<u>Final</u> Scope of Work to Prepare a Draft Environmental Impact Statement for the Saint Vincents Campus Redevelopment

A. INTRODUCTION

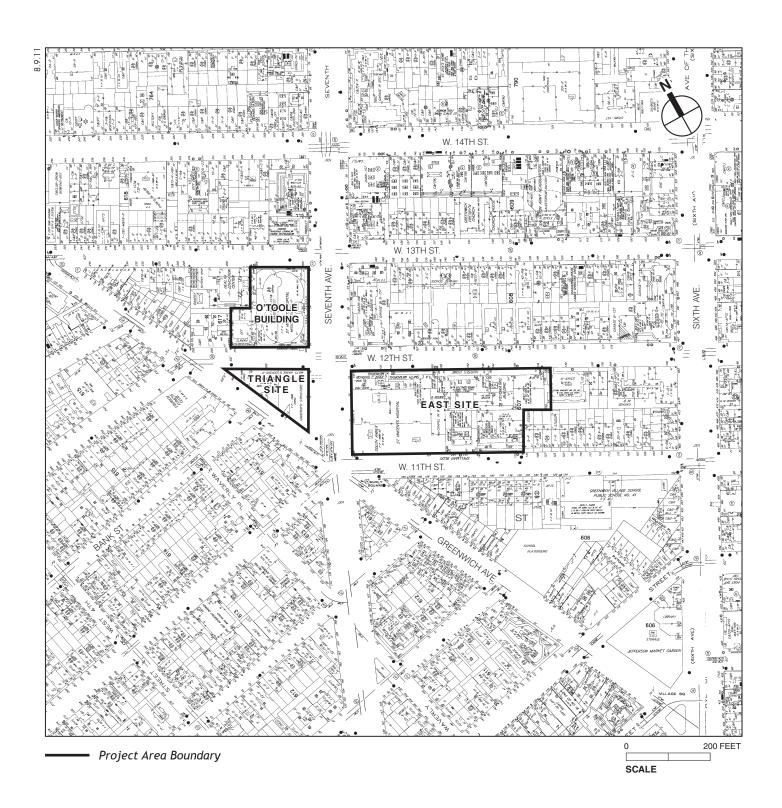
The proposed <u>East Site</u> project consists of the creation of a primarily residential development and new publicly accessible open space by RSV, LLC. The <u>proposed East Site</u> project <u>would be located on two of the three blocks of</u> the former campus of Saint Vincent's Hospital Manhattan (the East Site <u>and</u> the Triangle Site) fronting <u>on</u> Seventh Avenue between West <u>12th</u> Street and West 11th Street/Greenwich Avenue (see **Figures 1 and 2**).

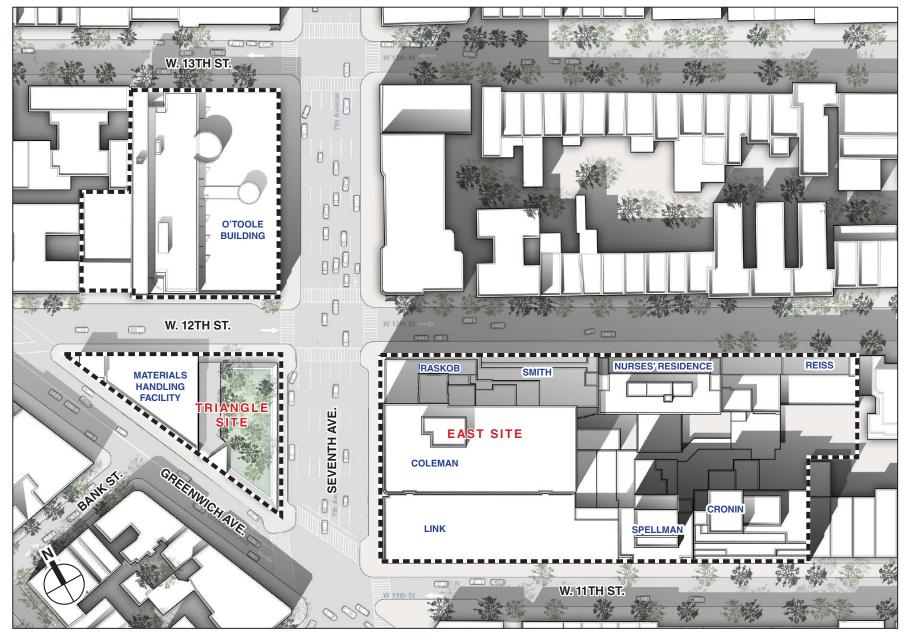
Contemporaneously, North Shore-Long Island Jewish Health System (NSLIJ) would develop a comprehensive health care facility—referred to as the Center for Comprehensive Care—on the third block of the former campus of Saint Vincent's Hospital Manhattan in the O'Toole Building. The O'Toole Building would be completely renovated for this purpose while maintaining its overall shape and appearance.

