 1,750 young adult students (p.26) who will most likely be freshmen, 260 dwelling units for faculty members (p.26) and constant transient hotel guests will have on the delivery of NYPD services, specifically the already understaffed 6th Precinct, to the rest of the precinct.

Hospitals

- Analyze how the Proposed Action Plan and increased population will indirectly affect the community's access to services at the planned North Shore-LIJ Center for Comprehensive Care, which will have limited space and services compared to the full service St. Vincent's Hospital it is replacing.

Child Care

- Analyze the impact on the displacement of the childcare facility, Creative Steps Playgroup on the ground level of WSV, which may be turned into retail, which would physically displace the childcare facility. If Creative Steps Playgroup were to be displaced, how would the displacement be mitigated by NYU?

Physical Fitness Facilities

- Report on how access to and egress from the proposed "temporary gym" will be achieved, especially by busloads of visiting basketball and volleyball teams, since there is no streetside access from Mercer Street and the porticos limit the height of the vehicles that can enter the "Greene Street" N/S roadway.
- Report on the uses of the "temporary gym." As this facility will be smaller than the existing Coles, will it be more of a field house than a gym? Will any community uses even be possible? Report on how the community's access to the gym facilities will be coordinated with student access and analyze how NYU can provide increased access to the community to the "temporary gym" and, eventually, the permanent gym facility.

Libraries

- Analyze how the proposed action plan and increased population will indirectly affect the community's access to its Jefferson Market Library and Hudson Park Library.

Places of Worship

- Analyze the indirect effects that the proposed action plan will have on St. Anthony's Church and any other public places of worship identified to be within the study area.

4. OPEN SPACE

Over a period of many years, access to parks and open space has been one of the most passionately expressed concerns among residents within the CB2 district. Our board has actively and successfully promoted creation of new open spaces, large and small, at every opportunity, and has advocated for the improvement and good care and management of existing spaces. This leadership has been consistently supported by all of our elected officials over the years. The public open spaces currently within the project area are among the parks that have been created and cared for through intense and passionate public engagement. They are part of the history and fabric of the immediate district. So it is not a surprise that the response of the community to proposals to eliminate these spaces has been intense and passionate as well. Please refer to appendices as follows:

1. A Community Board 2 Resolution opposing de-mapping public lands in the project area and supporting transfer of these spaces to the Parks Department
2. A press release to the same effect issued by elected officials for all districts in which the project area resides

This request is for substantial expansion of the scope with regard to open space in the following areas:

1. Alienation of Public Open Space
2. Need for a Full Assessment of Direct Effects on Open Space
3. Need for Special Assessments of Indirect Effects
4. Special Considerations for the Need for a Detailed Assessment
5. Staging Impacts

1. Alienation of Public Open Space

*** A full review is required to evaluate legal issues related to alienation of public open space in the project area.**

Existing public open space in the project area is likely to require alienation legislation. The C1QR Technical Manual advises that when a project eliminates "or involves certain changes in use of dedicated City-owned parkland or open space, the City must have the authorization of the New York State Legislature and Governor to alienate the parkland or open space." The project proposes transfer to NYU of City-owned land that is public open space. Some of this land has been developed with government funds dedicated for improvement of public open space and also private funds accepted by New York City for the restricted purpose of developing this land for active and passive open space use.

- a. A public playground will be built this year in LaGuardia Park on the east side of LaGuardia Place between Bleecker and West Third Streets. The area was dedicated for this purpose and the design for the park was approved through a process including review by the NYC Parks Department, Community Board 2, and the Public Design Commission, and City funds will be used for construction.
- b. Mercer Playground is public open space on Mercer Street between Bleecker and West Third Streets. The NYC Parks Department web site states "In 1995 the Department of

Transportation gave Parks a permit to use the site. Two years later the site was formally transferred to Parks, and plans were made for capital improvements. The playground construction was funded jointly by Council Member Kathryn Freed and LMNO(P) at a total cost of \$340,000. LMNO(P) raised an additional \$100,000 for the construction of the fence. Supporters included New York University, the Robinson & Benham Charitable Trust, and the Archives Fund.”

- c. NYU recently built an underground co-generation plant on public land on Mercer Street between West Third and West Fourth Streets. The easement allowing this use was part of an agreement dedicating the above ground use of this City-owned property to passive open space. Neighbors, community board members, and elected officials participated in a design process resulting in a design for this public open space that was approved by Community Board 2 and the Public Design Commission. The design includes gardens and seating areas.

A full review is needed of all possible legal issues regarding transfer of public lands, including a review of whether the proposed land transfers and/or alternatively transfer of underground easements that might impact the public open space use of the properties would require state legislation. Additionally, all prior development of public open space on these properties needs to be reviewed to determine whether there are issues regarding alienation of parklands that have received state or federal funding. A report on this review should be made available to the lead agency, the NYC Parks Department, local elected officials, and Community Board 2.

2. Need for a Full Assessment of Direct Effects on Open Space

• Determine the users of existing public open space and evaluate how the project may reduce the usability of these spaces, detract from their aesthetic qualities or impair their operation.

The Draft Scope states that “a detailed assessment of the Proposed Actions’ direct effects on open space will be provided that considers the types, quantities, and quality of displaced publicly accessible open spaces as compared to the new publicly accessible open spaces that would result from the Proposed Actions.” This suggests that the assessment will be limited to what the CEQR Technical Manual calls “a simple comparison of conditions with and without the project and a discussion of the users affected.” But the Technical Manual states that this may be insufficient when “more information on users of that open space may be appropriate or there is ambiguity as to whether the project would reduce the usability of an open space, detract from its aesthetic qualities, or impair its operation.” As discussed in detail herein, there are reasons why replacement spaces provided by the project are not comparable to spaces that will be eliminated or significantly impacted.

• Evaluate whether proposed replacement space within a campus environment will provide a welcoming alternative to current users. Include surveys and interviews of current users.

Because the project will locate replacement open space away from the public streets in a manner that will surround the space with large NYU buildings and may create a campus feel, students and workers may displace residents and more information is needed regarding current open space users and the availability of other space. The relocation of active space to a more shaded area may have a negative impact on its usability and the loss of many mature trees will have a long term or even permanent impact on aesthetic qualities.

The Draft Scope indicates that there is justification for limiting the assessment of direct effects because “the proposed project intends to enhance public recreation opportunities in the Proposed Development Area by providing new and replacement open space.” However, the following

considerations indicate the need for a full review of the direct effects on the entire study area, and not just the proposed comparative analysis of existing and replacement spaces.

- **Study the basis for strong community support for existing outward facing public space on public land including consideration of the importance of the history of these spaces. (See appendices: Community Board 2 Resolution and Press Statement by Elected Officials.)**

There is strong public support for retaining the existing open spaces. There has been a strong negative public response to the proposal to eliminate the existing open spaces on City-owned land and there has been little or no public expression of support. More than 200 people attended a Community Board 2 public hearing on October 18, 2010, where 36 people spoke against replacement of the existing open spaces and no one spoke in favor. A subsequent resolution (appended hereto) was passed opposing transfer of these spaces to NYU and supporting transfer of these properties to the Parks Department. A press release (appended hereto) opposing the transfer of these spaces to NYU and supporting transfer of these properties to the Parks Department included statements from all the local elected officials: United States Congressman Jerrold Nadler, Manhattan Borough President Scott Stringer, State Senator Tom Duane, State Assembly Member Deborah Glick, and City Council Member Margaret Chin.

- **Describe and evaluate the aesthetic character, user groups, and public accessibility of existing open space as conditioned by its placement along the streets and outside university property.**

The proposed replacement open space is substantially different in aesthetic character, user groups served and public accessibility. The existing open space on public land has direct access for neighborhood streets while the replacement space will be surrounded by large NYU campus buildings. Therefore, even without consideration of the dramatic increase of new resident students, non-resident students, and NYU faculty, employees, and visitors, the uses will likely be more associated with the campus than with the neighborhood, creating a feel more responsive to the University than to the broader community. The existing open space is connected to the adjacent streets and provides a relief to the urban grid typical of the attractiveness of other "park blocks." Building new towers where the parks are currently located is a drastic change to the aesthetic impact of the open space. Existing open spaces, including spaces on public land and the publicly accessible Children's Playground/Key Park are built on natural ground and support large species mature trees. These trees, as well as dozens of smaller species mature trees in other areas will be removed and the hardscape replacement spaces will support fewer trees of smaller species because all the replacement spaces will be built above occupied space and not on natural land. The gardens above the garage at Washington Square Village were designed by Sasaki, Walker and Associates and completed in 1959. They are eligible for listing in the State and National Register of Historic Places. The tranquility and historic importance of these gardens will not be replaceable in the middle of a complex of large campus towers.

- **Evaluate the location of the existing playgrounds and dog run in consideration of warmth provided by the sun, the benefit of mature, large species trees, and distance from residential windows.**

The proposed replacement open space has limited usability. The addition of new buildings and the relocation of existing open space including children's playgrounds and spray showers to more shaded areas will reduce the usability of these spaces. A replacement for the existing dog park at Mercer and Houston Streets is sited adjacent to one of the Silver Towers residential buildings. NYC Parks Department policy does not allow placement of dog runs where noise and odor will create conflicts with residents. The location will at least limit the hours of use of the dog run which is currently used at all hours.

- **Study the importance of sun exposure to the Community Garden.**

Tall new buildings in the project area will increase the shading in existing spaces, with particularly harmful impacts on the Community Garden on LaGuardia Place south of Bleecker Street. This extraordinary space is an important resource to its participating gardeners, and also stands as a symbol of urban resiliency and civic pride. The garden provides immense pleasure to its gardeners, visitors, and passers-by. The success of the garden is threatened by shading from new towers to its east, by the intensity of new uses in the project area, and by the inevitable construction impacts.

- **Review the history of NYU stewardship of public and publicly accessible open space and evaluate the causes of admitted shortcomings.**

NYU has agreed that it has a poor track record in maintenance, management and operation of public access to open space on their property. While they have stated that they have “turned over a new leaf,” the difficulty of enforcement of public access to privately owned public space has been a widespread concern in areas such as urban plazas throughout the city. NYC would have latitude to make unilateral decisions regarding hours of access and other rules affecting campus security and institutional liability. NYU would have control over the look and feel of the open space, potentially affecting the level of public use. Access to open space for freedom of expression could be restricted on privately held land.

- **Provide qualitative and quantitative information regarding existing publicly accessible NYU-owned property including the Sasaki Garden and the Key Park.**

The Introduction section of the Draft Scope states that the project would add four new acres of publicly accessible open space. However, the Draft Scope provides insufficient quantitative analysis of the amount of added open space compared to the amount of eliminated open space. Specifically, while the Draft Scope includes in its analysis *proposed* publicly accessible private land to be added, it appears not to include *existing* publicly accessible private land that would be eliminated. The north superblock includes two very large publicly accessible areas. The “key park” children’s playground is an active open space in Washington Square Village, directly adjacent to Mercer Playground. While NYU has restricted the degree of public access to varying degrees over the years by limiting the number of keys available to the broader community, this area is the largest and one of the most heavily used children’s playgrounds in the study area. The Sasaki Garden, located above the parking garage in Washington Square Village, is the largest passive open space in the study area other than Washington Square Park. NYC has had an inconsistent policy with regard to public access, but the area is now publicly accessible without restriction. The Coles Athletic Center was approved in 1979 based on an agreement that included public access to an acre or more of rooftop space, although NYU has failed to honor the commitments in this agreement. The loss of publicly accessible private space should be included in a quantitative analysis that also includes the addition of new publicly accessible space. This loss was not included in the analysis for the draft scope and should be corrected in the final scope. (If the space is not included in the quantitative analysis, it still should be included in the qualitative assessment of the loss of open space, and the final scope should include a full review of any conditions affecting public access to these spaces and the displacement of current uses, including during construction phases, should be part of the comparative review.)

- **Evaluate the current availability of open space in the project area for active and passive uses including division of active uses by age group.**

The project will bring large new populations of residential and non-residential young adults to an area underserved by active recreation facilities. Assess the needs of this group for open space suitable for active recreation, and assess the availability of such space in the study area.

• As described above, the project may result in physical losses of highly used public open space and changes in usability of existing open space, will limit public access to open spaces, will result in increased noise and shadows in public spaces, while also increasing the demand for open space. Therefore, a simple comparison of conditions with and without the project is not sufficient. The direct impacts require a full assessment under the procedures outlined in the CEQR Technical Manual.

3. Need for Special Assessments of Indirect Effects.

• **Assess the true public accessibility to open space in the project area given the intensity of university activity in the project area, including a comparative analysis of per capita area as compared to current conditions.**

The project will have an enormous indirect impact on open space in parts of the study area close to the project area. There will be 1400 new dormitory residents and a large number of students attending classes and other university activities as well as many university employees. Given the intensity of university expansion in the area, it seems likely that on nice days between classes, at lunch hour, and at the end of the school day, students will overwhelm open space in the project area and spread into nearby open space. The replacement open space in Washington Square Village may not be useable for other than NYU populations, especially during weekday hours when NYU is in full session.

• **Assess the impact of the project on Washington Square Park, including impacts of overuse on lawn areas and the effect on current users and uses of a substantial increase of use by new residential and non-residential occupants of the project area.**

The project may have an especially significant impact on nearby Washington Square Park, a landmark open space resource of special importance for neighborhood residents as well as visitors that also has significance as a historical, cultural, and socio-economic resource. The students who will live in dormitories are in an age group that will be attracted to the special spaces in Washington Square and will create new use pressures in this overcrowded park, potentially pushing out current users and having a significant effect on current and historical uses. This age group will also seek opportunities for active uses that pose a threat to damage the newly renovated lawns in Washington Square that are intended for passive use only.

• **Assess the impact of the project on NoHo, an underserved area for public open space.**

The indirect effects on open space will have an especially significant impact on residents of NoHo, an underserved area, and on current residents in the project area and in immediately adjacent areas. Residents who depend on access to existing open space within the project area will be particularly vulnerable to the pressures caused by large numbers of new residents and new daytime visitors who will use the proposed replacement open spaces.

• **Assess the impact of the project on the availability of existing active recreation facilities in the study area. Evaluate current availability of active open space, including separate analysis by ages served, and assess the effect of the project.**

The indirect effects on open space will have an especially significant impact on active open space in the project area. The areas surrounding the project area have very limited access to active recreational space such as ball fields and basketball courts. Passanante Park, just three blocks away, is the only hard surface play area in the study area and is a vital resource for neighborhood residents, including

families with children, and for nearby schools. With no other nearby facilities suitable for activities such as Frisbee games, project occupants may cause pressures that reduce access of neighborhood residents to active recreation.

4. Special Considerations for the Need for a Detailed Assessment.

A simple quantitative preliminary assessment should not be used to obviate the need for a Detailed Assessment because

- a. There will be especially significant impacts on Nolito, an underserved residential area with no nearby alternative open space if use of open space in the project area is reduced.
- b. There will be especially significant impacts on residential areas in and immediately adjacent to the project area with no nearby alternative open space if use of open space in the project area is reduced.
- c. The user group composed of students residing and attending classes in the project area has higher than average needs for open space area and their use of open space will be highly focused in the project area and very nearby.
- d. The relatively high current open space ratio in the project area as compared to the study area means changes to open space use in the project area have a disproportionate effect on open space use near the project area as compared to their effect on the study area.
- e. Inadequacy of open space within the intensively used project area will have a cascading impact on nearby open space greater than the impact of the increased number of students on the open space ratio for the entire study area.

The project represents a major growth of NYU within its current core area. This is identified by NYU as one of four planning principles. The result will be a significant increase in the intensity of NYU activities in the project area, leading to a substantially increased presence of students in the project area as well as a greatly increased flow of students in and out. The project will also greatly increase the number of NYU visitors in the area as well as the volume of commercial activity in the area, and will create special new open space needs for students of a new elementary school, needs which may be in conflict or competition with the needs of NYU students.

• Perform detailed evaluations of current resources including surveys and interviews. Field surveys, performed while NYU is in full session, should assess the current active and passive use of nearby open space by NYU students.

• Provide detailed analysis of the impact on Washington Square Park, a special resource with enormous value to residents, nearby and citywide, and visitors

With respect to Washington Square Park, surveys should be done after areas of the park closed for Phase 2 reconstruction are reopened. Assessments should focus on park use during weekday hours when students are moving between classes or leaving educational activities for the day and evaluate user groups within the park as well as the impact of university and project related crowds on the perimeter of the park, e.g. with respect to the common use of the park perimeter for jogging and walking. Also, in Washington Square Park, data should be collected on active use by NYU students of lawns intended for passive use to help assess the extent of need for more active open space areas as

student activity is intensified in an area.

- **Compare existing use of publicly accessible open space in the campus setting to existing public space in the project area.**

The impact of large numbers of students and employees within the project area requires detailed evaluation including study of the total number of people from the project area likely to use and walk through the space. The assessment should include surveys of publicly accessible campus-like spaces such as Gould Plaza to evaluate their usability for public access. Surveys during weekdays when NYU is in full session should be included, especially at class-change times. The total number of resident and non-resident students anticipated in the project area, as well as employees and visitors, should be used in determining whether replacement open space surrounded by large university buildings will function well as publicly accessible open space.

- **Provide detailed analysis including field surveys and interviews to determine the impacts of the loss of the “key park” and Sasaki Garden as currently located.**

If a survey of an open space determines a space is under-utilized, the cause of disuse should be evaluated to determine if it is associated with a lack of demand or with an historical or administrative cause. For example, the residents in surrounding communities should be interviewed to determine the level of awareness regarding public access to current publicly accessible spaces such as the Sasaki Garden.

- **Perform surveys and interviews to evaluate comparative value to non-NYU residents of inward versus outward facing open space.**

NYU states in its draft scoping document that they seek “to design publicly accessible open space to be an integrated network of attractive spaces that are welcoming to the general public.” The project intentionally eliminates public open space on the street sides of the project area in favor of a large central hardscape surrounded by NYU educational and residential buildings. The hypothesis that this will improve public usability of open space is counter-intuitive and needs assessment. Field surveys should be designed to evaluate current user groups for open space with in-facing orientation such as Schwartz and Gould Plaza as compared to those with out-facing orientation such as the Co Gen plaza and the sitting area outside Coles.

Users in particular groups, such as seniors, who are particularly subject to dislocation, should be interviewed to determine whether proposed replacement open space will serve their special needs.

- **Provide a detailed assessment of the comparative value of the public spaces on Mercer Street between Houston and Bleecker Streets versus the proposed relocation of uses to the other side of the “Zipper building.”**

This is problematic because the children’s playground and reflecting garden areas on Mercer Street have fallen into disrepair and disuse. However, as in Washington Square Village, the project moves public space here from the street to areas separated from the street by campus buildings. The usability of the new space by the general public needs to be reviewed in consideration of the proposed intensity of NYU use of the project area. As mentioned above, the proposed location of the dog run directly below many residential windows suggests a likely loss of usability that requires assessment.

- **Provide a full historical review of intentions and agreements regarding all spaces in the project area, including access to the Coles roof, gym, and pool, and also NYU responsibilities to manage and maintain publicly accessible areas.**

The draft scope asserts that the project will add four acres of new public space. However, no clear evaluation is available of the status of public accessibility to existing private space within the project area. The comparative analysis of lost open space and replacement open space needs to evaluate the number and size of trees, the percentage of hardscape versus natural ground, increased winter shading caused by new buildings and location of open space features as well as decreased availability of summer shade from large trees, and various kinds of seating.

- **Assess the impact of new retail stores on Washington Square**

Currently, there is minimal retail on streets surrounding the park. A commercial overlay in the blocks east of Washington Square Park, including in buildings across the street from the park, will have impacts on the park that require assessment. Depending on the size and type of stores, based on crowds attracted to stores in the nearby Broadway commercial area, substantial crowds may be drawn to these blocks with significant increases to visitors and pass-through pedestrians. Park use in Washington Square should be compared to park use in Union Square and Madison Square where there is existing adjacent commercial use and park users should be interviewed to assess the potential significance of the commercial overlay. Similarly, the hotel and other commercial uses made possible by proposed C1-7 zoning for inside the project area should be evaluated with regard to impacts on existing and planned open space there.

- **Identify existing open space in the study area where current use is near or above capacity.**

Throughout the residential open space study area, conditions of high intensity of use in existing open space need to be separately evaluated for both passive and active areas, and compared to city-wide norms. Where use of open space is at or near capacity, the likelihood of significant impacts from the project is greater. Targeted mitigations may be required for each open space that is currently at or near capacity.

- **The Adequacy of Open Space needs to be assessed for sub-sections of the study area based on the increase caused by the project of the residential and non-residential populations.**

There is a likely substantial increase in demand for both passive and active use of open space. College students have high open space needs, both active and passive.

- There will be an increased demand for passive open space because of the increased number of daytime visitors to the area.
- There will be an increased demand for active open space based on the ages of the people brought to the area as a result of the project.
- The project will replace the current predominance of community residents in open spaces in the immediate area to the extent that current users may be displaced in some open spaces by newcomers. This has occurred on various streets near NYU over the past decade, such as University Place. The study needs to develop effective qualitative analysis tools to assess whether the non-NYU users will retain a critical mass presence in the new and pre-existing open space or whether they may be marginalized by new residential and non-residential populations.

- **Evaluate the impact to the demolition of Coles on current community users.**

How many residents will be affected? Will there be community access to the temporary gym? Will there be community access to the new permanent gym and pool?

5. Staging Impacts

• Evaluate the impacts on access to open space during the development period.

Review and analyze the impact of the extended development period caused by short- and mid-term loss of open space prior to completion of replacement open space including but not limited to Mercer Playground, LaGuardia Park, Community Garden, Key Park, dog run, Sasaki Garden, etc.

We are especially concerned that building a temporary gym in the northern superblock, on the site of the Key Park and Sasaki Garden will significantly reduce the amount of open space and recreational opportunities available during construction. In order to fully understand this impact, we must have specific information regarding phasing and project time frames.

6. Alternatives

• Project alternatives to be evaluated should include those that

- (1) retain all existing public open space without new underground use and supporting current uses
- (2) retain the Sasaki Garden and Key Park in current locations and
- (3) provide new open space for active use within the project area.

5. SHADOWS

The CEQR Technical Manual requires a shadow analysis on publicly accessible open space or historic resource with sun-sensitive features. In addition to these required analyses, CB2 seeks to draw attention to the following shadow analysis areas:

In all cases:

- Study air flow: shadows cause lack of tree growth, causing loss of CO₂ filters
- Study quality of life: effect of tall buildings blocking sunlight on human physical, physiological, mental, and emotional health.
- All buildings
 - Impact on property interiors and exteriors
 - Impact on property values – Possible eminent domain requiring just compensation?

West Side of Mercer Street between Houston and West 3rd Streets

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values – possible eminent domain requiring just compensation?
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings

- Loss of light and increase in shadows on Mercer Street between Bleecker and Houston Streets because of the height of the proposed Zipper building (“Valley of Darkness”) and on areas surrounding the Zipper building in general
- Loss of light and increase in shadows on Mercer Street between Bleecker and West 3rd Streets because of the proposed “Boomerang” building
- What will be the shadow on the buildings, on the street and inside the Mercer-facing apartments? There is currently direct and indirect sunlight entering Mercer-facing apartments through most of the day on most of the days of the year. What would be the effect of the proposed Superblock buildings?

LaGuardia Place

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values - Possible eminent domain requiring just compensation?
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings.

Block 525, LaGuardia Between Houston and Bleecker

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings.

Time Landscape

Landscape Artist Alan Sonfist created Time Landscape as a living monument to the Manhattan forest inhabited by Native Americans and encountered by Dutch Settlers in the early 17th century. This is green parkland maintained by the NYC Department of Parks under Greenstreets.

Study potential for shadows and effects on:

- Impact on variety of trees and other vegetation in landscape work of art
- Impact on insects
- Impact on animal life

LaGuardia Community Garden

Study potential for shadows and their:

- Impact on vegetation
- Impact on insects
- Impact on animal life
- Impact on flowering time of milkweed, which is the food source of Monarchs in the larval stage (LaGuardia Corner Garden has been a registered Monarch Waystation [#1766] since September 2007)

- Impact on the development of the larvae and what effect will that have on Monarch populations
- Impact on other insects such as sphinx moths, Admiral butterfly, Eastern Swallowtail and their food sources.
- Impact on mature apple and pear trees, which require 6-8 hours of direct sunlight daily to produce fruit.

Proposed New Children's Playground on North Side of Buildings 3&4, Washington Square Village

Study potential for shadows and their:

- Impact on safety given loss of light
- Impact on vitality of playground if shadowed and sunlight lost
- Impact on vitamin D absorption due to loss of light

Mercer Street Dog Run

Study potential for shadows and their:

- Impact on dog run vitality
- Impact on safety given loss of light
- Reviewed in greater detail in Open Space Section

Proposed Open Space Areas

Study potential for shadows and their:

- Impact on vegetation
- Impact on insects
- Impact on animal life
- Potential negative impact on the inviting nature of these areas

Morton Williams site

Study potential for shadows and their potential effects on:

- Monarch butterfly population
- LaGuardia Corner Garden plantings
- 505 LaGuardia Place windows
- Windows across LaGuardia Place

University Village Landmarked

Study potential for shadows and their potential effects on:

- Impact on property interiors and exteriors
- Property values
- How the impact of shadows from multi-story buildings affect the landmarked landscaping of the southern superblock, including grass surrounding the historically and culturally significant "Bus of Sylvette."

Washington Square Village - Eligible for Inclusion in the National Register per the New York State Historic Preservation Office

Study potential for shadows and effects on:

- Impact of shadows on historic structures - interior and exterior
- Impact of shadows on Community Gardens
- Impact of shadows on Sasaki, Walker & Assoc. roof garden, one of the earliest parking structure roof gardens in the country
- Impact on site lines of a Corbusian-inspired "Tower in the Park" aesthetic
- Impact of shadows on the Cable Building at 611 Broadway

6. HISTORIC AND CULTURAL RESOURCES

Greenwich Village, and especially the area being studied, is rich in historic and cultural resources that may be impacted by the proposed development. From the legendary people - writers, musicians, performers and more - who lived and worked in this area to the architecture and public art, careful study is warranted. Some of the items addressed below have been considered in greater detail in the following sections: Shadows, Neighborhood Character, Urban Design and Visual Resources, and Construction Impacts.

General Impacts

A broader consideration should be undertaken of direct and indirect impacts of sightlines to and from various historically designated sites, sites eligible for designation, specific historic structures, and cultural resources.

- Applicant must provide details of designs in a scoping document involving historically designated properties, those eligible for designations and the rich historic and cultural value of the area.
- Consider a more thoughtful analysis of direct and indirect impacts on nearby historic districts and individually landmarked buildings (designated and eligible/calendared).
- Provide an analysis of potential physical damage to historically designated property, individual landmarked buildings, and sites eligible for designation, and nearby historic districts and individually landmarked properties.
- Study impact of NYC's presence and space utilization on ability for preexisting and other community cultural facilities to take root.
- Study impact of expansion on plans to replace the Children's Aid Society at the same or an alternate location.
- Study effect of continuing transformation of historical sites, small businesses, into a university campus; loss of vibrant community to university "campus"
- Study effect of concentration of all resources in one monolithic entity.

- Study effect of diminishing experiences, contributions, and pride of non-academic members of the community.
- Provide an analysis of the impact of proposed commercial development in historical buildings on the character and aesthetic quality of these buildings.
- Proposed development may create street walls incompatible with neighborhood.

Alternatives

- Study implication of not acquiring or building under the City-owned strips.
- Zipper building: consider alternative aesthetics to comport with historic design of the area. It does not relate to the spatial constraints, nor to loft buildings in the historic NoHo to the east or tower-in-the-park with Historic Register-eligible WSV or University Village.

University Village (a/k/a/ Silver Towers and 505 LaGuardia Place)

- Landmarks Preservation Commission – Designation List 407, LP-2003 (November 18, 2008)
 - Boundaries- 100 and 110 Bleecker Street (aka Silver Towers I & II, 98-122 Bleecker Street and 40-58 West Houston Street) and 505 LaGuardia Place (aka 487-507 LaGuardia Place and 64-86 West Houston Street). Built 1964-67; J. M. Pei & Associates, architect; James Ingo Freed, chief designer.

Quotes from the 2008 Designation Report:

- “University Village is one of the finest examples of a mid-20th century residential complex located in New York City.” (p. 1)
- “Occupying a five-acre ‘superblock’ in Greenwich Village, between West Houston and Bleecker Streets, the site was originally part of a much larger urban renewal scheme conceived by Robert Moses, chairman of the Mayor’s Committee on Slum Clearance, in 1953. As part of NYU’s agreement with the city to take over the site in 1960, the school set aside one-third of the units for middle-income residents.” (emphasis added)
- “The complex includes three identical free-standing 30-story towers executed in reinforced concrete that are positioned at the center of the site in a “pinwheel” configuration around a 100-by-100 foot lawn. The west tower, at 505 LaGuardia Place, is a cooperative residence with a long-term lease from NYU, and the east towers serve as faculty housing.”
- “The buildings were thoughtfully arranged by Freed to maximize views and privacy, as well as to increase general visual interest.”
- “Near the center of the complex stands a large sandblasted concrete sculpture, an enlargement of a 1954 cubistic work by Pablo Picasso. Executed in 1968 by the French artist’s frequent collaborator, the Norwegian sculptor Carl Nesjar, the off-center placement of the 36-foot tall bust echoes and enhances the project’s dynamic

plan.”

- The complex has been deemed among “the most refined examples of modern architecture in Manhattan” (architecture curator, Terence Riley).
- SHPO deemed University Village eligible for inclusion in the National Register in February 2009

Quotes from SHPO’s 2009 Evaluation:

- “Associated with events that have made a significant contribution to the broad patterns of our history.”
- “Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose component may lack individual distinction.”
- “Though less than 50 years of age, University Village is exceptionally significant in the areas of architectural design and planning. Upon its completion, University Village was a critical success and won accolades from the American Institute of Architects, the City Club of New York, the Concrete Industry Board, and Fortune Magazine. Later, in 1983, when Pei was honored with the Pritzker Architecture Prize, University Village was cited as one of his most notable works.”

Washington Square Village

In February 2011, the New York State Historic Preservation Office (“SHPO”) determined that Washington Square Village, bounded by West 3rd Street, Bleecker Street, Mercer Street & LaGuardia Place, meets the eligibility criteria for inclusion in the National Register. The specific criteria met are as follows:

- “Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose component may lack individual distinction.”

Note that SHPO’s determination concurred with the Landmarks Preservation Commission’s May 21, 2007 determination that Washington Square Village appeared to be eligible for National Register listing.

SHPO further opined as follows:

- “It is the opinion of the SHPO that the superblock complex of two residential towers, elevated landscaped plaza, commercial strip, and below-grade parking meets Criterion C as an impressive example of postwar urban renewal planning and design. Paul Lester Wiener working with S.J. Kessler & Sons Architects designed the complex which was constructed between 1956 and 1958. The towers are notable for their vibrant blue, yellow and red glazed brickwork that contrasts with the field of grey glazed brick. Corbusian influences are shown by the sculptural elements hiding mechanical equipment on the roof and the pilotis forms at the bases.”

Sasaki, Walker & Associates were responsible for the landscape, which is one of the earliest parking structure roof gardens in the country.

- The garden between the two slab buildings was designed by Hideo Sasaki and Peter Walker and their associates, and was one of the earliest parking structure roof gardens to be built in this country. It was planned as an integral part of this modernist apartment complex, ensuring air space and light between the enclosing blocks, and providing an area of beauty and tranquility for the surrounding community.

The EIS should include information on the following:

- Impact of inappropriate masses and heights of two proposed “Boomerang” buildings. In particular, height of Mercer building is too tall.
- No details have been provided of construction elements and how they would comport with aesthetics of both Washington Square Village and University Village, if at all.
- No details have been provided as to changes in the bottom floors of Washington Square Village.

7. URBAN DESIGN AND VISUAL RESOURCES

The proposed area was carefully and thoughtfully designed by some of the time's most prominent architects: James Ingo Freed, a partner of I.M. Pei for the South Superblock, and Paul Lester Weiner, a former partner of Le Corbusier for the North Superblock. The North block was designed and built first, and the South block was designed with the North block's aesthetic as well as the open space to the east and west on the block, as key considerations. Both Pei and Weiner were followers of Le Corbusier's “tower-in-the-park” paradigm which requires that increased height be balanced by a proportional increase in open space. The study of the proposed project's urban design and visual resources should be analyzed with this in mind.

For both the North and South Superblocks:

- Define clearly exactly what changes are anticipated as part of the LSGD special permit concerning urban design features including height and setback waivers, floor area and open space redistribution, as well as building textures and materials, landscape design and plantings, and view corridors.
- Examine the effects of floor area and open space redistributions across zoning boundary lines on pedestrian comfort and orientation and community scale, identity and continuity.
- Analyze the effects of proposed de-mapping of parts of LaGuardia Place and Mercer Street on pedestrian comfort, enjoyment and general experience of the street, community context, image and identification, and reduced streetscape enhancement.
- Assess the impacts of increased building heights and bulk on blockage of sunlight, obscuring sightlines, obstruction of view corridors, reduced air circulation and creation of wind tunnels.
- Assess the effects of proposed conflicting architectural styles, forms and materials on community context, image, coherence, architectural mix and integrity, and area cohesiveness.

- Evaluate the impact of greater building bulk and height and re-aligned building and open space relationships on open space access, use, high-rise and low-rise interplay, and experience of community belonging and ownership.
- Analyze the effects of ambient lighting from proposed new buildings.
- Analyze placement of new curb cuts resulting from the proposed new development and their potential for interfering with streetscape continuity and image, urban essence and area cohesiveness.
- Study the impact on the existing path and sightlines of Greene and Wooster Streets preserved by previous efforts.

The above applies to both the North and South Blocks. The following are additional specifics to consider in each individual section.

North Block

- Assess the impact of recladding the ground level and second floors of Washington Square Village on historical context, neighborhood recognition, community image and loss of urban interest and variety.
- Study and compare alternative scenarios with different heights, bulk, shapes and orientations as alternatives to the two proposed new “boomerang” buildings in terms of taking up less open space and street space, having a more harmonious/less jarring effect in the urban design context, providing a more open pedestrian experience and obscuring less sunlight.
- Study and compare the following four alternatives:
 - (i) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does);
 - (ii) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does) and rising no taller than 23 feet above ground (the current height of Coles gymnasium);
 - (iii) erecting the Zipper building rising no taller than 23 feet above ground (the current height of the Coles gymnasium); and
 - (iv) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does) and rising no taller than 23 feet above ground from the midpoint of the block to the north (Bleecker) and stepping up or rising taller than 23 feet but no higher than 280 feet above ground from the midpoint of the block to the south (Houston).
- Study setting back the two proposed “boomerang” buildings to align with the east and west edges of Washington Square Village (instead of jutting out) and alternative forms of the two buildings in these alignments.
- Assess disorientation resulting from the two proposed “boomerang” buildings obscuring existing view corridors and driveways.

South Block

- Analyze effect of amassed bulk of proposed buildings on Mercer Street on light and air.
- Assess impact on the pedestrian experience of crowding of buildings on Mercer Street regarding blocked access, lack of openness, imposing bulk and loss of open space and airiness.
- Evaluate effects of proposed “zipper building” on urban design context, including lack of continuity, blockage of sunlight, creation of shadows, difference in scale, intrusion on sightlines and confusing form and setbacks.
- Evaluate the impact of moving the dog run and putting a building there on reducing open space, removing a green and airy environment, and curtailing social activity.
- Study the alternative scenario of changing the design of the building proposed at the dog run site to become cantilevered (to allow the dog run to remain).

8. NATURAL RESOURCES

For all of the categories related to direct environmental impacts including Natural Resources, Hazardous Materials, Water and Sewer Infrastructure, Solid Waste and Sanitation Services, Energy, Air Quality, Greenhouse Gas Emissions, Noise and Public Health, we understand that the CEQR Technical Manual calls for explicit areas of study, and that the University will be conducting preliminary analyses and only conduct further analyses if required based on the results. We would like to see all of the study results for all preliminary analyses, and further for each of these categories we want to call attention to our specific concerns.

- A detailed map of underground water is required.
- How will the increased number of “bathtubs” force and/or redirect this water? If water is restricted and/or redirected from the locations of the proposed buildings, it will be forced into other pathways leading to erosion of the foundations of the existing buildings that do not have underground protection.
- How will the loss of mature trees affect groundwater? (Past construction projects by NYU have involved extensive pumping of ground water stemming from Minetta Creek and its tributaries. Recorded data by community groups have detailed the loss of mature trees in the area that are attributable to such pumping.)
- Analysis of ground water pumping and its effect on the flora and tree-life in the project area is vital.
- How would the plan affect the habitat and viability of the red-tailed hawks that have developed, rather precariously, in the neighborhood? Red-tailed hawks are a majestic species rarely seen in urban areas, and thus treasured by bird-watchers and other community members. Red-tailed hawks have been seen for the last few years in the development area, and this spring even nested on the edge of Washington Square Park. How would the Plan (particularly the addition of large buildings, the diminution of park space, the removal of mature trees, the increase in population density, and poisons used to control rodents brought from additional garbage flows) affect their viability?

- What will the effects of pit excavation and soil removal be for:
 - Absorption of rainwater and storm water runoff
 - Air quality from removal of mature canopy of trees
 - Effect of deep earth removal, pit construction, on all natural resources in a 500' radius from surveyed dimensions of pit. (Mature trees, plantings, wildlife, springs, groundwater.)
- Information should be furnished on all aspects of ground stabilization within the immediate and surrounding areas. Monitors must be installed in buildings in the surrounding areas and the monitors' results must be posted online regularly.
- Vibration monitors must be installed in buildings in the surrounding areas and these monitors' results must be posted online regularly.

9. HAZARDOUS MATERIALS

- Please share all results of Phase I studies because there will be implications for what we think is important for Phase II.
- The root cause of the No. 6 heating oil leak has not been announced. Since a number of buildings at NYU continue to hold this type of heating oil, it is important to know what caused the leak. Moreover, since there will be significant vibrations in the immediate vicinity of the other Washington Square Village buildings, it is important the remaining tanks are permanently abandoned.
- Please give an outline of the age of all heating oil tanks used by NYU and the type of oil used.
- Which buildings have asbestos?
- What hazardous materials will be used during construction?
- Will there be new hazardous materials used in the buildings after completion?

10. WATER AND SEWER INFRASTRUCTURE

- What is the anticipated increase in demand on the New York City water supply?
- How will the increased demand affect water pressure in the surrounding areas?
- The draft scope should include a discussion of all new/proposed residential, commercial, hotels, and sports arenas that City Planning has approved by a zoning change or as of right in the Newtown Creek Catch Basin, and the impact that it will have in our area concerning the generation of waste water and storm water.

- All analyses need to include the net effect of permanent residents, employees, and transients. Their impact on our district and its infrastructure must be addressed given the condition/capabilities of our fresh and waste water systems and their limited capacities

11. SOLID WASTE AND SANITATION SERVICES

Solid waste and its collection is a major concern. We have these questions that apply to both during construction and after completion:

- Will NYU compost?
- Will the private carters they hire collect during the night hours or during the daytime?
- Will they build adequate and accessible storage space for solid waste and recyclables?
- Will they be installing "insinkerator"?
- What measures will be instituted to promote reuse and waste prevention?
- Will they be compacting unsorted waste?
- What will they do with hazardous waste?
- Specifically where will the refuse be collected by the private carters and which streets will be used to access those locations?
- Which days of the week and at which times will refuse be collected?
- An analysis needs to be made of the amount (in tons) and types of waste that will be created during construction and after completion.
- Private carters notoriously ignore the requirement to report their pick up and disposal of any materials including putrescibles, recyclables and hazardous waste. NYU must deal only with contractors willing to disclose regularly what they pick up, when and how it is subsequently handled. Example: Plan to sort solid waste at the source might assure proper handling, otherwise there is no assurance that the contractor will separate recyclable, compostable or hazardous waste from any other.

12. ENERGY

- All new buildings should achieve LEED Gold standards.
- What is the capacity of the Co-Gen facility and at what point will its capacity be met? What is the "buildable" or "add-on" capacity for the Co-Gen facility?
- Will NYU consider, or will NYU find it necessary, to add another Co-Gen facility due to this project?

- What impact will this project have on the New York City steam, natural gas, and electric grid systems? How much of these energy sources will be consumed during and after construction?
- How will the proposed construction alter NYU's current energy usage and management plans/strategies?
- Considering the height of some of the projected buildings, has NYU studied the installation of solar power and rooftop gardens?
- Will NYU consider requiring directed high-efficiency lighting to be used on the project construction sites in order to reduce energy use and direct lighting away from residential windows?