Previous efforts to redevelop the project <u>area</u> were the subject of a Draft Scope of Work issued on November 6, 2009, which is superseded in full by this <u>Final</u> Scope of Work.

As described in greater detail below, the actions necessary for the proposed <u>projects</u> include zoning map amendments, zoning text amendments, and special permits for the East Site and Triangle Site from the New York City Planning Commission (CPC). These discretionary land use approvals are subject to review under the Uniform Land Use Review <u>Procedure</u> (ULURP) and City Environmental Quality Review (CEQR). Although the Center for Comprehensive Care would be as_of_right under the New York City Zoning Resolution and would not require any approvals pursuant to ULURP, it does require a Certificate of Need approval from <u>the New York State Department of Health (NYSDOH).</u> In addition, as described below, the New York City Landmarks Preservation Commission (LPC) will also review certain aspects of the proposed projects.

Acting as lead agency, CPC has determined that the proposed <u>projects have</u> the potential to result in significant environmental impacts. Therefore, an EIS will be prepared. This <u>Final</u> Scope of Work describes the proposed actions and proposed development plan, describes the environmental review process, identifies the analysis framework to be used in the EIS, and presents the analyses and work items proposed to be undertaken for the EIS. As described below, a public meeting to receive comments on <u>the</u> Draft Scope of Work <u>was held at 2:00 PM on Tuesday</u>, June 28, 2011 at Spector Hall, Department of City Planning (<u>DCP</u>), 22 Reade Street, New York, NY, 10007. The period for submitting written comments <u>remained</u> open until Monday, July 11, 2011. After considering comments received during the public comment period, <u>this</u> Final Scope of Work <u>was</u> prepared to direct the content and preparation of a Draft EIS (DEIS).





■■■ Project Site Boundary

B. PROJECT DESCRIPTION

SITE HISTORY AND EXISTING CONDITIONS

The three parts of the former Saint Vincent's Hospital Manhattan campus include: the East Site on the east side of Seventh Avenue between West 11th and 12th Streets; the Triangle Site bounded by Seventh Avenue, West 12th Street and Greenwich Avenue; and the O'Toole Building Site on the west side of Seventh Avenue between West 12th and 13th Streets. Saint Vincents Catholic Medical Centers of New York d/b/a Saint Vincent Catholic Medical Centers (SVCMC) owns all three parcels in the project area. Saint Vincent's Hospital Manhattan served the Greenwich Village community and the lower West Side of Manhattan from its founding in 1849 until 2010, when the hospital filed for bankruptcy and closed its doors. The now-vacant former hospital buildings (see Table 1) occupy the East Site between West 11th and 12th Streets. On the Triangle Site the Materials Handling Facility, with loading bays and a connection to the East Site via a tunnel running beneath Seventh Avenue, is unused. The Materials Handling Facility shares the Triangle Site with a fenced open space. Across Seventh Avenue a block to the north between West 12th and 13th Streets is the O'Toole Building. Completed in 1964 as a purpose-built union hiring hall and offices, the O'Toole Building was converted to medical use in the mid-1970s. After the closing of Saint Vincent's Hospital Manhattan, the building continued to house ambulatory care programs run by Mount Sinai Medical Center and St. Luke's-Roosevelt Hospital as well as physicians' offices. Some of these activities have relocated already, and all are expected to be relocated by September 15, 2011. There is also a below-grade parking garage.