13. TRANSPORTATION

NYU's proposed changes will cause increases in vehicular and pedestrian traffic that will impact already congested and overused streets, approach corridors and parking accommodations, as well as causing increased use of public transportation. CB2 believes that NYU's Draft Scope shows an insufficient study area as well as inadequate study times and locations.

Vehicles

- The study should include not only intersections in the immediate study area, but should be extended to include approach routes to the study area, i.e. travel corridors, and what the impact of the increased development and commercial use will have in generating vehicular trips on these already congested corridors. For example:
 - Approaches from the Holland, Lincoln and Queens Midtown Tunnels and from the East River Bridges.
 - Bleecker Street -- from the western area.
 - Varick Street.
 - Avenue of the Americas.
 - Broadway.
 - Mercer Street.
 - West Broadway.
 - Washington Square South and West 4th Street.
 - Fourth Avenue/Bowery.
 - University Place.
- The study also should be extended to include times of day beyond the typical time periods assigned as critical peak hours (i.e. weekdays am, midday, pm) because of other periods of high traffic volume, in particular evening hours, including late evening on weekend nights (especially Friday and Saturday, but also Thursday and Sunday), when the area is often used for access to downtown clubs and other entertainment, also expected to increase with increased student populations.
- In addition to the intersections already cited in the draft scope of work, the effects of increased vehicular traffic (on both congestion and safety) should also be assessed at the following pedestrian crossings that are already dangerous and crowded:

- Washington Square South and LaGuardia Place.
 - Washington Square East and West 4th Street.
 - Cross streets along Washington Square South.
 - Midblock crossings, particularly on West 3rd Street between LaGuardia Place and Mercer Street, as well as Bleecker Street between LaGuardia Place and Mercer Street.
 - Mercer Street.
 - Broadway and Washington Place (which leads to the center of the proposed commercial overlay).
 - Greene Street and Washington Place (narrow intersection – potential traffic flow impact).
 - Greene Street and West 4th Street (narrow intersection – potential traffic flow impact).
 - Bleecker Street up to Broadway.
- Assess the impact on pedestrian safety from added turning movements at already dangerous turning areas, including:
 - LaGuardia Place at Washington Square South.
 - LaGuardia Place at West 3rd Street.
 - LaGuardia Place at Bleecker Street.
 - LaGuardia Place at Houston Street.
 - Mercer Street at Bleecker Street.
- Analyze the impact from added density of increased delivery trucks and service vehicles such as sanitation trucks and oil deliveries on street congestion and pedestrian safety, especially on already clogged and dangerous streets such as West 3rd Street and Bleecker Street between LaGuardia Place and Mercer Street, as well as the effects of increased deliveries in the proposed commercial overlay.
- Assess the increase in emergency vehicular traffic and its impact on local streets, as well as the potential for blocked emergency vehicle access.
- Assess the additional need for parking for students, faculty, NYU staff, residents, and businesses by group, numbers and times of day.
- Analyze the effects of the loss of 281 below-grade parking spaces and the relocation of 389 relocated below-grade parking spaces, as well as the impact of the loss of on-street parking, on circling of traffic searching for street parking, including on safety, congestion and emissions impacts, especially in light of a significant increase in both permanent and transient parkers.
- Assess the need for additional curb cuts and driveways and their impact on pedestrian safety and access, as well as on the loss of on-street parking.
- Analyze how increased traffic, particularly at peak times, will affect accessibility to residences.
- Assess the effects of new traffic patterns and circulation based on moving the entrance at Washington Square Village.
- Analyze the impact of the proposed hotel, faculty accommodations and dorms in the Zipper building on producing additional trips and accompanying congestion and safety concerns.

- Assess the effects of increased traffic and noise because of the much greater density and retail proposed for the Zipper Building.
- Assess the effects of additional limo and taxi traffic.
- Assess the effects of expanded NYU bus service (as well as school buses for the proposed school) on street congestion and potential accommodations.
- Analyze the projected modal split in the study area and how it will differ from current conditions in terms of impact on access, safety, and congestion.
- Assess the increase in noise and emissions from all types of increased vehicular traffic and congestion.
- Analyze the impact of visiting sports team buses and accommodation of their northwest passage on congestion, cruising, safety and air quality.

Pedestrians

- Extend pedestrian analysis locations to the commercial overlay area and street and sidewalk connections between the commercial overlay area and the development area.
- Analyze the impact of additional foot traffic in the commercial overlay area on sidewalks that are already heavily used at similar times of day.
- Analyze the impact of additional platoons of pedestrians at already crowded crossings and overloaded sidewalks on sidewalk congestion and crossing safety, for example at:
 - Washington Square South and LaGuardia Place.
 - Washington Square South and Washington Square East.
 - West 4th Street.
 - Bleecker Street.
- Analyze the effects of narrowed sidewalks on Mercer Street in both the North and South Blocks on pedestrian access and sidewalk congestion.
- Assess the impacts of increased vehicular traffic on access and mobility for seniors, the disabled and children.

Transit

- Assess need for increased bus service and frequency, including the need for restoration of as well as additional bus service and routes.
- Assess need to restore and re-open closed subway entrances and to restore/provide on-site service employees (token booths, etc.) at these entrances in light of increased usage. Include evening hours in this study in addition to usual am/pm peak hours.
- Assess need to increase subway trip frequencies.

- Assess potential for sidewalk crowding and interference with subway access on way to identified subway stops.

Bicycles

- Assess impact of increased bicycle trips on both bike riders and pedestrians and assess bicycle safety, access and parking.

14. AIR QUALITY

- How would wind patterns be affected by new buildings? Abnormally high winds are sometimes created by large buildings in close proximity, which compress air into narrow gaps between the buildings.
- How would wind patterns affect noise, the stability of windows and exterior window screens, and flying debris?
- It is vital that all vehicles and equipment used during construction use Ultra-Low Sulfur Diesel and Best Available Technology for contaminant filtration.
- A study of air quality during the summer and winter months from increased congestion, both traffic and human, on ground-level ozone levels.
- Air quality studies during both summer and winter months for increased particulate matter (including but not limited to pollen, dust, elemental carbon, etc.) are necessary for both before, during, and after construction.
- Third-party air monitoring throughout a five-block radius is mandatory and the results must be posted online weekly.
- Will delivery trucks and additional buses resulting from the expansion utilize diesel fuel? If so, how much additional particulate will be generated into our air?
- To prevent a generation growing up over the 19-year period with asthma-inducing dust, diesel fumes/particulates and elevated ozone, we encourage NYU to explore incorporating language specifying use of Ultra Low Sulfur Diesel with Best Available Technology for non-road vehicles in contracts with contractors and sub-contractors used for the project.

15. GREENHOUSE GAS EMISSIONS

- It is indicated on page 44 of the NYU Draft Scope of Work that Greenhouse Gas emissions estimates will be discussed and quantified “if deemed potentially significant.” These estimates must be quantified and discussed under any and all circumstances, regardless of their anticipated significance.

- What are the likely greenhouse gas emissions from the proposed school, from idling school buses and cars picking up and dropping off children? This should be estimated with the actual idling averages rather than based on legally mandated idling restrictions.
- Precisely how many trees will be removed? Using this number in consideration of the ages of the trees removed, what will be the effect of the removal of these trees on nature's ability to convert pollution and greenhouse gas emissions and filter carbon dioxide from air.

16. NOISE

The effects of the addition of so many young people in the area with an established and aging population is a concern for environmental study. Even if the DEP finds that the concomitant noise level after construction is not raised by the benchmark 3DBs, it will certainly change in content and character.

- On Page 45 of the NYU Draft Scope of Work, Task 17, paragraph 2 states: "...it is not expected that project-generated traffic would be likely to result in significant noise impacts. It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed." It is imperative that a study of noise impacts is performed and mitigation measures discussed.
- Late-night noise generated by students is a major problem in our community. How will the expansion and revolving temporary populations not exacerbate this problem? What mitigation measures will be put into place?
- What will the increased vehicular traffic have on noise levels (e.g. ambient, horn honking, engine idling, etc.) both during and after construction?
- Where will new HVAC units be placed? What effects will these units have on noise levels? What will the mitigation measures be? Will any HVAC units currently in use be replaced/moved during or after construction?
- What will be the noise levels of refuse collection trucks during and after construction?
- Will there be expanded lab and science rooms that will require large air handlers: if so where will they be located?

17. PUBLIC HEALTH

- How would health be affected, generally? The ways different populations would be affected (children, adults, seniors, those with a compromised immune system, etc.) in terms of sleep disruption, elevated blood pressure, and psychological effects must be discussed.

- What are the risks of injury from airborne objects and debris due to heightened winds, particularly for small children and seniors?
- How will the burden on local emergency rooms (diminished by the closing of St. Vincent's) be affected by the added population to the neighborhood?
- How would the people living in the area be affected by the closing and/or possible relocation of the Morton-Williams supermarket, both during construction and after the completion? Dependence on distant supermarkets is a hardship, especially for seniors.
- Can the local police precinct be expected to provide adequate police coverage for an expanded population? The 6th Police Precinct has told us many times that they are over-burdened with tourism, nightlife, and protection issues. This expansion will have a profound effect not only on the 6th, but on the immediately adjacent 1st Precinct.
- Fire hazards are greatly increased because of apparent removal of the two-way roads crossing the northern superblock and loss of access to the existing fire lanes there, among other reasons. To what extent will NYU study the FDNY's ability to operate during and after construction? In particular:
 - a. How would fire trucks get to all the existing apartments (in particular the buildings in the northern superblock given the landscaping around the two proposed "boomerang buildings" and taking of the green strip that is currently the LMNOP play area).
 - b. How would access to buildings for ambulance and emergency responders be affected by construction?
- How would access to buildings for ambulance and emergency responders be affected by automobile traffic? How would this affect ambulance response time? Certainly, the increased truck traffic for deliveries and moving in and out and increased refuse collection trucks will be a safety hazard for both bikers and pedestrians; mitigation measures must be outlined and discussed.

18. NEIGHBORHOOD CHARACTER

NYU's Draft Scope does not go into detail on Neighborhood Character and essentially states that it will be studied in light of other aspects of the EIS. That is insufficient given the unique character of the neighborhood, which has been created by the people who came here to be part of an avant garde lifestyle fostering diversity and tolerance. Greenwich Village is nothing without its character.

If you asked people around the world to name a place that epitomized the idea of Neighborhood Character, a high percentage would name Greenwich Village and SoHo, not just because of the historic buildings, but also because of the energy created by the people who lived - and live - here. The Study needs to define this quality, identify its sources and its lifeblood, and study how proposed project Plan elements such as freshman housing, hotel and classrooms may directly and indirectly change the qualities that made the Village and SoHo famous; the qualities that still make them among the major reasons why people visit New York

This creative character - the fabric of Greenwich Village - still exists in small restaurants, cafes, theaters, music clubs and neighborhood stores, but is threatened to change beyond recognition by the

influx of students and faculty displacing artists, musicians and other established residents, retail serving a university rather than a community, and reduction in the open space that helps define the area as a Village.

Some specific areas of investigation that CB2 requests include:

- Study and report on the impact of changing the zoning of a quiet residential area to higher-density residential plus commercial.
- Use interviews, surveys and focus groups with non-NYU-affiliated residents, especially long-term and arts community residents, to help define the area's character. Collaborate with knowledgeable residents, groups, and elected officials to develop appropriate survey parameters. For example:
 - Interview residents and business owners in the project area and nearby in NoHo, the South Village, and the Bleecker St. area, to assess their experience and concerns regarding NYU expansion with regard to impacts on neighborhood character
 - Interview residents on blocks such as East 12th Street where large NYU dormitories were recently built to evaluate the impact on the character of the immediate neighborhoods. Interviews should focus on residents who moved in years before the dorms were built and should include residents in different age groups
 - Interview residents on University Place between 8th Street and 12th Street where there is an apparent change of character caused by large numbers of students moving between dorms and classrooms
 - In the same areas, interview owners and customers of small stores and restaurants where the customer base is primarily the non-NYU community
- Report on the historic character of the area proposed for this project, including but not limited to:
 - Landmarks and buildings/complexes eligible for the State and National Register of Historic Places
 - Public art including the Picasso "Portrait of Sylvette" statue and the Vicki Kluzami "Bohemorama" print displayed on Morton Williams that features writers, musicians and artists that lived and worked in Greenwich Village because "Greenwich Village was the only place where they could live the lives they needed to live."
 - Locations where legendary people lived and worked, and sites of historic events
 - Books, movies, television shows and other media showing or mentioning the historic nature and unique character of Greenwich Village going back to the 1800s
 - Architectural history of Le Corbusier's Tower-in-the-Park paradigm and his modernist influence on both the University Village and Washington Square Village complexes (including their interplay – one somber and brutalist and the other featuring colored bricks and water towers typical of the modernist movement, etc) since I.M. Pei was influenced by and Paul Lester Weiner was a partner of Le Corbusier before designing Washington Square Village.
 - The history of Hideo Sasaki, chairman of the department of Landscape Architecture of the Harvard Graduate School of Design, and the garden he created as a pioneering example of rooftop planting above the Washington Square Village garage
 - Visitors/tourists coming to Greenwich Village annually, both national and international
 - Small "mom-and-pop" businesses, galleries and venues throughout the area
 - Retail that serves residential needs changing to that which is more suited to student population

- Study and report on the effect of additional NYU structures, housing, students and personnel in this historic area on:
 - Existing and prospective non-NYU residents on and near the project blocks
 - Balance of non-university residential and retail to NYU residential, offices, gym, retail, hotel and dormitory in the project area and adjacent buildings
 - Shift from true residential “Village” to university “campus”
 - Population demographic, density and character changes when the dorm and hotel are in use and daytime employees are present
 - Change in population as NYU students seeking off-campus housing displace existing residents and as long-time residents move rather than being in the middle of NYU students 24/7
 - Quiet enjoyment of the neighborhood by existing residents - to be studied on weekdays during class changeovers, on weekends, and on evenings/nights
 - Reduction of streetside public open space
 - Sunlight and air available to residents and visitors
 - Added stress due to crowded conditions and more buildings than appropriate in a medium-density residential neighborhood
 - Effect of loss of mature trees and plants, and publicly accessible tree-filled walkways
 - Loss of birds and their prevalent song as their existing habitat is cut down and/or shadowed into inability to thrive, glass-clad buildings cause birdstrike deaths, ongoing construction effects, and the loss of open and green areas in which the wide variety of birds - including many songbird species - currently feed
 - Loss of independence and quality of life for the area’s many elderly residents due to the plan’s moving the supermarket farther than they can reach without assistance, having a large student population hurrying to and between classes and not always giving mobility challenged people adequate berth, and taking away streetside gathering places.
 - Change in character due to loss of independent “mom-and-pop” shops, bookstores, galleries, music venues and small cafés that cater to adults and families, and other elements that together make up the charm of Greenwich Village
 - Reduction in property values causing vacancies and unsellable apartments both during and after construction, creating a “ghost-town” effect
 - Reduction in perceived value of the neighborhood as added retail creates long-term vacant storefronts or undesirable businesses
 - Loss of the character of neighborhood treasures such as Washington Square Park as students displace resident and visitor use
 - Loss of Le Corbusier tower-in-the-park modernist aesthetic of University Village and Washington Square Village by putting additional buildings on the “park” portion between and adjacent to the carefully planned existing structures

19. CONSTRUCTION IMPACTS

During the recent real estate expansion, Community Board 2 has gained significant experience in construction impacts. In such a dense residential area, construction projects can and have created noise, dirt, vermin and other challenges for residents and businesses. In order to address these kinds of issues the Board formed the Construction Committee. Based on our extensive expertise CB2 asks that NYU include plans to reduce or eliminate these problems.

- Please provide a detailed plan of the methods that will be used to achieve LEED Silver status.

- If the findings of the Phase I Environmental Site Assessment (ESA) require further testing and / or remediation, please provide the Board with complete information on any required protocols and the methods of implementing them during construction.
- Please provide a complete plan for construction monitoring and testing systems.
- Please provide complete details of the construction-phasing plan and it's impacts.
- Please provide a Plan to implement the requirements for protecting landmarked structures during construction.
- Please provide the approved Stage 1A Archaeological Assessment that will be implemented during construction.
- Please provide details of the proposed foundation systems including the methods of installation and a site preparation and excavation plan.
- Please provide a detailed construction site plan that includes crane locations, construction elevator locations, material storage, contractor entry points, contractor parking, garbage removal, and temporary street and sidewalk closings.
- CB2 notes that there have been serious impacts on other NYU projects in the area from dewatering and the noise it creates. Please provide complete details for dewatering including a noise mitigation plan.
- The Proposed Action states the need for **"New York City Department of Transportation revocable consent for utility lines beneath City streets."** CB2 notes that the mechanical systems for the new construction will require connection to the NYU central co-gen plant. CB2 has experienced significant problems with the simultaneous installation of these systems in conjunction with construction and related street closings. Please provide a complete plan for the installation of these systems. Also include plans for any work necessary to expand the capacity of the co-gen plant.
- Please provide a plan for keeping a supermarket in continuous operation during construction.
- Please provide the Board with a detailed vermin abatement plan.
- Please provide a plan for the protection of the open space strips, interior gardens, and existing trees during construction.
- The proposed action notes that there will be excavation under the Friends of LaGuardia Park. Please provide a plan for preserving the existing trees and vegetation at this location.
- Community Board 2 has experienced significant noise complaints from construction projects in our district. Please provide a Construction Noise mitigation Plan.
- Please provide a plan for Public Notification and Community Outreach during construction.

V. ALTERNATIVES

There are many possible alternatives that allow a significant amount of development in the proposed study area but with less impact on residents, businesses and the character of the area. Please provide information and response on the following:

The No-Action Alternative

- The “No Action Alternative” should be a “Reasonable Worst Case Scenario.” Please provide a detailed description of the maximum “AS OF RIGHT” build out (including development allowed by Special Permit), the options the current zoning allows, and the anticipated impacts.
- The “No Action Alternative” in the Commercial Overlay District should also include the maximum “AS OF RIGHT” build out. NYU has noted the potential for additional construction in this area.

Main Alternatives To Full Plan

- As reasonable alternative for the proposed C1-7 District, please provide a comparative analysis for a district that retains the current R7-2 zoning district and uses Commercial Overlay Districts as needed rather than a blanket commercial rezoning for the entire area. The North and South Superblocks already have over 76,000 sq ft of “as of right” commercial zoning available (proposed plan calls for only 55,000 sq ft of commercial development).
- Provide a reasonable alternative to the complete blanket commercial overlay rezoning in the COA, including an analysis detailing which blocks would be slated for commercial development and which would not be, in addition to the present existing grandfathered commercial areas totaling nearly 40,000 sq ft.
- As reasonable alternative for the proposed Demapping and City disposition of portions of City streets, please provide an analysis of the proposed project without using these areas in any way. This should include an analysis of the practicality of using space under the “green strips” in question where trees and shrubs have already taken deep root, and an alternative that would not involve removal of the existing trees, plantings, equipment, design or uses of these strips.
- As reasonable alternative for the proposed actions please provide a plan to retain the current zoning and city-owned property and relocate the proposed new buildings in other areas of the city such as Community Board 1, which has expressed strong interest in such a proposal. Invitations and options to build in the Financial District where land and existing zoning would accommodate present and future expansion to and beyond 2031, and better serve NYU and the City, should be investigated. (See Appendix D for list of potential sites, and also investigate empty lots available and/or working with other developers seeking Community Facility bonuses that NYU may be able to utilize.)
- As a reasonable alternative for the proposed Hotel, use excess hotel space in CB2 as there are many new hotels in the Board area, or other nearby Community Boards.

Additional Alternatives to All or Parts of Full Proposed Plan

- As a reasonable alternative for the proposed Temporary Gym on the North Superblock, study the possibility of arranging discounted services at local physical fitness facilities and use of

neighboring institutions' field houses, athletic facilities and/or gymnasium space in addition to NYU's existing Palladium athletic facility.

- Provide a reasonable alternative for the active recreational open space needed for a potential increase of some 2000 college-age young adults that is not provided for in the current plan. The current plan assumes that existing community based (non-university) active open spaces will be used, as no additional space is provided (active in this case is being defined as Frisbee, touch football, green fields as opposed to passive space -- benches gardens, paths, etc). Therefore, please provide a reasonable alternative to the actual building proposals for the Superblocks that could accommodate this campus environment.
- Provide an alternative that does not involve any building encroachment beyond the current streetwall of the superblocks.
- Provide an alternative with a significant reduction in the number of proposed dorm beds, hotel rooms, faculty housing and/or other added residential.
- Provide an alternative that requires less square footage overall, possibly resulting in fewer new NYU buildings, and results in significantly lower added density.
- Provide an alternative that does not change the zoning or add more commercial spaces to the COA.
- Provide an alternative that retains 14 and 15 Washington Place as residential buildings.
- Study the level of different potential land lease price points on the residents of 505 LaGuardia Place to determine a level that would not result in displacement of existing residents or undue financial hardship.
- Study the potential for using online learning to reduce space needs. According to the United States Distance Learning Association, "Nearly 30% of higher education students now take at least one course online. The overall finding of the U.S. Dept. of Education meta-analysis is that classes with online learning (whether taught completely online or blended), on average, produce stronger student learning outcomes than do classes with solely face-to-face instruction." They also report that, "More than sixty (60%) of college courses in 2020 will be taught online."
- As a reasonable alternative for a zoning change on the North Superblock, consider requesting a modification of the tax map for the Retail Strip on the North Superblock to include the grass area immediately behind it, and report on how much development that would allow without rezoning or changing the rest of the block's zoning. In this alternative, CB2 suggests that consideration be made to keep the additional built structure low so as to preserve the light, air and sightlines of the existing residences in Washington Square Village.
- As a reasonable alternative for a zoning change on the South Superblock, consider requesting a modification of the tax map to create a separate lot for what is now the Coles gymnasium building, and building to no higher than 23' from midblock north between Houston and Bleecker Street as currently exists, and higher but no higher than the adjacent University Village towers from midblock south.



THE CITY OF NEW YORK
OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN

SCOTT M. SPRINGER
Board of President

A Roadmap to a New York University Campus Plan

Introduction:

In the fall of 2006, a group of community groups, local elected officials and representatives from New York University (NYU), convened the Community Task Force on NYU Development to discuss NYU's growth and its impact on surrounding communities. Over subsequent meetings, the group discussed the need for the University to develop a comprehensive campus plan that balances respect for the community with the University's needs. In August of 2007, the Task Force drafted the following guiding principles for that campus plan.

The principles focus on the areas of urban design, quality of life, sustainability, community planning process and accountability. Each guiding principle is designed to become a chapter in a greater campus plan that the Task Force is committed to developing with the University.

Accompanying the planning principles is a letter of support from NYU President John Sexton. In adopting these principles the University is committing to proactively working with the community in advance of development, and to negotiating with the community through future conflicts, should they arise. The University recognizes that these principles are the first step to realizing a comprehensive campus plan that not only addresses the University's long term needs, but allows for a transparent community based planning process.

Over the coming months, the Task Force will work with NYU on developing each planning principle into a fully realized policy that promotes respect for neighborhood character through an open, community based planning process.

Planning Principles:

- **Establish criteria for development within the existing NYU footprint in the University's campus core and the surrounding neighborhoods that would prioritize**
 - Identifying opportunities to decentralize facilities and actively pursuing these opportunities;
 - Contextual development that is sensitive to building heights, densities and materials;
 - Reuse before new development; and
 - Consider mixed use facilities that complement Manhattan's mixed neighborhoods, particularly in regard to ground floor uses.

- **Identify solutions to maximize utilization of existing assets by consulting with the community on:**
 - The types of facilities that can be decentralized from the Village campus core and surrounding neighborhoods and cultivating locations outside these areas;
 - Preferences for appropriate places for vertical additions
 - Encouraging programmatic and scheduling efficiencies; and
 - Opening new and re-envisioning existing recreational spaces to better serve both the student population as well as the community at large.

- **Make thoughtful urban and architectural design a priority by:**
 - Respecting the limitations of the urban environment, including the impact on New York City's infrastructure;
 - Improving the quality of open spaces; and
 - Actively soliciting, utilizing and implementing input from the community in the design process.

- **Support community sustainability by:**
 - Preserving existing diverse social and economic character through the support of community efforts to sustain affordable housing and local retail;
 - Exploring the utilization of ground floors of buildings for community-oriented uses such as local retail, gallery spaces for local artists, non-profit users and other providers of community services; and
 - Generating a tenant relocation policy for legal, residential tenants, in the event that construction or conversion necessitates the relocation of tenants.

- **Respect the community's existing quality of life including but not limited to:**
 - Taking measures to mitigate effects of construction such as: noise, dust, work hours; sound mitigation for mechanical equipment; and construction staging;
 - Reaching out early and often for community consultation related to major construction;
 - Creating a website for ongoing constructions; and
 - Committing to a community-oriented public process for reviewing NYU's proposed projects and developments.

List of Endorsees:

➤ **Members of the Community Task Force on NYU Development:**

Manhattan Borough President Scott M. Stringer
New York University
Congressman Jerrold Nadler
Councilmember Alan J. Gerson
Councilmember Rosie Mendez
Councilmember Christine C. Quinn
State Senator Martin Connor
State Senator Thomas K. Duane
State Assemblymember Deborah J. Glick
State Assemblymember Brian P. Kavanagh
Manhattan Community Board 2
Manhattan Community Board 3
American Institute of Architects
Carmine Street Block Association
Coalition to Save the East Village
The Greenwich Village Society for Historic Preservation
NoHoManhattan.org
The SoHo Alliance

➤ **Other Endorsees:**

The Greenwich Village-Chelsea Chamber of Commerce
NoHo NY BID
Village Alliance BID

J. Paul Johnson, Chair
Eric Berman, Vice-Chair
Chairman Benjamin Netanyahu, CB#2
Benjamin Berman, District Manager



Eric Berman, Treasurer
Iman Khan, Secretary
Blaine Kovaly, Assistant Secretary

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December 3, 2010

Adrian Benepe, Commissioner
NYC Department of Parks & Recreation
The Arsenal/Central Park
830 Fifth Avenue
New York, New York 10021

Janette Sadik-Khan, Commissioner
NYC Department of Transportation
Street
New York, New York 10013

Dear Commissioners Benepe and Sadik-Khan:

At its Full Board meeting on November 18, 2010, Community Board #2, Manhattan (CB#2, Man.) adopted the following resolution:

Resolution Regarding NYU Superblocks

Whereas open space is in intense demand in downtown Manhattan because these areas were built up prior to societal recognition of the need for public open space in densely populated urban areas; and

Whereas CB#2, Man. has only four tenths acres of open space per 1,000 residents, or just 16 percent of New York City's benchmark of 2.5 acres needed to adequately serve a densely populated urban area; and

Whereas the dearth of public open space is a long-recognized detriment to the quality of life in our district and the preservation and improvement of open space has consistently been a top priority of the board since its creation; and

Whereas on rare occasions, such as the extension of 6th Avenue, demolition of the Womens' House of Detention, and the reconstruction of Route 9A, opportunities have arisen to create new open public spaces, and our community always recognized those opportunities and successfully advocated for new parks; and

Whereas in 1954 an Urban Renewal project created three "superblocks" by de-mapping Wooster and Greene from West Houston to West 4th and transferred portions of the properties to the Department of Transportation for future street widening along La Guardia and Mercer between West 4th and West Houston, and along West 3rd and Bleecker, between La Guardia and Mercer; and

Whereas through the efforts of this board and enlightened community leaders the street widening proposals were rejected and over a period of years these DOT properties were designated for a variety of public open space uses; and

Whereas today, the New York University (NYU) administration has stated that, as part of a ULURP application, it will ask for six of the seven remaining strips to be transferred from DOT to the University in order to facilitate development on the two residential superblocks between West 3rd and West Houston, and La Guardia and Mercer; and

Whereas the strips the NYU administration now seeks to acquire are along La Guardia Place between West 3rd and West 4th Street, Mercer Street between West 4th and West Houston Streets, the south side of Bleecker Street between La Guardia Place and Mercer Street and part of West 3rd Street between La Guardia Place and Mercer Street; and

Whereas these spaces now include La Guardia Park, La Guardia Corner Garden, Time Landscape, Mercer Playground, the Children's Playground, and the Mercer Houston Dog Run, and the new sitting area above the new NYU cogeneration plant built beneath this public land; and

Whereas community members have a commitment to many of these areas deepened through a long tradition of community voluntary involvement, especially in the strips along La Guardia Place and the Mercer Playground; and

Whereas these spaces are important historical markers of the battle against Robert Moses' efforts to cut an arterial roadway from the south end of Fifth Avenue, into Washington Square, and through the heart of the South Village; and

Whereas these areas also include planted areas along Bleecker Street with irreplaceable mature trees; and

Whereas CBR2, Man, has long called for these areas to be transferred to the Department of Parks to guarantee their public character in perpetuity, and the Department of Parks and Department of Transportation have been generally open to such transfer; and

Whereas the NYU administration has consistently opposed such transfer; and

Whereas as part of its 2031 Plan, the NYU administration now seeks to acquire all these spaces except the strip along La Guardia Place from West Houston to Bleecker; and

Whereas the NYU administration states that its plan seeks to create new publicly accessible open space, including a large area on the current supermarket site at La Guardia and Bleecker, and alter the landscaping of the two superblocks to integrate open space so that underused areas of open space on their property are more accessible to the public; and

Whereas NYU has announced it will propose to build a tower in the supermarket site, it has apparently already retracted its offer to create new open space there; and

Whereas NYU has a history of failing to fulfill both its commitments to provide stewardship and maintenance of public open space and its commitments to provide public access to open space within its properties; and

Whereas the design and management of publicly accessible private open space typically conforms first of all to the needs of the owner, and therefore these spaces are fundamentally different in character from publicly owned open space; and

Whereas although public access to privately held space throughout the city can be very beneficial, the experience with these spaces shows how they differ from public open spaces and demonstrates the benefit of retaining public ownership of open space intended for public use, in general, and on these superblocks in particular; and

Whereas the DOT property along La Guardia Place between Washington Square South and West 3rd Street was transferred to NYU in the 1960's in connection with the development of Bobst Library, thus interrupting the LaGuardia Place greenway that previously connected to Washington Square Park, in exchange for new public open space to be created at Gould Plaza; and

Whereas Gould Plaza, while technically accessible to the public has a private character that discourages public use and serves a private purpose; and

Whereas amendment in 1978 to the Urban Renewal Plan to allow construction of the Coles Athletic Center was based on a commitment by NYU to "rebuild and physically maintain the Mercer Street strip in accordance with the Community Board's preferences," but the playground and the reflecting garden in this area have been kept closed for many years because of sunken pavements; and

Whereas the amendment also required NYU to build a public playground on the roof of Coles but this playground was immediately closed because of safety considerations, and NYU has not sought to create alternative public space to compensate for its failure to meet this commitment; and

Whereas CB#2, Man. held a public hearing attended by more than 200 people on October 18, 2010, regarding the public space in the superblocks; and

Whereas 37 community members spoke in favor of maintaining existing public open space and transferring the space to the Parks Department, and against transfer of the public land to NYU while no one spoke in favor of the transfer to NYU; and

Whereas New Yorkers for Parks made a presentation about the alienation of parkland, and CB#2, Man. believes that the transfer of public open space to NYU is contrary to the Doctrine of Public Trust;

Whereas New York University is an outstanding institution of great importance to our city and our community, as well as a source of pride to its students, faculty, alumni, and employees, many of whom are residents here and all of whom are welcome members of our community; and

Therefore it is resolved that CB#2, Man., supports the goal of the NYU administration to improve public access to open spaces within its property; and

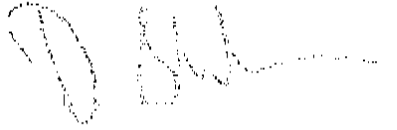
It is further resolved that CB#2, Man. urges the NYU administration to remove from its development proposals and ULURP application any transfer of publicly owned land to private ownership, and

It is finally resolved that the best way to preserve the public open space is to keep it in the public domain and the best way to guarantee its public use and character in perpetuity is to transfer these properties to the Parks Department.

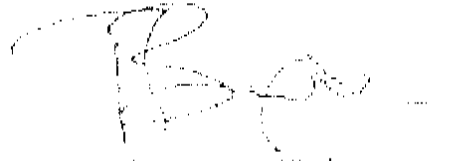
Note: Passed, with 46 Board members in favor and 1 in opposition (J. Dutton).

Please advise us of any decision or action taken in response to this resolution.

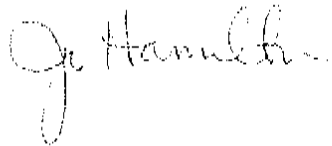
Sincerely,



David Gruber, Chair
Arts & Institutions Committee
Community Board #2, Manhattan



Tobi Bergman, Chair
Parks, Recreation & Open Space Committee
Community Board #2, Manhattan



Jo Hamilton, Chair
Community Board #2, Manhattan

JH/fa

cc: Hon. Jerrold L. Nadler, Congressman
Hon. Thomas K. Duane, NY State Senator
Hon. Daniel L. Squadron, NY State Senator
Hon. Deborah J. Glick, Assembly Member
Hon. Scott M. Stringer, Man. Borough President
Hon. Christine C. Quint, Council Speaker
Hon. Margaret Chin, Council Member
Hon. Rosie Mendez, Council Member
Sandy Myers, CB2 Liaison, Man. Borough President's office
Lolita Jackson, Manhattan Director, CAU
Alicia Hurley, Director, Office of Community Relations, New York University
William T. Castro, Manhattan Borough Commissioner, NYC Department of Parks
Margaret Forgione, Manhattan Borough Commissioner, NYC Department of Transportation

Deborah Lee, Chair
31 West 87th Street, 2nd Floor
New York, NY 10024
Phone: 212-224-5102



Lisa P. Ryan, Secretary
Susan Kelly, Treasurer
Carmel Young, Assistant Secretary

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FOR IMMEDIATE RELEASE

Contact: Jo Hamilton, CB2: 212.807.0332; Terri Cude, CAAN: 212.673.3208

ELECTED OFFICIALS, COMMUNITY BOARD 2, THE COMMUNITY ACTION ALLIANCE
ON NYU 2031 AND LOCAL ACTIVISTS DENOUNCE PLANS BY NYU TO GRAB LAND
ALONG "SUPERBLOCKS" SOUTH OF WASHINGTON SQUARE

December 5, 2010: A coalition of community groups, elected officials and community members spoke out Sunday against plans by New York University to take more than 2 acres of City-owned land in the heart of Greenwich Village for its own use.

Two weeks ago, Community Board 2 passed a resolution strongly opposing the University's bid to annex the land. The resolution calls on NYU to remove these strips from any land use changes they will request and further calls on the City to transfer all seven strips to the Parks Department, noting "the best way to preserve open space is to keep it in the public domain."

These seven strips of land are currently City-owned--but they are now part of a proposal by New York University seeking to add 2 million square feet of new development south of Washington Square.

All five local elected officials representing the area are strongly supporting the Community Board's first official position regarding NYU 2031.

"The current resolution builds on the recommendations of the NYU Task Force and signals overwhelming community support for keeping this open space public," said **Manhattan Borough President Scott Stringer**. "NYU must take these concerns into account and seriously explore alternative proposals that do not include development on these strips."

Councilmember Margaret Chin said: "NYU is a University in a neighborhood, not the other way around. This is why any proposed development must be appropriate and contextual, and must demonstrate their commitment to the neighborhood and its residents. The elimination of these green strips would change the nature of this community for the worse; it would turn large portions of these blocks from open space to dense building and reduce what little green the neighborhood enjoys. The 1st Council District is honored to host an institution as important and prestigious as NYU, but there are many other development opportunities that they can use to expand. I welcome NYU and President Sexton to work collaboratively with my office and other elected officials to locate alternative expansion sites. But, when it comes to the Village, I stand with CB2, and support their desire to see green open space preserved

as parkland.”

Assemblymember Deborah Glick said: “Living in the Village with NYU has come to feel as though we are living with the Sheriff of Nottingham – The rules for the serfs keep changing for the worse, with the sheriff demanding more and more. Call me Robin Hood – enough is enough, we want our forest back.”

“I stand with the community of Greenwich Village in calling for the DOT strips on the superblocks to be preserved as public parkland and open space,” said **Congressman Jerrold Nadler**. “I urge NYU to remove from its development proposals any request for the DOT strips, and I strongly encourage the City to transfer the strips to the Parks Department. As it now stands, the community already lacks sufficient public parkland, and it would be terrible to lose the strips, which have provided public open space to the community for decades. I thank NYU for its stated commitment to preserving and maintaining open space in its design proposals, but in order for this open space to remain truly accessible to the community, it should stay public land.”

Senator Thomas Duane also expressed his concern: “I join Community Board 2 in opposing New York University’s request to acquire six strips of New York City Department of Transportation (DOT) property. I have long opposed relinquishing public spaces to private entities. These strips contain rare open space in park-starved Greenwich Village – which rightfully belong to the people of New York City. To ensure these spaces remain truly public and open in perpetuity, DOT should transfer them to the New York City Department of Parks and Recreation.”

These public spaces were created when land was acquired by the Department of Transportation a half-century ago, as part of a plan by Robert Moses to build onramps for an expressway across SoHo.

The project failed in the face of overwhelming community opposition, and in 1967, the City Planning Commission, the Manhattan Borough President and the Community Board voted to transfer the property to the Department of Parks and Recreation. But the transfer was never completed.

NYU claims that its plan to build on the strips and create new public space between their buildings will improve public accessibility. But **Jo Hamilton, Chair of Community Board 2**, points out that “NYU does not have a great track record in creating or maintaining public spaces. It would be unwise to think that this time will be any different. Two weeks ago, the University withdrew an equally controversial plan to build a 4th tower on a landmarked site, because the original architect wrote that it would be inappropriate. I would ask that they similarly recognize the overwhelming community sentiment that public land should remain in public hands, and remove this request from their proposal, then support us in advocating for the land’s transfer to the Parks Department.”

Community Board 2 has always supported this position, and passed resolutions again in 1979, 1998 and 2004, asking that the land be mapped as permanent parkland. In 2004, then Parks Commissioner Henry Stern supported the transfer, but said, “NYU won’t grant consent and is blocking the move.”

Sadly, over the years, NYU made many agreements with the city to maintain these spaces for the benefit of the community, in exchange for development rights elsewhere on the superblocks. But their stewardship has been woefully inadequate, and at times completely neglectful.

“You just have to look at the padlocked playground and reflecting garden on Mercer Street, the fact that Gould Plaza is a front door for two NYU buildings instead of a community public space, and the broken promise of a playground on top of Coles gym,” said **Ferri Cude, Co-Chair of CAAN**. “The only successful spaces are the ones created by dedicated community volunteers, who band together to make

useful parks from unused land. Our community members have planted, built, cleaned and advocated for all of these spaces for years, and do not want the results of their hard work destroyed by NYU."

Tobi Bergman, Chair of the CB2 Parks Committee, states: "Neither NYU nor the Department of Transportation is equipped to manage these important public areas for the best benefit of the neighborhood, NYU, and the city. It requires cooperative stewardship under the leadership of the agency that knows how to manage parkland, our Parks Department."

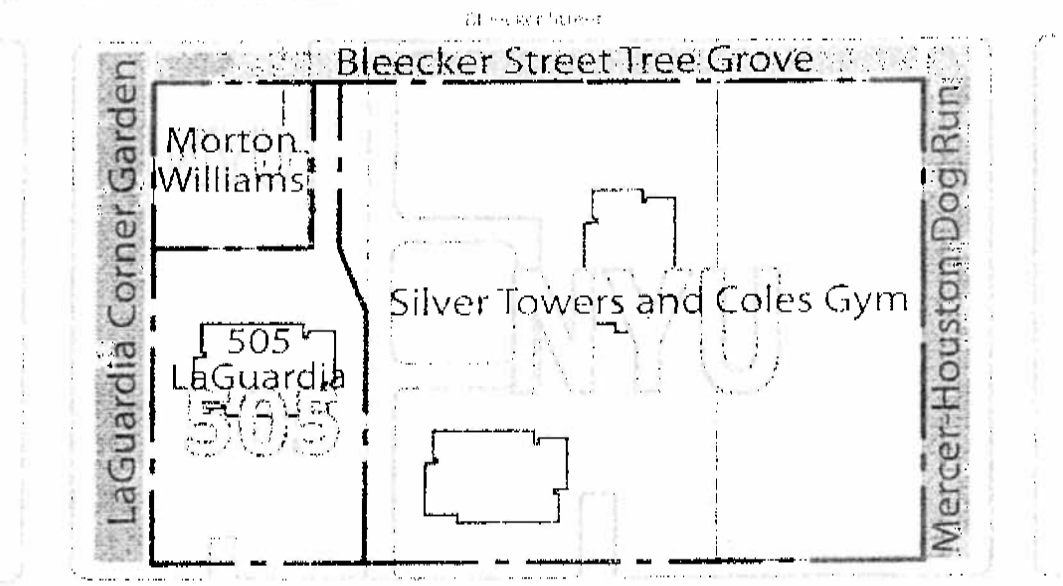
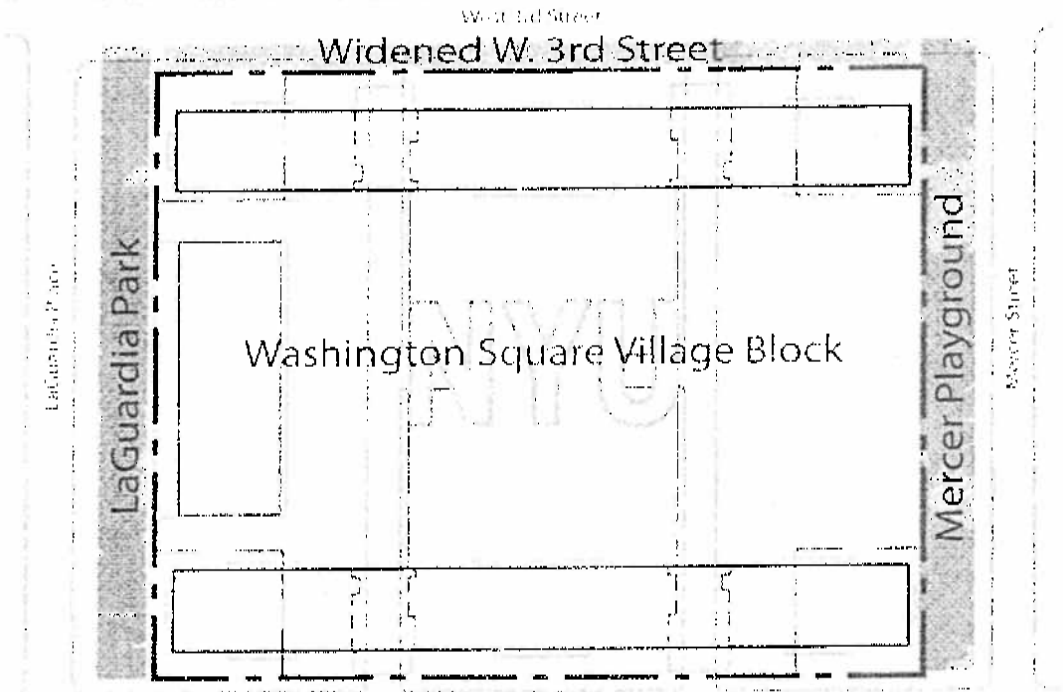
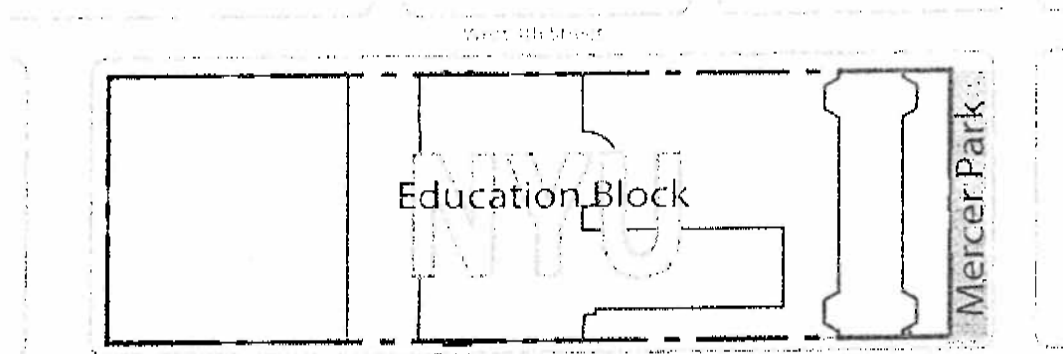
"We understand that NYU is part of Greenwich Village, and a neighbor, but it is inappropriate for them to take what little public space we have and privatize it for reasons which seem unclear and unnecessary. This community stands firmly behind a position that we have held for over 40 years, and calls on NYU to not include this parkland in their land use application," says **David Gruber, Chair of the CB2 Institutions Committee**.

Members of the community who are actively involved with the current uses on the strips have also expressed support for the Board's position:

- **Ellen Horan, LaGuardia Corner Garden**: "We hope the city will preserve this public land as much-needed community parkland. A zoning change from residential use would forever place Greenwich Village in the shadow of NYU's buildings. Like the plants in these ribbons of green, residential neighborhoods thrive on sunshine and air and once deprived, they are gone forever."
- **Beth Gottlieb, Mercer-Houston Dog Run Association**: "Almost 30 years ago, neighborhood residents and their dogs began meeting on our corner, then an empty lot. The Mercer-Houston Dog Run continues to answer the needs of community dog owners. We are a vibrant facet of the neighborhood, and hope to secure our future longevity. CB2's resolution is very encouraging. We sincerely hope to sit and stay!"
- **Larry Goldberg, Friends of LaGuardia Place**: "The public parkland and open space represented by the statue of Fiorello LaGuardia and the soon-to-be-built Adrienne's Garden for toddlers, is a green oasis for all New York City residents and visitors. It must not be turned over for an unnecessary private use."
- **Enid Braun, LMNO(P)**: "Given the proximity of Mercer Playground to NYU property, we have always worried about the university's future plans, and strongly support the permanent transfer of the park to the NYC Parks Department. Public open space is irreplaceable; we thank CB2 for its forceful statement."

Mlyson Reina, New Yorkers for Parks, Director of Research, Planning & Programs, said: "The community garden, dog run, plaza and playground located on these strips are critical open space to the park-deprived community. These vibrant public spaces have served this neighborhood for decades, and any attempt to privatize them or sell them to NYU is a violation of the Public Trust Doctrine."

*For more information and background, visit cb2manhattan.org (see *File to NYU's 2031 Plans on file*) or email info@cb2manhattan.org. For additional information on the Community Action Alliance on NYU 2031, visit caaa2031.org or email info@caaa2031.org.*



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The City of New York

Manhattan Community Board 1

Julie Menin CHAIRPERSON | Noah Pfefferblut DISTRICT MANAGER

Appendix D

April 29, 2011

Jo Hamilton
Chairperson
Community Board 2
3 Washington Square Village, #1A
New York, NY 10012

Dear Jo:

I am writing in response to your letter requesting information regarding stalled construction sites and other developable sites in Community Board One.

The Lower Manhattan Construction Command Center includes a list of stalled construction sites on the minutes of its biweekly meetings. The following sites were included on the most recent list. We have included information about those sites that have come before CB 1.

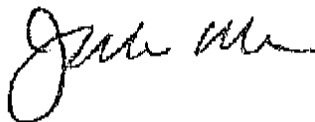
- **21 Ann Street** - Ann Nassau Realty LLC proposed a 170,000 square foot, multi-use office and residential building at 21 Ann Street to feature retail and office space through the fourth floor and residential condominiums on floors five through 28. It has been stalled for several years.
- **33 Beckman Street** - Developer Sam Chang proposed a 36 story, 140,000 square foot hotel with 270 rooms at this site but it is currently inactive.
- **99 Church Street** - Silverstein Properties has proposed an 80 story hotel/condo. The foundations are complete and the superstructure is on hold.
- **92 Fulton Street** - This is a vacant development site on the south side Fulton Street between William Street and Gold Street in the Financial District. There are 21,890 buildable square feet including air rights from another property. Plans called for a 23 story mixed-use building with retail on the ground floor, a hotel component on floors 2-6, and residential apartments on floors 7-23. We understand that there has been litigation concerning this site.
- **133 Greenwich Street** - Greenwich Thames Realty recently purchased this 156,000-square foot, mixed-use development site. It is currently inactive.
- **56 Leonard Street** - The Alexico Group proposed a new 57-story residential tower designed by Herzog & de Meuron. The project was begun in mid-2007 and has been on hold for several years. The site is located at the corner of Church Street, on the east side of the block shared by New York Law School.
- **67 Liberty Street** - 15 stories are being added to a five-story building located between Broadway and Liberty Place. A former office building will be converted to residential space.

- **217 Pearl Street** - Rockrose announced plans for a 28-story resident building at this site several years ago. It is currently inactive.
- **50 Trinity Place** - A planned 28-story hotel at the southwest corner of Rector Street.
- **111 Washington Street** - BCN Development announced plans several years ago for a 50-story high-rise multi-use building has been proposed at 111 Washington Street (near Carlisle Street).
- **50 West Street** - This planned development by Time Equities will replace three existing buildings with a 63-story (725-foot) residential tower and hotel. The site is located between West and Washington Streets at J.P. Ward Street (just north of the Brooklyn-Battery Tunnel entrance). A 500,000-square-foot, glass-clad tower, designed by Murphy/Jahn Architects was presented, with retail at ground level.
- **5 World Trade Center** - Community Board 1 has asked the Lower Manhattan Development Corporation and the Port Authority to consider issuance of a Request for Expressions of Interest for this site to include mixed-use projects with commercial, hotel, and residential space.

In a presentation by NYU at CBI regarding their expansion plans, we mentioned Tower 5 and the many other stalled construction sites in the Financial District that could be considered. We would be glad to attend any meetings or answer any questions from NYU or any other developer interested in the possibility of locating in Lower Manhattan.

If you would like us to provide like any additional information about any of the sites on the list or have any other questions do not hesitate to contact me or Noah Pfeifferblit at 212-442-5050 and we would be glad to add any additional details needed.

Sincerely,



Julie Menin
Chairperson

Jo Hamilton, *Chair*
Bo Riccobono, *First Vice Chair*
Sheelah Feinberg, *Second Vice Chair*
Bob Gormley, *District Manager*



Erin Roeder, *Treasurer*
Susan Kent, *Secretary*
Elaine Young, *Assistant Secretary*

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May 24, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
NYC Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216

RE: **NYU Core**
CEQR No. 11DCP121M
Comments on Draft Scope of Work

Dear Mr. Dobruskin:

Community Board No. 2, Manhattan (“CB2”), at its May 19, 2011 Full Board meeting, voted approval of the following testimony to be submitted to the New York City Department of City Planning at its May 24, 2011, Public Scoping Hearing for the above project.

New York University (“NYU”) has anticipated a significant expansion of its facilities and holdings in our community district for over six years. CB2 held numerous public meetings with the University to learn about their stated needs, and offered, along with members of the community, meaningful input as to concerns about the appropriateness of the proposed development and potential impacts.

In 2006, CB2 joined representatives from NYU, local elected officials, other community boards, and community groups in the Community Task Force on NYU Development (“Task Force”), convened by Manhattan Borough President Scott Stringer. The Task Force developed a set of unanimously accepted Planning Principles (attached as Appendix A), which were based on a premise first articulated by NYU President John Sexton in 2004, that Greenwich Village is a “fragile ecosystem” and the University must not overwhelm the historic neighborhood that is their home campus. The Task Force met for over three years and made many specific recommendations about urban design, quality of life, sustainability, community planning process and accountability.

In July 2010, CB2 began its own review process of NYU Plan 2031. Since that time, we have hosted eight public hearings and forums, and two public working meetings, in addition to receiving testimony from many hundreds of people about the University's proposals. This document derives from a careful consideration of this extensive input.

We understand that NYU makes an important contribution to the economy and status of New York City, and that they want to grow in order to maintain their status as a premier institution of higher learning and internationally respected research. However, this is the largest development project to ever come before CB2, and the overwhelming reaction from our board and the community has been that NYU's proposal to add two and a half million square feet of new academic, dormitory, residential, retail and hotel uses in the heart of Greenwich Village, will forever change the character of this iconic neighborhood.

Our comments here are limited to the scope of study for the Draft Environmental Impact Statement ("DEIS"), to be prepared in advance of certification of a Uniform Land Use Review Process ("ULURP"). We begin with general comments and concerns about the actions being proposed, and then follow with specific requests for further study in each of the nineteen categories of potential impacts in the Project Area, as outlined in the NYC CEQR Technical Manual, and then end with a consideration of alternatives.

I. CONTEXT OF THE PROJECT

New York University has been a part of Greenwich Village since their founding in 1831. The University moved to the Bronx in the early decades of the 20th Century, but began a return to the neighborhood after World War II. In the 1960's they acquired the property between Mercer Street and La Guardia Place, West 3rd and Houston Streets, the "Proposed Development Area," with zoning and deed restrictions that defined these blocks as residential, and made subsequent agreements to become the stewards of the auxiliary open spaces.

In the 1970's, NYU decided to make the Washington Square area its main campus, and started an aggressive campaign to buy properties in the Washington Square Park "core." Over the years, this has led to increasingly strained community/university relations. Long time residents of what was once a vibrant, diversified neighborhood feel as if they live on a college campus. Further, NYU has enlarged and modified many of the existing buildings, designed new buildings that are not in keeping with the historic quality of the area, taken over and then neglected public space, and ignored the damaging impact of incessant construction on the quality of life for residents and businesses.

Currently the University owns or leases 10.8 million sf of space in the immediate Washington Square neighborhood. This proposal seeks to increase their dominance by another 25%. More alarming still is that all of the increase occurs in two residential superblocks, currently housing approximately 2000 families. Not only will these superblocks be asked to absorb two million sf in above-ground development, they will see the addition of an estimated 1400 dormitory students, 260 faculty families, 150 transient hotel rooms, up to 800 public school children, and the thousands of visitors associated with a conference center, an expanded gym facility and over a million square feet of new academic space. All of these new uses come at the cost of losing open space, light and air, historic view corridors and quality of life issues associated with increased noise, congestion and pollution.

The prospect of a delicately balanced, stable neighborhood that is largely residential, intimate in character, and historical in context, being overwhelmed by the proposed influx of exceptionally tall, bulky buildings, additional and augmented campus uses, and swelled populations makes it essential that we carefully evaluate all of the potential impacts of this project.

II. GENERAL COMMENTS

In order to facilitate the increased bulk and density, and new uses that NYU is requesting in the Project Area (comprised of a Proposed Development Area and a Commercial Overlay Area), the city must approve a series of discretionary actions. It is important to evaluate these requests in the context of the University's stated goals.

NYU says that it has grown precipitously in the period from 1990 to 2005, and that their "facilities are severely overburdened." Their goal is to 'de-compress' the strain on services in the Washington Square campus by embarking on a program of "serious upgrade(s) and improvement(s) in facilities" in order to sustain the quality of its educational offerings. Three actions help to facilitate this goal.

1. Change in Zoning in Proposed Development Area

The plan calls for a blanket re-zoning of the Proposed Development Area from R7-2 to C1-7. Our community is generally comprised of low-scale and low-density neighborhoods, and the existing R7-2 designation is one of the largest zoning envelopes in our district. The height and bulk allowed by a C1-7 (an R8 equivalent) zoning may be appropriate in midtown or downtown, but not in the historic core of Greenwich Village. Further, most of the uses being proposed in this area are allowable under the community facility bonus, and we have not heard an adequate explanation as to why their goals could not be accomplished with targeted commercial overlays. A hotel is a possible exception, but we are not convinced that a hotel is central component to the stated goal of 'decompressing' the core in order to maintain academic excellence.

2. Large Scale General Development Special Permit

The plan also calls for dissolving the current Large Scale Residential Development (LSRD) on the southern superblock in the Proposed Development Area, and replacing it with a Large Scale General Development Special Permit (LSGD) that covers both the northern and southern superblock. We have not been able to determine from the Draft Scope the purpose of the LSGD, so it is difficult to comment. The plans are undefined and vague, and sorely lacking in specific detail, so how can we responsibly evaluate the impact of the entire project? We are especially concerned that the boundaries have not yet been determined, that the area covered is too large, and that the development would take place in two distinct phases over twenty years.

3. Deed Restrictions

The two superblocks in the Proposed Development Area were created under the Title I, Urban Renewal program to provide quality housing for the neighborhood. The plan specified the amount of land that could be covered by buildings, with the understanding that the remaining open space would compensate for the height of the buildings. Because of significant amendments to the plans, the Deed Restrictions are now set to expire 10 years from now, in 2021. Accelerating massive development violates the expectations of the residents and businesses in the area, who have made lifestyle and financial choices based on the terms of these restrictions.

NYU also cites that "enhanc[ing] public recreational opportunities in the Proposed Development Area" is an another goal of the project. They claim that there will be a "net increase in the amount of publicly accessible open space." However this is accomplished only by acquiring open space that is currently publicly owned, and very much in the public realm, as well as utilizing space that is already available to the public.

4. **Demapping and Disposition of City Owned Land**

For many years, CB2 has asked New York City to transfer the open space strips bordering La Guardia Place and Mercer Street from the Department of Transportation to the Parks Department. Recently we passed another resolution asking for this transfer, and received the support of all of our elected officials (see Appendices B and C.) NYU has defaulted through the years on agreements with the City and the community to create and maintain public open space. It makes no sense that one of the proposed amenities of the project is to take public parkland away from the public and instead offer access to space the community *already* has access to - but will now be surrounded by buildings, and to deprive an entire generation of access to parks and playgrounds. We question whether there is an Open Space Ratio requirement that is not met without this action.

NYU states that, in the Commercial Overlay Area, an additional goal is “to bring the existing retail uses into compliance and [to] allow for the development of . . . ground floor retail uses.”

5. **Change of zoning in Commercial Overlay Area, east of Washington Square Park**

We do not accept this goal as a rationale for rezoning six square city blocks. The existing retail uses are grandfathered, and are more than adequate to serve the needs of the community. The area is surrounded by important commercial corridors, including Broadway, Lafayette, Eighth and Bleecker Streets. Currently, there is a great deal of empty retail space in and around the area. Therefore the impacts of this action must be carefully considered. The Draft Scope of Work says that the University has intentions to develop retail in only five locations. This change could easily be accomplished by applying for Special Permits, rather than go to the extreme of an area-wide rezoning.

Finally, while not an explicitly stated goal of the project, NYU has made the offer of 100,000 sf for a New York City Public School a very prominent part of the proposal. This will require specific city actions.

6. **Public Authorities Law Site Selection by the NYC School Construction Authority (SCA)**

Our district, like so many in the city, is struggling with a shortage of public school seats at the kindergarten, elementary and middle school levels. This proposed facility could create 600-800 seats and therefore it is an element of the plan that is very interesting to us. However, the description of the process by which property would be made available to the SCA is disconcerting both because it is vague, and because it seems to be a great promise without a guarantee. First, it is unclear what kind of school our district needs to meet projected populations in 10 to 20 years, or even if such an assessment will be available to us during this ULURP process. Second, we have no assurances that SCA even wants this property, or if they have the resources in their capital plans to be able to develop it. And third, the Draft Scope states that if SCA is not ultimately willing or able to take over the site, then it will revert to NYU. This is of grave concern. If there are no specific guarantees at the time of ULURP, then all the possible alternatives for this site must be studied.

III. STUDY METHODOLOGY

We have three major concerns about the general approach of the scope for the proposed study.

1. First, the Draft Scope outlines a baseline of the year 2021 in the “Future Without the Proposed Actions,” and refers to two as-of-right projects in the Commercial Overlay Area. We think it is more appropriate to analyze the plan in the entire Project Area as of 2031, when the University expects to complete all of their proposed development. This will allow a more accurate comparison of the two scenarios, and facilitate a better understanding of the impacts.

We are especially interested in an analysis of any potential community facility bonus or development rights currently available in the superblocks, any additional commercial square feet that could be built in the C1-5 overlays in the superblocks and any potential for further residential or community facility development. Such an analysis should include the reasons limiting such development.

As part of understanding all the implications of the “no-action” scenario, we insist on a more complete analysis of the “Reasonable Worst Case Development Scenario” (RWCDS). Throughout the report, the University refers to its ‘intentions’ when defining the parameters of studying the RWCDS. This is unacceptable. NYU must always look at the maximum potential development and change allowed under the actions they are requesting.

For example, in the Commercial Overlay Area, the Draft Scope refers to NYU’s desire to maintain current (academic) second floor uses, and says that they intend to convert no more than 23,236 sf to ground floor retail. We should know the impacts of the maximum that would be allowed if the area was rezoned to C1-5.

2. Second, we would like to see the Final Scope take into account both regional and local impacts when defining the study areas for each CEQR category.

NYU describes the Washington Square Campus as the Hub of a Global Network University. “Each of the main global academic portals must have a home base at the Core that serves as a gateway for faculty, students and the wider public. Thus, even NYU’s plans that disperse its facilities at locations remote from the Washington Square campus burdens the Washington Square campus with additional space demands.” This describes a major expansion of a regional facility. Many of the categories for study should therefore consider the impacts in a wider context.

At the same time, the bulk and density of the proposal will have intense impacts on the immediate Project Area. As provided for in the CEQR Technical Manual, some categories should also identify subareas for study. The current residents of the two superblocks will be the people who are most affected by the increased height, bulk, density and change of use. A quarter mile or half mile study area radius could significantly dilute the potential impacts on open space, noise, air quality and traffic, to name a few categories.

3. The character of Greenwich Village includes many intangibles related to its history, the people that choose to live and work here, its iconic stores, and vibrant arts scene. We feel that this area is unique - in the city and country, and even worldwide. We call on NYU to conduct an extensive quantitative and qualitative analysis to truly understand what this neighborhood represents.

The Draft Scope states that the proposed methodology will simply “summarize the predominant factors that contribute to defining the character of the neighborhood, including land use, zoning and public policy; open space; historic and cultural resources; urban design and visual resources; transportation; and noise.” The spirit of Greenwich Village is more than the sum of these items. It is essential to capture what this neighborhood means to residents and the millions of people

who come every year to be a part of this experience. This study requires a strong sensitivity to the fact that the proposed project has the potential to overwhelm a neighborhood, in favor of a campus.

In addition to a detailed demographic profile of the immediate neighborhood, and the core of Greenwich Village, we would like the University to expand their methodology to include surveys, in-depth interviews and focus groups with non-NYU-affiliated residents on the superblocks and in the Commercial Overlay Area, and to ensure that the results are all based on accepted research protocols for qualitative analysis.

IV. SPECIFIC COMMENTS ON TECHNICAL AREAS

1. LAND USE, ZONING AND PUBLIC POLICY

Community Board 2 notes that the Zoning Resolution's intent is to establish development and use parameters appropriate to the applicable neighborhood or blocks. CB2 is concerned that the proposed zoning actions in the project area will result in unacceptable height, bulk and density that will change a residential neighborhood into an area with more buildings and people than the neighborhood was intended to support.

Zoning :

- The details of the Large-Scale General Development (LSGD) Special Permit are an essential part of this proposal. The **Draft Scope of Work** does not properly describe the LSGD. These details must be the basis of study for all impacts and environmental consequences. Please provide the precise boundaries of the LSGD and describe the waivers and/or Zoning Resolution text amendments (may include height and setback waivers and potentially floor area and open space redistribution across zoning lot boundary lines, and court and location of use regulations) that will be needed.
- NYU's proposal includes the re-cladding of the ground floor and second floor of the Washington Square Village apartment buildings to add transparency. This seems to indicate a change of use on these floors. Please describe in detail the purpose of recladding and study the potential impacts to current tenants, especially possible displacement.
- Please provide an analysis of the current zoning requirements for open space and the open space requirements for the proposed action. Please explain how the proposed demapping of public land impacts the open space requirements.
- The proposed Commercial C1-5 Overlay District does not include a complete build out for the full amount possible of retail space. Please provide an analysis of the Reasonable Worst Case Development Scenario for the C1-5 overlay, east of Washington Square Park.
- Community Board 2 questions the appropriateness of a Commercial Overlay district that faces Washington Square Park. Please provide an analysis of a RWCDs as to the impacts of potential retail on the eastern boundary of the Park.

Public Policy:

- The Urban Renewal Plan that created the original superblocks, and its subsequent amendments, established a Public Policy that shaped these blocks. This Policy was in effect for 50 years. The proposed action significantly changes the original plan. Please provide a comparative analysis of the requirements of the Urban Renewal Plan, including the Deed Restrictions, and the Proposed Action.
- The Mitchell-Lama Program that created 505 LaGuardia Place established a Public Policy for affordable housing. Please provide an analysis of the potential impacts, including the potential for indirect displacement, that the proposed action may have.
- Community Board 2 notes that the adjoining Historic Districts also constitute Public Policy. Our concerns are addressed in the section below, Historic and Cultural Resources.

PENDING:

Future Projects

The map of projects provided by NYU does not include all of the proposed projects in the Hudson Square Area. A list of these projects will soon be available as part of the Draft Scope of Work for the pending Hudson Square Rezoning, and should be included.

Zoning Projects

CB2 notes the proposed Hudson Square Rezoning and pending zoning actions at former St Vincent's Hospital site.

Policy Actions

CB2 notes the proposed SOHO BID and the planned expansion of the NOHO BID.

ALTERNATIVES:

The No Action Alternative

- Based on documents from City Planning it appears that there may be additional unused development rights available in the Proposed Development Area. The "No Action Alternative" should be fully explored. Please provide a detailed description of the maximum "as-of-right" build-out (including development allowed by Special Permit) allowed under the current zoning, and the anticipated impacts.
- The "No Action Alternative" in the Commercial Overlay District should also include the maximum "as-of-right" build-out. NYU has noted the potential for additional construction in this area.

Additional Alternatives:

- As reasonable alternative for the proposed C1-7 District please provide a comparative analysis for a district that retains the current R7-2 zoning district and uses Commercial Overlay zoning, as needed.
- As reasonable alternative for the proposed demapping and City disposition of portions of city streets. please provide an analysis of the proposed project without the demapped areas.
- As reasonable alternative for the proposed actions please provide a plan to retain the current zoning, and instead relocate new development to other areas of the City that have expressed strong interest and invited development, for example Community Board 1, Manhattan. Land-use and existing zoning regulations in areas such as the nearby Financial District would accommodate present and future expansion to and beyond 2031, and should be investigated. (see Appendix D)
- Within Community Board 2, many hotels have been built in recent years, and have indicated that they are not nearly at capacity. As reasonable alternative for the proposed Hotel please provide a plan for using excess hotel space in CB2.
- As part of the Reasonable Worst Case Development Scenario, please study the maximum allowable development in the event that the NYC SCA decides not to pursue a public school on the current Morton Williams supermarket site.

2. SOCIOECONOMIC CONDITIONS

NYU's Plan 2031 proposes a large number of changes that will affect existing residents and businesses as well as change the existing socioeconomic conditions. CB2 requests more detail on all aspects of this topic, especially including indirect displacement of residences and businesses. In addition to the studies required by CEQR and included in NYU's Draft Scope, we ask that the following be studied.

- Overall, CB2 asks that NYU provide a separate analysis of the existing demographic conditions in the Sub-Areas directly impacted by the proposed project, specifically Census Tracts 55.01 and 59, and how the proposed changes will affect these Sub-Areas*.

Direct Residential Displacement

- NYU's Draft Scope states that the proposed action will not directly displace any residents from the project site. However, page 23 of the Draft Scope states that 15 Washington Place will be converted from approximately 74,000-gsf residential into 129,000-sf academic use. Please provide a full explanation of what will happen to 14 and 15 Washington Place and any other locations that will no longer be residential under either without or with the proposed actions, the number of residents affected and what plans are being made to accommodate them.
- NYU's Draft Scope states under the proposed actions that the bottom two floors of Washington Square Village may become retail. Please provide details of what will happen to the current residents on these floors.

- Study potential for and ramifications of displacement of rent-stabilized residents by a not-for-profit University.

Indirect Residential Displacement

- Analyze the effect of increased land rent on the income-limited Mitchell-Lama housing known as 505 LaGuardia Place. A reset of the land lease occurs in 2014 which is within the proposed project period. Will the increased land lease fees cause monthly charges to become too high for some residents, thereby causing displacement?
 - On the negotiations and final pricing of the Land Lease, analyze the potential effects of the:
 - proposed zoning change
 - removal of deed restrictions/covenants on the Urban Renewal Plan
 - dissolution of the existing LSRD
- Analyze the effect of a more than 300% increase in the number of residents on the South Superblock on living conditions for those residing there – both the generally elderly population of 505 LaGuardia Place and the families with small children in the two Silver Towers, as well as the immediate neighborhood including the North Superblock and the residents of the buildings adjacent to and having frontage on both Superblocks. Will changes in living conditions cause indirect residential displacement?
- Analyze the potential for reduction in property values, causing indirect displacement and/or severe financial consequences to those who own co-operatives or condominiums adjacent to the proposed project area
 - during construction
 - after streetside green spaces have been transferred to NYU and potentially built on or under
 - after transient/community parking spaces have been removed
 - when up to 1,750 (per Draft Scope p. 26) young people with no ties or commitment to the neighborhood are added to the area
 - when a hotel facility with a transient population as well as 260 faculty residences (per Draft Scope p. 26) are added to the area
 - taking into account new shadows cast on these buildings by new NYU structures
 - across LaGuardia Place if the LaGuardia Corner Garden plants fail to thrive and/or die as a result of the shadows cast by the proposed building on the supermarket site.
- Analyze the potential increase in crime due to the enormous increase in population including young students located at the far southeastern edge of the 6th Precinct, and its effect on property values on apartments in the buildings adjacent to the Superblocks.
- Report on the square footage change in dedicated play space for toddlers and for children up to age 16, both programmed and unprogrammed, on the University Village and Washington Square Village Superblocks. Separately study both temporary and permanent replacement playground sites, and with and without the acquisition of the city-owned open space strips. Report on how the changes will affect families on and adjacent to these blocks as well as property values.
- Explain how a project that will affect so many residents in such a concentrated area can be justified, and what demographic changes can be expected when the population of students and faculty are dramatically increased thereby changing the proportions from that found in the

existing residential population.

- Report on rent-stabilized or rent-controlled residents on both the Washington Square Village block and buildings East of Washington Square Park:
 - Do added buildings, commercial tenants and/or reduction in open space dedicated to these residents have the potential to reduce the number of these residents?
 - Is an overall reduction of this type of residents possible due to the proposed plan?
- Provide an analysis of the number of mobility-impaired and elderly people that will be affected by the move of the supermarket, including whether they will lose the independence of being able to reach the supermarket unassisted, and possibly suffer indirect displacement.
- Report on the square foot reduction of non-built space on the entire University Village and Washington Square Village Superblocks, both publicly and privately owned, since the total amount of open space is an important factor in the value of owned as well as rented housing.
- Report the number of mature trees that will be destroyed as a result of the proposed plan, and its impact on the value of nearby rental and co-op housing.
- Provide clear information on plans for 14 and 15 Washington Place and any indirect residential displacement or attrition plans.
- Analyze the potential for underground water being diverted by the enormous “bathtubs” needed for the underground structures proposed for both Superblocks eroding the foundations of buildings near the Superblocks as well as possible water infiltration on sub-grade apartments and retail, and the potential for these causing a reduction in property values and/or displacement.

Direct Business Displacement

- Provide information on any retail facilities that will be removed as a result of this plan, including the existing Supermarket and the stores on the retail strip on the North Superblock, as well as any other existing businesses that will be removed or relocated.

Indirect Business Displacement

- Analyze the potential indirect displacement of existing community-oriented retail in favor of stores and other establishments serving the NYU population.
- Report on the likely increase in food-and-drink establishments in the proposed additional retail to be added under the plan, and the effects of increased alcohol-serving establishments on residents and businesses in the area.
- Analyze the potential for vacancies in the newly created retail if restrictions on liquor licenses, including both the 200-foot rule from the proposed school and the 500-foot rule from existing establishments, were to prevent new food-and-drink establishments from taking the new spaces.
- Report on the current retail vacancy rate and analyze the potential effects of adding the proposed maximum retail on existing stores and vacant space on:
 - the area east of Washington Square Park including 8th Street - a major retail thoroughfare
 - Broadway which is currently zoned for and amply supplied with retail

- Bleecker Street from Lafayette to Avenue of the Americas
 - North/South streets from Houston Street to 8th Street
 - The SoHo area from Canal Street to Houston Street
- Analyze the potential effect of new retail development on whether it would meet unmet needs for residents or compete with existing retail and longstanding iconic neighborhood merchants, and the effect on commercial rents on blocks including:
 - Washington Place and Waverly Place
 - Bleecker Street
 - on and near the Superblocks
 - Provide detailed information on the number, size and type of retail establishments that would be added if the proposed zoning were to be approved, both C1-7 on the Superblocks and C1-5 overlay on the area east of Washington Square Park, and analyze the current and future retail market saturation and rents.
 - Study the need for car and truck parking and loading docks for the proposed facilities, and whether these will impact accessibility to buildings throughout the Superblocks and on adjacent streets and the area east of Washington Square Park, and how reduction in parking and increase in traffic will impact property values.
 - Study the potential effects – including indirect displacement – on nearby established industries and uses such as the manufacturing, retail and arts communities and facilities in SoHo and NoHo.

*NOTE - From the CEQR Manual:

For projects covering a large area, it may be appropriate to create subareas for analysis if the project affects different portions of the study area in different ways. For example, if a project concentrates development opportunities in one portion of the study area, and would result in higher increases in population in that portion, it may be appropriate to analyze the subarea most likely to be affected by the concentrated development.]

3. COMMUNITY FACILITIES AND SERVICES

The Draft Scope for NYU's Plan 2031 needs to include analyses of the potential direct and indirect impacts on a variety of areas included in this category. Special attention should be paid to a careful comparison between the "No Action Alternative" and the "With Action RWCDS Alternative."

*With regard to the space that NYU is offering for the public school, the language on p.6 of the Draft Scope, which states, "**If SCA does not utilize the space for a public school by a yet-to-be-established date prior to 2031, NYU would utilize the 100,000 square foot space for its own academic purposes**" must be revised. As stated above, under General Comments, it is essential that all potential alternatives are fully studied.*

Public Schools

- Analyze how increased population will impact CB2 schools. Specifically, how many families will NYU bring to our district as part of the Plan 2031 expansion?
- Analyze and offer specific details as to how NYU is arriving at the 100,000 sq ft figure for a public school.

- Analyze what is the right level of public school (i.e., Elementary vs. Middle School.) Since Middle School is a district choice and not a zone choice, the need for a Middle School should include an analysis of district wide (D2) enrollment/school seats, but will largely be based on the growing Middle School population in the CB2 zone, and on the fact that parents and students do not have a Middle School choice in CB2.

Analyze the appropriateness of housing an undergraduate college dormitory above a public school. What are the School Construction Authority (SCA) and Department of Education protocols? Provide a clear description of the proposed school building, and information as to how the SCA and NYU will coordinate construction.

- Analyze the amount of outdoor space a state-of-the-art school would have and where it is best placed based on the grade-levels included. Per open space requirements, analyze if there is enough open space on the rooftop of the donated shell and core for a public school, and the appropriateness of a rooftop play yard. Rooftop play yards can be loud when they are filled with children. Analyze noise impacts on nearby buildings.
- Analyze the actual costs for NYU to provide both the "Shell and Core" for a public school. Are there differences in costs between an Elementary School, Middle School and/or High School.
- Analyze the possibility of NYU financially supporting the renovations of P.S. 3 and P.S. 41, which have been, and continue to be, attended by children of NYU faculty, and which are desperately in need of upgraded infrastructures compared to other zoned public schools. One or both of these schools are in need of a larger outdoor play space, a new cafeteria, a separate gymnasium, an elevator, and permanent seating in the auditorium, and so these areas should be included in a cost analysis.
- Analyze as an alternative to donating space within the core the costs of NYU financially supporting the purchase and construction of a new public school outside of the core. (e.g., 75 Morton Street which could potentially be used for both Middle and High School, Grade 6-12.)
- Analyze school completion timing. When would the school be completed, and will that coincide with the community's needs? Analyze viable mitigations if it is proven the community needs a school now. The school is a deferred benefit, so what will NYU do for the community in the meantime?
- Analyze as an alternative the costs of NYU financially supporting the construction of a community center fitted for a public school on the site in the core that the University has promised to the community. Analyze the costs to build classrooms, a book/reading area geared for children, a gym, a childcare center space, a senior center space, and a break room.
- Analyze the costs of NYU donating space for a community center in existing, or yet-to-be constructed NYU buildings.
- Analyze what protections the community has that a public school will actually be built, that SCA wants and can afford the space, *and that the space will not revert back to NYU under any circumstances*. Provide information on how the community will retain this mitigation even if DOE/SCA does not want to, or have the funds to, build the school. The DEIS states that NYU

will utilize this land if a public school is not built. What would be built there is currently unspecified. NYU's Scope must provide alternatives that retain community ownership and use of this land promised by the University to the community.

Fire and Ambulance

- Analyze the fire access to the middle of Washington Square Village between the proposed extra buildings, playground and superblocks overall. How will the apparent removal of the 2-way roads crossing the northern superblock and loss of access to the existing fire lanes there increase fire hazards?
- Analyze how the removal of the N/S roads on the WSV block affect the ability of ambulances to get in, get their patients loaded, and get out.
- Analyze the impact that an additional population of 1,750 young adult students (p.26) who will most likely be freshmen, 260 dwelling units for faculty members (p.26) and constant transient hotel guests will have on the delivery of NYPD services, specifically the already understaffed 6th Precinct, to the rest of the precinct.

Hospitals

- Analyze how the Proposed Action Plan and increased population will indirectly affect the community's access to services at the planned North Shore-LIJ Center for Comprehensive Care, which will have limited space and services compared to the full service St. Vincent's Hospital it is replacing.

Child Care

- Analyze the impact on the displacement of the childcare facility, Creative Steps Playgroup on the ground level of WSV, which may be turned into retail, which would physically displace the childcare facility. If Creative Steps Playgroup were to be displaced, how would the displacement be mitigated by NYU?

Physical Fitness Facilities

- Report on how access to and egress from the proposed "temporary gym" will be achieved, especially by busloads of visiting basketball and volleyball teams, since there is no streetside access from Mercer Street and the porticos limit the height of the vehicles that can enter the "Greene Street" N/S roadway.
- Report on the uses of the "temporary gym." As this facility will be smaller than the existing Coles, will it be more of a field house than a gym? Will any community uses even be possible? Report on how the community's access to the gym facilities will be coordinated with student access and analyze how NYU can provide increased access to the community to the "temporary gym" and, eventually, the permanent gym facility.

Libraries

- Analyze how the proposed action plan and increased population will indirectly affect the community's access to its Jefferson Market Library and Hudson Park Library.

Places of Worship

- Analyze the indirect effects that the proposed action plan will have on St. Anthony's Church and any other public places of worship identified to be within the study area.

4. OPEN SPACE

Over a period of many years, access to parks and open space has been one of the most passionately expressed concerns among residents within the CB2 district. Our board has actively and successfully promoted creation of new open spaces, large and small, at every opportunity, and has advocated for the improvement and good care and management of existing spaces. This leadership has been consistently supported by all of our elected officials over the years. The public open spaces currently within the project area are among the parks that have been created and cared for through intense and passionate public engagement. They are part of the history and fabric of the immediate district. So it is not a surprise that the response of the community to proposals to eliminate these spaces has been intense and passionate as well. Please refer to appendices as follows:

1. A Community Board 2 Resolution opposing de-mapping public lands in the project area and supporting transfer of these spaces to the Parks Department
2. A press release to the same effect issued by elected officials for all districts in which the project area resides

This request is for substantial expansion of the scope with regard to open space in the following areas:

1. Alienation of Public Open Space
2. Need for a Full Assessment of Direct Effects on Open Space
3. Need for Special Assessments of Indirect Effects
4. Special Considerations for the Need for a Detailed Assessment
5. Staging Impacts

1. Alienation of Public Open Space

• A full review is required to evaluate legal issues related to alienation of public open space in the project area.

Existing public open space in the project area is likely to require alienation legislation. The CEQR Technical Manual advises that when a project eliminates “or involves certain changes in use of dedicated City-owned parkland or open space, the City must have the authorization of the New York State Legislature and Governor to alienate the parkland or open space.” The project proposes transfer to NYU of City-owned land that is public open space. Some of this land has been developed with government funds dedicated for improvement of public open space and also private funds accepted by New York City for the restricted purpose of developing this land for active and passive open space use.

- a. A public playground will be built this year in LaGuardia Park on the east side of LaGuardia Place between Bleecker and West Third Streets. The area was dedicated for this purpose and the design for the park was approved through a process including review by the NYC Parks Department, Community Board 2, and the Public Design Commission, and City funds will be used for construction.
- b. Mercer Playground is public open space on Mercer Street between Bleecker and West Third Streets. The NYC Parks Department web site states “In 1995 the Department of

Transportation gave Parks a permit to use the site. Two years later the site was formally transferred to Parks, and plans were made for capital improvements. The playground construction was funded jointly by Council Member Kathryn Freed and LMNO(P) at a total cost of \$340,000. LMNO(P) raised an additional \$100,000 for the construction of the fence. Supporters included New York University, the Robinson & Benham Charitable Trust, and the Archives Fund.”