Table 1 Existing Buildings in the Project Area

Location/		Lot Area				Gross Floor
Building Name	Block/Lot	(sf)	Address	Height	Use	Area (sf)
East Site						
Coleman/Link	Block 607,	92,925	1 Seventh Avenue	190/59 ft.	Vacant	356,013
Pavilions	Lot 1					
Cronin Building			133 West 11th Street	151 ft.	Vacant	88,170
Spellman Pavilion			143 West 11th Street	<u>135</u> ft.	Vacant	63,582
Reiss Pavilion			148 West 12th Street	109 ft.	Vacant	67,120
Nurses' Residence			158 West 12th Street	140 ft.	Vacant	73,903
Smith/Raskob			170 West 12th Street	146/168	Vacant	114,326
Buildings				ft.		
Triangle Site						
Materials Handling	Block 617,	16,677	76 Greenwich	20 ft.	Vacant	26,320
Facility	Lot 1		Avenue			
O'Toole Building Site						
O'Toole Building	Block 617,	36,138	20 Seventh Avenue	82 ft.	Clinics and	162,020
	Lot 55				Physician's	
					Offices; Parking	
Note: Gross floor area for the East Site is above-grade: there is an additional 118 750 gsf below-grade on the East						

Note: Gross floor area for the East Site is above-grade; there is an additional 118,750 gsf below-grade on the East Site. **Source:** SVCMC, Perkins Eastman.

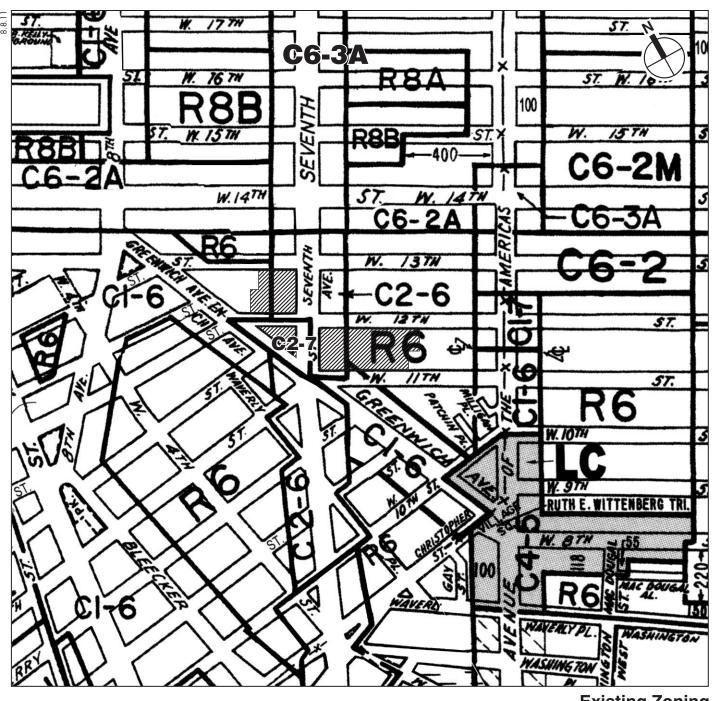
The East Site includes individual buildings previously used for hospital and administrative support uses:

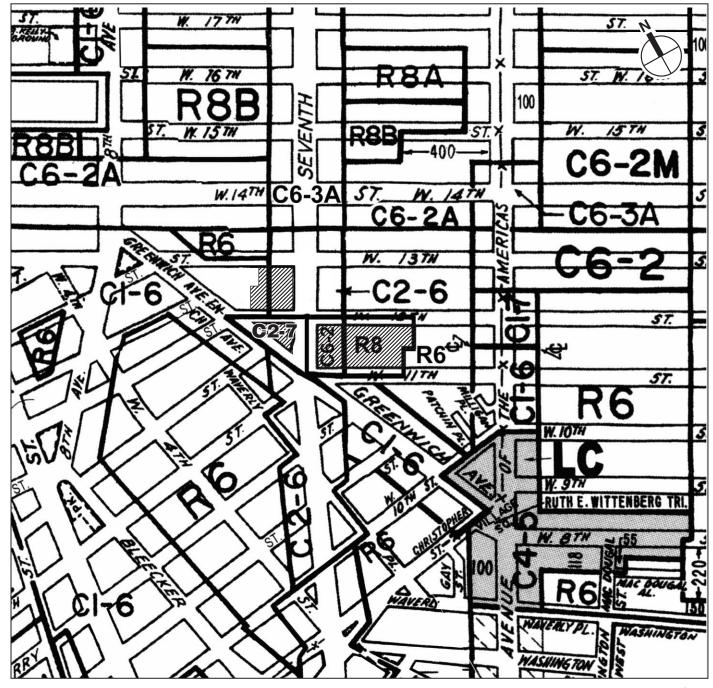
- Coleman Pavilion, completed in 1983, is the tallest building on the East Site. It stands in the middle of the Seventh Avenue frontage.
- Link Pavilion adjoins the Coleman Pavilion to the south and occupies the corner of Seventh Avenue and West 11th Street. Completed in 1987 as a hospital wing to the Coleman Pavilion, it is the newest building on the East Site.
- Cronin Building, located at the eastern end of the East Site on West 11th Street, was built in 1961 for research and laboratory facilities.
- Spellman Pavilion, on West 11th Street between the Link Pavilion and the Cronin Building, was constructed in 1941 for administrative offices.
- Smith/Raskob Buildings, north of the Coleman Pavilion at the corner of Seventh Avenue and West 12th Street, were constructed in 1950 and 1953, respectively, as inpatient pavilions serving the buildings that preceded the Coleman/Link Pavilions.
- Reiss Pavilion, built in 1955 as a residential behavioral health facility, is located at the eastern end of the East Site on West 12th Street.
- The Nurses' Residence, completed in 1924 to serve as a dormitory for the since closed School of Nursing, is located on West 12th Street between the Smith/Raskob Buildings and Reiss Pavilion.

The East Site is zoned C2-6 along Seventh Avenue and R6 in the midblock with a very small portion (less than 400 square feet) located in a C1-6 district, the Triangle Site is zoned C2-7, and the O'Toole Building Site is zoned C2-6 along Seventh Avenue and C1-6 in the midblock (see **Figure 3**). The <u>campus</u> is also a large-scale community facility development (LSCFD) designated in 1979 and received special permits that allowed the transfer of zoning floor area from Block 617, Lots 1 and 55 (the Triangle and O'Toole Building Sites, respectively) to Block 607, Lot 1 (the East Site), and also received authorizations to modify lot coverage and height and setback for the construction of the Link and Coleman Pavilions (N780516 ZAM) (see **Figure 4**). The LSCFD also provided for the construction of the Materials Handling Facility and creation of the landscaped space on the Triangle Site.

Although the <u>former Saint Vincent's Hospital Manhattan campus</u> is located within the boundaries of the Greenwich Village Historic District (listed on the State/National Registers of Historic Places [S/NR] and a designated New York City Historic District), none of the buildings on the <u>campus</u> is individually designated as a New York City Landmark (NYCL). The O'Toole Building itself was determined S/NR-eligible by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) in 2008.

The area surrounding the <u>campus</u> includes a variety of residential, retail, commercial, and community facility uses. Residential uses include apartment buildings as well as townhouses, while retail uses generally include local neighborhood services such as delis and grocery stores as well as larger stores selling clothing and other merchandise. Institutional uses include churches and schools as well as the Jefferson Market branch of the public library. Directly south of the Triangle Site—at the intersection of Greenwich and Seventh Avenues below West 11th Street—is a triangular lot that is planned as the future site of an MTA-New York City Transit fan plant.





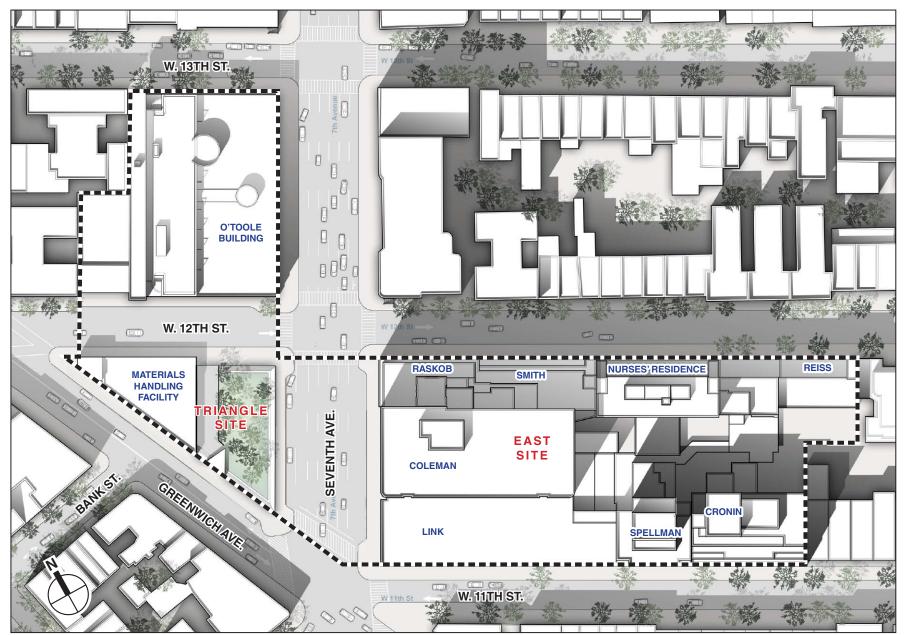
Proposed Zoning

Existing Zoning

Zoning District Boundary

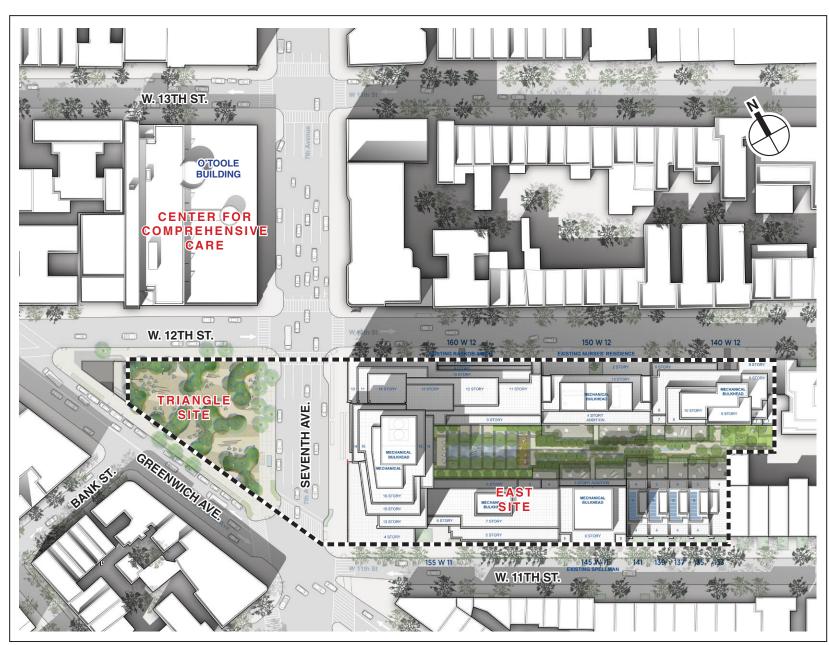
SCALE

Special Purpose District



■■■■ Boundary of Existing LSCFD

Existing Large-Scale Community Facility Development (LSCFD)



NOTE: TRIANGLE SITE OPEN SPACE DESIGN SHOWN FOR ILLUSTRATIVE PURPOSES ONLY

■■■■ Boundary of Proposed LSGD

Proposed Large-Scale General Development (LSGD)

PROPOSED DEVELOPMENT

With the proposed <u>East Site</u> project the East Site would be redeveloped with primarily residential use in new buildings and in renovated and adapted existing buildings. In addition to the residential use, there would be retail space and medical office space along the Seventh Avenue frontage, accessory parking, mechanical, and below-grade and at-grade residential amenity space. The number of dwelling units <u>on</u> the East Site would be limited to 450 under a large-scale general development (LSGD) special permit, substantially <u>fewer than</u> the permitted residential density on the site.

On the Triangle Site the former Materials Handling Facility would be <u>demolished except</u> for <u>the medical gas storage area</u> (approximately 1,100 gsf) and the adjacent driveway <u>which</u> would be reused by NSLIJ. With the elimination of the loading docks, the curb cut on the south side of <u>West 12th Street between Greenwich and Seventh Avenues—where there is now a long, single curb cut providing access to both the loading docks of the Materials Handling Facility and the <u>gas storage area—would be significantly reduced.</u> The open space would be <u>expanded to 15,102 square feet</u>, redesigned and opened to the public. The <u>contemplated design includes several stands of trees surrounded by plantings</u>, paved <u>areas and undulating benches as well as memorials</u> to events in the history of <u>Saint</u> Vincent's Hospital Manhattan.</u>