- c. NYU recently built an underground co-generation plant on public land on Mercer Street between West Third and West Fourth Streets. The easement allowing this use was part of an agreement dedicating the above ground use of this City-owned property to passive open space. Neighbors, community board members, and elected officials participated in a design process resulting in a design for this public open space that was approved by Community Board 2 and the Public Design Commission. The design includes gardens and seating areas.

A full review is needed of all possible legal issues regarding transfer of public lands, including a review of whether the proposed land transfers and/or alternatively transfer of underground easements that might impact the public open space use of the properties would require state legislation. Additionally, all prior development of public open space on these properties needs to be reviewed to determine whether there are issues regarding alienation of parklands that have received state or federal funding. A report on this review should be made available to the lead agency, the NYC Parks Department, local elected officials, and Community Board 2.

2. Need for a Full Assessment of Direct Effects on Open Space

- **Determine the users of existing public open space and evaluate how the project may reduce the usability of these spaces, detract from their aesthetic qualities or impair their operation.**

The Draft Scope states that “a detailed assessment of the Proposed Actions’ direct effects on open space will be provided that considers the types, quantities, and quality of displaced publicly accessible open spaces as compared to the new publicly accessible open spaces that would result from the Proposed Actions.” This suggests that the assessment will be limited to what the CEQR Technical Manual calls “a simple comparison of conditions with and without the project and a discussion of the users affected.” But the Technical Manual states that this may be insufficient when “more information on users of that open space may be appropriate or there is ambiguity as to whether the project would reduce the usability of an open space, detract from its aesthetic qualities, or impair its operation.” As discussed in detail herein, there are reasons why replacement spaces provided by the project are not comparable to spaces that will be eliminated or significantly impacted.

- **Evaluate whether proposed replacement space within a campus environment will provide a welcoming alternative to current users. Include surveys and interviews of current users.**

Because the project will locate replacement open space away from the public streets in a manner that will surround the space with large NYU buildings and may create a campus feel, students and workers may displace residents and more information is needed regarding current open space users and the availability of other space. The relocation of active space to a more shaded area may have a negative impact on its usability and the loss of many mature trees will have a long term or even permanent impact on aesthetic qualities.

The Draft Scope indicates that there is justification for limiting the assessment of direct effects because “the proposed project intends to enhance public recreation opportunities in the Proposed Development Area by providing new and replacement open space.” However, the following

considerations indicate the need for a full review of the direct effects on the entire study area, and not just the proposed comparative analysis of existing and replacement spaces.

- **Study the basis for strong community support for existing outward facing public space on public land including consideration of the importance of the history of these spaces. (See appendices: Community Board 2 Resolution and Press Statement by Elected Officials.)**

There is strong public support for retaining the existing open spaces. There has been a strong negative public response to the proposal to eliminate the existing open spaces on City-owned land and there has been little or no public expression of support. More than 200 people attended a Community Board 2 public hearing on October 18, 2010, where 36 people spoke against replacement of the existing open spaces and no one spoke in favor. A subsequent resolution (appended hereto) was passed opposing transfer of these spaces to NYU and supporting transfer of these properties to the Parks Department. A press release (appended hereto) opposing the transfer of these spaces to NYU and supporting transfer of these properties to the Parks Department included statements from all the local elected officials: United States Congressman Jerrold Nadler, Manhattan Borough President Scott Stringer, State Senator Tom Duane, State Assembly Member Deborah Glick, and City Council Member Margaret Chin.

- **Describe and evaluate the aesthetic character, user groups, and public accessibility of existing open space as conditioned by its placement along the streets and outside university property.**

The proposed replacement open space is substantially different in aesthetic character, user groups served and public accessibility. The existing open space on public land has direct access for neighborhood streets while the replacement space will be surrounded by large NYU campus buildings. Therefore, even without consideration of the dramatic increase of new resident students, non-resident students, and NYU faculty, employees, and visitors, the uses will likely be more associated with the campus than with the neighborhood, creating a feel more responsive to the University than to the broader community. The existing open space is connected to the adjacent streets and provides a relief to the urban grid typical of the attractiveness of other “park blocks.” Building new towers where the parks are currently located is a drastic change to the aesthetic impact of the open space. Existing open spaces, including spaces on public land and the publicly accessible Children’s Playground/Key Park are built on natural ground and support large species mature trees. These trees, as well as dozens of smaller species mature trees in other areas will be removed and the hardscape replacement spaces will support fewer trees of smaller species because all the replacement spaces will be built above occupied space and not on natural land. The gardens above the garage at Washington Square Village were designed by Sasaki, Walker and Associates and completed in 1959. They are eligible for listing in the State and National Register of Historic Places. The tranquility and historic importance of these gardens will not be replaceable in the middle of a complex of large campus towers.

- **Evaluate the location of the existing playgrounds and dog run in consideration of warmth provided by the sun, the benefit of mature, large species trees, and distance from residential windows.**

The proposed replacement open space has limited usability. The addition of new buildings and the relocation of existing open space including children’s playgrounds and spray showers to more shaded areas will reduce the usability of these spaces. A replacement for the existing dog park at Mercer and Houston Streets is sited adjacent to one of the Silver Towers residential buildings. NYC Parks Department policy does not allow placement of dog runs where noise and odor will create conflicts with residents. The location will at least limit the hours of use of the dog run which is currently used at all hours.

- **Study the importance of sun exposure to the Community Garden.**

Tall new buildings in the project area will increase the shading in existing spaces, with particularly harmful impacts on the Community Garden on LaGuardia Place south of Bleecker Street. This extraordinary space is an important resource to its participating gardeners, and also stands as a symbol of urban resiliency and civic pride. The garden provides immense pleasure to its gardeners, visitors, and passers-by. The success of the garden is threatened by shading from new towers to its east, by the intensity of new uses in the project area, and by the inevitable construction impacts.

- **Review the history of NYU stewardship of public and publicly accessible open space and evaluate the causes of admitted shortcomings.**

NYU has agreed that it has a poor track record in maintenance, management and operation of public access to open space on their property. While they have stated that they have “turned over a new leaf,” the difficulty of enforcement of public access to privately owned public space has been a widespread concern in areas such as urban plazas throughout the city. NYU would have latitude to make unilateral decisions regarding hours of access and other rules affecting campus security and institutional liability. NYU would have control over the look and feel of the open space, potentially affecting the level of public use. Access to open space for freedom of expression could be restricted on privately held land.

- **Provide qualitative and quantitative information regarding existing publicly accessible NYU-owned property including the Sasaki Garden and the Key Park.**

The Introduction section of the Draft Scope states that the project would add four new acres of publicly accessible open space. However, the Draft Scope provides insufficient quantitative analysis of the amount of added open space compared to the amount of eliminated open space. Specifically, while the Draft Scope includes in its analysis *proposed* publicly accessible private land to be added, it appears not to include *existing* publicly accessible private land that would be eliminated. The north superblock includes two very large publicly accessible areas. The “key park” children’s playground is an active open space in Washington Square Village, directly adjacent to Mercer Playground. While NYU has restricted the degree of public access to varying degrees over the years by limiting the number of keys available to the broader community, this area is the largest and one of the most heavily used children’s playgrounds in the study area. The Sasaki Garden, located above the parking garage in Washington Square Village, is the largest passive open space in the study area other than Washington Square Park. NYU has had an inconsistent policy with regard to public access, but the area is now publicly accessible without restriction. The Coles Athletic Center was approved in 1979 based on an agreement that included public access to an acre or more of rooftop space, although NYU has failed to honor the commitments in this agreement. The loss of publicly accessible private space should be included in a quantitative analysis that also includes the addition of new publicly accessible space. This loss was not included in the analysis for the draft scope and should be corrected in the final scope. (If the space is not included in the quantitative analysis, it still should be included in the qualitative assessment of the loss of open space, and the final scope should include a full review of any conditions affecting public access to these spaces and the displacement of current uses, including during construction phases, should be part of the comparative review.)

- **Evaluate the current availability of open space in the project area for active and passive uses including division of active uses by age group.**

The project will bring large new populations of residential and non-residential young adults to an area underserved by active recreation facilities. Assess the needs of this group for open space suitable for active recreation, and assess the availability of such space in the study area.

• As described above, the project may result in physical losses of highly used public open space and changes in usability of existing open space, will limit public access to open spaces, will result in increased noise and shadows in public spaces, while also increasing the demand for open space. Therefore, a simple comparison of conditions with and without the project is not sufficient. The direct impacts require a full assessment under the procedures outlined in the CEQR Technical Manual.

3. Need for Special Assessments of Indirect Effects.

• **Assess the true public accessibility to open space in the project area given the intensity of university activity in the project area, including a comparative analysis of per capita area as compared to current conditions.**

The project will have an enormous indirect impact on open space in parts of the study area close to the project area. There will be 1400 new dormitory residents and a large number of students attending classes and other university activities as well as many university employees. Given the intensity of university expansion in the area, it seems likely that on nice days between classes, at lunch hour, and at the end of the school day, students will overwhelm open space in the project area and spread into nearby open space. The replacement open space in Washington Square Village may not be useable for other than NYU populations, especially during weekday hours when NYU is in full session.

• **Assess the impact of the project on Washington Square Park, including impacts of overuse on lawn areas and the effect on current users and uses of a substantial increase of use by new residential and non-residential occupants of the project area.**

The project may have an especially significant impact on nearby Washington Square Park, a landmark open space resource of special importance for neighborhood residents as well as visitors that also has significance as a historical, cultural, and socio-economic resource. The students who will live in dormitories are in an age group that will be attracted to the special spaces in Washington Square and will create new use pressures in this overcrowded park, potentially pushing out current users and having a significant effect on current and historical uses. This age group will also seek opportunities for active uses that pose a threat to damage the newly renovated lawns in Washington Square that are intended for passive use only.

• **Assess the impact of the project on NoHo, an underserved area for public open space.**

The indirect effects on open space will have an especially significant impact on residents of NoHo, an underserved area, and on current residents in the project area and in immediately adjacent areas. Residents who depend on access to existing open space within the project area will be particularly vulnerable to the pressures caused by large numbers of new residents and new daytime visitors who will use the proposed replacement open spaces.

• **Assess the impact of the project on the availability of existing active recreation facilities in the study area. Evaluate current availability of active open space, including separate analysis by ages served, and assess the effect of the project.**

The indirect effects on open space will have an especially significant impact on active open space in the project area. The areas surrounding the project area have very limited access to active recreational space such as ball fields and basketball courts. Passanante Park, just three blocks away, is the only large hard surface play area in the study area and is a vital resource for neighborhood residents, including

families with children, and for nearby schools. With no other nearby facilities suitable for activities such as Frisbee games, project occupants may cause pressures that reduce access of neighborhood residents to active recreation.

4. Special Considerations for the Need for a Detailed Assessment.

A simple quantitative preliminary assessment should not be used to obviate the need for a Detailed Assessment because

- a. There will be especially significant impacts on NoHo, an underserved residential area with no nearby alternative open space if use of open space in the project area is reduced.
- b. There will be especially significant impacts on residential areas in and immediately adjacent to the project area with no nearby alternative open space if use of open space in the project area is reduced.
- c. The user group composed of students residing and attending classes in the project area has higher than average needs for open space area and their use of open space will be highly focused in the project area and very nearby.
- d. The relatively high current open space ratio in the project area as compared to the study area means changes to open space use in the project area have a disproportionate effect on open space use near the project area as compared to their effect on the study area.
- e. Inadequacy of open space within the intensively used project area will have a cascading impact on nearby open space greater than the impact of the increased number of students on the open space ratio for the entire study area.

The project represents a major growth of NYU within its current core area. This is identified by NYU as one of four planning principles. The result will be a significant increase in the intensity of NYU activities in the project area, leading to a substantially increased presence of students in the project area as well as a greatly increased flow of students in and out. The project will also greatly increase the number of NYU visitors in the area as well as the volume of commercial activity in the area, and will create special new open space needs for students of a new elementary school, needs which may be in conflict or competition with the needs of NYU students.

• Perform detailed evaluations of current resources including surveys and interviews. Field surveys, performed while NYU is in full session, should assess the current active and passive use of nearby open space by NYU students.

• Provide detailed analysis of the impact on Washington Square Park, a special resource with enormous value to residents, nearby and citywide, and visitors

With respect to Washington Square Park, surveys should be done after areas of the park closed for Phase 2 reconstruction are reopened. Assessments should focus on park use during weekday hours when students are moving between classes or leaving educational activities for the day and evaluate user groups within the park as well as the impact of university and project related crowds on the perimeter of the park, e.g. with respect to the common use of the park perimeter for jogging and walking. Also, in Washington Square Park, data should be collected on active use by NYU students of lawns intended for passive use to help assess the extent of need for more active open space areas as

student activity is intensified in an area.

- **Compare existing use of publicly accessible open space in the campus setting to existing public space in the project area.**

The impact of large numbers of students and employees within the project area requires detailed evaluation including study of the total number of people from the project area likely to use and walk through the space. The assessment should include surveys of publicly accessible campus-like spaces such as Gould Plaza to evaluate their usability for public access. Surveys during weekdays when NYU is in full session should be included, especially at class-change times. The total number of resident and non-resident students anticipated in the project area, as well as employees and visitors, should be used in determining whether replacement open space surrounded by large university buildings will function well as publicly accessible open space.

- **Provide detailed analysis including field surveys and interviews to determine the impacts of the loss of the “key park” and Sasaki Garden as currently located.**

If a survey of an open space determines a space is under-utilized, the cause of disuse should be evaluated to determine if it is associated with a lack of demand or with an historical or administrative cause. For example, the residents in surrounding communities should be interviewed to determine the level of awareness regarding public access to current publicly accessible spaces such as the Sasaki Garden.

- **Perform surveys and interviews to evaluate comparative value to non-NYU residents of inward versus outward facing open space.**

NYU states in its draft scoping document that they seek “to design publicly accessible open space to be an integrated network of attractive spaces that are welcoming to the general public.” The project intentionally eliminates public open space on the street sides of the project area in favor of a large central hardscape surrounded by NYU educational and residential buildings. The hypothesis that this will improve public usability of open space is counter-intuitive and needs assessment. Field surveys should be designed to evaluate current user groups for open space with in-facing orientation such as Schwartz and Gould Plaza as compared to those with out-facing orientation such as the Co-Gen plaza and the sitting area outside Coles.

Users in particular groups, such as seniors, who are particularly subject to dislocation, should be interviewed to determine whether proposed replacement open space will serve their special needs.

- **Provide a detailed assessment of the comparative value of the public spaces on Mercer Street between Houston and Bleecker Streets versus the proposed relocation of uses to the other side of the “Zipper building.”**

This is problematic because the children’s playground and reflecting garden areas on Mercer Street have fallen into disrepair and disuse. However, as in Washington Square Village, the project moves public space here from the street to areas separated from the street by campus buildings. The usability of the new space by the general public needs to be reviewed in consideration of the proposed intensity of NYU use of the project area. As mentioned above, the proposed location of the dog run directly below many residential windows suggests a likely loss of usability that requires assessment.

- **Provide a full historical review of intentions and agreements regarding all spaces in the project area, including access to the Coles roof, gym, and pool, and also NYU responsibilities to manage and maintain publicly accessible areas.**

The draft scope asserts that the project will add four acres of new public space. However, no clear evaluation is available of the status of public accessibility to existing private space within the project area. The comparative analysis of lost open space and replacement open space needs to evaluate the number and size of trees, the percentage of hardscape versus natural ground, increased winter shading caused by new buildings and location of open space features as well as decreased availability of summer shade from large trees, and various kinds of seating.

- **Assess the impact of new retail stores on Washington Square**

Currently, there is minimal retail on streets surrounding the park. A commercial overlay in the blocks east of Washington Square Park, including in buildings across the street from the park, will have impacts on the park that require assessment. Depending on the size and type of stores, based on crowds attracted to stores in the nearby Broadway commercial area, substantial crowds may be drawn to these blocks with significant increases to visitors and pass-through pedestrians. Park use in Washington Square should be compared to park use in Union Square and Madison Square where there is existing adjacent commercial use and park users should be interviewed to assess the potential significance of the commercial overlay. Similarly, the hotel and other commercial uses made possible by proposed C1-7 zoning for inside the project area should be evaluated with regard to impacts on existing and planned open space there.

- **Identify existing open space in the study area where current use is near or above capacity.**

Throughout the residential open space study area, conditions of high intensity of use in existing open space need to be separately evaluated for both passive and active areas, and compared to city-wide norms. Where use of open space is at or near capacity, the likelihood of significant impacts from the project is greater. Targeted mitigations may be required for each open space that is currently at or near capacity.

- **The Adequacy of Open Space needs to be assessed for sub-sections of the study area based on the increase caused by the project of the residential and non-residential populations.**

There is a likely substantial increase in demand for both passive and active use of open space. College students have high open space needs, both active and passive.

- There will be an increased demand for passive open space because of the increased number of daytime visitors to the area.
- There will be an increased demand for active open space based on the ages of the people brought to the area as a result of the project.
- The project will replace the current predominance of community residents in open spaces in the immediate area to the extent that current users may be displaced in some open spaces by newcomers. This has occurred on various streets near NYU over the past decade, such as University Place. The study needs to develop effective qualitative analysis tools to assess whether the non-NYU users will retain a critical mass presence in the new and pre-existing open space or whether they may be marginalized by new residential and non-residential populations.

- **Evaluate the impact to the demolition of Coles on current community users.**

How many residents will be affected? Will there be community access to the temporary gym?
Will there be community access to the new permanent gym and pool?

5. Staging Impacts

• Evaluate the impacts on access to open space during the development period.

Review and analyze the impact of the extended development period caused by short- and mid-term loss of open space prior to completion of replacement open space including but not limited to Mercer Playground, LaGuardia Park, Community Garden, Key Park, dog run, Sasaki Garden, etc.

We are especially concerned that building a temporary gym in the northern superblock, on the site of the Key Park and Sasaki Garden will significantly reduce the amount of open space and recreational opportunities available during construction. In order to fully understand this impact, we must have specific information regarding phasing and project time frames.

6. Alternatives

• Project alternatives to be evaluated should include those that

- (1) retain all existing public open space without new underground use and supporting current uses
- (2) retain the Sasaki Garden and Key Park in current locations and
- (3) provide new open space for active use within the project area.

5. SHADOWS

The CEQR Technical Manual requires a shadow analysis on publicly accessible open space or historic resource with sun-sensitive features. In addition to these required analyses, CB2 seeks to draw attention to the following shadow analysis areas:

In all cases:

- Study air flow; shadows cause lack of tree growth, causing loss of Co2 filters
- Study quality of life; effect of tall buildings blocking sunlight on human physical, physiological, mental, and emotional health.
- All buildings
 - Impact on property interiors and exteriors
 - Impact on property values – Possible eminent domain requiring just compensation?

West Side of Mercer Street between Houston and West 3rd Streets

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values – possible eminent domain requiring just compensation?
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings

- Loss of light and increase in shadows on Mercer Street between Bleecker and Houston Streets because of the height of the proposed Zipper building (“Valley of Darkness”) and on areas surrounding the Zipper building in general
- Loss of light and increase in shadows on Mercer Street between Bleecker and West 3rd Streets because of the proposed “Boomerang” building
- What will be the shadow on the buildings, on the street and inside the Mercer-facing apartments? There is currently direct and indirect sunlight entering Mercer-facing apartments through most of the day on most of the days of the year. What would be the effect of the proposed Superblock buildings?

LaGuardia Place

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values - Possible eminent domain requiring just compensation?
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings.

Block 525, LaGuardia Between Houston and Bleecker

Study potential for shadows and their:

- Impact on property interiors and exteriors
- Impact on property values
- Impact on vegetation
- Impact of shadows on windows of buildings near any new multi-story buildings.

Time Landscape

Landscape Artist Alan Sonfist created Time Landscape as a living monument to the Manhattan forest inhabited by Native Americans and encountered by Dutch Settlers in the early 17th century. This is green parkland maintained by the NYC Department of Parks under Greenstreets.

Study potential for shadows and effects on:

- Impact on variety of trees and other vegetation in landscape work of art
- Impact on insects
- Impact on animal life

LaGuardia Community Garden

Study potential for shadows and their:

- Impact on vegetation
- Impact on insects
- Impact on animal life
- Impact on flowering time of milkweed, which is the food source of Monarchs in the larval stage (LaGuardia Corner Garden has been a registered Monarch Waystation [#1766] since September 2007)

- Impact on the development of the larvae and what effect will that have on Monarch populations
- Impact on other insects such as sphinx moths, Admiral butterfly, Eastern Swallowtail and their food sources.
- Impact on mature apple and pear trees, which require 6-8 hours of direct sunlight daily to produce fruit.

Proposed New Children’s Playground on North Side of Buildings 3&4, Washington Square Village

Study potential for shadows and their:

- Impact on safety given loss of light
- Impact on vitality of playground if shadowed and sunlight lost
- Impact on vitamin D absorption due to loss of light

Mercer Street Dog Run

Study potential for shadows and their:

- Impact on dog run vitality
- Impact on safety given loss of light
- Reviewed in greater detail in Open Space Section

Proposed Open Space Areas

Study potential for shadows and their:

- Impact on vegetation
- Impact on insects
- Impact on animal life
- Potential negative impact on the inviting nature of these areas

Morton Williams site

Study potential for shadows and their potential effects on:

- Monarch butterfly population
- LaGuardia Corner Garden plantings
- 505 LaGuardia Place windows
- Windows across LaGuardia Place

University Village – Landmarked

Study potential for shadows and their potential effects on:

- Impact on property interiors and exteriors
- Property values
- How the impact of shadows from multi-story buildings affect the landmarked landscaping of the southern superblock, including grass surrounding the historically and culturally significant “Bust of Sylvette.”

Washington Square Village – Eligible for Inclusion in the National Register per the New York State Historic Preservation Office

Study potential for shadows and effects on:

- Impact of shadows on historic structures - interior and exterior
- Impact of shadows on Community Gardens
- Impact of shadows on Sasaki, Walker & Assoc. roof garden, one of the earliest parking structure roof gardens in the country
- Impact on site lines of a Corbusian-inspired “Tower in the Park” aesthetic
- Impact of shadows on the Cable Building at 611 Broadway

6. HISTORIC AND CULTURAL RESOURCES

Greenwich Village, and especially the area being studied, is rich in historic and cultural resources that may be impacted by the proposed development. From the legendary people – writers, musicians, performers and more - who lived and worked in this area to the architecture and public art, careful study is warranted. Some of the items addressed below have been considered in greater detail in the following sections: Shadows, Neighborhood Character, Urban Design and Visual Resources, and Construction Impacts.

General Impacts

A broader consideration should be undertaken of direct and indirect impacts of sightlines to and from various historically designated sites, sites eligible for designation, specific historic structures, and cultural resources.

- Applicant must provide details of designs in a scoping document involving historically designated properties, those eligible for designations and the rich historic and cultural value of the area.
- Consider a more thoughtful analysis of direct and indirect impacts on nearby historic districts and individually landmarked buildings (designated and eligible/calendared).
- Provide an analysis of potential physical damage to historically designated property, individual landmarked buildings, and sites eligible for designation, and nearby historic districts and individually landmarked properties.
- Study impact of NYU’s presence and space utilization on ability for preexisting and other community cultural facilities to take root.
- Study impact of expansion on plans to replace the Children’s Aid Society at the same or an alternate location.
- Study effect of continuing transformation of historical sites, small businesses, into a university campus; loss of vibrant community to university “campus.”
- Study effect of concentration of all resources in one monolithic entity.

- Study effect of diminishing experiences, contributions, and pride of non-academic members of the community.
- Provide an analysis of the impact of proposed commercial development in historical buildings on the character and aesthetic quality of these buildings.
- Proposed development may create street walls incompatible with neighborhood.

Alternatives

- Study implication of not acquiring or building under the City-owned strips.
- Zipper building: consider alternative aesthetics to comport with historic design of the area. It does not relate to the spatial constraints, nor to loft buildings in the historic NoHo to the east or tower-in-the-park with Historic Register-eligible WSV or University Village.

University Village (a/k/a/ Silver Towers and 505 LaGuardia Place)

- Landmarks Preservation Commission – Designation List 407, LP-2003 (November 18, 2008)
 - Boundaries- 100 and 110 Bleecker Street (aka Silver Towers I & II, 98-122 Bleecker Street and 40-58 West Houston Street) and 505 LaGuardia Place (aka 487-507 LaGuardia Place and 64-86 West Houston Street). Built 1964-67; I. M. Pei & Associates, architect; James Ingo Freed, chief designer.

Quotes from the 2008 Designation Report:

- “University Village is one of the finest examples of a mid-20th century residential complex located in New York City.” (p. 1)
- “Occupying a five-acre ‘superblock’ in Greenwich Village, between West Houston and Bleecker Streets, the site was originally part of a much larger urban renewal scheme conceived by Robert Moses, chairman of the Mayor’s Committee on Slum Clearance, in 1953. **As part of NYU’s agreement with the city to take over the site in 1960, the school set aside one-third of the units for middle-income residents.**” (emphasis added)
- “The complex includes three identical free-standing 30-story towers executed in reinforced concrete that are positioned at the center of the site in a “pinwheel” configuration around a 100-by-100 foot lawn. The west tower, at 505 LaGuardia Place, is a cooperative residence with a long-term lease from NYU, and the east towers serve as faculty housing.”
- “The buildings were thoughtfully arranged by Freed to maximize views and privacy, as well as to increase general visual interest.”
- “Near the center of the complex stands a large sandblasted concrete sculpture, an enlargement of a 1954 cubistic work by Pablo Picasso. Executed in 1968 by the French artist’s frequent collaborator, the Norwegian sculptor Carl Nesjar, the off-center placement of the 36-foot tall bust echoes and enhances the project’s dynamic

plan.”

- The complex has been deemed among “the most refined examples of modern architecture in Manhattan” (architecture curator, Terence Riley).
- SHPO deemed University Village eligible for inclusion in the National Register in February 2009

Quotes from SHPO’s 2009 Evaluation:

- “Associated with events that have made a significant contribution to the broad patterns of our history.”
- “Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose component may lack individual distinction.”
- “Though less than 50 years of age, University Village is exceptionally significant in the areas of architectural design and planning. Upon its completion, University Village was a critical success and won accolades from the American Institute of Architects, the City Club of New York, the Concrete Industry Board, and Fortune Magazine. Later, in 1983, when Pei was honored with the Pritzker Architecture Prize, University Village was cited as one of his most notable works.”

Washington Square Village

In February 2011, the New York State Historic Preservation Office (“SHPO”) determined that Washington Square Village, bounded by West 3rd Street, Bleecker Street, Mercer Street & LaGuardia Place, meets the eligibility criteria for inclusion in the National Register. The specific criteria met are as follows:

- “Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose component may lack individual distinction.”

Note that SHPO’s determination concurred with the Landmarks Preservation Commission’s May 21, 2007 determination that Washington Square Village appeared to be eligible for National Register listing.

SHPO further opined as follows:

- “It is the opinion of the SHPO that the superblock complex of two residential towers, elevated landscaped plaza, commercial strip, and below-grade parking meets Criterion C as an impressive example of postwar urban renewal planning and design. Paul Lester Wiener working with S.J. Kessler & Sons Architects designed the complex which was constructed between 1956 and 1958. The towers are notable for their vibrant blue, yellow and red glazed brickwork that contrasts with the field of grey glazed brick. Corbusian influences are shown by the sculptural elements hiding mechanical equipment on the roof and the pilotis forms at the bases.”

Sasaki, Walker & Associates were responsible for the landscape, which is one of the earliest parking structure roof gardens in the country.

- The garden between the two slab buildings was designed by Hideo Sasaki and Peter Walker and their associates, and was one of the earliest parking structure roof gardens to be built in this country. It was planned as an integral part of this modernist apartment complex, ensuring air space and light between the enclosing blocks, and providing an area of beauty and tranquility for the surrounding community.

The EIS should include information on the following:

- Impact of inappropriate masses and heights of two proposed “Boomerang” buildings. In particular, height of Mercer building is too tall.
- No details have been provided of construction elements and how they would comport with aesthetics of both Washington Square Village and University Village, if at all.
- No details have been provided as to changes in the bottom floors of Washington Square Village.

7. URBAN DESIGN AND VISUAL RESOURCES

The proposed area was carefully and thoughtfully designed by some of the time’s most prominent architects: James Ingo Freed, a partner of I.M. Pei for the South Superblock, and Paul Lester Weiner, a former partner of Le Corbusier for the North Superblock. The North block was designed and built first, and the South block was designed with the North block’s aesthetic as well as the open space to the east and west on the block, as key considerations. Both Pei and Weiner were followers of Le Corbusier’s “tower-in-the-park” paradigm which requires that increased height be balanced by a proportional increase in open space. The study of the proposed project’s urban design and visual resources should be analyzed with this in mind.

For both the North and South Superblocks:

- Define clearly exactly what changes are anticipated as part of the LSGD special permit concerning urban design features including height and setback waivers, floor area and open space redistribution, as well as building textures and materials, landscape design and plantings, and view corridors.
- Examine the effects of floor area and open space redistributions across zoning boundary lines on pedestrian comfort and orientation and community scale, identity and continuity.
- Analyze the effects of proposed de-mapping of parts of LaGuardia Place and Mercer Street on pedestrian comfort, enjoyment and general experience of the street, community context, image and identification, and reduced streetscape enhancement.
- Assess the impacts of increased building heights and bulk on blockage of sunlight, obscuring sightlines, obstruction of view corridors, reduced air circulation and creation of wind tunnels.
- Assess the effects of proposed conflicting architectural styles, forms and materials on community context, image, coherence, architectural mix and integrity, and area cohesiveness.

- Evaluate the impact of greater building bulk and height and re-aligned building and open space relationships on open space access, use, high-rise and low-rise interplay, and experience of community belonging and ownership.
- Analyze the effects of ambient lighting from proposed new buildings.
- Analyze placement of new curb cuts resulting from the proposed new development and their potential for interfering with streetscape continuity and image, urban essence and area cohesiveness.
- Study the impact on the existing path and sightlines of Greene and Wooster Streets preserved by previous efforts.

The above applies to both the North and South Blocks. The following are additional specifics to consider in each individual section.

North Block

- Assess the impact of recladding the ground level and second floors of Washington Square Village on historical context, neighborhood recognition, community image and loss of urban interest and variety.
- Study and compare alternative scenarios with different heights, bulk, shapes and orientations as alternatives to the two proposed new “boomerang” buildings in terms of taking up less open space and street space, having a more harmonious/less jarring effect in the urban design context, providing a more open pedestrian experience and obscuring less sunlight.
- Study and compare the following four alternatives:
 - (i) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does);
 - (ii) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does) and rising no taller than 23 feet above ground (the current height of Coles gymnasium);
 - (iii) erecting the Zipper building rising no taller than 23 feet above ground (the current height of the Coles gymnasium); and
 - (iv) erecting the Zipper building set back from Mercer Street to retain the current city-owned parkland strip (as the Coles gymnasium currently does) and rising no taller than 23 feet above ground from the midpoint of the block to the north (Bleecker) and stepping up or rising taller than 23 feet but no higher than 280 feet above ground from the midpoint of the block to the south (Houston).
- Study setting back the two proposed “boomerang” buildings to align with the east and west edges of Washington Square Village (instead of jutting out) and alternative forms of the two buildings in these alignments.
- Assess disorientation resulting from the two proposed “boomerang” buildings obscuring existing view corridors and driveways.

South Block

- Analyze effect of amassed bulk of proposed buildings on Mercer Street on light and air.
- Assess impact on the pedestrian experience of crowding of buildings on Mercer Street regarding blocked access, lack of openness, imposing bulk and loss of open space and airiness.
- Evaluate effects of proposed “zipper building” on urban design context, including lack of continuity, blockage of sunlight, creation of shadows, difference in scale, intrusion on sightlines and confusing form and setbacks.
- Evaluate the impact of moving the dog run and putting a building there on reducing open space, removing a green and airy environment, and curtailing social activity.
- Study the alternative scenario of changing the design of the building proposed at the dog run site to become cantilevered (to allow the dog run to remain).

8. NATURAL RESOURCES

For all of the categories related to direct environmental impacts including Natural Resources, Hazardous Materials, Water and Sewer Infrastructure, Solid Waste and Sanitation Services, Energy, Air Quality, Greenhouse Gas Emissions, Noise and Public Health, we understand that the CEQR Technical Manual calls for explicit areas of study, and that the University will be conducting preliminary analyses and only conduct further analyses if required based on the results. We would like to see all of the study results for all preliminary analyses, and further for each of these categories we want to call attention to our specific concerns.

- A detailed map of underground water is required.
- How will the increased number of “bathtubs” force and/or redirect this water? If water is restricted and/or redirected from the locations of the proposed buildings, it will be forced into other pathways leading to erosion of the foundations of the existing buildings that do not have underground protection.
- How will the loss of mature trees affect groundwater? (Past construction projects by NYU have involved extensive pumping of ground water stemming from Minetta Creek and its tributaries. Recorded data by community groups have detailed the loss of mature trees in the area that are attributable to such pumping.)
- Analysis of ground water pumping and its effect on the flora and tree-life in the project area is vital.
- How would the plan affect the habitat and viability of the red-tailed hawks that have developed, rather precariously, in the neighborhood? Red-tailed hawks are a majestic species rarely seen in urban areas, and thus treasured by bird-watchers and other community members. Red-tailed hawks have been seen for the last few years in the development area, and this spring even nested on the edge of Washington Square Park. How would the Plan (particularly the addition of large buildings, the diminution of park space, the removal of mature trees, the increase in population density, and poisons used to control rodents brought from additional garbage flows) affect their viability?

- What will the effects of pit excavation and soil removal be for:
 - Absorption of rainwater and storm water runoff
 - Air quality from removal of mature canopy of trees
 - Effect of deep earth removal, pit construction, on all natural resources in a 500' radius from surveyed dimensions of pit. (Mature trees, plantings, wildlife, springs, groundwater.)
- Information should be furnished on all aspects of ground stabilization within the immediate and surrounding areas. Monitors must be installed in buildings in the surrounding areas and the monitors' results must be posted online regularly.
- Vibration monitors must be installed in buildings in the surrounding areas and these monitors' results must be posted online regularly.

9. HAZARDOUS MATERIALS

- Please share all results of Phase I studies because there will be implications for what we think is important for Phase II.
- The root cause of the No. 6 heating oil leak has not been announced. Since a number of buildings at NYU continue to hold this type of heating oil, it is important to know what caused the leak. Moreover, since there will be significant vibrations in the immediate vicinity of the other Washington Square Village buildings, it is important the remaining tanks are permanently abandoned.
- Please give an outline of the age of all heating oil tanks used by NYU and the type of oil used.
- Which buildings have asbestos?
- What hazardous materials will be used during construction?
- Will there be new hazardous materials used in the buildings after completion?

10. WATER AND SEWER INFRASTRUCTURE

- What is the anticipated increase in demand on the New York City water supply?
- How will the increased demand affect water pressure in the surrounding areas?
- The draft scope should include a discussion of all new/proposed residential, commercial, hotels, and sports arenas that City Planning has approved by a zoning change or as of right in the Newtown Creek Catch Basin, and the impact that it will have in our area concerning the generation of waste water and storm water.

- All analyses need to include the net effect of permanent residents, employees, and transients. Their impact on our district and its infrastructure must be addressed given the condition/capabilities of our fresh and waste water systems and their limited capacities

11. SOLID WASTE AND SANITATION SERVICES

Solid waste and its collection is a major concern. We have these questions that apply to both during construction and after completion:

- Will NYU compost?
- Will the private carters they hire collect during the night hours or during the daytime?
- Will they build adequate and accessible storage space for solid waste and recyclables?
- Will they be installing "insinkers"?
- What measures will be instituted to promote reuse and waste prevention?
- Will they be compacting unsorted waste?
- What will they do with hazardous waste?
- Specifically where will the refuse be collected by the private carters and which streets will be used to access those locations?
- Which days of the week and at which times will refuse be collected?
- An analysis needs to be made of the amount (in tons) and types of waste that will be created during construction and after completion.
- Private carters notoriously ignore the requirement to report their pick up and disposal of any materials including putrescibles, recyclables and hazardous waste. NYU must deal only with contractors willing to disclose regularly what they pick up, when and how it is subsequently handled. Example: Plan to sort solid waste at the source might assure proper handling, otherwise there is no assurance that the contractor will separate recyclable, compostable or hazardous waste from any other.

12. ENERGY

- All new buildings should achieve LEED Gold standards.
- What is the capacity of the Co-Gen facility and at what point will its capacity be met? What is the "buildable" or "add-on" capacity for the Co-Gen facility?
- Will NYU consider, or will NYU find it necessary, to add another Co-Gen facility due to this project?

- What impact will this project have on the New York City steam, natural gas, and electric grid/systems? How much of these energy sources will be consumed during and after construction?
- How will the proposed construction alter NYU's current energy usage and management plans/strategies?
- Considering the height of some of the projected buildings, has NYU studied the installation of solar power and rooftop gardens?
- Will NYU consider requiring directed high-efficiency lighting to be used on the project construction sites in order to reduce energy use and direct lighting away from residential windows?

13. TRANSPORTATION

NYU's proposed changes will cause increases in vehicular and pedestrian traffic that will impact already congested and overused streets, approach corridors and parking accommodations, as well as causing increased use of public transportation. CB2 believes that NYU's Draft Scope shows an insufficient study area as well as inadequate study times and locations.

Vehicles

- The study should include not only intersections in the immediate study area, but should be extended to include approach routes to the study area, i.e. travel corridors, and what the impact of the increased development and commercial use will have in generating vehicular trips on these already congested corridors. For example:
 - Approaches from the Holland, Lincoln and Queens Midtown Tunnels and from the East River Bridges.
 - Bleecker Street – from the western area.
 - Varick Street.
 - Avenue of the Americas.
 - Broadway.
 - Mercer Street.
 - West Broadway.
 - Washington Square South and West 4th Street.
 - Fourth Avenue/Bowery.
 - University Place.
- The study also should be extended to include times of day beyond the typical time periods assigned as critical peak hours (i.e. weekdays am, midday, pm) because of other periods of high traffic volume, in particular evening hours, including late evening on weekend nights (especially Friday and Saturday, but also Thursday and Sunday), when the area is often used for access to downtown clubs and other entertainment, also expected to increase with increased student populations.
- In addition to the intersections already cited in the draft scope of work, the effects of increased vehicular traffic (on both congestion and safety) should also be assessed at the following pedestrian crossings that are already dangerous and crowded:

- Washington Square South and LaGuardia Place.
 - Washington Square East and West 4th Street.
 - Cross streets along Washington Square South.
 - Midblock crossings, particularly on West 3rd Street between LaGuardia Place and Mercer Street, as well as Bleecker Street between LaGuardia Place and Mercer Street.
 - Mercer Street.
 - Broadway and Washington Place (which leads to the center of the proposed commercial overlay).
 - Greene Street and Washington Place (narrow intersection – potential traffic flow impact).
 - Greene Street and West 4th Street (narrow intersection – potential traffic flow impact).
 - Bleecker Street up to Broadway.
- Assess the impact on pedestrian safety from added turning movements at already dangerous turning areas, including:
 - LaGuardia Place at Washington Square South.
 - LaGuardia Place at West 3rd Street.
 - LaGuardia Place at Bleecker Street.
 - LaGuardia Place at Houston Street.
 - Mercer Street at Bleecker Street.
 - Analyze the impact from added density of increased delivery trucks and service vehicles such as sanitation trucks and oil deliveries on street congestion and pedestrian safety, especially on already clogged and dangerous streets such as West 3rd Street and Bleecker Street between LaGuardia Place and Mercer Street, as well as the effects of increased deliveries in the proposed commercial overlay.
 - Assess the increase in emergency vehicular traffic and its impact on local streets, as well as the potential for blocked emergency vehicle access.
 - Assess the additional need for parking for students, faculty, NYU staff, residents, and businesses by group, numbers and times of day.
 - Analyze the effects of the loss of 281 below-grade parking spaces and the relocation of 389 relocated below-grade parking spaces, as well as the impact of the loss of on-street parking, on circling of traffic searching for street parking, including on safety, congestion and emissions impacts, especially in light of a significant increase in both permanent and transient parkers.
 - Assess the need for additional curb cuts and driveways and their impact on pedestrian safety and access, as well as on the loss of on-street parking.
 - Analyze how increased traffic, particularly at peak times, will affect accessibility to residences.
 - Assess the effects of new traffic patterns and circulation based on moving the entrance at Washington Square Village.
 - Analyze the impact of the proposed hotel, faculty accommodations and dorms in the Zipper building on producing additional trips and accompanying congestion and safety concerns.