<u>It is anticipated that construction of the proposed East Site project, including the Triangle Site, would be completed by 2015.</u>

CENTER FOR COMPREHENSIVE CARE

The former O'Toole Building would be renovated to house the Center for Comprehensive Care, with <u>an</u> emergency department on the ground floor and an ambulatory surgery center, imaging center and other health care services on the upper floors. <u>NSLIJ</u> would restore the façade to its originally designed condition as finished concrete painted white. At ground level the glass blocks would be replaced in kind. To allow for its renovation to house the Center for Comprehensive Care, a number of alterations would be required. The form of the ground floor would be altered at its northwest and southwest corners. The southwest corner would be reconfigured with a single loading dock and a driveway into the site and under the overhang of the building for ambulances. At the northwest corner a new entrance for outpatients would be created with Americans with Disabilities Act (ADA)-compliant ramps and a canopy. The Seventh Avenue entrance would serve for walk-in emergency department visits and would be improved with a new exterior vestibule and entrance with projecting canopy, and ADA-compliant ramps. The need for sufficient mechanical equipment would require that new mechanical equipment be placed at the roof of the sixth floor. It is anticipated that the Center for Comprehensive Care would also be complete and occupied by 2014.

PROPOSED ACTIONS

The discretionary approvals being requested for the proposed <u>projects</u> include zoning map<u>and</u> zoning text amendments, and special permits for the East Site and the Triangle Site, all of which are subject to CPC and City Council approval.

<u>Demolition of</u> the Materials Handling Facility and the proposed design of the <u>publicly accessible</u> open space on the Triangle Site will require approval (a Certificate of Appropriateness) from LPC. LPC permits issued under the New York City Landmarks Law are not subject to CEQR. The design of the buildings on the East Site has been reviewed by LPC and LPC issued a Status Update Letter

10-1426 documenting LPC's approval of the design of the residential/commercial development on the East Site on July 7, 2009. No further LPC reviews of the design of the East Site buildings will be required.

A description of the approvals follows:

ZONING MAP AMENDMENTS

- Rezoning of the <u>East Site within 100 feet of Seventh Avenue from C2-6 to C6-2 (see **Figure 3**, above). This map amendment would increase the allowable Floor Area Ratio (FAR) for residential use from up to 3.44 to up to 6.02 and would maintain the current FAR <u>of 6.5</u> for community facility. It would also increase the allowable FAR for commercial use from 2.0 to 6.0. The rezoning would also allow the East Site and a portion of the Triangle Site to be treated as an LSGD and allow for the grant of the LSGD special permits described below (see "Discretionary Permits and Authorizations").</u>
- Rezoning of the midblock portion of the East Site from R6 and C1-6 to R8. This rezoning would increase the allowable FAR for residential use from up to 2.43 to 6.02 (3.44 to 6.02 for the small C1-6 district) and the allowable FAR for community facility or mixed use residential/community facility from 4.8 to 6.5 (unchanged in the small C1-6 district).

The two zoning map amendments would allow for a combined maximum floor area of 604,013 zoning square feet (zsf), at least 73,400 zsf less than exists on the East Site today.

ZONING RESOLUTION TEXT AMENDMENTS

A zoning text amendment pursuant to ZR 74-743(a)(4) is proposed to make a special permit currently available only for LSGDs in Manhattan Community District 7 also available for LSGDs in Manhattan Community District 2. The special permit allows the floor area ratio available for new development to be used without regard to height factor or open space ratio requirements and allows for a reduction in open space requirements for appropriate open space with superior landscaping. This would permit a reduction in the required open space obligation for the residential portion of the project by up to 50 percent for open space of a superior design.

It is unlikely that another property within Community District 2 would take advantage of the proposed text amendment. The text amendment is only applicable to LSGDs that are partially located within C6-1, C6-2, or C6-3 districts, which are not widely mapped in Community District 2. In addition, in order to meet the criteria for LSGDs, properties generally must consist of at least 1.5 acres and be in common ownership on a single zoning lot. Even if all of these criteria are met, the amended text would only be available by special permit, a discretionary approval subject to ULURP and its own review. Within Community District 2, the Westbeth Artists' Housing property located at 55 Bethune Street is the only property that currently meets these criteria; however this property is already built out, and is a designated historic resource. Thus, it is not likely to take advantage of the text amendment in the future.

LARGE-SCALE GENERAL DEVELOPMENT SPECIAL PERMITS

The East Site and a 15,<u>102-square-foot</u> portion of the Triangle Site would be developed as a Large Scale General Development (LSGD) (see **Figure 4**, above), and several special permits available to LSGDs would be requested, as follows:

• LSGD special permits pursuant to ZR 74-743 as follows:

- ZR 74-743(a)(1) to allow for distribution of total open space required by ZR 35-33 and 23-142 without regard for zoning lot lines or district boundaries. This would allow for approximately 15,102 square feet of the open space required as part of the East Site development to be located on the Triangle Site rather than on the East Site. No floor area or lot coverage distribution is being requested as part of the proposed projects.
- ZR 74-743(a)(2) to allow the location of buildings without regard for the applicable court and height and setback (including rear yard setback) regulations set forth in ZR 23-632, 23-663, 23-843, and 33-432. This special permit would allow for modification of height and setback regulations, including rear yard setback controls, and outer court recess requirements for additions to the existing buildings and for certain of the proposed buildings.
- ZR 74-743(a)(4) (as amended) to modify the open space regulations by reducing the open space requirement to 50 percent and permit the maximum residential FAR to be applied to development. This special permit would allow for the maximum residential FAR of 6.02 to be applied to development on the East Site and reduce the amount of required open space from 59,857 square feet to 29,928 square feet for appropriate open space with superior landscaping.
- LSGD special permit pursuant ZR 74-744(b) to <u>allow commercial</u> uses <u>on the third floor of a building in</u> the C6-2 <u>district</u> portion of the LSGD without regard for <u>the</u> locational <u>restrictions</u> set forth in ZR 32-42. This would allow doctors' offices proposed for the East Site within the C6-2 district to occupy a portion of the third floor of the development, with residential uses located on the <u>second story and the remainder of the third floor</u>.