- Assess the effects of increased traffic and noise because of the much greater density and retail proposed for the Zipper Building.
- Assess the effects of additional limo and taxi traffic.
- Assess the effects of expanded NYU bus service (as well as school buses for the proposed school) on street congestion and potential accommodations.
- Analyze the projected modal split in the study area and how it will differ from current conditions in terms of impact on access, safety, and congestion.
- Assess the increase in noise and emissions from all types of increased vehicular traffic and congestion.
- Analyze the impact of visiting sports team buses and accommodation of their northwest passage on congestion, cruising, safety and air quality.

Pedestrians

- Extend pedestrian analysis locations to the commercial overlay area and street and sidewalk connections between the commercial overlay area and the development area.
- Analyze the impact of additional foot traffic in the commercial overlay area on sidewalks that are already heavily used at similar times of day.
- Analyze the impact of additional platoons of pedestrians at already crowded crossings and overloaded sidewalks on sidewalk congestion and crossing safety, for example at:
 - Washington Square South and LaGuardia Place.
 - Washington Square South and Washington Square East.
 - West 4th Street.
 - Bleecker Street.
- Analyze the effects of narrowed sidewalks on Mercer Street in both the North and South Blocks on pedestrian access and sidewalk congestion.
- Assess the impacts of increased vehicular traffic on access and mobility for seniors, the disabled and children.

Transit

- Assess need for increased bus service and frequency, including the need for restoration of as well as additional bus service and routes.
- Assess need to restore and re-open closed subway entrances and to restore/provide on-site service employees (token booths, etc.) at these entrances in light of increased usage. Include evening hours in this study in addition to usual am/pm peak hours.
- Assess need to increase subway trip frequencies.

- Assess potential for sidewalk crowding and interference with subway access on way to identified subway stops.

Bicycles

- Assess impact of increased bicycle trips on both bike riders and pedestrians and assess bicycle safety, access and parking.

14. AIR QUALITY

- How would wind patterns be affected by new buildings? Abnormally high winds are sometimes created by large buildings in close proximity, which compress air into narrow gaps between the buildings.
- How would wind patterns affect noise, the stability of windows and exterior window screens, and flying debris?
- It is vital that all vehicles and equipment used during construction use Ultra-Low Sulfur Diesel and Best Available Technology for contaminant filtration.
- A study of air quality during the summer and winter months from increased congestion, both traffic and human, on ground-level ozone levels.
- Air quality studies during both summer and winter months for increased particulate matter (including but not limited to pollen, dust, elemental carbon, etc.) are necessary for both before, during, and after construction.
- Third-party air monitoring throughout a five-block radius is mandatory and the results must be posted online weekly.
- Will delivery trucks and additional buses resulting from the expansion utilize diesel fuel? If so, how much additional particulate will be generated into our air?
- To prevent a generation growing up over the 19-year period with asthma-inducing dust, diesel fumes/particulates and elevated ozone, we encourage NYU to explore incorporating language specifying use of Ultra Low Sulfur Diesel with Best Available Technology for non-road vehicles in contracts with contractors and sub-contractors used for the project.

15. GREENHOUSE GAS EMISSIONS

- It is indicated on page 44 of the NYU Draft Scope of Work that Greenhouse Gas emissions estimates will be discussed and quantified “if deemed potentially significant.” These estimates must be quantified and discussed under any and all circumstances, regardless of their anticipated significance.

- What are the likely greenhouse gas emissions from the proposed school, from idling school buses and cars picking up and dropping off children? This should be estimated with the actual idling averages rather than based on legally mandated idling restrictions.
- Precisely how many trees will be removed? Using this number in consideration of the ages of the trees removed, what will be the effect of the removal of these trees on nature's ability to convert pollution and greenhouse gas emissions and filter carbon dioxide from air.

16. NOISE

The effects of the addition of so many young people in the area with an established and aging population is a concern for environmental study. Even if the DEP finds that the concomitant noise level after construction is not raised by the benchmark 3DBs, it will certainly change in content and character.

- On Page 45 of the NYU Draft Scope of Work, Task 17, paragraph 2 states: "...it is not expected that project-generated traffic would be likely to result in significant noise impacts. It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed." It is imperative that a study of noise impacts is performed and mitigation measures discussed.
- Late-night noise generated by students is a major problem in our community. How will the expansion and revolving temporary populations not exacerbate this problem? What mitigation measures will be put into place?
- What will the increased vehicular traffic have on noise levels (e.g. ambient, horn honking, engine idling, etc.) both during and after construction?
- Where will new HVAC units be placed? What effects will these units have on noise levels? What will the mitigation measures be? Will any HVAC units currently in use be replaced/moved during or after construction?
- What will be the noise levels of refuse collection trucks during and after construction?
- Will there be expanded lab and science rooms that will require large air handlers; if so where will they be located?

17. PUBLIC HEALTH

- How would health be affected, generally? The ways different populations would be affected (children, adults, seniors, those with a compromised immune system, etc.) in terms of sleep disruption, elevated blood pressure, and psychological effects must be discussed.

- What are the risks of injury from airborne objects and debris due to heightened winds, particularly for small children and seniors?
- How will the burden on local emergency rooms (diminished by the closing of St. Vincent's) be affected by the added population to the neighborhood?
- How would the people living in the area be affected by the closing and/or possible relocation of the Morton-Williams supermarket, both during construction and after the completion? Dependence on distant supermarkets is a hardship, especially for seniors.
- Can the local police precinct be expected to provide adequate police coverage for an expanded population? The 6th Police Precinct has told us many times that they are over-burdened with tourism, nightlife, and protection issues. This expansion will have a profound effect not only on the 6th, but on the immediately adjacent 1st Precinct.
- Fire hazards are greatly increased because of apparent removal of the two-way roads crossing the northern superblock and loss of access to the existing fire lanes there, among other reasons. To what extent will NYU study the FDNY's ability to operate during and after construction? In particular:
 - a. How would fire trucks get to all the existing apartments (in particular the buildings in the northern superblock given the landscaping around the two proposed "boomerang buildings" and taking of the green strip that is currently the LMNOP play area).
 - b. How would access to buildings for ambulance and emergency responders be affected by construction?
- How would access to buildings for ambulance and emergency responders be affected by automobile traffic? How would this affect ambulance response time? Certainly, the increased truck traffic for deliveries and moving in and out and increased refuse collection trucks will be a safety hazard for both bikers and pedestrians; mitigation measures must be outlined and discussed.

18. NEIGHBORHOOD CHARACTER

NYU's Draft Scope does not go into detail on Neighborhood Character and essentially states that it will be studied in light of other aspects of the EIS. That is insufficient given the unique character of the neighborhood, which has been created by the people who came here to be part of an avant-garde lifestyle fostering diversity and tolerance. Greenwich Village is nothing without its character.

If you asked people around the world to name a place that epitomized the idea of Neighborhood Character, a high percentage would name Greenwich Village and SoHo, not just because of the historic buildings, but also because of the energy created by the people who lived - and live - here. The Study needs to define this quality, identify its sources and its lifeblood, and study how proposed project Plan elements such as freshman housing, hotel and classrooms may directly and indirectly change the qualities that made the Village and SoHo famous; the qualities that still make them among the major reasons why people visit New York

This creative character – the fabric of Greenwich Village – still exists in small restaurants, cafes, theaters, music clubs and neighborhood stores, but is threatened to change beyond recognition by the

influx of students and faculty displacing artists, musicians and other established residents, retail serving a university rather than a community, and reduction in the open space that helps define the area as a Village.

Some specific areas of investigation that CB2 requests include:

- Study and report on the impact of changing the zoning of a quiet residential area to higher-density residential plus commercial.
- Use interviews, surveys and focus groups with non-NYU-affiliated residents, especially long-term and arts community residents, to help define the area's character. Collaborate with knowledgeable residents, groups, and elected officials to develop appropriate survey parameters. For example:
 - Interview residents and business owners in the project area and nearby in NoHo, the South Village, and the Bleecker St. area, to assess their experience and concerns regarding NYU expansion with regard to impacts on neighborhood character
 - Interview residents on blocks such as East 12th Street where large NYU dormitories were recently built to evaluate the impact on the character of the immediate neighborhoods. Interviews should focus on residents who moved in years before the dorms were built and should include residents in different age groups
 - Interview residents on University Place between 8th Street and 12th Street where there is an apparent change of character caused by large numbers of students moving between dorms and classrooms
 - In the same areas, interview owners and customers of small stores and restaurants where the customer base is primarily the non-NYU community
- Report on the historic character of the area proposed for this project, including but not limited to:
 - Landmarks and buildings/complexes eligible for the State and National Register of Historic Places
 - Public art including the Picasso "Portrait of Sylvette" statue and the Vicki Khuzami "Bohemorama" print displayed on Morton Williams that features writers, musicians and artists that lived and worked in Greenwich Village because "Greenwich Village was the only place where they could live the lives they needed to live."
 - Locations where legendary people lived and worked, and sites of historic events
 - Books, movies, television shows and other media showing or mentioning the historic nature and unique character of Greenwich Village going back to the 1800s
 - Architectural history of Le Corbusier's Tower-in-the-Park paradigm and his modernist influence on both the University Village and Washington Square Village complexes (including their interplay – one somber and brutalist and the other featuring colored bricks and water towers typical of the modernist movement, etc) since I.M. Pei was influenced by and Paul Lester Weiner was a partner of Le Corbusier before designing Washington Square Village.
 - The history of Hideo Sasaki, chairman of the department of Landscape Architecture of the Harvard Graduate School of Design, and the garden he created as a pioneering example of rooftop planting above the Washington Square Village garage
 - Visitors/tourists coming to Greenwich Village annually, both national and international
 - Small "mom-and-pop" businesses, galleries and venues throughout the area
 - Retail that serves residential needs changing to that which is more suited to student population

- Study and report on the effect of additional NYU structures, housing, students and personnel in this historic area on:
 - Existing and prospective non-NYU residents on and near the project blocks
 - Balance of non-university residential and retail to NYU residential, offices, gym, retail, hotel and dormitory in the project area and adjacent buildings
 - Shift from true residential “Village” to university “campus”
 - Population demographic, density and character changes when the dorm and hotel are in use and daytime employees are present
 - Change in population as NYU students seeking off-campus housing displace existing residents and as long-time residents move rather than being in the middle of NYU students 24/7
 - Quiet enjoyment of the neighborhood by existing residents - to be studied on weekdays during class changeovers, on weekends, and on evenings/nights
 - Reduction of streetside public open space
 - Sunlight and air available to residents and visitors
 - Added stress due to crowded conditions and more buildings than appropriate in a medium-density residential neighborhood
 - Effect of loss of mature trees and plants, and publicly accessible tree-filled walkways
 - Loss of birds and their prevalent song as their existing habitat is cut down and/or shadowed into inability to thrive, glass-clad buildings cause birdstrike deaths, ongoing construction effects, and the loss of open and green areas in which the wide variety of birds – including many songbird species – currently feed
 - Loss of independence and quality of life for the area’s many elderly residents due to the plan’s moving the supermarket farther than they can reach without assistance, having a large student population hurrying to and between classes and not always giving mobility-challenged people adequate berth, and taking away streetside gathering places.
 - Change in character due to loss of independent “mom-and-pop” shops, bookstores, galleries, music venues and small cafés that cater to adults and families, and other elements that together make up the charm of Greenwich Village
 - Reduction in property values causing vacancies and unsellable apartments both during and after construction, creating a “ghost-town” effect
 - Reduction in perceived value of the neighborhood as added retail creates long-term vacant storefronts or undesirable businesses
 - Loss of the character of neighborhood treasures such as Washington Square Park as students displace resident and visitor use
 - Loss of Le Corbusier tower-in-the-park modernist aesthetic of University Village and Washington Square Village by putting additional buildings on the “park” portion between and adjacent to the carefully planned existing structures

19. CONSTRUCTION IMPACTS

During the recent real estate expansion, Community Board 2 has gained significant experience in construction impacts. In such a dense residential area, construction projects can and have created noise, dirt, vermin and other challenges for residents and businesses. In order to address these kinds of issues the Board formed the Construction Committee. Based on our extensive expertise CB2 asks that NYU include plans to reduce or eliminate these problems.

- Please provide a detailed plan of the methods that will be used to achieve LEED Silver status.

- If the findings of the Phase I Environmental Site Assessment (ESA) require further testing and / or remediation, please provide the Board with complete information on any required protocols and the methods of implementing them during construction.
- Please provide a complete plan for construction monitoring and testing systems.
- Please provide complete details of the construction-phasing plan and it's impacts.
- Please provide a Plan to implement the requirements for protecting landmarked structures during construction.
- Please provide the approved Stage 1A Archaeological Assessment that will be implemented during construction.
- Please provide details of the proposed foundation systems including the methods of installation and a site preparation and excavation plan.
- Please provide a detailed construction site plan that includes crane locations, construction elevator locations, material storage, contractor entry points, contractor parking, garbage removal, and temporary street and sidewalk closings.
- CB2 notes that there have been serious impacts on other NYU projects in the area from dewatering and the noise it creates. Please provide complete details for dewatering including a noise mitigation plan.
- The Proposed Action states the need for **“New York City Department of Transportation revocable consent for utility lines beneath City streets.”** CB2 notes that the mechanical systems for the new construction will require connection to the NYU central co-gen plant. CB2 has experienced significant problems with the simultaneous installation of these systems in conjunction with construction and related street closings. Please provide a complete plan for the installation of these systems. Also include plans for any work necessary to expand the capacity of the co-gen plant.
- Please provide a plan for keeping a supermarket in continuous operation during construction.
- Please provide the Board with a detailed vermin abatement plan.
- Please provide a plan for the protection of the open space strips, interior gardens, and existing trees during construction.
- The proposed action notes that there will be excavation under the Friends of LaGuardia Park. Please provide a plan for preserving the existing trees and vegetation at this location
- Community Board 2 has experienced significant noise complaints from construction projects in our district. Please provide a Construction Noise mitigation Plan.
- Please provide a plan for Public Notification and Community Outreach during construction.

V. ALTERNATIVES

There are many possible alternatives that allow a significant amount of development in the proposed study area but with less impact on residents, businesses and the character of the area. Please provide information and response on the following:

The No-Action Alternative

- The “No Action Alternative” should be a “Reasonable Worst Case Scenario.” Please provide a detailed description of the maximum “AS OF RIGHT” build out (including development allowed by Special Permit), the options the current zoning allows, and the anticipated impacts.
- The “No Action Alternative” in the Commercial Overlay District should also include the maximum “AS OF RIGHT” build out. NYU has noted the potential for additional construction in this area.

Main Alternatives To Full Plan

- As reasonable alternative for the proposed C1-7 District, please provide a comparative analysis for a district that retains the current R7-2 zoning district and uses Commercial Overlay Districts as needed rather than a blanket commercial rezoning for the entire area. The North and South Superblocks already have over 76,000 sq ft of “as of right” commercial zoning available (proposed plan calls for only 55,000 sq ft of commercial development).
- Provide a reasonable alternative to the complete blanket commercial overlay rezoning in the COA, including an analysis detailing which blocks would be slated for commercial development and which would not be, in addition to the present existing grandfathered commercial areas totaling nearly 40,000 sq ft.
- As reasonable alternative for the proposed Demapping and City disposition of portions of City streets, please provide an analysis of the proposed project without using these areas in any way. This should include an analysis of the practicality of using space under the “green strips” in question where trees and shrubs have already taken deep root, and an alternative that would not involve removal of the existing trees, plantings, equipment, design or uses of these strips.
- As reasonable alternative for the proposed actions please provide a plan to retain the current zoning and city-owned property and relocate the proposed new buildings in other areas of the city such as Community Board 1, which has expressed strong interest in such a proposal. Invitations and options to build in the Financial District where land and existing zoning would accommodate present and future expansion to and beyond 2031, and better serve NYU and the City, should be investigated. (See Appendix D for list of potential sites, and also investigate empty lots available and/or working with other developers seeking Community Facility bonuses that NYU may be able to utilize.)
- As a reasonable alternative for the proposed Hotel, use excess hotel space in CB2 as there are many new hotels in the Board area, or other nearby Community Boards.

Additional Alternatives to All or Parts of Full Proposed Plan

- As a reasonable alternative for the proposed Temporary Gym on the North Superblock, study the possibility of arranging discounted services at local physical fitness facilities and use of

neighboring Institutions' field houses, athletic facilities and/or gymnasium space in addition to NYU's existing Palladium athletic facility.

- Provide a reasonable alternative for the active recreational open space needed for a potential increase of some 2000 college-age young adults that is not provided for in the current plan. The current plan assumes that existing community based (non-university) active open spaces will be used, as no additional space is provided (active in this case is being defined as Frisbee, touch football, green fields as opposed to passive space -- benches gardens, paths, etc). Therefore, please provide a reasonable alternative to the actual building proposals for the Superblocks that could accommodate this campus environment.
- Provide an alternative that does not involve any building encroachment beyond the current streetwall of the superblocks.
- Provide an alternative with a significant reduction in the number of proposed dorm beds, hotel rooms, faculty housing and/or other added residential.
- Provide an alternative that requires less square footage overall, possibly resulting in fewer new NYU buildings, and results in significantly lower added density.
- Provide an alternative that does not change the zoning or add more commercial spaces to the COA.
- Provide an alternative that retains 14 and 15 Washington Place as residential buildings.
- Study the level of different potential land lease price points on the residents of 505 LaGuardia Place to determine a level that would not result in displacement of existing residents or undue financial hardship.
- Study the potential for using online learning to reduce space needs. According to the United States Distance Learning Association, "Nearly 30% of higher education students now take at least one course online. The overall finding of the U.S. Dept. of Education meta-analysis is that classes with online learning (whether taught completely online or blended), on average, produce stronger student learning outcomes than do classes with solely face-to-face instruction." They also report that, "More than sixty (60%) of college courses in 2020 will be taught online."
- As a reasonable alternative for a zoning change on the North Superblock, consider requesting a modification of the tax map for the Retail Strip on the North Superblock to include the grass area immediately behind it, and report on how much development that would allow without rezoning or changing the rest of the block's zoning. In this alternative, CB2 suggests that consideration be made to keep the additional built structure low so as to preserve the light, air and sightlines of the existing residences in Washington Square Village.
- As a reasonable alternative for a zoning change on the South Superblock, consider requesting a modification of the tax map to create a separate lot for what is now the Coles gymnasium building, and building to no higher than 23' from midblock north between Houston and Bleecker Street as currently exists, and higher but no higher than the adjacent University Village towers from midblock south.

Written Statement of Daniel Bowman Simon
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New York University, Robert F. Wagner School of Public Service
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Presented to NYC City Planning Commission
Re: New York University's proposed expansion

Spector Hall, 22 Reade St. May 24, 2011

Thank you for having me here today. My name is Daniel Bowman Simon. I am a resident of the East Village and I am a Master of Urban Planning Candidate at NYU Wagner. I am also an NYU alumnus, BS Stern 2001. My connection to NYU started before I was born. My parents met in an NYU Dining Hall, and 6 months later, were married in a tent in my grandparents backyard. I was born 3 years later. I love NYU and all that it has done for me.

But I am here today to vent my extreme frustration with dealing with NYU administration on land use issues.

In March 2010, I launched a well-thought out petition campaign which read:

“To President John Sexton:

We, the undersigned students of New York University, respectfully request permission for students to plant a vegetable garden in the gated grass area behind Silver Towers in the area facing Houston Street between Mercer Street and LaGuardia Place. The harvest could be donated to a nearby food pantry to help feed the hungry in our community.

This garden would serve as an outdoor classroom for NYU students and neighborhood youth. It would be a beautiful, tangible, and robust commitment to NYU’s dedication to public service, creative teaching, innovative research practices, and environmental stewardship.”

In a matter of weeks, over 300 NYU students signed on in support. I was told by the administration that because this area is landmarked, it would have to remain grass.

I did my homework, and reaffirmed my belief that Landmarks does not regulate the particulars of plantings. Grass is the equivalent of tomatoes and corn. (In fact, corn is a grass.)

I pointed this out to the administration, and by the end of April 2010 I received an email from NYU Administration that said "Just continuing to feel chagrin that I had misinformation about landmarks...Hope you're well, and please accept my apologies for the wrong information." However, that did not mean NYU was ready for a garden.

My request to meet with President Sexton was refused until I ran into him in Washington Square Park on June 1, 2010. He told me that he thought a garden was a wonderful idea, but that he was no "Don Mafia" and that I should be in touch with Lynne Brown, Senior Vice President for University Relations and Public Affairs.

I contacted Ms Brown. She asked me to answer four questions: 1) The rationale behind the site you have indicated as your preferred location for an urban agriculture project; 2) A project budget that estimates initial up-front costs and ongoing operating costs of the project (materials, supplies, etc.); 3) Your plan for assembling and managing a cohort of volunteers to plant and maintain the garden (and the number of hours involved); 4) Thoughts about "succession planning" once you graduate.)

I reached out to other university gardeners, such as Harvard, Yale, and University of Pennsylvania who helped me answer the questions and provided letters of support. Additionally, the University Plaza Nursery School located in the ground level of 110 Bleecker, and Bowery Mission, a local hunger organization in need of fresh produce provided letters of support and collaboration.

On July 29th, we finally met, along with a handful of other administration officials. It was a very encouraging meeting. She asked when Spring planting season would begin. She told me that I need not do any further outreach to stakeholders such as Silver Towers Tenants Association because she was already in support. Ms. Lynne Brown asked for a "Full Proposal." Colleagues and myself delivered that on September 25th. On December 16th, I received an email from Ms. Brown that indicated in no uncertain

terms that my proposal was being refused. What was uncertain to me, and actually illogical was the rationale.

I quote: "We are engaged in several levels of consultation with a wide array of city agencies and civic groups and looking comprehensively at the future of the site. We need to approach whatever we do now on the superblocs, particularly on the landmark site you have identified, with an eye toward how it may trigger a series of premature reviews which we do not choose to undertake at this time. Since our developed plans for the superblocs do NOT call for a food garden on the site you have located, there is a high chance that putting one there now would result, at a minimum, in confusion."
"

If you recall, we'd resolved that Landmarks was not an issue back in April 26th. What other premature reviews might be triggered, I know not.

At that point I decided to reach out to the Silver Towers Tenants Association. They invited me to meet with them on February 17, 2011. They voted unanimously to support our proposal, and send a letter to NYU administration indicating such.

Shortly after, NYU put out their COA request to LPC. It included a change in vegetation on our requested site, from grass to shade trees. The COA was approved. And so I emailed LPC to double check that modifying the planting would not trigger another COA or any other LPC review. Jenny Fernández, Director of Intergovernmental & Community Relations NYC Landmarks Preservation Commission confirmed that. And I've attached that correspondence. I also sent it to Ms. Brown requesting to meet to discuss, but have not heard back.

That is where this stands today. I thought it important to come down to speak today, since I feel that NYU Administration is not dealing with me and the hundreds of students I represent in a professional, rational, logical manner. My proposal is good for NYU and for the neighborhood and I've been stonewalled to the max. I hope to report back to you at some point in the near future that they've had a change of heart. But for the meanwhile, please take heed when you make decisions about their requests.

NYU Garden Proposal
September 2010

By
Daniel Bowman Simon and Christina Ciambriello
with Kelly McLane and Professor Jennifer Berg



*"For the things we have to learn before we can do them, we learn by doing them."
-Aristotle*

"And I said, my Lord, New York City is the first experiment in the ecumenical century, in trying to create a community of communities. And then all of a sudden, because of the way NYU was in New York City, I said, my lord, this University is ecosystematic with the city. We don't have a single gate on campus. We don't have a single place at which you can retreat. We don't have a blade of grass. Most of our buildings aren't next to NYU buildings. We are, in the words of Gallatin, 'in and of the city,' and I said maybe there is a special mission for the city and the university together"

-President John Sexton, in conversation with Charlie Rose, July 2010

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SUMMARY

Project Description

The NYU Garden is a proposed edible garden in the gated grass area behind Silver Towers in the area facing Houston Street between Mercer Street and LaGuardia Place, an area of approximately 115 feet x 25 feet. The garden will be tended to and enjoyed by students, faculty, staff, and community members. Produce will be donated to Bowery Mission to provide a modest amount of healthy, fresh food to the hungry in the local community.

The Department of Nutrition, Food Studies, & Public Health in the Steinhardt School of Culture, Education, and Human Development will be the primary academic sponsor of this garden.

Mission

To create a garden that serves as an outdoor classroom in NYU's core Washington Square campus. This garden will afford new and profound opportunities for experiential learning, research, community building, and job skills training. It will be a beautiful, tangible, and robust commitment to NYU's dedication to academic excellence, public service, creative teaching, innovative research practices, and environmental stewardship—truly “in and of the city.”

Vision

The NYU Garden will be a university-wide project that places NYU at the forefront of the international gardening and good food movements. The NYU Garden will serve as a hub to coordinate and facilitate pedagogical and research activities, and connect NYU to the greater New York City community.

The garden will act as a recruitment tool for top prospective students, establish a “green” fundraising vehicle, and provide a venue to keep Alumni engaged and literally rooted in NYU activities. As stated in the NYU Sustainability Task Force 2008 Annual Report, “As a major urban research university uniquely embedded in the fabric of New York City, we can not only develop resources, ideas, and practices that further other university sustainability efforts, we can also export our knowledge and our example to cities all over the world.” The garden at NYU will be grounds for a cutting edge research laboratory, an example in innovative practices and civic engagement.

In addition to helping NYU remain competitive with peer institutions, the NYU Garden will further the goals of NYU 2031 providing much needed space in the University's core for innovative learning, research, and community outreach opportunities that benefit NYU students, faculty, and administration alike.

Background

The People's Garden NYU petition was launched in March 2010 as part of Daniel Bowman Simon's Clinton Global Initiative University (CGIU) commitment. Over 300 current students signed on to the petition. By moving forward with this proposal, NYU will join the hundreds of colleges and universities nationwide, including many Ivy League schools, which have started and sustained active campus gardens.

Christina Gambriello and Professor Jennifer Berg collaborated previously on an NYU Green Grant called Grow Cook Eat Learn (GCEL). GCEL educated fifty-five 1st and 5th grade students about where food origins as well as the environmental, ecological, health, and ethical decisions associated with food production.

SITE SELECTION

There are not many on-the-ground NYU locations available for cultivation. The Silver Tower site is ideal and unique because:

- It is highly visible to passers-by on Houston Street and sidewalk/driveway entrance to Silver Towers complex, which, with a garden would beautify the area and increase goodwill with neighbors.
- The site is currently unutilized and provides no demonstrable benefit to NYU.
- The site is immediately adjacent to University Plaza Nursery School, attended by many children of NYU faculty. The school has expressed interest in being an active participant in the garden.
- Its southern exposure affords plenty of sunlight for year-round growing. (There are three honey locust trees on the adjacent sidewalk, but they are mostly dead and do not block much sunlight. Even if replanted, it would be many years before the site were shaded.)
- The spigot on the west side of the Tower provides easy access to water.
- The site is surrounded by a tall iron fence, which acts as a security feature and an ideal place to mount signage that will highlight positive attributes of the project.



existing conditions

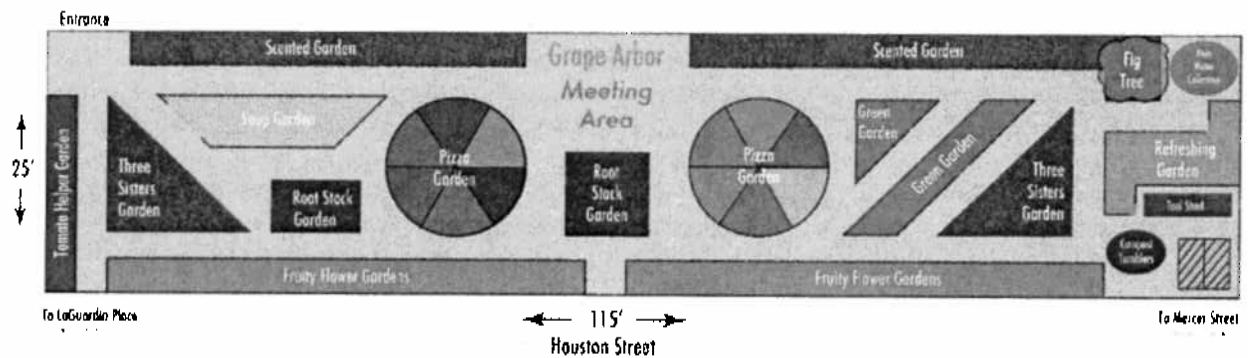
SITE DESIGN

The garden is divided into nine groups of intercropped beds containing compatible plants linked by a common theme. Garden themes are popular in children's gardens as they offer an additional "hook" to engage children in the garden, enrich curricula with historical and scientific facts, increase crop production when companion planting is utilized and organize gardens in a more meaningful way for both children and adults alike.

The historically significant Three Sisters Garden, for example, includes sunflowers, corn, squash, pole beans and nasturtium flowers. Corn, squash and beans were nicknamed the "three sisters" by Native Americans to describe the way these three plants support and sustain one another when grown together. Each plant uses and contributes to the soil in unique ways, offering sustainably healthy soil and, in turn, increased crop production. The corn provides a structure for the pole beans to grow on while simultaneously stabilizing the corn stalks. Adding sunflowers next to the corn has a positive impact on that sister's growth, while the nasturtium flowers keep the devastating squash bugs away.

The variety of plants available in this garden serves a multitude of purposes. In this garden, children and adults will have the opportunity to encounter a wide range of meal ingredients in plant form, increasing awareness about where our food comes from. The variety also entices people to taste things they may never have tried before and inspires people to combine different fruits, vegetables and herbs when cooking. In addition, such a variety allows food pantries a unique opportunity to provide consumers with a healthy and stimulating array of choices in food. From a gardener's perspective, planting such a wide array of crops encourages healthy soils and decreases the likelihood of pests and diseases.

To demonstrate resource conservation and the closed-loop potential of gardening, a small rodent-proof composter and a rainwater cistern will also be situated in the garden. A small, secured toolshed will be included as well.



(This garden was designed by Kelly McLane, an alumna of NYU and the Garden Coordinator at Bronx Green Middle School.)

ACADEMIC PROGRAMMING AND CIVIC ENGAGEMENT

Academics

The Food Studies department will offer courses in urban agriculture that include garden maintenance and education as coursework components, including a 1 credit course offered in Spring 2011. The garden will also enhance the proposed undergraduate major in Food, Culture and Sustainability. Other departments from across the University will also be able to propose courses that include garden maintenance and education as coursework components.

In the Fall 2010 academic semester, Professor Jennifer Berg will sponsor and oversee an Independent Study with Christina Ciambriello, who will explore and develop the funding and implementation of the forthcoming NYU Garden. This will include: curriculum development, budget and construction timeline, and grant writing and research. Daniel Bowman Simon is simultaneously conducting a survey of university-level garden projects across America for his Wagner Capstone Independent Study, advised by Professor David Elcott and Professor Jennifer Berg.

Residential groups

There are a variety of residential groups that have expressed interest in gardening at NYU. There are "Green Streams" at both Broome and Goddard residence halls and the bulk of programming at Seventh Street is environmentally focused. The garden would be a perfect venue for such programming.

Involvement of other members of the NYU and surrounding community

The NYU Green Alumni Network, Silver Towers Tenant Association, University Plaza Nursery School, nearby public schools and The Bowery Mission may be interested in volunteering or touring the garden as a one-time activity or on a recurring basis. These groups will liaise with the NYU Office of Civic Engagement. In the event that there is more interest in maintaining the garden than is actually necessary, the NYU Office of Civic Engagement can work with gardening organizations such as New York City Community Garden Coalition, GrowNYC and CropMobNYC to offer gardening opportunities around the five boroughs.

GARDEN MANAGEMENT AND MAINTENANCE

General management

The Garden will be managed under the supervision of faculty from the Department of Food Studies. The Food Studies department will supervise a part-time, year-round student garden manager who will ensure that the garden is properly maintained and who will coordinate volunteers for the garden, in collaboration with the Office of Civic Engagement. We anticipate up to 30 total hours a week will be required to maintain the garden during peak season. The NYU Garden Shop may supply student workers to the garden from time to time. However, the Garden Shop is not expected to be the principal or fundamental source of labor to maintain the garden. Every volunteer will sign proper liability waivers.

Initial construction and planting

The garden will be constructed and planted by a team of volunteers recruited from across campus via email listservs and posters. The proposal authors will manage the recruitment effort along with the NYU Office of Civic Engagement. Silver Towers Tenant Association and University Plaza Nursery School (housed in 110 Bleecker Street, which borders on the proposed garden site) will be invited to participate.

Clubs

An All-Square Gardening Club at NYU is currently in proposal phase and will be submitted to the NYU Student Activities Board. Upon approval, this club will serve as a primary recruiting vehicle for garden volunteers. It will also sponsor and co-sponsor garden-related events. Other clubs with overlapping interests, such as Earth Matters, Two Birds One Stone, Sustainable Silver, Gallatin Consciousness, CHET's for School, Stern Campus Greening Initiative, Wagner Environmental Policy and Action and Wagner Food Policy Alliance, will be invited to volunteer in the garden.

Long term sustainability of the garden

Gardens, by their very nature, are somewhat unpredictable. A risk is taken every time a seed is planted. If the garden fails due to lack of interest, the disassembly and return to its current state as a patch of grass would be a simple process. However, the hope is that this garden will engage many members of the NYU community for many reasons and that the rewards will far surpass the modest harvest the garden provides. The responsibility for this small plot of land will transfer from year to year. The commitment and passion exhibited in one year will transfer to the next as well. The University, by taking this garden seriously, will do their part to see that this garden succeeds from one year to the next, and through the generations.

PROPOSED TIMELINE 2010-2011

Fall 2010

Garden approval process

Independent Study Coursework of Daniel Bowman Simon and Christina Crambriello

Spring 2011

Food Studies course in Urban Agriculture

March 2011

Raised Bed Construction

April 2010

Plant/Transplant seeds into raised beds in Garden

Earth Week 2011

Garden Groundbreaking with President Sexton and other dignitaries

Summer 2011

First harvest

September 2011

Fall harvest event

NYU Garden
Proposed Startup Budget

Item	Description	Unit Price	Quantity	Cost	Subtotal/Total	Supplier
PLANT MATERIALS						
1 Scented Gardens (2)						
Lavender	Potted Perennial	\$8.00	12	\$96.00		FM/LLF Farmers' Market - Local Farm
Anise, Hyssop	Potted Perennial	\$8.00	16	\$128.00		FM/LLF
Sage	Potted Perennial	\$8.00	20	\$160.00		FM/LLF
Rosemary	Potted Herb	\$5.00	16	\$80.00		FM Farmers' Market
Lemon Balm	Potted Perennial	\$8.00	24	\$192.00		FM/LLF
Bee Balm	Potted Perennial	\$8.00	16	\$128.00		FM/LLF
Marjoram	Potted Herb	\$5.00	16	\$80.00		FM
Oregano	Potted Herb	\$5.00	20	\$100.00		FM
Thyme	Potted Herb	\$5.00	16	\$80.00		FM
					\$1,044.00	
2. Pizza Gardens (2)						
Peppers	Potted Vegetable	\$2.25	40	\$90.00		SHFM Silver Heights Farm Nursery
Chives	Potted Herb	\$5.00	40	\$200.00		FM
Onions	Potted Bulbs 15-25	\$2.75	12	\$33.00		SHFM
Garlic	Potted Bulbs 15-25	\$2.75	12	\$33.00		SHFM
Tomatoes	Potted Vegetable	\$2.50	24	\$60.00		SHFM
					\$416.00	
3. Three Sisters Gardens (2)						
Sunflowers	Seeds 1 oz	\$5.35	2	\$10.70		SOC Seeds of Change
Corn	Flat of 36+ Starts	\$21.00	2	\$42.00		SHFM
Squash	Potted Vegetable	\$2.25	16	\$36.00		SHFM
Pole Beans	Flat of 48+ Starts	\$28.00	2	\$56.00		SHFM
Nasturtiums	Seeds 1/2 oz	\$5.00	8	\$40.00		HMCOS High Mowing Organic Seeds
					\$184.70	
4. Fruity Flower Garden						
Raspberries	Potted Perennial	\$25.00	12	\$300.00		EL Edible Landscaping
Strawberries	Potted Perennial	\$3.20	60	\$192.00		EL
Ground Cherries	Potted Fruit	\$2.50	36	\$90.00		SHFM
Sunflowers	Seeds 1 oz	\$5.35	4	\$21.40		SOC
Nasturtiums	Seeds 1/2 oz	\$5.00	8	\$40.00		HMCOS
Panster	Seeds	\$4.50	8	\$36.00		SOC
Spinach	Seeds 1,000	\$3.95	4	\$15.80		HMCOS
Lettuce Mix	Seeds 1,000	\$5.75	4	\$23.00		HMCOS
					\$718.20	
5. Root Stock Gardens (2)						
Carrots	Seeds 1/8 oz	\$3.75	4	\$15.00		HMCOS
Turnips	Seeds 2 oz	\$4.30	4	\$17.20		HMCOS
Raddishes	Flat of 48+ Starts	\$20.00	2	\$40.00		SHFM
Potatoes	"Seeds" 2.5 lb bag	\$14.50	4	\$58.00		CG Cook's Garden
Cauliflower	Flat of 48+ Starts	\$32.00	2	\$64.00		SHFM
Sugar Snap Peas	Flat of 48+ Starts	\$28.00	2	\$56.00		SHFM
Bush Beans	Flat of 48+ Starts	\$28.00	2	\$56.00		SHFM
					\$306.20	
6. Tomato Helpers Garden						
Heirloom Tomatoes	Potted Vegetable	\$2.50	10	\$25.00		SHFM
Bee Balm	Potted Perennial	\$8.00	5	\$40.00		FM/LLF
Parsley	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LLF
Cilantro	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LLF
Basil	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LLF
					\$125.00	
7. Soup Garden						
Heirloom Tomatoes	Potted Vegetable	\$2.50	3	\$7.50		SHFM
Okra	Potted Vegetable	\$2.25	3	\$6.75		SHFM
Yellow Onions	Potted Bulbs 15-25	\$2.75	2	\$5.50		SHFM
Parsley	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LLF
Carrots	Seeds 1/8 oz	\$3.75	1	\$3.75		HMCOS
					\$43.50	
8. Green Gardens						
Snow Peas	Seeds 1 lb	\$11.50	1	\$11.50		HMCOS
Dill	Potted Herb	\$5.00	3	\$15.00		FM/LLF
Okra	Potted Vegetable	\$2.25	4	\$9.00		SHFM
Leeks	Potted Bulbs 15-25	\$2.75	1	\$2.75		SHFM
Kales	Flat of 48+ Starts	\$32.00	1	\$32.00		SHFM
Cabbages	Flat of 48+ Starts	\$32.00	1	\$32.00		SHFM
Lettuce Mix	Seeds 1,000	\$5.75	1	\$5.75		HMCOS
					\$108.00	
9. Refreshing Garden						
Anise Hyssop	Potted Perennial	\$8.00	6	\$48.00		FM/LLF
Mint (peppermint & spearmint)	Potted Herb	\$5.00	6	\$30.00		FM/LLF
Lemon Balm	Potted Perennial	\$8.00	6	\$48.00		FM/LLF
Lemon Verbena	Potted Herb	\$5.00	6	\$30.00		FM/LLF
Sorrel	Potted Herb	\$5.00	6	\$30.00		FM/LLF
					\$186.00	
Fig Tree	Black Mission Fig Tree	\$150.00	1	\$150.00		Willis Orchard Company
					\$150.00	
	PLANT TOTAL				\$3,281.60	

NYU Garden
Proposed Startup Budget

Item	Description	Unit Price	Quantity	Cost	Subtotal/Total	Supplier
RAISED BED MATERIALS						
Soil	sold by cubic yard	\$16.75	50	\$837.50		BN Bisset Nursery
Soil Delivery	charged by truckload (20 cu yd max)	\$275.00	3	\$825.00		BN
Recycled Lumber (locally reclaimed hard pine)		\$3,950.00	1	\$3,950.00		GPF Gotham Forest Products
Lumber Cutting and Assembly		\$2,400.00	1	\$2,400.00		
Grape Ards or Shady Meeting Area (14'x6')	sold by square foot	\$45.00	81	\$3,780.00		TS Trellis Structures
					\$11,792.50	
TOOLS, WATERING, & MISCELLANEOUS						
Kids Tool Set (shovel, trowel, cultivator, rakes)	3 of each tool, 18 pcs.	\$119.95	4	\$479.80		KG Kids Gardening
Adult Shovel		\$29.95	4	\$119.80		GSC Gardener's Supply Company
Adult Hoe		\$19.95	4	\$79.80		GSC
Tub Troughs	carry tools, water, plants	\$16.95	12	\$203.40		GSC
Kneeling Pads		\$9.75	12	\$117.00		GI Global Industries
Kids Gardening Gloves		\$7.95	12	\$95.40		KG
Adult Gardening Gloves		\$6.00	4	\$24.00		GSC
Watering Hose	100 ft	\$39.97	2	\$79.94		HD Home Depot
Adjustable Water Nozzle		\$5.97	2	\$11.94		HD
Y Splitter Hose Adapter	allows 2 hoses to connect to spout	\$10.94	1	\$10.94		HD
Rainwater Urn	65 gallons	\$219.00	1	\$219.00		GSC
Compost Tumbler		\$149.00	2	\$298.00		GSC
Suncast Horizontal Storage Shed	dimensions: 56"x31.5"x50.25"	\$239.00	1	\$239.00		
					\$1,978.02	
PLANT ACCESSORIES						
Tomato Cages	set of 4	\$44.99	7	\$314.93		GSC
Bamboo Stakes	set of 25	\$15.95	3	\$47.85		GSC
Twine	2,250 ft length	\$12.87	1	\$12.87		HD
					\$375.65	
	SUPPLIES TOTAL				\$14,146.17	
LABOR						
Student Farm Manager	\$15/hour @ 10 hours/week	\$150.00	52	\$7,800.00	\$7,800.00	N/A
	GRAND TOTAL				\$25,227.77	

NYU Garden
Proposed Ongoing Budget

Item	Description	Unit Price	Quantity	Cost	Subtotal/Total	Supplier
PLANT MATERIALS						
1 Scented Gardens (2)						
Lavender	Potted Perennial	\$8.00	3	\$24.00		FM/LF Farmers' Market: Local Farm
Anise Hyssop	Potted Perennial	\$8.00	4	\$32.00		FM/LF
Sage	Potted Perennial	\$8.00	5	\$40.00		FM/LF
Rosemary	Potted Herb	\$5.00	4	\$20.00		FM Farmers' Market
Lemon Balm	Potted Perennial	\$8.00	6	\$48.00		FM/LF
Bee Balm	Potted Perennial	\$8.00	1	\$8.00		FM/LF
Marjoram	Potted Herb	\$5.00	4	\$20.00		FM
Oregano	Potted Herb	\$5.00	5	\$25.00		FM
Thyme	Potted Herb	\$5.00	4	\$20.00		FM
					\$261.00	
2. Pizza Gardens (2)						
Peppers	Potted Vegetable	\$2.25	40	\$90.00		SHFM Silver Heights Farm Nursery
Chives	Potted Herb	\$5.00	40	\$200.00		FM
Onions	Potted Bulbs 15-25	\$2.75	12	\$33.00		SHFM
Garlic	Potted Bulbs 15-25	\$2.75	12	\$33.00		SHFM
Tomatoes	Potted Vegetable	\$2.50	24	\$60.00		SHFM
					\$416.00	
3. Three Sisters Gardens (2)						
Sunflowers	Seeds 1 oz	\$5.35	2	\$10.70		SCC Seeds of Change
Corn	Flat of 36+ Starts	\$21.00	2	\$42.00		SHFM
Squash	Potted Vegetable	\$2.25	16	\$36.00		SHFM
Pole Beans	Flat of 48+ Starts	\$28.00	2	\$56.00		SHFM
Nasturtiums	Seeds 1/2 oz	\$5.00	8	\$40.00		HMCOS High Mowing Organic Seeds
					\$184.70	
4. Fruity Flower Garden						
Raspberries	Potted Perennial	\$25.00	3	\$75.00		EL Ebbelle Landscaping
Strawberries	Potted Perennial	\$3.20	30	\$96.00		EL
Ground Cheries	Potted Fruit	\$2.50	36	\$90.00		SHFM
Sunflowers	Seeds 1 oz	\$5.35	4	\$21.40		SCC
Nasturtiums	Seeds 1/2 oz	\$5.00	8	\$40.00		HMCOS
Pansies	Seeds	\$4.50	8	\$36.00		SCC
Spinach	Seeds 1,000	\$3.95	4	\$15.80		HMCOS
Lettuce Mix	Seeds 1,000	\$5.75	4	\$23.00		HMCOS
					\$397.20	
5. Root Stock Gardens (2)						
Carrots	Seeds 1/8 oz	\$3.75	4	\$15.00		HMCOS
Turnips	Seeds 2 oz	\$4.50	4	\$17.20		HMCOS
Raddishes	Flat of 48+ Starts	\$20.00	2	\$40.00		SHFM
Potatoes	"Seeds" 2.5 lb bag	\$14.50	4	\$58.00		CG Cook's Garden
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					\$306.20	
6. Tomato Helpers Garden						
Heirloom Tomatoes	Potted Vegetable	\$2.50	10	\$25.00		SHFM
Bee Balm	Potted Perennial	\$8.00	3	\$24.00		FM/LF
Parsley	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LF
Cilantro	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LF
Basil	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LF
					\$109.00	
7. Soup Garden						
Heirloom Tomatoes	Potted Vegetable	\$2.50	3	\$7.50		SHFM
Okra	Potted Vegetable	\$2.25	3	\$6.75		SHFM
Yellow Onions	Potted Bulbs 15-25	\$2.75	2	\$5.50		SHFM
Parsley	Flat of 48+ Starts	\$20.00	1	\$20.00		FM/LF
Carrots	Seeds 1/8 oz	\$3.75	1	\$3.75		HMCOS
					\$43.50	
8. Green Gardens						
Snow Peas	Seeds 1 lb	\$11.50	1	\$11.50		HMCOS
Dill	Potted Herb	\$5.00	3	\$15.00		FM/LF
Okra	Potted Vegetable	\$2.25	4	\$9.00		SHFM
Leeks	Potted Bulbs 15-25	\$2.75	1	\$2.75		SHFM
Kales	Flat of 48+ Starts	\$32.00	1	\$32.00		SHFM
Cabbages	Flat of 48+ Starts	\$32.00	1	\$32.00		SHFM
Lettuce Mix	Seeds 1,000	\$5.75	1	\$5.75		HMCOS
					\$108.00	
9. Refreshing Garden						
Anise Hyssop	Potted Perennial	\$8.00	2	\$16.00		FM/LF
Mint (peppermint & spearmint)	Potted Herb	\$5.00	6	\$30.00		FM/LF
Lemon Balm	Potted Perennial	\$8.00	2	\$16.00		FM/LF
Lemon Verbena	Potted Herb	\$5.00	6	\$30.00		FM/LF
Sorrel	Potted Herb	\$5.00	6	\$30.00		FM/LF
					\$122.00	
PLANT TOTAL					\$1,947.60	

NYU Garden
Proposed Ongoing Budget

Item	Description	Unit Price	Quantity	Cost	Subtotal/Total	Supplier
RAISED BED MATERIALS						
Soil	sold by cubic yard	\$16.75	15	\$251.25		BN Bissett Nursery
Soil Delivery	charged by truckload (20 cu yd max)	\$275.00	1	\$275.00		BN
					\$526.25	
TOOLS, WATERING, & MISCELLANEOUS						
Kids Tool Set - shovel, rake, trowel, rakes	3 of each tool, 18 pcs.	\$119.95	1	\$119.95		KG Kid's Gardening
Adult Shovel		\$29.95	1	\$29.95		GSC Gardener's Supply Company
Adult Hoe		\$19.95	1	\$19.95		GSC
Tub Trugs	carry tools, water, plants	\$16.95	2	\$33.90		GSC
Kneeling Pads		\$9.75	4	\$39.00		GI Global Industries
Kids Gardening Gloves		\$7.95	12	\$95.40		KG
Adult Gardening Gloves		\$6.00	4	\$24.00		GSC
Watering Hose	100 ft	\$39.97	1	\$39.97		HD Home Depot
					\$403.12	
PLANT ACCESSORIES						
Bamboo Stakes	set of 25	\$15.95	3	\$47.85		GSC
Twine	2,250 ft length	\$12.87	1	\$12.87		HD
					\$60.72	
					\$989.09	
LABOR						
Student Farm Manager	\$15/hour @ 10 hours/week	\$150.00	52	\$7,800.00	\$7,800.00	N/A
					\$10,736.69	

APPENDIX A: RELEVANT NYU INTERESTS + OUTSIDE SUPPORT & RESOURCES

University-wide

- University Relations & Public Affairs
- Strategic Assessment, Planning, and Design
- Facilities, Construction & Management
- Office of Civic Engagement
- Inter-Residence Hall Council
- The Residential College- Broome, Goddard, and Seventh Street (“Green Stream”)
- Sustainability Task Force
- NYU Green Alumni Network

Student Clubs/Groups

- Earth Matters
- Two Birds One Stone
- Sustainable Silver
- Gallatin Consciousness
- CHED's for School
- Community Agriculture NYU
- Stern Campus Greening Initiative
- Wagner Environmental Policy and Action
- Wagner Food Policy Alliance
- Urban Planning Student Association

Academics (classes, lectures, etc)

- CAS: Environmental Studies, Freshman Honors Seminar, Metropolitan Studies
- Gallatin: Individualized Fill-in-the-Blank
- Law: Furman Center, Environmental and Land Use Law
- NYC Poly: Engineering
- Steinhardt: Food Studies, Early Education, Elementary Education
- Tisch: Film Studies, ITP
- Wagner: Urban Planning, Public Administration, Reynolds Program
- Fales Library: Critical Topics in Food Series

Community Partners

- University Plaza Nursery School (at 110 Bleecker St, Silver Towers)
- Local public school (P.S. 116)
- Gardeners at 505 LaGuardia (Silver Towers)
- Silver Tower Tenants Association
- The Bowery Mission

Outside Support & Resources

- Green Thumb, NYC Department of Parks & Recreation
- NYS Office of Community Gardens and NYS Department of Agriculture & Markets
- People's Garden Initiative, United States Department of Agriculture
- NYC Community Garden Coalition, Just Food, and other NYC-based non-profits
- Association for the Advancement of Sustainability in Higher Education
- Sustainable Agriculture Education Association
- Gardens programs at other universities, such as Harvard Garden, Penn Garden at University of Pennsylvania, Columbia University Community Garden and Yale Sustainability Food Project

**APPENDIX B:
MULTIMEDIA**

Christopher James of the NYU Office of Public Affairs, has requested that two HD rapid dome camera be installed in the NYU Garden in order to document activities and the passage of time in the garden. The footage will be used for both marketing and educational purposes. Mr. James will submit a separate proposal detailing the concept.

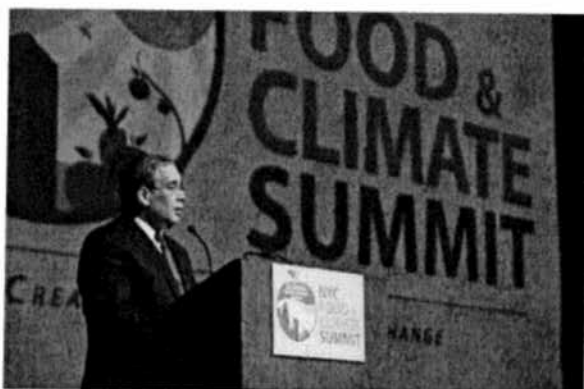
APPENDIX C: THE CURRENT NYC SCHOOL GARDEN LANDSCAPE

The school garden movement in NYC is at a tipping point. In 2010, many prominent elected officials and political appointees have gone on the record in support of school gardens. With this surge in interest, there will be increased demand for skilled professionals. NYU should seize the opportunity to create its own school garden to use as a training ground for the next generation of garden educators and policy makers in this city and beyond.



In May 2010 NYC Mayor Michael Bloomberg, City Council Speaker Christine Quinn, NY State Department of Agriculture and Markets Commissioner Patrick Hooker, and TV personality Rachael Ray came together in Brooklyn P.S. 29's school garden. They announced "new programs to promote healthy eating...gardening, cooking and nutrition instruction to show city youth how food is grown and how to bring that food from garden to table." At the event, Mayor Bloomberg remarked "School gardens encourage more young New Yorkers to eat healthier diets and help them understand where their food comes from." Speaker Quinn agreed and said that "Teaching children about healthy eating and where our food comes from is just as valuable as teaching them how to read and write...The Council has been working to use our food system to create jobs, promote public health, and protect the environment – most recently through our FoodWorks New York initiative. We look forward to continued partnership on additional community gardens efforts."

As an outcome of this announcement, GrowNYC (formerly CENYC) hired their first Citywide School Gardens Coordinator. (Source: <http://www.nyc.gov/html/om/html/2010a/pr206-10.html>)



Also in 2010, Manhattan Borough President, Scott Stringer, issued the report FoodNYC: A Blueprint for a Sustainable Food System as a follow-up to the 2009 NYC Food and Climate Summit (co-sponsored by NYU). One of primary goals of the report is "to educate New York City's children to become a new generation of healthy and environmentally aware eaters." Two of Borough President Stringer's recommendations to help achieve this goal are 1) Require a Food Curriculum in Public Schools and 2) Expose city students to farms and gardens. (Source: <http://www.mbpo.org/uploads/foodnyc.pdf>)

**APPENDIX D:
THE CURRENT CAMPUS GARDEN LANDSCAPE**

Hundreds of colleges and universities across America are integrating gardens into the fabric of their identity. As more and more young people gardening, the presence of a robust on-campus gardening programming will become a deciding factor in where many top students matriculate. Many of NYU's peer institutions have recently established gardens on campus. A sample of mission statements follows:

Columbia

The Columbia Community Garden aims to demonstrate the potential for urban agriculture to support the development of a just food system and to engage the community in growing healthy, sustainable food.

<http://gosustainable.blogspot.com/>



Harvard

The mission of the Harvard Garden project is to provide experiential education in sustainable, urban agriculture and food for students, faculty, and the local community.

<http://chge.med.harvard.edu/programs/food/garden.html>



University of Pennsylvania

The mission of this garden is to educate the Penn community about urban agriculture and to advocate for environmentally friendly food systems. From an academic perspective, the goal of the garden is to educate students about issues surrounding food including public policy, food systems, and environmental sustainability. In terms of advocacy, the goal of the garden is to personally connect the Penn community to sustainable eating practices and increase understanding of responsible food systems. These goals will connect the Penn community to the food it consumes and link it to the wider world.”

<http://thepennarden.wordpress.com/>



NYU Garden Proposal

Yale

The Yale Sustainable Food Project manages an organic farm on campus, collaborates on a sustainable dining program at Yale, and runs diverse programs that support exploration and academic inquiry related to food and agriculture.

<http://www.yale.edu/sustainablefood/>



**APPENDIX E:
HISTORICAL PRECEDENT OF SCHOOL GARDENING AT NYU**



Dr. Elmer Ellsworth Brown, NYU Chancellor from 1911-1933, was a trailblazer for his early recognition of the value of giving urban youth the opportunity to experiment with gardening and farming and the importance of training teachers. Dr. Brown arrived at NYU in 1911 after serving as U.S. Commissioner of Education under President Theodore Roosevelt. During his tenure, NYU was the first university to host a Department of School Gardens.

As quoted in a New York Times article from March 3, 1912:

"I have faith that school gardens will help us discover genuine country boys in the city. And this is of importance more far reaching than would appear on the surface. The discovery of individual abilities and their right development would have so great and influence upon our National life that it would benefit society."

School Gardens, innovative in Dr. Brown's era, and currently experiencing a strong resurgence, can help strengthen the University's commitment to a "Tradition of Leadership and A Legacy of Innovation" that Dr. Brown helped establish in his own time.



Dr. Elmer Ellsworth Brown

**WANT \$1,000,000
FOR SCHOOL FARMS**

Endowment is Needed to Establish Firmly the Work Started Ten Years Ago in This City.

TO TRAIN SPECIAL TEACHERS

Demand for Persons Qualified to Give Proper Instruction Exceeds the Supply—Work to Start at N. Y. U.

New York Times article, February 1, 1912

NEW YORK UNIVERSITY

Summer School at University Heights. Seventeenth Year. July 8th.—August 16th, 1911.

One hundred and twenty-five courses, by fifty specialists, arranged especially for teachers. Education, Manual Arts, Music, Domestic Art, Domestic Science, School Gardens, Languages, Philosophy, Psychology, History, Economics, Sociology, Accounting, Mathematics and Sciences.

For bulletin address:

G. C. SPRAGUE, Registrar.
New York University, N. Y. City.

An advertisement for NYU's Summer School, 1911.
"School Gardens" was one of the courses offered for teachers.

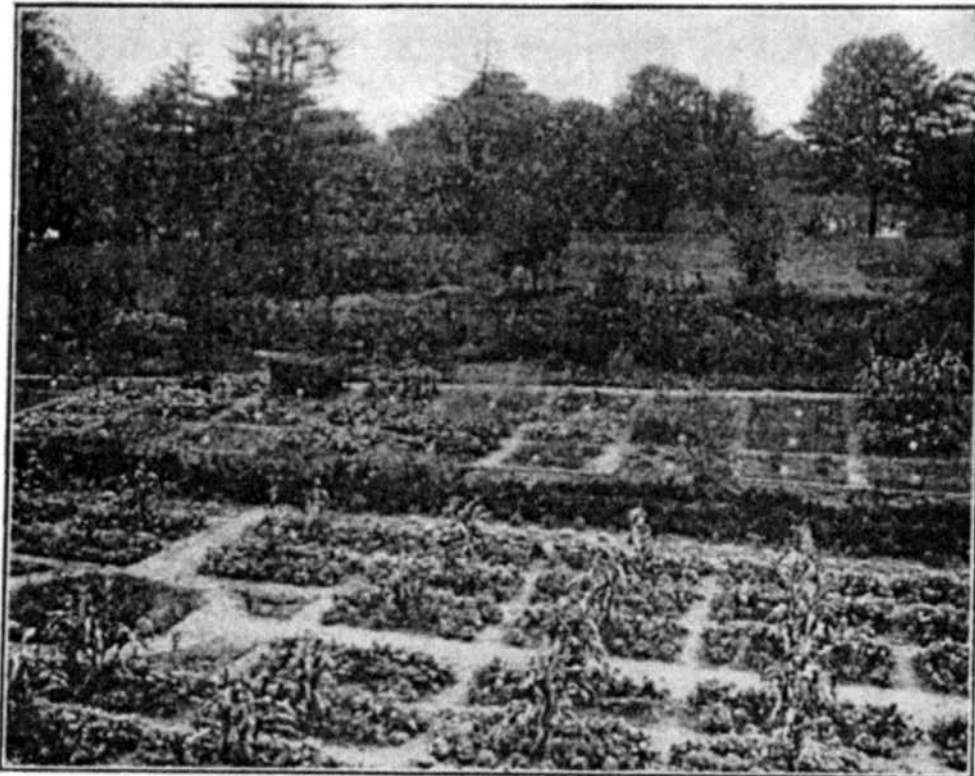


Photo by Golde

Garden of the Department of School Gardens, New York University, under the direction of the Author

An image from the book "Children's Gardens for Pleasure, Health and Education"
By Henry Griscom Parsons, Director, NYU Department of School Gardens

still, will reveal the dew-gemmed plants catching the first rays of the sun, and furnish a sight to well repay the effort of early rising. This is the hour in which



Adults learning to spade at the New York University

to gather sweet peas and nasturtiums, which will hold their freshness and fragrance for hours longer than if picked at midday.

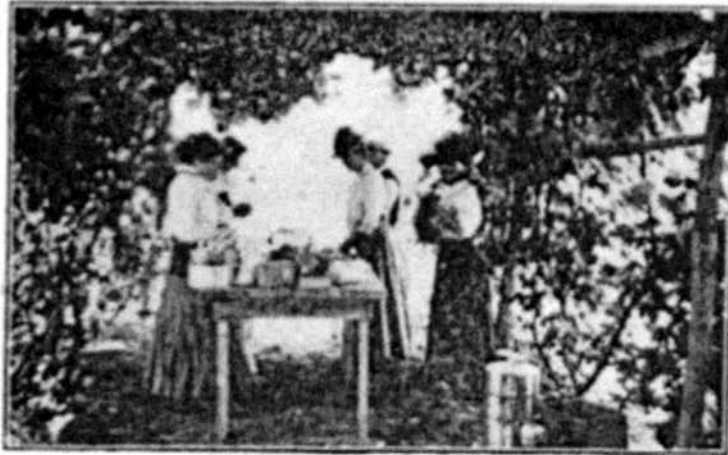


Photos by the Author

Adults learning to plant at New York University

A page from the book "Children's Gardens for Pleasure, Health and Education"
By Henry Griscom Parsons, Director, NYU Department of School Gardens

Turn to the garden for delight and inspiration for the mind and soul and at the same time, with cheerful



Adults learning to judge vegetables and prepare them for exhibition and for the table, at New York University

shrewdness, get it to supply the inner man with succulent and dainty dishes.



Photos by the Author

A meal of vegetables, grown, prepared, and cooked in the garden, and eaten under the grapes at the New York University

A page from the book "Children's Gardens for Pleasure, Health and Education"
By Henry Griscom Parsons, Director, NYU Department of School Gardens

Memorandum

From: STTA Executive Community
To: NYU Faculty Housing and Residential Services
Date: March 9, 2011

RE: NYU Garden Proposal

On February 17, 2011, the STTA Executive Committee held an open meeting with residents of Silver Towers to develop an ongoing agenda for the Executive Committee. Among the items considered was the NYU Garden proposal submitted by Daniel Bowman Simon and the Department of Nutrition, Food Studies and Public Health. We had previously read the excellent proposal, and were aware of NYU's decision of December 16, 2010 to not support that proposal. Despite that decision, we believed the proposal warranted further discussion, as it seemed to us that it might be an excellent use of available (and currently fenced off and unused/unusable) green space, especially as it would be space for families and members of the community to work together on a community project, one that would require and generate continual participation. We therefore asked Mr. Simon to attend our meeting and explain his proposal to STTA residents.

We wish to report that they were most enthusiastic about the project, and voted unanimously in support of a motion that we endorse the garden project and actively try to bring it to fruition (this spring, if possible). The strong and enthusiastic endorsement of the garden proposal comes from multiple directions: 1) it would open up additional space for community use; 2) the idea of having an organic garden where families and other residents could work, and contribute the produce from the garden to local food banks is very attractive, and would be good for NYU-community relations; 3) it would contribute to an aesthetic enhancement of the fenced in, unused and unattractive space; 4) it would provide an additional and excellent resource for the UPNS preschool housed in 110 Silver Towers; 5) it would facilitate peoples' desires to be more actively involved in composting; 6) it has the strong support of an academic department at NYU, and would contribute to that department's curricular development; and 7) it grew out of a student initiative, one backed by hundreds of student signatures, and as faculty & residents of NYU we strongly encourage NYU to stand behind student-based initiatives that are aimed at improving the quality of campus and university life.

In short, we would like to see NYU facilitate this excellent garden proposal, and give the students and residents the opportunity to go ahead with its development and implementation. It would be an excellent community-building project, one that will forge closer relations between students and faculty/residents. The long-term promises of a flourishing garden and aesthetically enhanced space is very attractive to the residents. Moreover, the proposed garden seems consistent with NYU plans recently presented to CB 2 Landmark Committee to re-landscape the plaza.

December 16, 2010

Dear Daniel:

Thank you for your patience as we reviewed your proposal for locating an NYU Food Garden near the Silver Towers. After careful and due consideration, we have determined that the site is simply not a viable option for your proposed food garden. As you know, we are in the midst of a lengthy and complicated approvals process for the so-called "superblocks", including the Silver Towers and the surrounding site, with the aim of securing rights to construct new buildings and enhance the public space. Major changes, such as the installation of an entire new use (i.e. a Food Garden) on the landmarked site, is not compatible with our taking our application through this complex approvals process.

We are engaged in several levels of consultation with a wide array of city agencies and civic groups and looking comprehensively at the future of the site. We need to approach whatever we do now on the superblocks, particularly on the landmark site you have identified, with an eye toward how it may trigger a series of premature reviews which we do not choose to undertake at this time. Since our developed plans for the superblocks do NOT call for a food garden on the site you have located, there is a high chance that putting one there now would result, at a minimum, in confusion.

I appreciate the hard work you and your colleagues and Professor Berg put into your proposal. If it involved a different location and/or came at a different point in the University's timing with its own plans, I would advise that it be pursued. But I hope I have made clear the problems it presents in its current form.

Sincerely,

Lynne



Daniel Bowman Simon <daniel@thewhofarm.org>

My LPC correspondence: Inquiry from NYU urban planning student. Re: University Village

2 messages

Daniel Bowman Simon <daniel@thewhofarm.org>

Thu, Apr 28, 2011 at 3:15 PM

To: Lynne Brown <lynne.brown@nyu.edu>, Beth Morningstar <aem1@nyu.edu>

Cc: Karen Wolff <kw481@nyu.edu>, Amy Bentley <amy.bentley@nyu.edu>, Brett Gary <brett.gary@nyu.edu>, Jini Watson <jini.watson@nyu.edu>, Oliver Buhler <obuhler@cims.nyu.edu>

To Lynne, Beth, and STTA,

I decided to go ahead and reach out to LPC. If you read below to the bottom, as I'd thought, even though, in the recently approved CoA, NYU put trees in the site where we've proposed a vegetable garden, there would be no need of further LPC review in order to modify the planting plan from trees to vegetables. Hope this is helpful in finally getting this garden planted. 'Tis the season!

Best,
Daniel
917-476-7275

Forwarded conversation

Subject: Inquiry from NYU urban planning student. Re: University Village

From: Daniel Bowman Simon <simple@nyu.edu>

Date: Wed, Apr 13, 2011 at 11:12 AM

To: John Weiss <JWeiss@lpc.nyc.gov>

Mr. Weiss,

Can you please explain to me why NYU needed to submit a CoA request for landscaping modifications? (Their CoA was approved, as you probably know.) Would future CoA requests be necessary if they wished to further modify landscaping?

For your easy reference, here is the original designation: http://www.nyc.gov/html/lpc/downloads/pdf/reports/university_village.pdf

As well as NYU's blog, which includes link to their presentation: http://blogs.nyu.edu/blogs/eb85/nyu2031/2011/04/nyus_application_receives_unan.html

Hearing: 04/05/2011

MD, MG 6-0-0 Closed

LR, RT 6-0-0 Approved

w/Modifications

CERTIFICATE OF APPROPRIATENESS

BOROUGH OF MANHATTAN

11-7194- Block 524, lot 66-

100-110 Bleecker Street- University Village- Individual Landmark

A Brutalist style residential complex designed by James Ingo Freed of I. M. Pei & Associates and built in 1964-67. Application is to modify the landscape and install a playground and assorted fixtures.

Thanks,
Daniel Bowman Simon
[917.476.7275](tel:917.476.7275)

From: **Daniel Bowman Simon** <simple@nyu.edu>
Date: Wed, Apr 13, 2011 at 11:29 AM
To: Mark Silberman <msilberman@lpc.nyc.gov>

Mr. Silberman,
I sent John Weiss an email but rec'd his "out of office" reply.

Can you please answer the below?

Thanks,
Daniel

From: **Jenny Fernandez** <jfernandez@lpc.nyc.gov>
Date: Wed, Apr 13, 2011 at 3:51 PM
To: simple@nyu.edu

Cc: John Weiss <JWeiss@lpc.nyc.gov>

Hi,

Mr. Weiss is currently not in the office. Your inquiry was forwarded to me for response. The landmark site for the Silver Towers complex includes three 30 story towers arranged around a central lawn with the landscaped areas at the perimeter of the site, and the landscape design is a significant feature of the landmark site. While the Commission generally does not regulate plantings, the Commission does regulate changes to paving, railings and other architectural features within a designated landscape. Therefore, any proposed changes to the hardscape or fixtures would need to be approved by the Commission. Because these changes were introducing new elements to the site and rearranging existing features, the proposal required a review by the full Commission.

Please let me know if you have any further questions.

Best regards,

Jenny Fernández
Director of Intergovernmental & Community Relations
NYC Landmarks Preservation Commission

1 Centre Street, 9th Floor North
New York, NY 10007
P: (212) 669-7923
F: (646) 500-5577
jfernandez@lpc.nyc.gov

From: **Daniel Bowman Simon** <dbs429@gmail.com>
Date: Wed, Apr 13, 2011 at 4:40 PM

To: Jenny Fernandez <jfernandez@lpc.nyc.gov>
Cc: John Weiss <JWeiss@lpc.nyc.gov>

Jenny,

Thanks for your speedy response.

So if NYU wanted to alter plans to change future plantings from trees to vegetable garden, without modification to hardscape or fixtures, would an additional CoA be required to be submitted?

Best,
Daniel

From: **Daniel Bowman Simon** <dbs429@gmail.com>
Date: Mon, Apr 25, 2011 at 1:59 PM

To: Jenny Fernandez <jfernandez@lpc.nyc.gov>
Cc: John Weiss <JWeiss@lpc.nyc.gov>

Jenny,

I appreciated our phone call, and please see below as I'm awaiting your response. Thanks, Daniel

From: **Jenny Fernandez** <jfernandez@lpc.nyc.gov>
Date: Tue, Apr 26, 2011 at 5:06 PM
To: dbs429@gmail.com

Hi Daniel,

As we discussed, the Commission doesn't regulate plantings. If the applicant decided to change the vegetation, but no changes to the hardscape features they would not require additional review from the LPC. The only exception is the removal of large, original, trees, which we regulate.

Hope that helps,

Regards,

~Jenny

Daniel Bowman Simon <daniel@thewhofarm.org>

Tue, May 24, 2011 at 10:35 AM

To: Karen Wolff <kw481@nyu.edu>, Amy Bentley <amy.bentley@nyu.edu>, Brett Gary <brett.gary@nyu.edu>, Jini Watson <jini.watson@nyu.edu>, Oliver Buhler <obuhler@cims.nyu.edu>

Cc: Beth Morningstar <aem1@nyu.edu>

Imagine you know about this, but just in case...

Today 2 p.m. and 6 p.m.

City Planning Commission hear public testimony about New York University's proposed expansion during a "public scoping meeting";
Spector Hall, 22 Reade St.

Scoping notice here:

http://www.nyc.gov/html/dcp/pdf/env_review/nyu_core/nyu_scoping%20notice.pdf

Daniel

[Quoted text hidden]

May 24, 2011

TO: CITY PLANNING COMMISSION
Calendar Information Office - Room 2E
22 Reade Street, New York, N.Y. 10007

RE: NYU Draft EIS

All of NYU's proposed rezoning, demapping, Large-Scale General Development special Permit (LSGD), and construction work would take place in just TWO census tracts: 5501 (the superblock area) and 59 (north of W. 4th St.).

Yet NYU is proposing to study a much wider area for purposes of their EIS--

Figure 20 – Land Use Study Area (p. 24 of NYU Draft Scope) shows the scope area boundary for purposes of their EIS to be 1/4-mile from where the proposed rezoning, demapping, Large-Scale General Development (LSGD) special permit and construction work would take place.

Figure 21 – Open Space Study Areas (p. 30 of NYU Draft Scope) shows the scope area boundary for purposes of studying open space in their EIS to be 1/2-mile from where the proposed rezoning, demapping, Large-Scale General Development (LSGD) special permit and construction work would take place. They propose to analyze 20 zoning tracts (all zoning districts for which at least 1/2 of the tract is inside the 1/2-mile boundary).

This will completely skew the results of the EIS and make it appear as if what NYU is doing is “no big deal.”

Meanwhile, Tract 5501 and Tract 59 will be devastated. This may be the largest project ever proposed in a tightly occupied residential area.

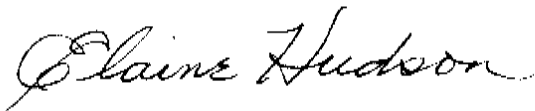
1. Study the impact of building two office buildings in the middle of a residential complex of 1292 units.
2. Study the impact of the displacement of non-NYU residents who live in NYU buildings and are protected by rent-regulation laws.
3. Study the impact that the on-going construction will have upon the NYU faculty and other people who live in the blocks where work is proposed.

4. Study the impact of constructing new buildings equal in square footage to the Empire State Building in just TWO residential blocks.
5. Study the impact of cutting down the majority of mature and deeply-rooted trees in a two-block area including (but not limited to) air quality and climate.
6. Study the impact of removing public green areas and children's play areas and a dog run and the major supermarket for the neighborhood —nearly every open space in the area.
7. Study the impact and the demographics of adding 2000 more residents to Tract 5501 (which currently has under 5,000 residents).
8. Study the impact of adding more than 1200 freshman students into Tract 5501.
9. Study the impact of building a commercial hotel in a residential block.
10. Study the impact of a 2-block residential area in Tract 5501 being under construction almost continually for 18 years.
11. Study the impact that NYU's proposed plans will have on the neighborhood character of Tract 5501 and Tract 59.
12. Study the impact that NYU's proposed plans to add retail establishments will have upon competition with FOR-PROFIT retail businesses in the area, and whether NYU will pay property taxes on their commercial operations.
13. Study the impact that NYU's proposed building plans will have on the adequacy of water pressure and storm drains in Tract 5501 and Tract 59.
14. Study the impact that NYU's proposed building plans will have on closing down streets in Tract 5501 and Tract 59 to enable their construction.
15. Study the impact that NYU's proposed building plans will have on street parking and on parking lot spaces in the Tract 5501 and Tract 59.
16. Study the impact that NYU's proposed building plans will have upon the existing bike lane on Bleecker Street.
17. Study the impact of the increased vehicular traffic that will be needed to handle deliveries and garbage and construction rubbish, as well as the increased vehicular traffic that will result from getting many more people in and out of the area.

18. Study the impact of the loss to the community (and to the world) of the unique Sasaki garden at Washington Square Village. We only have one other Sasaki park in New York City (the GreenAcre Park on 51st Street).
19. As an alternative, study the impact of giving the DOT park strips to the community and the Department of Parks. Many years ago most of these park strips were mud holes, and various community groups have taken over park sections to create useful and attractive amenities.

In summary, NYU's EIS should be focused primarily ON THE AREAS WHERE THEY PROPOSE TO DO CONSTRUCTION, since that is exactly where the greatest impacts will take place.

Respectfully submitted,



Elaine Hudson, President
Mercer Street Block Association
250 Mercer Street
New York, NY 10012

P.S. It does not seem that limiting the EIS to Tract 5501 and Tract 59 would result in "segmentation". See excerpt from CEQR TECHNICAL MANUAL (attached).

130. SEGMENTATION

One of the early steps in the CEQR process is to define the scope of the project that is the subject of the environmental review (see also Chapter 2, "Establishing the Analysis Framework"). Segmentation, "the division of the environmental review of an action such that various activities or stages are addressed . . . as though they were independent, unrelated activities, needing individual determinations of significance," 6 NYCRR 617.2(ag), generally is not permissible. An example that raises segmentation issues is the construction of a highway in phases or sections, where, until joined together with other sections of the highway, the individual sections would serve no purpose. If these separate actions were reviewed individually, the combined effects of the total project might be in-adequately addressed.

In certain limited circumstances, it may be permissible to segment a review; however, an agency must be careful to avoid improper segmentation. To permissibly segment a project, each of the segments should also have independent utility and not commit the agency to continuing with the remaining segments. See 6 NYCRR 617.3(g)(1).

If the lead agency believes segmented review may be permissible, it must document in its environmental review: the reasons segmentation is warranted under the circumstances; the reasons for proceeding in a segmented manner; and a determination that the segmented review is no less protective of the environment than that of an unsegmented review. The lead agency must also identify and fully discuss the other segments in the individual environmental reviews for each segment. The determination whether to segment a project may require expert guidance, particularly for the purpose of understanding judicial decisions that address this issue. One reference for guidance on this issue is the SEQR Hand-book published by DEC, which offers the following eight criteria that are considered in determining whether individual agency actions should be reviewed together:

1. Is there a common purpose or goal for each action?
2. Is there a common reason for each action being completed at about the same time?
3. Is there a common geographic location involved?
4. Do any of the activities being considered contribute toward significant cumulative or synergistic impacts?
5. Are the different actions under the same ownership or control?
6. Is a given action a component of an identifiable overall plan?

7. Can the interrelated phases of various projects be considered “functionally independent?”

8. Does the approval of one phase or action commit the agency to continuing with other phases?

As an example, the construction of a new highway interchange and additional widening of the highway may be interrelated to such an extent that the two actions must be examined together. In this example, it would be relevant to consider whether: (i) the highway is being widened for the sole purpose of accommodating the additional traffic entering the road via the new highway interchange; (ii) both actions are being completed at about the same time and in general proximity to each other; (iii) the additional traffic entering the highway via the new interchange greatly increases the congestion on that part of the highway just past the portion that has been widened; (iv) the same entity owns or operates the road areas where both actions are being conducted; (v) there is an overall plan to improve or increase the capacity of the highway system of which these two projects are each a component; and (vi) each of the actions would serve its purpose, even if the other one is never executed.

GREENWICH VILLAGE CHSELSEA
CHAMBER OF COMMERCE

Greenwich Village, Chelsea, Soho, Noho, West Village, East Village, Union Square, Flatiron

Tony Juliano
Chairperson & President

May 24, 2011

NYU Scoping Testimony

Good afternoon. My name is Tony Juliano and I am the president and chair of the Greenwich Village-Chelsea Chamber of Commerce. For more than 60 years, our Chamber has represented and promoted businesses in the Village, Chelsea and many of the surrounding neighborhoods.

There is no single institution more important to our neighborhood than New York University. That is why we strongly support the university's NYU-2031 expansion plan, which would be the largest private investment to occur in the city over the next two decades.

I don't think anyone here today could imagine the Village without NYU. From the Chamber's point of view, NYU's 16,000 employees and 40,000 students provide the economic lifeblood for our neighborhood. It is estimated that NYU's Washington Square campus directly and indirectly accounts for more than \$2.25 billion in economic activity every year and nearly 25,000 jobs.

A recent report by the Appleseed economic analysis firm confirmed for us what we have known for years – NYU and other institutions are the most important economic contributors to the Village economy.

CHAMBER OF COMMERCE

NYU Scoping Testimony
Tony Juliano, May 24, 2011

Page 2

The impact is even more pronounced at specific times of the year. During spring commencement, some 30,000 people spend time in the Village and another 15,000 visit during fall semester back-to-school days. And the university hosts more than 50,000 prospective students and families every year for information sessions and tours. All these visitors shop, eat and relax in the Village and that means they are spending money at our members businesses, strengthening our neighborhood's economy.

NYU's expansion plan will provide a major shot in the arm to our economy—not just our neighborhood, but the entire city. And given the economic difficulties of the last few years, we certainly need all the economic stimulus we can get.

As you begin the environmental review required in the city's land review process, we urge you to be diligent, fair, and efficient. There are those who oppose NYU's plans and they will seek to use this review process to block the expansion. All voices should be heard of course, but the opponents should not be allowed to use this legitimate process to stop growth and the great benefit NYU's proposal will bring to both the city and the Village. We urge you to complete the environmental review with dispatch so the land review process for NYU-2031 can begin.

Thank you.

Howard Negrin

President, Washington Place Block Association

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New York, NY 10003

212-254-3059

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As a long-term resident of Washington Place, and given the scant time available, I will limit my remarks to the commercial overlay portion of the proposed project. These time constraints will also prevent me from discussing the larger context of NYU's relations with the community, both current and historical, which would certainly deepen your understanding of the community's response to this Draft Scope of Work. Therefore, I will limit my remarks to listing some of the many areas that I believe require further study, analysis, explanation or clarification

Socioeconomic Conditions

1. Study to define and establish the boundaries of the neighborhood served by the proposed commercial overlay district.
2. Study of the role of the proposed commercial overlay in meeting specific unmet *neighborhood* needs, as per the Department of City Planning guidelines regarding C1-5 designations.
3. Analysis of the potential competition offered existing merchants by development of new commercial space.
4. Study of the impact of the proposed new commercial space on commercial rents and the availability of space in the commercial overlay and surrounding areas.
5. Explanation of why in light of the university's professed need for academic space, NYU plans to use 24,000 square feet of potential academic space for commercial purposes.
6. Explanation of why, given past proposals by NYU to thoroughly commercialize Washington Place -- the center of the proposed commercial overlay -- the university in the future would not add additional commercial space to the proposed 24,000 square feet if the C1-5 designation is approved.

Transportation and Traffic

1. Study of the impact of the proposed commercial development on pedestrian traffic in the overlay area.
2. Study of the impact of the proposed development on vehicular traffic in the commercial overlay and surrounding areas.
3. Expansion of the proposed traffic study area to include the intersection of Broadway and Washington Place, and the intersections of Greene Street and W. 4th Street and Greene Street and Washington Place, two narrow intersections where

traffic flow is likely to be impacted by the proposed commercial development, as well as by additional "as-of-right" commercial development by NYU not specified in the Draft Scope.

Neighborhood Character

1. Analysis of the impact on the neighborhood character by proposed changes in the current mix of residential, academic and commercial elements, which would include elimination of all residential space in 15 Washington Place and a general increase in commercial and academic space in the overlay area.
2. Analysis of the impact on the neighborhood character of the new lighting and commercial signs that would result from the proposed commercial development.

Construction Impacts

1. Analysis of the impact of new construction related to the commercial overlay on an area already saturated with multiple, simultaneous, unsequenced university construction and renovation projects.

May 16, 2011

TO: New York City Planning Commission

RE: NYU - Scope of NYU's Environmental Impact Statement

The following are scoping items that should be addressed or expanded upon in NYU's scoping parameters for their Environmental Impact Statement.

SOCIOECONOMIC CONDITIONS

1) INDIRECT RESIDENTIAL DISPLACEMENT

SUMMARY:

The average incomes of the study population will be skewed by the large influx of non-income generating student population. The scoping statistics criteria must be changed to incorporate this population in a meaningful way, and does not skew the statistics used for Residential Displacement unfairly. A large increase in non-income generating students will result in the criteria never moving beyond Step 1 to Step 2 or Step 3.

New student population is generally a non-income producing population. Therefore an important analysis NYU must do - the expected future average income of the population - will be skewed artificially downwards.

This will result in no additional assessments and studies being conducted to address the result on residential displacement and rent increases.

The Scope of Work must address the inequities from the artificial skewing of the results due to the non-income producing substantial increase in population.

Step 1 of the Scope of Work for Indirect Residential Displacement will assess average incomes of the study area populations.

It only moves to Step 2 if the expected average incomes of the new population would exceed the average incomes of the study area populations.

A large increase in students will result in Step 2 not being addressed.

If it gets to Step 2, this step determines if the Proposed Actions' population is large enough to affect real estate market conditions in the study area. If so, Step 3 is addressed.

Step 3 determines whether there is a risk of indirect displacement resulting from rent increased due to changes in the real estate market caused by the new population.

Neither Step 2 or 3 will be addressed if the forecasts include statistics of a non-income student population. How these statistics are accounted for must be changed in order to incorporate this population into the statistics in a meaningful way.

2) INDIRECT BUSINESS DISPLACEMENT & ADVERSE EFFECT ON SPECIFIC INDUSTRIES

The Scope of Work must include:

- Whether the concentration of one large institution (NYU) being the owner/landlord/leaseholder of a significant amount of business/retail space will:
 - A) Displace some current businesses and institutions;
 - B) Alter the mix of businesses and services in the community;
 - C) Alter the mix and diversity of workers (i.e. age, salaries).

3) FINANCIAL IMPACT ON THE TAXPAYER

The Scope of Work must include the financial impact on the taxpayer, such as monies, tax credits and abatements, loan funding or guarantees, including most importantly monies from NY State and NY City and/or their representative agencies.

POLICE & SECURITY IMPACT

Private NYU security statistics on drug/harassment and other crimes should be given to City and State agencies to assess true conditions.

The ability for local police precincts to accommodate increased patrols, traffic and crime must be assessed and addressed in the scoping.

There is concern that NYU's private security does not report publicly on all drug and other crimes, keeping statistics artificially low. In addition, the local precinct is hard pressed and overloaded as it is.

It must be assured that the governmental agencies which handle security and crime are not adversely impacted in performing their functions, which in turn impacts residents, merchants, students, faculty, workers and tourists.

FIRE & EMERGENCY ACCESS

It must be shown through the scoping parameters that there is an ability to provide high standards of service for fire, emergency and medical purposes. Of great concern is that due to increased traffic, residents and transient population, along with closing of St. Vincent's Hospital, additional leaning on these services may lead to further degradation to all in the surrounding area.

The Fire Department must be given the opportunity to weigh in directly. No agency except the Fire Department should speak for it and its assessment of this issue.

DEED RESTRICTIONS AND COVENANTS

There has been impact from long standing deed restrictions, covenants and similar that were not adhered to in the past years.

There is and will be impact from not only past breaches, but from the current requested lifting of such promises and restrictions.

The scoping should consider the effect and impact on the lifting of deed restrictions, covenants and similar and the impact on the community.

AREA SCOPE

The scoping area should very importantly review the impact on the area WITHIN THE FEW BLOCKS RADIUS OF THE WASHINGTON SQUARE / BLEECKER ST/ 3rd ST / LAQUARDIA PLACE vicinity.

The immensity and density of this plan within such a few blocks radius in a neighborhood of great history, prominence, tourism and residential living is without precedent.

The impact of NYU's dense and one-of-a kind plan requires a "study area within a study area" approach.

OPEN SPACE

Open space and park areas must be studied for accessibility to the public, including the ease and

public knowledge of that accessibility.

Standards for open space in the vicinity are already below recommended levels for open space and park criteria.

The ruse by which public space is made to look private or is situated in such a manner as to make it look private is not acceptable.

The scoping should include detail on how these public spaces will be accessible to the public with ease and not be confused or convoluted to be deemed private spaces to the reasonable person.

NEIGHBORHOOD CHARACTER

- 1) Impacts on change from residential to commercial zoning must be evaluated.
- 2) Impact on increase in student population and affect on diversity and character of neighborhood, including services provided must be evaluated.
- 3) Impact of centralization and dominance of one large institution on the character of the area, including public spaces like Washington Square Park, must be evaluated.
- 4) Impact on low-rise character of Greenwich Village must be evaluated.
- 5) Impact on local dog runs, garden areas, historic areas (LaGuardia Place and Washington Square Park) and playgrounds
- 6) Impact on NYC tourist industry and merchants and stores who derive business and visits.
- 7) Prove there are no better alternatives.

COMMUNITY FACILITIES AND SERVICES

1) PUBLIC SCHOOLS

A detailed analysis of public schools must be required in the scoping.

NYU wants to only do a "preliminary" assessment of school needs. They already state the foregone conclusion that it "is expected to screen out the potential for significant adverse impact".

A foregone conclusion by NYU is unacceptable. The reason the statistics and needs are studied for an EIS is to make the determination.

NYU states that their plans are such that a detailed analysis of public schools is not required.

Downtown NYC already has a well known crisis in space for public schools and seats for its children. NYC statistics on needed seats have proven time and again to low ball the actual needs.

Even a modest increase in population requires a serious assessment of school needs.

2) HOSPITALS

The impact of the increase in population without access to a full-service hospital within a reasonable distance or travel time must be addressed.

NATURAL RESOURCES

- 1) NYU must address the impact of the stream bodies underground in the area.

- 2) **NYU must address the impact of stored fuel and similar in the event of leaks or accidents on the impact of the sensitive and/or significant and/or designated resources (such as park areas) in the area.**
- 3) **NYU has research labs and buildings with scientific uses and similar. The impact of types of materials disposed of and methods used must be studied.**
- 4) **Air should be considered a natural resource for purposes here.**

HAZARDOUS MATERIALS

- 1) **NYU must address the impact of stored fuel and similar in the event of leaks or accidents on the impact of the sensitive and/or significant and/or designated resources (such as park areas) in the area. Included should be impact on underground streams.**
NYU has research labs and buildings with scientific uses and similar. The impact of types of materials disposed of and methods used must be studied.
Records of any prior mishaps and accidents should be considered in the scoping.
- 2) **Removal of hazardous materials, including transportation methods and storage must be addressed. This is especially pertinent when there is use, storage or transport near existing residential buildings, planned residential buildings, classrooms and any other places where populations exist.**
- 3) **Air quality must be included in the scope of impact.**

WATER & SEWAGE INFRASTRUCTURE

- 1) **Flood and water backup criteria: Standards (i.e. 100 year flood occurrence) have not held true in the last 15-18 years and require modification. Several times a year over several years water backups have occurred beyond the standard criteria, thus making the standard criteria outmoded.**
DEP and/or other agencies and independent advisors need to address recent occurrences and data to accommodate proposed plans.
- 2) **Water pressure to existing and planned buildings in the vicinity must be addressed to determine if water pressure will be compromised.**

SOLID WASTE & SANITATION SERVICES

- 1) **Presently NYU has been noted to accumulate trash from one area or building and move to another location, disrupting residential tenants.**
Detailed plans, hours and storage of solid waste, trash and any other matter, including hazardous materials, must be addressed in great detail.
This must include plans for location of disposable materials moved to other building sites for subsequent removal, and proximity to residential existing and planned buildings.

ENERGY

- 1) **Impact on energy load in the vicinity and regionally.**

TRANSPORTATION

- 1) **Parking and layover of NYU buses must be included as regards to their impact.**

Currently, NYU buses park and have layovers beyond the scope NYU proposes. The traffic scope must be widened to evaluate the impact to other neighborhoods.

Future anticipated number of buses and bus routes must be considered, not just current numbers and routes.

AIR QUALITY

- 1) **See HAZARDOUS MATERIALS section above.**
- 2) **Venting/HVAC systems in NYU's scientific, laboratory and other buildings is of particular importance to address in impact studies. Especially near and around residential buildings and classrooms.**
- 3) **Shifts in wind and affects on outlying areas must be considered. The weeks after 9/11 many were made aware of the wind shifts during the day that brought unhealthy and contaminated air to heavily residential areas.**
- 4) **Emissions from NYU buses, including running engines when stationary, must be included in studies on Air Quality.**
- 5) **Existing air quality data published by the NYSDEC must be considered for its accuracy. Numerous issues have arisen in the past with information-gathering equipment that did not work (or purposely was left not to work). The lack of data at important locations skewed results to make air quality appear better than it was.**

The exact locations of air-monitoring equipment must be disclosed and addressed for their pertinence to the studies.

NOISE

- 1) **Noise from sanitation and waste disposal pickups, HVAC and venting systems, and bus layovers, as in winter months with engines idling, not just through-traffic, must be evaluated. The impact on the existing residential buildings must be considered as well as all planned buildings, whether they be residential, dormitories, faculty housing or hotels.**
- 2) **Noise must be considered in aggregate, not just singly by building.**

May 16, 2011

**Submitted by Jeanne Wilcke
10 Bleecker St., NY, NY 10012**



THE CITY OF NEW YORK
OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN

SCOTT M. STRINGER
BOROUGH PRESIDENT

**Testimony at Scoping Session for New York University Plan 2031
Before the Department of City Planning**

May 24, 2011

I would like to thank the Department of City Planning for the opportunity to testify on the proposed scope of work for environmental review on New York University's Plan 2031 development. I would also like to thank and commend the members of Community Board 2, and their chair Jo Hamilton, for their diligent work in thoughtfully and thoroughly responding to NYU's proposals.

In 2006, I convened the Community Task Force on NYU Development to engage the community in ongoing discussions with NYU around its campus planning and to work with the University on developing a strategy that balances NYU's growth needs with the community's concerns. After 50 meetings over a 40 month period, the Task Force issued a document of over 75 findings and recommendations to the University that articulated concerns, suggestions, and guidelines for the University's growth. This document laid the groundwork for the Community Board's recent advocacy and their thorough response to NYU's proposed scope of work.

The responsible expansion of a university such as NYU can be a great benefit to the economic, cultural and intellectual capital of New York City. However, if that expansion is undertaken without proper community consultation or appreciation for shared physical space, there could be a negative impact to the delicate balance that underlies the continued success of the Greenwich Village neighborhood.

Like other major developments, this project must balance local needs with the University's need to expand. From my work on other university expansion projects, such as Columbia and Fordham Universities, I know that this balance is achievable – and all stakeholders can win. New York City's growth depends on finding a way for all sides of this process to remain fully invested in the City's future.

Today's hearing offers the public an opportunity to comment on the scope of NYU's environmental study. Scoping hearings are essential for determining a framework that will ensure a fair disclosure of potential environmental impacts and identifying appropriate alternative development scenarios. As a participant in the UIURP process, I will not issue a formal position until the project is before me for review. However, I remain concerned about the potential negative impacts of the project. In order to ensure a fair and accurate reporting of potential impacts, I echo the concerns diligently laid out by Community Board 2 and specifically ask that the study be modified as outlined below.

Alternatives

While many alternatives may be offered through the course of this hearing, the community and the Community Board have consistently requested modifications to the proposed project. In order to ensure that these modifications remain feasible through the ULURP process, they should be studied as alternative development scenarios in the Environmental Impact Statement (EIS). Based on community concerns, I strongly urge NYU to study at least three alternative development scenarios in the EIS: an alternative with lower density; an alternative that does not include a hotel; and an alternative that does not include the acquisition of the publicly-owned property known as the “park strips.”

Many residents have expressed concern over the projects’ total density at 2.5 million gross square feet. The University is able to achieve this greater density through the proposed rezoning and because the development is a superblock. Superblocks became prominent in the 1950’s as part of Robert Moses’ slum clearance program. The superblock design allowed planners to create tower-in-the-park developments, which were carefully planned residential communities with ample open space and tall slender buildings. NYU’s proposed expansion is centered on two such superblocks, which were created by demapping the public streets and combining six city blocks. This demapping increased the size of the lots and allowed a greater maximum total density than would otherwise be permitted. The original planners of these superblocks never intended for this density to be utilized. As such, NYU should study a lesser density alternative, which will not only minimize the potential impacts, but would also address a clear community concern.

In addition, the EIS should study an alternative without the proposed 180,000-square-foot hotel use. The surrounding neighborhood is defined by its predominately residential and community facility uses with limited local retail. The hotel use will introduce a new transient population, new deliveries and services, and more intense traffic and pedestrian flows. This use has the potential to increase impacts and, depending on its operation, may not be compatible with the neighboring residential uses. Further, members of the community have expressed that the placement of a hotel on the superblocks is inappropriate. As such, the EIS should include an alternative that does not include the hotel at this site. Without the hotel, a commercial zoning district may not be necessary and any such alternative should reexamine the proposed C1-7 zoning district.

Last December, I stood with the Community Board, other elected officials, and the larger community to oppose NYU’s plans to acquire the open spaces located along Mercer and LaGuardia Streets that are owned by the Department of Transportation and urge that they remain as public open space. This sentiment has a strong resonance with community members as it recognizes the dearth of open space in the neighborhood. Community District 2 has one of the lowest percentages of open space in Manhattan.¹ Therefore, I continue to urge the University to develop an alternative that does not involve taking public land as part of the proposed project.

Open Space

Retaining the park strips is an important community goal, and as NYU’s expansion plans move forward, creating and maintaining high-quality public open space areas is certainly a top priority. Community District 2 has some of the lowest open space ratios of any neighborhood in the

¹ Based on 2010 NYC PLUTO data, open space area in Community District 2 occupies 2.61% of the total area in the district. The district has the second lowest percentage in Manhattan compared to Community District 12 with the highest percentage open space at 50.06%.

City. In addition, the proposed project area is specifically identified in the CEQR Technical Manual as “underserved” in the amount of total open space.² The proposed project, may therefore not only affect public open spaces in the neighborhood, but can have significant impacts on the open spaces located on the superblocks. Any open space affected by the University proposal must receive careful consideration of its overall design and usability.

The proposed buildings will surround open space, which has been traditionally accessible to the public. As such, the proposed project has the potential to have significant impacts on the quality of remaining open space on the block. The project should be analyzed for the potential loss of mature trees, shadow impacts, and accessibility. Given the scarcity of open space in the area, any identified impact on the open space must be minimized and receive reasonable mitigations to offset those impacts.

Additionally, the proposal to construct a temporary gym on the site of the Mercer Street Playground would remove a valuable residential resource and neighborhood amenity. As an alternative, the University should study other on-site and off-site locations for the temporary gymnasium including the use of existing University recreational facilities such as Palladium and student housing with athletic equipment in the building. Moreover, the current open space plan relocates the dog park next to existing residential units. From a land use and planning perspective, the close placement of these two uses may result in unintended conflicts. NYU should study another location for the dog run that may be more appropriate and complementary.

Finally, the proposed open space on Washington Square Village will replace the existing historic Sasaki Garden. Recently the garden was placed on the State and National Registry for Historic Places. Any development on the site must be respectful of not only potential open space impacts, but also potential impacts on historic resources.

Transportation

NYU plans to add nearly 2.5 million square feet of new development which may include a combination of a hotel, classrooms, faculty housing, offices, and student dormitories. These uses will introduce new populations which may have significant impact on the City’s transportation systems. This impact may be further exacerbated during specific times of the year, such as at the beginning and end of the school year when significant numbers of students are moving in and out of dorm rooms. As such, the traffic analysis should be expanded to include additional street intersections, as recommended by Community Board 2, and unique annual events such as move-in and move-out days for students. Additionally, the Community Board’s suggestions for extended times and days of study should be strongly considered, since they come from residents who are familiar with the day-to-day traffic patterns and conditions.

The increase in traffic and pedestrian flows should be considered, in particular, as they relate to and impact the response time of essential City services such as the Police and Fire Departments. Emergency response time in Manhattan has declined in recent years. According to New York City statistics, police response times have increased every year since 2007. It now takes an average of 8.4 minutes to respond, which is 90 seconds longer than the response time in 2007. It is critical

² CEQR Technical Manual, Appendix “Open Space Maps,” Manhattan.
http://www.nyc.gov/html/nyced/html/ceqr/open_space_maps_manhattan.shtml

then for the EIS to study and identify mitigations to increased traffic that may be a further impediment on the delivery of these vital services.

Socio-Economic Conditions

The displacement of residents in the neighborhood as a result of this project has always been a significant concern for this community. I am specifically concerned with NYU's plan to introduce a Commercial Overlay Area at 15 Washington Place, which will help facilitate the conversion of a 74,000 square-foot residential building into a 129,000 square-foot academic building. The resulting displacement is in contradiction to the Planning Principles my Task Force developed with NYU in 2006. The University agreed to support community sustainability by preserving the existing diverse social and economic character of the neighborhood. It recognized the importance of sustaining affordable housing and local retail. In 2010, the Task Force's Findings and Recommendations reconfirmed these Planning Principles and stated that NYU should avoid displacing existing residential tenants. I therefore urge the University to study the potential impacts of its development on the rent-regulated housing for the community.

Additionally, I recommend the EIS include analysis of the proposed development's indirect effect on the increase in land rents at 505 LaGuardia Place. 505 LaGuardia Place is one of the few remaining Mitchell Lama properties in the area and is an integral part of the diverse housing stock in the Village. The Mitchell Lama has a land lease with NYU and its rent may be adjusted based on the value of the property. The proposed actions will facilitate new construction and will increase the value of the land. The proposed actions, therefore, could have an indirect effect on the affordability levels of the Mitchell Lama. These indirect effects must be studied and the University should make every effort to ensure it does not cause undo hardship on the residents of 505 LaGuardia Place.

Environmental Sustainability

Environmental sustainability reaches across many categories indicated in the CEQR Technical Manual. I am pleased to see that all new construction will be held to LEED Silver standards, but as a leading center for learning and research, I urge NYU to set the bar even higher by exploring the highest level of sustainable practices possible. Further, as LEED ratings can be achieved through improvements in multiple environmental categories, it is important that the University provide a plan outlining specific anticipated sustainable practices.

Schools

School overcrowding has been a consistent problem for Greenwich Village and School District 2. In my reports "Crowded Out" (2008), "Still Crowded Out" (2008), and "School Daze" (2009), I found that every public school in Community Board 2 was at or above capacity. The latest statistics from the Department of Education's Capacity and Utilization Traditional Report 2009-2010, also known as the Blue Book, indicates this trend continues - P.S. 3 is at 112 percent utilization, P.S. 41 is at 118 percent utilization and P.S. 130 is at 111 percent utilization.³ For years, Community Board 2 and local parents have been sounding the alarm on the severely overcrowded conditions in their local schools.

³ Utilization was found by dividing enrollment by target capacity.

In recent years, these local schools have lost critical cluster spaces for art and music. Further, P.S. 3 and P.S. 41 have lost a combined three sections of pre-kindergarten over the past few years. Waitlists for kindergarten at the local schools have approached close to 100 children. Unlike other neighborhoods, if children do not move off the waitlist, there are no other elementary schools in Community District 2 they can attend.

NYU's Environmental Assessment Statement assumes it will not require a detailed analysis of the area's public schools. This assumption, however, is based on the illustrative program not the maximum build out. The illustrative program assumes only 105,000 square feet for faculty housing (a residential use) and not the maximum 200,000 square feet actually sought in the application. At 600 square feet per unit, this could result in an additional 333 units and the families and children who will occupy them.

The lack of capacity in local schools means that even a modest increase to the public school population strains the existing infrastructure. Every new public school student in this area will be added to an overcrowded classroom or sent to a school outside of his or her neighborhood. The existing statistics on the area's crowded schools and the proposed scale of NYU's project warrant special considerations, and a full study of the impact of the project on the public school system is warranted. Further, as the surrounding schools are simply unable to absorb an additional student, NYU must propose full mitigation for any potential impact.

I was dismayed to learn that NYU's commitment to donate space for a school did not extend to providing physical space and had an expiration date as indicated in their Draft Scope of Work. Providing space for a school means more than just giving the dirt patch. Children need a building for their desks and seats to learn. The University needs to live up to its commitment and come back to this community with a proper alternative that includes a core and shell for the school.

Conclusion

I look forward to seeing the results of this Environmental Impact Statement and urge that all potential impacts be examined carefully and thoroughly. In the meantime, I encourage the University to continue working closely with the community to ensure that any future development properly balances the needs of the community and the need for the University to grow. Thank you again for the opportunity to testify.

**Comments on the Draft Scope of Work
for an Environmental Impact Statement for the NYU Core
Submitted to the New York City Department of City Planning, the lead agency in the
City Environmental Quality Review Process
May 24, 2011**

The Municipal Art Society offers the following comments to the New York City Department of City Planning, the lead agency in the City Environmental Quality Review of the Proposed NYU Core Expansion Draft Scope of Work, with the intention of identifying where the Draft Scope may be improved in order to best describe the scope of the EIS for the project, the methodology for studying the project, and its impacts.

ENVIRONMENTAL REVIEW PROCESS

Discussion of irreversible and ir retrievable commitments of resources to develop the project should, to the fullest extent possible, disclose the sources of the public funding; the total amount of the funding; and the percentage of that funding devoted to the project site in relation to the total funding available citywide.

Task 1: Project Description

The statement of purpose and need for the proposed project should clearly outline which academic departments located in NYU's academic core are experiencing the most growth and will benefit from the proposed expansion. NYU's 2031 expansion plan aims to create a comprehensive citywide approach to accommodate expected growth, however there are no specifics included in the Draft Scope of Work outlining which academic departments will relocate from the NYU core campus to other parts of the city. The EIS should attempt to disclose which academic departments currently located within the academic core will relocate to other parts of the city, such as NYU's Health Corridor or its Brooklyn campus. This information will provide a greater sense of the institutional need for additional space within NYU's academic core and will provide the information needed to determine if there are more feasible alternatives.

Task 2: Land Use, Zoning and Public Policy

The EIS should include a scenario that studies the potential for maximum residential density. This should be considered in light of the proposed zoning changes which would increase residential FAR from 3.44 FAR to 6.02 FAR. This increases the potential for the development of residential density significantly more than is specified in the current Draft Scope of Work. This maximum residential scenario should be discussed both in terms of maximum square feet as well as the total number of units that could be developed. Including a residential maximum density scenario as part of the RWCDs framework will better capture the range of development that may occur on the project site and will better determine how the surrounding neighborhood could be affected by the project.

In addition, the EIS should state the specific waivers that will be requested as part of the special permit and the specific zoning resolution text amendments. Text amendments in particular should be analyzed in the EIS as they have the potential to affect sites that are not affiliated with this

project. Furthermore, any necessary legal documents that will be filed along with proposed actions should be disclosed along with any restrictive declarations under consideration as these declarations will influence the future use and development of the property.

Task 4: Community Facilities and Services

The aforementioned request that a maximum residential scenario be included in the RWCDs framework may indicate the need for additional public school analysis. The EIS should include a scenario that studies the potential for maximum residential density. This should be considered in light of the proposed zoning changes which would increase residential FAR from 3.44 FAR to 6.02 FAR. As noted above, this increases the potential for the development of residential density significantly more than is specified in the current Draft Scope of Work. Including a residential maximum density scenario as part of the RWCDs framework will better capture the range of development that may occur on the project site and will better determine how the surrounding neighborhood could be affected by the project.

Task 5: Open Space

With regard to the use of the open space, “publicly-accessible” but privately owned open space frequently fails to be a meaningful public amenity. Often this is caused by inadequate programming, half-hearted enforcement, and restricted hours of operation. This is a concern as several of the open spaces currently located on the North and South blocks of the Proposed Development Area, such as the LaGuardia Corner Garden and the Mercer-Houston Dog Run, are frequently used and cared for by the surrounding community. As the proposed project intends to displace and relocate several of these private and public spaces, it is vital that the EIS clearly outline the current public spaces that will become private as a result of proposed actions. Also a phasing strategy should be disclosed to explain which spaces will be open and available and which spaces will be closed.

Task 6: Shadows

Careful analysis of shadow impacts are necessary particularly with respect to the proposed heights of the La Guardia building, the zipper building and the Mercer Street building.

Task 7: Historic and Cultural Resources

If this project requires an undertaking from a state agency, including financing from the Dormitory Authority of the State of New York, the Proposed Development Area’s historic status will likely subject the project to Section 14.09 of the *Parks, Recreation and Historic Preservation Law*. Section 14.09 requires consultation with the Office of Parks, Recreation and Historic Preservation regarding the proposed changes to the University Village and Washington Square Village sites, both of which are eligible for listing on the National Register of Historic Places. Although no formal consulting process is required in the case of Section 14.09, MAS and concerned community groups would like to be consulted on the proceedings and decisions made regarding the Washington Square Village and University Village sites located within the Proposed Development Area.

If this project requires permits from Federal agencies, or if there is federal funding used in the action, the project would likely be subject to Section 106 of the National Historic Preservation Act, which requires Federal agencies to take into account the effects of their undertakings on historic properties. In order to ensure compliance with Section 106 regulations, Section 106 review ought to be conducted simultaneously with the CEQR review and the findings and mitigation that results from Section 106 review ought to be included in the EIS. At this time, the Municipal Art Society formally requests consulting party status in Section 106 Review, if such review is triggered.

Task 19: Neighborhood Character

According to the Draft Scope, NYU plans to “summarize the predominant factors that contribute to defining the character of the neighborhood.” This section should more specifically identify what the defining characteristics of this neighborhood are.

The Houston Street corridor in particular should be studied fully in terms of the proposed project’s impact on the visual character of that street, which is an important New York City thoroughfare. Special consideration should also be given to the visual character of Mercer Street and LaGuardia Place. An inventory of the buildings along these streets, carefully documenting building types, heights, and materials, is central to determining the potential affect the proposed project may have on neighborhood character.

Task 20: Construction Impacts

The Draft Scope states that no one location will experience the effects of construction for the full 19 year construction period, however the impending phasing plan may require that construction occur in a single location over a number of years at a time, possibly changing the nature of the land use and character of the neighborhood.

The EIS should therefore carefully analyze whether the type and duration of construction activities would result in adverse impacts to the neighborhood land use patterns or neighborhood character, thereby determining if additional mitigation methods should be developed.

Task 22: Alternatives

The purpose of an alternatives section in an EIS is to examine development options that would tend to reduce action-related impacts. The alternatives are usually defined when the full extent of the proposed action’s impacts is identified, but at this time we believe that because of the privatization of the DOT strips and the displacement of the users of that space there could be a significant adverse open space impact and therefore recommend that the EIS explore an open space alternative.

Open Space Use/Configuration Alternatives

The EIS should study different options to ensure that any potential open space impacts are mitigated to the greatest extent feasible and an alternative should be explored that provides the City Planning Commission and the City Council the ability to modify the application if the

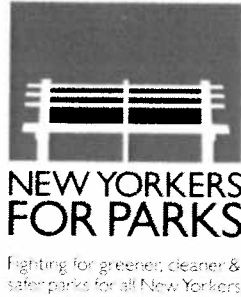
privatization of the open space is expressed as a concern during the public review process. The open space alternatives should include:

- Mapping the open space or portions of the open space as public parkland and transferring jurisdiction to the NYC Parks Department;
- Ensuring a Memoranda of Understanding that would guarantee the handover of open space to a local community group that would maintain the land;
- Requiring commercial retail or a community facility at the base of the new buildings to draw people to the open spaces, thereby increasing the quality and accessibility of the spaces.

Maintaining these open spaces in public hands will be more effective and meaningful mitigation of a potential adverse open space impacts as privately owned public space has a checkered history and often ends up being fully or partially privatized.

Lesser Density Alternative

Considering that the degree of potential impact of the proposed development project is related to the significant amount of density it would add to the area, a Lesser Density Alternative should be thoroughly studied in order to determine if all proposed actions are necessary for NYU to accomplish its stated needs. One potential lesser density alternative should include a scenario that does not include the de-mapping of the DOT strips and the additional floor area acquired by such de-mapping



**Comments regarding the Draft Scope of Work
for a Draft Environmental Impact Statement for the NYU Core
May 24, 2011**

New Yorkers for Parks is the leading independent organization championing greener, cleaner and safer parks for all New Yorkers. We provide the tools that help communities build better parks for better neighborhoods citywide. New Yorkers for Parks (NY4P) achieves its mission through an integrated framework of research, advocacy, and strategic partnerships.

ALIENATION

The proposed development scenario for NYU's core expansion includes the alienation of a City park for disposition to a private developer. This park, Mercer Playground (or LMNOP), is a small public playground that has served the central Village community for 16 years. The playground itself is a result of years of community galvanizing and hard work to bring a public park to this underserved neighborhood.

The impact of this alienation should be thoroughly examined in the Environmental Impact Statement. While we applaud NYU for recognizing the need to replace Mercer Playground in their most recent expansion plan, the scenario is an alienation and, as such, must follow the procedural framework established for alienations of parkland in New York City. In order to comply with SEQRA, a full environmental review must be conducted prior to the New York City Council's passage of a home rule resolution to request alienation authority from the State Legislature. In 2007, the New York State Department of Environmental Conservation affirmed this obligation. A copy of the DEC's affirmation is appended to this document.

New Yorkers for Parks. 355 Lexington Avenue, 14th Floor, NY. NY 10017.

212.838.9410 www.ny4p.org



PARK PRESERVATION & MAINTENANCE

NYU's current expansion plan includes four acres of new or replacement open space. However, these new spaces will be owned and maintained by NYU, a private entity with no obligation to the public. We encourage the City to use the Environmental Review period, and specifically the Environmental Impact Statement to explore mechanisms that will oblige NYU to a) preserve these open spaces as open space in perpetuity, and b) contribute a set dollar amount to a dedicated maintenance fund that will be independently monitored to ensure the ongoing maintenance of the privately operated public open spaces.

We hope that NYU and the City will continue to work with us to address these concerns about Mercer Playground and establish a model for a maintenance fund. We look forward to seeing these issues fully explored in the Environmental Impact Statement.

New Yorkers for Parks. 355 Lexington Avenue, 14th Floor, NY. NY 10017.

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New York State Department of Environmental Conservation

Deputy Commissioner & General Counsel

Office of General Counsel, 14th Floor

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Alexander B. Grannis
Commissioner

NOV 30 2007

Christian DiPalermo
Executive Director
New Yorkers for Parks
355 Lexington Avenue
New York, NY 10017

RE: Petition of New Yorkers for Parks for a Declaratory Ruling or Advisory Opinion with respect to SEQRA and Alienation of Municipal Parkland

Dear Mr. DiPalermo:

This letter replies to your petition dated September 11, 2007 for a declaratory ruling or advisory opinion on the applicability of the State Environmental Quality Review Act ("SEQRA") to alienation of municipal parkland. Specifically, you asked the following question:

Whether a change in the use of parkland to a nonpark use or the adoption of a plan to make such a change including, but not limited to, a home rule resolution adopted by a municipality requesting State Legislative authority to alienate parkland, is an action that is subject to SEQRA and, if so, [what] is the proper timing for environmental review?

I must decline your request for a declaratory ruling based on the legal criteria for issuance of such rulings. The Department's legal authority for issuance of declaratory rulings is set out in Section 204 of the State Administrative Procedure Act ("SAPA") and 6 NYCRR §619.3(a). SAPA §204 provides:

On petition of any person, an agency may issue a declaratory ruling with respect to (i) the applicability to any person, property, or state of facts of any rule or statute enforceable by it, or (ii) whether any action by it should be taken pursuant to a rule.

Under 6 NYCRR §619.3(a), the Department may decline to issue a declaratory ruling if the petition does not raise a question of the applicability of any regulation or statute enforceable by the Department. While the Department is charged with issuing regulations

SEQRA is codified at Article 8 of the Environmental Conservation Law ("ECL"), which is implemented by Part 617 of Title 6 of the Official Compilation of Rules and Regulations of the State of New York (NYCRR).

implementing the SEQRA statute, the Department has no authority to review the application of SEQRA by other agencies. The Department previously determined that there are several aspects of SEQRA that are enforceable by it, and, hence, upon which it will issue declaratory rulings. *DEC Declaratory Ruling 8-01* (1984). Specifically, the Legislature gave the Commissioner specific authority to: 1) resolve lead agency disputes [ECL §8-011(6)]; 2) determine 'ungrandfathering' petitions [ECL §8-011(5)(a)(1)]; and 3) determine fees on appeal [ECL §8-0113(2)(k)]. The application of SEQRA to the alienation of municipal parkland does not fall within one of these authorities. Accordingly, the following is an advisory opinion only.

In response to your questions, the Department's view is that a municipal resolution requesting legislation to alienate parkland falls within the definition of an action under SEQRA. Further, any reviews under SEQRA should be complete prior to the adoption of the resolution requesting legislation authorizing the alienation of parkland.

The Department's SEQRA regulations set out at 6 NYCRR §617.3(a) provide that: "[n]o agency involved in an action may undertake, fund or approve the action until it has complied with the provisions of SEQRA. . .". The term "agency" means: ". . . a state or local agency." 6 NYCRR 617.2(c). A local agency includes: ". . . any local agency, board, authority, district, commission or governing body, including any city, county and other political subdivision of the state." 6 NYCRR §617.2(v). The term "action" includes, *inter alia*, ". . . (3) adoption of agency rules, regulations and procedures, including local laws, codes, ordinances, executive orders and resolutions that may affect the environment . . ." 6 NYCRR §617.2(b). The term "approval" is defined under the regulations to mean "a discretionary decision by an agency to issue a permit, certificate, license, lease or other entitlement or to otherwise authorize a proposed project or activity." 6 NYCRR §617.2(e).

The municipal alienation process is formally initiated through a resolution adopted by the municipal governing board (county legislature, city council, town board or village board of trustees) pursuant to Municipal Home Rule Law (MHRLL) §40, through which it requests the Legislature to enact special legislation authorizing the alienation of parkland.¹ The reason for the State legislative approval requirement is that, as explained by the Court of Appeals in *Friends of Van Cortlandt Park, et al. v. City of New York* (95 N.Y.2d 623), ". . . parkland is impressed with a public trust, requiring legislative approval before it can be alienated or used for an extended period for non-park purposes [citations omitted]." *Id.* at 630. The Office of Parks, Recreation and Historic Preservation, in its manual on parkland alienation, recommends that parkland alienation legislation identify parkland to be substituted for the parkland that is proposed to be alienated. *See Office of Parks, Recreation and Historic Preservation, Handbook on the Alienation and Conversion of Municipal Parkland*, p. 20 (2005). Identification of substitute parkland is important in determining the environmental significance of the action. Typically, most such legislation either identifies substitute parkland or spells out the requirement that alienated parkland must be replaced with parkland of equivalent or greater value.

¹ Actions of the State legislature are exempt from SEQRA. 6 NYCRR §617.5(e)(3)(i).

Parkland alienation clearly affects the environment. Over eighty years ago in *Williams v. Gallatin* (229 N.Y. 248, 253), the Court of Appeals explained “[a] park is a pleasure ground set aside for the recreation of the public, to promote its health and enjoyment.” It needs no citation to say that parks such as Central Park in Manhattan, Prospect Park in Brooklyn, Washington Park in Albany and many others are State and national treasures. They are the breathing space of New York’s metropolitan areas. Smaller neighborhood parks, as do larger parks, provide essential playground and recreational space for young families, small children and senior citizens. “Municipally owned parkland and open space are nonrenewable resources which are carefully preserved in all communities. Once lost to another use, open space is difficult to recover.” *Handbook on the Alienation and Conversion of Municipal Parkland, supra*, p. 3 (2005).

Based on the foregoing, I conclude that a municipal resolution requesting the State legislature’s permission to alienate parkland falls within the definition of an “action” under SEQRA since municipalities, including counties, cities, towns and villages, are “agencies,” as defined by SEQRA, and the MHRI. §40 resolution is discretionary and it affects the environment. *See Chatham Green, Inc. v. Bloomberg*, 1 Misc.3d 434 (Sup. Ct. NY Co. 2003).


The timing question is more complex than the question of whether a decision to alienate parkland is an action because there are several steps in the alienation process, beginning with the municipal home rule resolution and ending in the actual alienation of parkland. This is typical of many actions that involve SEQRA. Indeed, the SEQRA regulations recognize that “[a]ctions commonly consist of a set of activities or steps.” 6 NYCRR §617.3(g). SEQRA contains several statements that strongly suggest that the process must be complete *prior* to the municipal home rule resolution requesting authority to alienate parkland. The SEQRA regulations state that, “[n]o agency involved in an action may undertake, fund or approve the action until it has complied with the provisions of SEQR. . .” 6 NYCRR §617.3(a); and, “[t]he basic purpose of SEQRA is to incorporate the consideration of environmental factors into the existing planning, review and decision-making processes of state, regional and local government agencies *at the earliest possible time*.” 6 NYCRR §617.1(f); emphasis supplied. The phrase “at the earliest possible time” means the point in time when SEQRA can still play a meaningful role in the decision-making process. *See Tri-County Taxpayers Ass’n, Inc. v. Town Board of Queensbury*, 55 N.Y.2d 41, 46-47 (1982).

In *Tri-County, supra*, the Court of Appeals held that town board resolutions to create a sewer district constituted an “action” requiring the preparation of environmental impact statement prior to the board’s adoption of its initiating resolutions. Somewhat akin to the alienation process, the formation of the sewer district in *Tri-County* involved a series of steps that, in relevant part, began with the adoption of a resolution affirming that the formation of the district was in the public interest. The resolution to create the district was subject to both voter and State Comptroller approval. Once both of these approvals were obtained the town board voted to issue the bonds to finance the district. With respect the question of timing, the Court stated:

... an environmental impact statement should have been prepared and made available to the members of the town board and the public prior to the adoption of the resolutions of authorization in July, 1979. It is accurate to say, of course, that by actions of rescission later adopted the town board could have reversed the action authorizing the establishment of the sewer district. As a practical matter, for several reasons, however, the dynamics and freedom of decision-making with respect to a proposal to rescind a prior action are significantly more constrained than when the action is first under consideration for adoption. Thus, although not legally conclusive the initiatory action by the town board might well have been practically determinative. In effect the purpose of SEQRA is to assure the preparation and availability of an environmental impact statement at the time any significant authorization is granted for a specific proposal. . . [*Tri-County, supra*, at 46-47.]

In keeping with the Court of Appeals rationale in *Tri-County* and SEQRA's policy declarations discussed above, I conclude that a municipality must complete SEQRA before adopting its resolution pursuant to Municipal Home Rule Law §40 to alienate parkland. Additionally, I stated above that parkland alienation legislation typically identifies the substituted parkland or spells out that parkland of equivalent value must be substituted for the proposed alienated parkland. SEQRA's timing policies are enhanced by having the SEQRA process completed at the municipal resolution stage as it helps to ensure that offsetting or mitigation measures for the lost parkland will be incorporated into the State legislation.

Sincerely,


Alison H. Crocker
Deputy Commissioner
and General Counsel

cc: S. Gruskin
M. Lenane
A. Reynolds
J. Sama
M. Crew

**Testimony of
Richard T. Anderson, President
New York Building Congress
at a City Planning Commission
Public Hearing on
New York University**



**NEW YORK
BUILDING
CONGRESS**

May 24, 2011

As the City's largest and most diverse coalition of the design, construction and real estate industry, the New York Building Congress is committed to promoting well-planned development that improves the City's economic health and quality of life. We are pleased to offer our support today for New York University's ambitious and important NYU 2031 expansion plan.

The Building Congress has supported the expansion plans of Columbia and Fordham Universities, and the City University of New York, allowing them to modernize and grow to meet the needs of 21st century higher education.

NYU has the same need to expand. As an urban campus, NYU is perennially challenged by space constraints. To remain competitive with the nation's leading universities, NYU must provide facilities that attract the best and brightest minds and facilitate learning. NYU has identified locations close to its Washington Square home, as well as in downtown Brooklyn and Governors Island, where it plans to build enough space to accomplish these goals.

NYU's proposed expansion is a critical response to changes in the City's economy and the world's economy. The Bloomberg Administration has made important efforts to move the City away from a heavy reliance on the financial sector to more diverse, knowledge-based industries such as medicine, technology, higher education and the arts.

NYU and its sister universities are incubators for much of the talent that ends up entering and then leading these industries. Our universities are therefore critical links in the cycle of education, innovation and economic development.

In fact, NYU is already a major contributor to the City's economy, employing more than 16,000 faculty members, administrators and staff, and generating hundreds of millions of dollars in annual economic activity.

The scale of NYU's proposal has provoked some concern about how it will impact the Greenwich Village neighborhood. NYU has looked carefully at creating satellite campuses that will place much of the proposed square footage in other parts of the City. In the meantime, the proposal would modernize its existing Washington Square buildings and develop much of the new square footage on properties it already owns. Therefore, the actual "footprint" of NYU will not grow in a way that overwhelms the historic neighborhood.

The City has taken important steps to attract investment and retain a highly-mobile, well-educated workforce. It has made critical investments in its schools, parks and transit infrastructure, and rezoned key areas of the City to permit growth and investment in the City's multiple business districts.

New York City's leaders must take the next step by ensuring the City remains an inviting home to the investors and professionals who will drive the industries of the future. An expanded, diversified, modern New York University is a key to this vision.

We urge the City Planning Commission to approve and expedite NYU's planned expansion.

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THE COUNCIL OF
THE CITY OF NEW YORK

MARGARET S. CHIN

COUNCIL MEMBER, 1ST DISTRICT, MANHATTAN

CHAIR
LOWER MANHATTAN REDEVELOPMENT

COMMITTEES
PUBLIC HOUSING
EDUCATION
SMALL BUSINESS
CIVIL RIGHTS
WOMEN'S ISSUES
WING

Comments of Council Member Margaret Chin
To the Department of City Planning Concerning
NYU's 2031 Planned Scope of Work
May 24th, 2011

I would like to thank you Madam Chair and fellow Commissioners for giving me, my colleagues in government, and the community this opportunity to comment on New York University's Draft Scope of Work. I would also like to add my compliments to the Community Board Chair, Ms. Jo Hamilton and the dedicated members of the NYU Working Group and the whole Community Board on their commitment and hard work in formulating their comments and for being here today.

Through meetings with involved and concerned residents, my constituents have provided me with a deeper understanding of how this project will impact their lives. There are diverse concerns regarding NYU's expansion and it is important their comments be addressed, be studied and incorporated into what will be the final draft of the Environmental Impact Statement.

NYU's ambitious expansion project is one of the largest projects taking place in the 1st Council District. It will have an enormous impact on many different aspects of life in the Greenwich Village community, as well as the surrounding neighborhoods of NoHo, SoHo and the South Village. There are many significant categories that require study by both the State and City's Environmental Quality Review Acts; my comments will focus on only a few.

While I have made public comments on some aspects of NYU's planned expansion, my recommendations here touch upon impacts that I believe must be better understood in order to fully gauge what the future of this community will look like in the face of such a large project in a residential community.

Land Use and Zoning

Of the many proposed actions being sought by NYU changes to the land uses in the area and the current zoning will create the most visible and tangible impacts. Changing the current zoning would, in effect, create something akin to spot rezoning. The proposed action would carve out the two super blocks and put in place a zoning that is more likely to be seen in other communities to the north that are denser and taller in character. In addition, this would provide the opportunity for more commercially based uses in an area that has historically been residential with only light commercial uses. I would urge NYU to study the impacts of changing the zoning here. A hotel use is more traditionally located in areas that are more mixed use in character. Understanding what impacts that will have in a residential community may show that there is a negative impact that erodes the character of the neighborhood so valued by NYU. In the interest of the community, an overlay district might provide a better alternative which would enable replacement of the Morton Williams supermarket and provide for enhanced commercial opportunities in which the university is interested. Further, another factor to study would be what the annual cost to housing the guests expected to visit NYU in the surrounding hotels versus building their own facility.

In addition, changing the zoning also changes allowable uses. Would an overlay allow NYU to achieve the same goal? What are the differences in allowable use groups between a C1-5 overlay and a C1-7 overlay? The impacts associated with changing these two blocks from an R7-2/C1-5 to a C1-7 could drastically alter the character of the built environment in this area. It would change the surrounding neighbor's access to light and air. In addition, such a change could potentially overburden the area with a significantly denser development than anything found elsewhere in the general area. Why rezone the Commercial Overlay Area? Why not ask for special permits that would accomplish the same goals and allow for bringing in currently non-compliant retail uses into compliance rather than changing the current zoning overlay?

Alternatives to the densities requested as well as the zoning sought should be examined so that a balance between the needs of NYU can be balanced with those of the resident's in whose community the university resides.

Finally, I would like to better understand the different land use changes that are being sought, the rationale for these changes, and precisely the amendments that are being sought to the zoning resolution.

Socioeconomic Conditions

The greatest concern for my office is the direct displacement of residents in the *Future Without the Proposed Actions* scenario. Under this portion of the plan without the changes sought by NYU residents along Washington Place are in danger of losing their homes. The conversion of 15 Washington Place in the Commercial Overlay Area into an academic building nearly twice

the size demands the study of alternatives regardless of their proposed actions. Essentially the community is being asked to accept their zoning changes or risk having our constituents lose their homes. I urge the NYU to examine alternatives to this prospect. There are communities that would gladly accept the development they are proposing and can provide the kind of commercial uses that their students desire.

Indirect residential displacement is also of great concern and must be examined closely. The surrounding cooperatives along Mercer Street could face debilitating property value losses through construction phasing that will take nearly fifteen years to complete. In that time residents who might have reaped a tremendous benefit from the sale of their units will have to accept lower prices because of the burdens placed on them by years of construction noise and related impacts. NYU must look at the impact that their expansion will have on indirect displacement of residents in the surround area. The proposed development will add a substantial new population. The proposed development will also alter real estate market conditions and put the different population at risk of several different factors. What will the effect on cooperative residents be over that time frame? What will the effect of rising rents on seniors on limited incomes be? These and many other questions must be studied in close detail for our community to understand what the true impact of this project will be.

Finally, what will be the impact of the commercial rezoning on Washington Square Village's ground floors should retail be included in those spaces? Will there be direct displacement of residents? How many residents could be displaced? What indirect impacts will arise from this proposed action?

Neighborhood Character and Urban Design

With regard to urban design and neighborhood character impacts, I must echo the concerns of Community Board 2 Manhattan. I have stated publicly my objection to losing such important spaces that the community has cultivated and cared for over the years. NYU has publicly stated that they do not even need those spaces for their proposed development to proceed. Further, these new buildings will be significantly different and employ new urban design techniques in an area that is, for the most part, uniform in how buildings interact with the street. There are currently uniform building street walls but the addition of new buildings could change the design fabric of the neighborhood. What will the impact of these new structures be on the neighborhood character? Will they blend into the city fabric like the Commercial Overlay Area or will they act to separate out NYU's property from the rest of the neighborhood?

It will be necessary to ask these questions as well when evaluating the proposed projects impacts:

- How will new buildings compare with the current built environment?
- What impact will these buildings have on future projects in the adjacent historic districts to the east, south and west of the proposed development area?

- What will the increased density do to the pedestrian's experience when walking through this neighborhood?
- How will NYU's designs impact the enjoyment of light and air on Mercer and La Guardia Street?
- What will the loss of the community garden "strips" mean for those areas where they used to exist?
- What impacts will not having those spaces have on their project and how would any change to the development impact the community should they not receive those "strips"?

Open Space

Community Board 2 Manhattan has a significant dearth of open space; in fact they have one of the lowest percentages of any community board in Manhattan. Through combination of the north and south super blocks into one project area by using the Large Scale General Development special permit procedure, NYU affectively is allowed to combine the open space requirements for each of the super blocks into one requirement for both blocks. Will this enable the university to transfer open space rations across streets? Thus enabling them to over develop one block while claiming that, when taken together, there is ample open space in relation to the amount of height and bulk?

The CEQR Technical Manual requires an assessment of a project's direct impacts if access is limited or changed. Currently the Sasaki Garden and Interior Playground are publicly accessible, but, however, the university claims are not inviting because of the way the space is situated and view corridors as well as access are limited. It is because of this that NYU must study the direct impact of changing such a space. A feasible alternative must be studied. Would NYU be to maintain the current Sasaki Garden and examine how new means of ingress and egress could be established that would enhance a potential user's access to the space?

Other important impacts to study will be:

- What impacts will the loss of the Sasaki Garden, the "key" park, the Washington Square Village Playground, open space strips have on community residing in the "core" and the surround community?
- How will the new users of the parks change the character of the open space that is now available?
- Who will be the primary users of the new open space and what will their impact on the newly created open space be?
- If the new buildings built around the park are academic in use, how will any new open space be portrayed as public if surrounded by campus buildings are utilized primarily by students and faculty?

Community Facilities and Services

The proposed actions would not displace any fire or police stations. However, the population added through the number of students, faculty and their families necessitates that the impact on these service provisions be undertaken. While perhaps not meeting the threshold of "sizeable", it is clear that the addition of a new large population mandates understanding what impact to the services provided from emergency services like the police and fire department will be.

Specifically, the change of ingress to the Washington Square Village area is of the most immediate importance. Currently there are means in place for the FDNY to combat fires through means of entrance along the La Guardia and Mercer Street sides of Washington Square Village. Under the new site plan those means of access will be changed or eliminated. What will the impact of the new site plan have on emergency service provision? Will there be sufficient means of access available to the FDNY in the event of an emergency?

With regard to other facilities, the project will add new families that will impose new burdens on public schools, libraries and even social services. What will the impact of these new families be? Will local schools be able to absorb influxes of new students generated by new faculty and their families?

Alternatives

There are several alternatives that must be examined by NYU. Among these are what development options will be available to them in 2021 and 2031; are there places available in other communities or locations that can accommodate their need to grow when they need to grow? What spaces can accommodate their needs that already exist or that they can acquire elsewhere that need not burden an already burdened community?

The 1st Council District is home to many alternative locations. Community Board 1 Manhattan has said they would welcome NYU's expansion with open arms. The current zoning in lower Manhattan would accommodate all the proposed actions that the university is asking for now. The current zoning would allow for the kinds of facilities that are being planned in the proposed actions. In addition the sort of commercial retail uses are currently in place.

Other alternatives include academic space on Governor's Island; locations in other borough that would welcome the economic development opportunities NYU could provide. Examining what other options could be undertaken to meet both their short- and long-term goals must be undertaken in order to fully understand what impacts the current proposed actions will have on the Greenwich Village and surrounding communities.

Conclusion

Measuring and understanding a scoping document of this complexity is no easy task, even for those trained as urban planners. There are many aspects of the scoping document that, for the sake of brevity, I was not able to comment on today. It is vital that all substantive comments be addressed and examined as we move forward toward completion of the scope of work and the issuance of the Final Environmental Impact Statement.

I appreciate the need for the continued growth of New York University. As they have matured NYU has grown into a world class institution. There are many benefits that having an institution like NYU brings to the City of New York. They open their doors to the community and groups that need space. However, they must also understand that they are part of a delicately balanced community. Their proposed development will change that balance. I hope that they will apply the diligence that others have in preparing their testimony today.



DEBORAH J. GLICK
Assemblymember 66TH District
New York County

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

CHAIR
Higher Education Committee

COMMITTEES
Environmental Conservation
Rules
Ways & Means

**Testimony of Assemblymember Deborah J. Glick
At the Public Scoping Meeting for New York University's Core Project**

As the State Assemblymember representing the Village east to west, SoHo, NoHo and TriBeCa, I am grateful for the opportunity to present testimony before you today regarding the New York University Core Project. I have a great number of concerns about the impact this project will have on traffic, the environment, the disruption of the very nature of the community, and quality of life in the Washington Square area, along with strong reservations about the ethical compromise that would be made were the University be permitted to rescind an agreement made with the City nearly thirty years ago.

The University's request to lift the deed restriction put in place under the Title 1 Urban Renewal program created in 1981 to provide affordable, high quality housing for the neighborhood is unacceptable and must not be granted. Not only would granting this request bring about a deluge of construction projects that would occur simultaneously in the neighborhood, disrupting the quality of life for residents and reducing foot traffic and patronage of our valued small businesses, it is would also set a dreadful precedent by allowing an agreement made in good faith with City agencies to be abrogated in service of expedience. The University agreed to the deed restriction and should not be allowed to break that promise because its restrictions are now inconvenient for their development plans.

I also take pause at the idea of giving NYU exclusive ownership of what has been to this point public space, in the form of the strips of land currently owned by the Department of

Transportation that border La Guardia Place and Mercer Street. The community has long held that these lands should be under the control of the Parks Department. New York City has very little land that is undeveloped and maintained as public space, and the appropriation of public space by a private institution to assist with development plans that are already contested by the surrounding community seems unnecessary and unfair, particularly as the community has spent several decades turning the strips into very beloved park space. In light of that, I ask that the university provide an alternate plan for development that does not include these pieces of land, as the justification for their current plans have been based purely in aesthetic concerns.

The EIS should also contain analysis not only of NYU's proposed plans, but of the maximum possible development allowable under the proposed rezonings. I second the request made by Manhattan Community board 2 that studies be performed to provide a comparative analysis for a district that retains the current R7-2 zoning district and uses Commercial Overlay Districts as needed rather than a blanket commercial rezoning for the entire area.

I further support the Board's request that the applicants provide a reasonable alternative to the complete blanket commercial overlay rezoning in the COA, including an analysis detailing which blocks would be slated for commercial development and which would not be, in addition to the present existing grand-fathered commercial areas totaling nearly 40,000 sq ft.

In addition, I have concerns about the effects of NYU's construction plans on the light and air available to the LaGuardia Corner Gardens, as well as the disruption of land and displacement of groundwater that will occur during the process of constructing the academic structure on LaGuardia Place. These gardens have been painstakingly maintained by volunteer organizations for decades and the scoping plan must include the measures the University will take to preserve the garden and protect it from the potentially damaging and intrusive construction that will be sited nearby.

Earlier projects in the Washington Square area have required a significant amount of water displacement from the now-underground Minetta brook and its tributaries. There should be additional attention paid to the effect of this displacement on the surrounding area, particularly as the large “bathtubs” needed for the new structures on the Superblocks will undoubtedly cause substantially more displacement of underground liquids. These liquids could potentially damage the foundations of the nearby structures as well as erode the soil quality in the surrounding area, which would have a damaging effect on the grass, plants, and trees in the areas intended for public enjoyment. Concerns of this type warrant additional attention as they have the potential to irrevocably change the neighborhood for the worse.

In closing, a project of this scope warrants a degree of analysis that will examine its impacts not only on the local area, but on the region as a whole. In the near future Lower West Side of Manhattan will be the site of a number of large scale construction projects, including the work on the Holland Tunnel, Catch Basin Reconstruction, the replacement of trunk water mains on substantial stretches of Hudson Street and Lafayette Street. The University’s plans and their impact on traffic and quality of life must be taken in context of the combined impact of these projects, all of which will be underway before NYU begins its Core Project. In light of this, I ask that the EIS contain not only analysis of the local effects of NYU’s plans, but a regional analysis as well to ascertain the effects of their plans on Lower Manhattan as a whole.

New York University has already changed the neighborhood in which it has grown substantially over the last two decades. The increase in size has brought with it a change in the demographic makeup of the Washington Square area, difficulties with quality of life for the area’s lifelong residents, and an overcrowding of public space. As we move forward into the next decade, it is important that the University’s Core Project does not further erode the character and quality of life in the neighborhood we have built as a community over many years.



THE SENATE
STATE OF NEW YORK
ALBANY

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COMMISSIONER, STATE OF NEW YORK
DEPARTMENT OF SOCIAL SERVICES
COMMISSIONER, STATE OF NEW YORK
DEPARTMENT OF TAXATION AND FINANCE
COMMISSIONER, STATE OF NEW YORK
DEPARTMENT OF HEALTH

May 24, 2011

Mr. Robert Dobruskin, AICP, Director
Environmental Assessment and Review Division
New York City Department of City Planning
22 Reade Street, Room 4E
New York, New York 10007-1216

RE: NYU Core project (CEQR No. 11DCP121M)

Dear Mr. Dobruskin,

My name is Thomas K. Duane and I represent New York State's 29th Senate District, in which the Washington Square campus of New York University ("NYU"), as well as most of its surrounding neighborhoods, is located.

I certainly appreciate the role NYU plays as an economic, cultural and intellectual engine for our City, and I recognize its prerogative to grow in order to maintain its position as one of the world's leading academic and research institutions. Yet, I am quite concerned about the impacts of the particular expansion NYU seeks to undertake, which would add approximately 2.5 million gross square feet of new uses to its core campus in historic Greenwich Village and for which it is seeking numerous discretionary actions, some of which would open the door for even greater development and change than NYU has proposed. There would be no point, however, in my saying in a different way what Manhattan Community Board 2 (CB2) has already said in its exhaustive and articulate testimony on this matter. I would be hard-pressed to add or subtract from such a well-reasoned and well-researched document.

Thus, I wish to urge the New York City Department of City Planning to ensure that the Scope of Work for the Draft Environmental Impact Statement (DEIS) for NYU's Core project is expanded to study the impacts and alternatives CB2 has so capably detailed.

Thank you for your consideration.

Sincerely,

Thomas K. Duane
New York State Senate
29th District

To Community Board 2

I am writing to you as resident of Greenwich Village. I am a resident at 505 La Guardia Place. I am Vice President of my Co-op. I am also resident chair of BAMRA and active in the Village Reform Democratic Club.

I have some concerns about NYU's proposed development plans and I would like to voice them. When CB #2 put together it's question concerning the Scoping for NYU's Environmental Impact Statement, I would like them reflected and included.

MIDDLE/LOWER INCOME HOUSING

If NYU is allowed to carry out its hyper overdevelopment of the area between Houston Street and 3rd Street from LaGuardia Place to Mercer Street, I believe that NYU damage this part of the community. If allowed to develop this area as they are requesting it will put pressure on middle and lower income residents. As an example currently NYU is pressuring on 505 LaGuardia Place whose land lease readjustment is due in 2014. This is a property that was acquired by Title 1 and they themselves paid very little money when it was transferred to them. It has been hinted that they might charge 505 LaGuardia Place a land rent of between one to three million dollars a year. This would for all practical purposes eliminate middle-income housing. Any increases will eventually be passed on to the residents. I believe NYU should do a study to see what short, middle and long-term effects it will have on the people living there. Then if they are interested in helping supported housing they must address what they can do to mitigate these pressures.

OPEN SPACE

The area that is landmarked between LaGuardia Place and Mercer from Blecker St. and Houston St. is having its open space altered. NYU has requested that the dog run be moved from their Mercer St. site and placed in a place they don't want. They are acting as a governmental agency with the power to obtain property by eminent domain. If NYU has its way they will place it next to 100 and 110 Blecker Street. They would then move the existing children's playground next to the dog run. This is an accident waiting. I pray that an accident between the dog run and the children's playground never happens but it's not a question of if it will happen but one when it will happen. The close proximity is what's the problem.

Furthermore the small playground that NYU wants to build will not take the place of the children's playground in Washington Square village. A study should be done reflecting this. NYU is making it sound like they are giving the community a gift but in reality they are giving the community something with far less value to the community.

The open space from LaGuardia to Mercer Street from Blecker Street to 3rd Street was developed for children between the ages 4 and 12. It's the only safe area for some

one to learn how to ride a bike. No other park was designed with this niche in mind. Has NYU done a study as to how the children of this 4-to12-age range will be affected?

The open space along LaGuardia Place between Bleecker Street and 3rd Street will be affected also. In NYU's plans they want to build below the existing park. This would require the destruction of the existing park so they can build under it. There are a number of older growth trees there that will be cut down. Even if NYU rebuilt the park, any future park there could not support any taller trees to grow. There would be no soil to support the tree. This would change the very nature of the park. NYU will eliminate or damage three of the 4 open spaces in the area and a study should be done to see what affect this will have on the community.

SHADOWS

If NYU is allowed to build taller buildings along Mercer Street between Bleecker and Houston Street it will create a valley of darkness. This street will only get a limited amount of direct sunlight. Anyone living on the East side of the street will see their plants, shrubs, and trees have hard time surviving. They will see their quality of their lives diminished. Property value will go down. NYU should do a study to see how it will affect the quality of life and value of their property.

TRANSPORTATION/ AIR QUALITY

If NYU is allowed to undertake their existing 2031 Plan, they will eliminate a great deal of what little parking we have in the area. Noise and air pollution will increase because cars will drive around looking for non-existing parking. NYU is making no provisions to find parking for their increased usage. NYU plans will increase the amount of people who will live or work in the area by at least by 2500 people. The area will also see an increase in trucking to support the increased building stock. NYU needs to study what adverse effects this will have on the air quality.

CONSTRUCTION IMPACTS

Construction will cause additional air pollution. Besides this there will be many traffic blockages. There is a large population of seniors especially at 505 LaGuardia Place. NYU needs to study and develop a plan to provide emergency vehicle support. When NYU undertakes any construction on what is currently the super market site any construction will block any street access to the building and 100/110 Bleecker. This is just one example of one area that will be affected.

HAZARDOUS MATERIAL

If NYU is allowed to do continuous construction there will be many pollutants in the air caused by demolition of existing buildings. How will this affect children and seniors in this area. What side effects will the residents have to expect. We have sadly learned of what has happened to the people who worked the 9/11 site downtown. This was due to the intensity of the pollution and long-term exposure. Some of these problems did not crop

up till years later. Has NYU done any studies if this long-term work is done here? If construction workers are forced to wear mask to lessen long-term problem, what can the residents of this area do.

ENERGY

When the Silver Towers and 505 LaGuardia was designed and built in the early 60's, it was to use outside steam for heating and hot water. NYU also has a number of properties that are heated in the same manner. 505 LaGuardia and the Silver towers have no independent source of steam nor was it designed to even have a space to make its own steam. If NYU's plans to use steam for heating and hot water in its future buildings, the question is what capacity does its existing plant have? Does NYU have the capability? Does NYU plan to eliminate this service to any of its existing buildings?

NEIGHBORHOOD CHARACTER

The neighborhood character impact will be tremendous. If NYU is allowed to implement their 2031 plan the face of the neighborhood will change. When NYU built the Silver towers (100 and 110 Bleecker Street) and 505 LaGuardia Place the area was blighted. NYU received property that was obtained by Title 1 and work was done as part of an Urban Renewal Project. At first NYU didn't plan to give the people in the Greenwich Village area any benefits but under pressure of the community and elected officials they allowed 505 LaGuardia to be populated by residents. This gave the villagers a place to raise a family. You could have a boy and girl and not be forced to find a home elsewhere. There were promises in the early 60's about a school being built. That was never done. Currently the same promise is being made. Even if it is built now, that will not help the residents that live in the community. No one business and NYU is a business should be allowed to dominate a community. NYU came to Greenwich Village from the Bronx because they liked this area and the Bronx was not an area that had a promising future. They were welcome to the Village because of the benefits it was going to bring the community. However their overbuilding has outweighed those benefits. They have become a cancer that is now destroying the community. NYU does many good things but they have a Jekyll and Hyde persona. Communities are made up of the people who live within a certain geographic area. They are born, go to school, make a living and if they are lucky, they will get married and start the process with the next generation. NYU is destroying that process in Greenwich Village. I can't picture my daughter, who was born from a mother who was born and died in Greenwich Village of having the same opportunity or the same luck. The economic pressures are just too great. You have to be lucky and successful to just come here to live now. Has NYU considered how they are contributing to the downfall of a community?

Thanks for your concern,

Raymond W. Cline

**Statement for the City of New York Department of City Planning Hearing on the
Draft Scope of Work to Prepare a DEIS for the NYU Core Project**

**L. Nicolas Ronderos, Economic and Community Development Director
Regional Plan Association**

May 24th, 2011

My name is Nicolas Ronderos and I'm Economic and Community Development Director for Regional Plan Association, a private, nonprofit group that promotes the economic vitality and livability of the greater New York metropolitan region.

RPA wants to express its support for the NYU Core project given this institution's importance to the economy and life of the city and region. As stated in the DEIS scope of work, NYU is one of the 10 largest employers in the city and its Washington Square campus accounts for more than 24,000 jobs and \$2.25 billion in economic output to the city. The proposed 2.5 million sq. ft. of development will accommodate its expected growth in the Village area maintaining this critical mass of activities.

The future of New York relies on the need to balance and house our key economic activities such as NYU within an urban environment in which there are spatial and other constraints for development. We need to work together to ensure that we are able to continue to make New York a vibrant and attractive place for all.

This project will ensure that NYU is able to keep its forecasted growth at its current location - where it makes sense for the institution to expand. The proposed project allows the University to increase its existing facilities by building on its historic presence in the area without taking new land for development through the proposed Zoning Map changes and Large Scale Development Special permit. This plan achieves this balance by protecting the integrity and fabric of historic communities by not encroaching on them.

RPA believes that building through infill in the existing superblocks where NYU is already located makes sense and will reduce pressure on its piecemeal and scattered development around the Village. By concentrating development in these parcels the project balances the need to accommodate NYU's growth and preserves the neighborhood. The proposed de-mapping and city disposition of portions of LaGuardia and Mercer Streets are necessary actions to make sure that the development plans succeed and are architecturally coherent.

The site plan for the NYU Core project will also "stitch" and reconnect the neighborhood large superblocks together by creating north-south pedestrian walkways from Houston Street to Washington Square Park and enliven the area with new retail and contextual architecture that would complement the built environment diversity of the area through the proposed Development and Commercial Overlay areas.

The draft scope of work for the project includes the right development scenarios (academic, dormitory and hotel maximum programs), and alternatives (reduced impact, lesser density and no action alternatives) to be analyzed by the study. These account for the most important aspects for environmental review result of this action.

Re: NYU Scoping

I basically see the following overriding issues, however they're incorporated.

light density
air quality and effect on respiratory rates
construction and noise
temperature adjustments
monolithic institution versus diversity of institutions
historic character of Village and its other, non-NYU institutions

Here are my specific comments

Land Use, Zoning, and Public Policy:

Effect of decrease of diversity among neighborhood institutions
Effect of monopoly on uses of existing land if given over to a single institution.

Socioeconomic conditions:

Effect of increase of transient population on our area
Increase in narcotics in neighborhood (NYU students have a track record)
Effect on loss of "neighborhood" and "neighborly" feeling
Effect on census count of decreasing permanent resident population and allocation of federal resources to the city

Community Facilities and Services:

Effect of increase in NYU-only community facilities and decrease in community-access facilities

Open Space:

Effect of loss of mature trees on air quality and general sense of livability
Effect of loss of mature plantings on sense of stability and community pride
Effect of loss of sky on general health and well-being
Effect on migrating bird population by increasing towers and windows and decreasing ledges and natural areas for hibernation
Effect of loss of historical memory of the seasons
Effect of inability for elderly and disabled residents to draw sustenance from mature local trees, community and other gardens

Shadows:

Effect on public safety of darker streets caused by shadows cast by taller, denser buildings
Effect on ability to grow vegetables, roses, and other flowers in community garden
Effect on flowering and fruiting cycle of more than 30-year old apple and crabapple trees

Historic and Cultural Resources:

Effect of concentration of all resources in one monolithic entity
Effect of diminishing experiences, contributions, and pride of non-academic members of the community

Urban Design and Visual Resources:

Effect on historic character and mix and interplay of high-rise and low-rise
Effect on inadequate bedrock to support an increase in towers

Natural Resources:

Effect on water supply and electric power grid
Effect on ability of have 20 minutes of Vitamin E daily by taking a walk in the neighborhood
Effect on air quality of destruction of mature trees and mature plantings during heat of summer
Effect on monarch butterfly population, dependent on certain host plants in community garden
Effect on endangered bee populations, necessary for pollination and cultivation of fruit crops elsewhere in the state, by destroying bee-loving plants in community garden.

✓ over

Hazardous Materials:

Effect of breathing hazardous chemicals and materials during construction period
Effect of monitoring of air quality and air alerts on "civilian" population in neighborhood
Effect of potential breathing and asthma rates being exacerbated in a neighborhood which has shown higher respiratory problems than average after 9/11.

Infrastructure:

Effect on ease of ambulance and other emergency services to deliver adequate and timely care

Transportation:

Effect of raising density and undermining already underserved MTA local bus routes, compromised by MTA changes of June 27, 2011.
Effect of traffic congestion due to extra taxis, pedestrians, and subway riders.
Effect of increased population on already crowded streets, saturated with bikers, scooters, messengers, baby carriages, tourists, and residents
Effect on senior population of inability to navigate streets and provide own services such as grocery shopping due to increase in pedestrian and other traffic

Air Quality:

Effect on air quality, especially with global warming
Effect of raising local summer temperatures due to destruction of mature trees, taller and denser buildings

Noise:

Effect of noise pollution on area and surrounding area

Public Health:

Effect of increase in young, drinking-age population on other residents' ability to safely navigate streets. See also issues of air quality and transportation

Neighborhood Character:

Effect of zoning change on neighborhood character

Construction Impacts:

Effect on elderly and disabled of blocked roadways, especially in winter's icy periods.
Effect of increasing distances to travel for grocery shopping
Effect of traveling for daily groceries through torn-up and treacherous streets and possibly dangerous air quality
Effect of increased accidents and lawsuits arising from too much construction in a small, concentrated space
Effect on local population of loss of sky through construction of additional high-rise buildings

I am firmly opposed to any construction on the superblocks, to any destruction of publicly owned greenspace, and to any further torture inflicted on a historic community which should treasure the very things that make this neighborhood of such historic and present value. An academic institution that purports to be an educational institution has no business destroying the very cultural and historic environment it feeds upon.

Rhoma Mostel

tidalfats@mac.com

ENVIRONMENTAL IMPACT STATEMENT - May 24, 2011- Sylvia Rackow

As a longtime Villager, the area's environment has been very important to my family. We've experienced annual Halloween parades, annual Washington Square Art Shows, visitors/tourists for the San Gennaro and other feasts, local street fairs, park closings, Houston Street construction of many years, which brought car and truck and bus traffic down Bleecker Street (and the traffic still continues) bicycle lanes, NYU facilities construction on 3rd Street which lasted for several years, NYU Washington Square Village facility problems which required deep digging to empty an oil spill this year closing part of sidewalk, daily four buses crowding our streets every 10-15 minutes and now NYU proposes to build millions of square feet on a two block area which is already crowded.

We Villagers request that the Environmental Impact study of NYU's proposed construction include the following;

How many years ^{each} this proposed building ~~plant~~ will take to construct?

Environmental impact of the construction (on residents' health, nearby residences, traffic, noise, air pollution, possible accidents, hazardous debris, garbage, rodents, insects, etc.)

How will landmarked green areas and public lands be protected during construction?

Impact of noise and pedestrian traffic from moving Dog Run near 100-110 Bleecker Street (if permitted to take over public lands now housing dog run on Mercer Street.)

Effect of Car, taxi and truck traffic on Bleecker and on Mercer during construction.

Increased pedestrian traffic on already crowded streets from new population.

Increased parking needs of hotel and other buildings' occupants.

Impact on children in proposed public school (if built) of large crowds of older students.

Loss of parking garage in Washington Square Village and impact on streets.

Cleanliness of the impacted area before, during and after construction.

Shadows cast by newly erected buildings on other properties.

Effect of any zoning change to both residential and commercial nearby entities .

Effect on Minetta Creek which flows beneath Washington Square Village to Houston.

Maintenance plan for the upkeep of the properties.

Impact on bus, subway and other transportation of increased population.

Effect on bike lanes.

And probably most important, disturbance of rodents (rats,mice,etc.) who live in the skeletons of underground buildings

Certainly there are many more issues which need to be addressed in the Impact study. I am sure there are others who can testify to those needs.

Thank you for all courtesies extended.

Sylvia Rackow

*505 Laguardia Place-5C
New York, NY 10012*

May 24, 2011

Good afternoon. My name is Terri Cude from Community Board 2, and I am speaking about Neighborhood Character.

Say “**The Village**” and everybody knows exactly where you mean.

Greenwich Village is a very popular tourist destination. Visitors come to experience where Bob Dylan sang, where Keith Haring drew, where Le Corbusier’s influence teaches us about modernist architecture and the balance of height to open space as Picasso’s “Sylvette” watches over us, and where plays and books and music are being written right now and artists are discovering new ways to express their creativity and communicate their views.

This creative character – the fabric of Greenwich Village – still exists in small restaurants, cafes, theaters, music clubs and neighborhood stores, but is threatened to change beyond recognition by the influx of students and faculty displacing artists, musicians and other established residents, retail serving a university rather than a community, and reduction in the open space that helps define the area as a Village.

NYU’s proposed project Plan elements such as freshman housing, hotel and classrooms will directly and indirectly change the qualities that make the Village and SoHo famous; the qualities that still make them among the major reasons why people visit New York. Some pass through, some become enchanted and live here because there is no other place where they can possibly live as they are. Greenwich Village is a vibrant residential neighborhood, infused with the vitality and diversity of those who lived - and continue to live - in “The Village.”

Our community currently has **appropriate** mid-level residential zoning. R7-2 has allowed and continues to permit as-of-right building and the change that New York City is famous for, but puts a limit on the amount of height, bulk and density that can be jammed into our residential blocks.

Determined Village residents took leftover Robert Moses artifacts and turned them into vibrant, treasured parkland with different and much-needed uses, from spots of quiet reflection and communing with nature to unprogrammed play space desperately needed by children who are past the toddler stage. Taking those streetside parks built by the sweat and love of residents over decades and allowing them to become partly building sites and completely rooftops that cannot accommodate deep-rooted trees or prevent storm water runoff will irrevocably change the character of the area, as well as the livability – and health – of the neighborhood and those who live here.

While NYU’s study will certainly follow CEQR guidelines, it is still up to City Planning to parse the information in the context of what will happen to the character of the neighborhood. And in this case, the proposed study is insufficient to capture what makes Greenwich Village, SoHo and NoHo a unique neighborhood in New York City. Therefore, we ask that the detailed recommendations in the CB2 testimony you have been provided be implemented and included in NYU’s scope of work for their Environmental Impact Statement.

Thank you.



Testimony of Jennifer E. Falk
City Planning Draft Environmental Impact Statement (DEIS)
Hearing on NYU 2031 Plan
May 24, 2011

My name is Jennifer Falk, and I serve as Executive Director of the Union Square Partnership, a community-based, non-profit organization that works to foster the best possible quality-of-life for residents, businesses and visitors in the Union Square-14th Street district. I thank you for the opportunity to testify today at this hearing, which will determine the scope of the Draft Environmental Impact Statement (DEIS) that will be prepared for New York University's expansion as part of their NYU 2031 Plan.

I am here today speaking on behalf of the Union Square Partnership membership, which includes the district's employees and businesses, medical, cultural and educational institutions. Our large institutions, including NYU, The New School, Con Edison and Beth Israel Medical Center, are all major economic drivers in the area and there is no doubt that their presence adds to the great strength and vitality of Union Square.

Over the past three decades, the Union Square district has undergone an incredible transformation and the investments made by NYU in the past decade or so have been a large part of the neighborhood's continued success. The report conducted by Appleseed that was released earlier this month underscores much of what we in Union Square already know and experience on a daily basis. NYU serves as active community partner offering space for community gatherings and hosting events that are free and open to the public, NYU's students and employees, and the institution itself, spends significant amounts with our local merchants, and NYU and The New School are a leading source of new private investment in the area. The contributions of our large academic institutions cannot be taken for granted especially when times are tough as they have been in the last few years, and we must continue to make crucial investments, like the plan put forth today, to safeguard our City's future and grow its economy.

The required environmental review is an important process and we strongly believe that all voices should be heard so that in the end, the best plan possible moves forward. As you listen today, we urge you to think beyond the impact of just one neighborhood and understand the importance of NYU to the whole of Lower Manhattan and the City. We believe that NYU's expansion plan will provide another important boost to the Union Square district and that the benefits this plan will bring will be great.

Thank you again for this opportunity to share our views with you today - we urge you to complete the environmental review as soon as possible so the land review process for NYU's 2031 plan can begin.

NYU stated earlier tonight
that their design for public
space is "more user friendly"

How can moving current
public space accessible to
the community now to
privately owned space
within the confines of NYU
be better for the community

The areas surrounding the
proposed design are currently
used by for parks
children playgrounds, dog park
and gardens.

There is no benefit to
the community to move
the areas.

The plan is only
beneficial to the
Real Estate of NYU
not the citizens of NYC.

JUDICIARY COMMITTEE

CONGRESSMAN

RANKING MEMBER

2011-2013

REPUBLICAN PARTY, STATE OF NEW YORK

**TRANSPORTATION AND
INFRASTRUCTURE COMMITTEE**

CONGRESSMAN

2011-2013

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Congressman Jerrold Nadler
Testimony for Department of City Planning Hearing
Re: Scope of Work for Environmental Review of NYU Proposal
May 24, 2011

Thank you for the opportunity to testify today regarding the scope of work to be studied in the Environmental Impact Statement (EIS) for New York University's (NYU) 2031 development plan. NYU's proposal will have a significant long-term impact on Greenwich Village, and it is critically important that the EIS provide a thorough analysis of these potential effects. I want to commend Community Board 2 and its chair, Jo Hamilton, for their thorough response to NYU's Draft Scope. I wholeheartedly urge DCP to include CB2's many recommendations in the EIS to ensure that the environmental review provides as robust an analysis as possible of the impact of the development that NYU is proposing. I also want to thank NYU for working with the community on these complex issues and I encourage them to continue to do so in the future. NYU is a valuable academic institution that contributes to the intellectual and economic vitality of this city. I understand and appreciate its need to expand, but this growth must occur in a manner that respects the needs of the neighborhood in which it is located.

I would like to take the opportunity today to discuss a few key points that I think are especially important to study in the EIS. NYU proposes to develop 2.5 million square feet on two primarily residential superblocks, equal to 6 square city blocks, which is a significant amount of development in a relatively small area. It is important that the EIS examine not only the impact on the wider Greenwich Village neighborhood, but also the ability of such a concentrated area to absorb the impact of this dense growth. The EIS should examine the impact of nonresidential development on primarily residential blocks - how the impact of academic buildings, a dorm, expanded retail and commercial space, a public school and a hotel will affect the character of these quiet, residential blocks. The EIS should study the socioeconomic impact on nearby affordable housing and examine the potential for both direct and indirect displacement of residents.

In regards to the reasonable worst-case development scenario (RWCDS), NYU bases its calculations on the scale of development it is proposing, which is not the maximum square

footage and height allowed under the changes that NYU seeks. If the proposed actions are approved, NYU will be able to initiate future development up to the allowable amount under these changes. Therefore, the RWCDS should be based on the maximum allowable development under the proposed actions, rather than simply studying the impacts based on NYU's proposed development. Additionally, the EIS should study alternatives to NYU's proposed plan, including an alternative with less density, given the wide community opposition to the development of 2.5 million square feet on 6 square city blocks.

The issue of school overcrowding has plagued Community Board 2 for years, and the addition of more residents to the neighborhood will only compound the problem. Schools in Community Board 2 are already at or above capacity, so any development project adding residents to the area should trigger a study of the need for more school seats. Additionally, NYU should ensure that its offer of 100,000 square feet for a public school will not be retracted if SCA does not have the funds to build the school by a certain date.

Another critical element I would like to discuss is public open space. NYU states that its proposal will bring a net increase of publicly accessible space to the superblocks. This calculation is based on acquiring already-public space that the University would then manage. Publicly accessible privately-owned open space is qualitatively different than public open space. Transferring public land to a private entity means that the public now relies on the private entity to manage and upkeep the open space (rather than through public funds) and that access to this open space is ultimately at the discretion of the private institution. Because NYU seeks to purchase public land for its own use, even though it will be publicly-accessible, the EIS should study the impact that this change would have on the use, accessibility and quality of this open space. Additionally, I urge DCP to study an alternative that retains the DOT strips as public open space, so that the square footage of public open space does not decrease. In a neighborhood with one of the lowest rates of square footage of open space per resident in Manhattan, it is critically important to retain and increase the amount of available public open space.

The Greenwich Village community has taken great strides to retain the unique, rich historical character for which the neighborhood is famous. Greenwich Village is a special neighborhood not simply because of the number of independent and locally-owned stores and restaurants, the community investment in maintaining and beautifying public space, the historical architectural richness, and the close-knit community that exists, but also because of how carefully the residents and Community Board shape the growth of their neighborhood. The neighborhood character of Greenwich Village is admired across the entire country. The EIS must thoroughly study how NYU's proposed development either contributes to or harms this neighborhood character.

I hope that the Department of City Planning incorporates into the EIS the many recommendations presented today by CB2, community members, and elected officials. This will ensure a robust environmental review, so that all possible development iterations and their

impacts are studied and the groundwork is laid for a healthy public debate about NYU's proposal. The need for NYU to grow, and the value of its location in the center of Manhattan as an engine of economic growth and academic influence, must be balanced with the needs of Greenwich Village and its residents.