As part of the LSGD special permits, the maximum amount of zoning floor area that would be allowed on the East Site would be limited to 590,660 square feet. Of this amount, no more than 31,251 square feet of zoning floor area would be available for community facility and commercial development, limited to the first three floors of the Seventh Avenue buildings on the East Site. Of this amount, commercial use would be limited to no more than 20,426 square feet of zoning floor area. The LSGD special permit would also limit the number of dwelling units to a maximum of 450. In addition, the zoning floor area that would be allowed on the Triangle Site would be limited to the existing gas storage area.

On the East Site, the LSGD special permits would establish a development envelope for the existing buildings and new development, and would also introduce a central courtyard running the length of the <u>proposed East Site</u> project. Unlike the present condition, where buildings extend into the interior of the block, the proposed design would create a uniform rear building wall condition so that the interior courtyard has a consistent depth throughout its length and can have a coherent design. A limited portion of the interior courtyard would be for private yards for the townhouses and certain of the side street buildings, but the majority of the space would be open space accessible to all of the residents of the <u>proposed East Site</u> project. The common area would be a passive open space with significant landscaping, seating, and uniform lighting throughout, providing both a visual amenity as well as open space for the residents. The proposed <u>projects</u> would result in over 14,000 square feet more open space than exists today.

The LSGD special permits would provide that the <u>15,102</u> square foot open space on the Triangle Site be a publicly accessible amenity, and would mandate that the open space conform to a design approved as part of the special permit. The Triangle Site open space is expected to be a heavily landscaped area fronting Seventh Avenue incorporating fixed, curvilinear seating

surrounding the planting beds, moveable seating, lighting, and elements serving as a remembrance to events in the history of Saint Vincent's Hospital Manhattan.

As part of the LSGD special permits, the developer will enter into a Restrictive Declaration governing the development of the East Site and the portion of the Triangle Site encompassed within the LSGD boundaries. The Restrictive Declaration will among other things: require that the LSGD property be developed in accordance with plans adopted as part of the LSGD special permits; restrict the number of residential units to no more than 450 and limit the overall amount of floor area and the amount of commercial and community facility floor area allowed in the LSGD; provide for the construction and maintenance of the publicly accessible open space on the Triangle Site; and require that the <u>proposed East Site</u> project incorporate measures <u>identified</u> in the environmental review process that would avoid or minimize certain environmental impacts of the <u>proposed East Site</u> project.

ACCESSORY PARKING GARAGE SPECIAL PERMIT

A special permit pursuant to ZR 13-561 would be requested to allow for an accessory parking garage with 152 spaces. This would be an increase above the 98 parking spaces that would be permitted as-of-right pursuant to ZR 13-12 and ZR 13-133. This would allow on-site accessory parking spaces for approximately 30 to 40 percent of the anticipated residential units.

Upon the approval of the actions set forth above and the demolition of a portion of the Link/Coleman Pavilions, the height and setback waivers and floor area transfer granted under the LSCFD would no longer be required and the LSCFD would cease to <u>exist</u>.

OTHER AGENCY APPROVALS

Landmarks Preservation Commission. Due to the project <u>area's</u> location in the New York City Greenwich Village Historic District, the proposed <u>projects are</u> subject to review and approval by LPC. As noted above, LPC issued a Status Update Letter 10-1426 <u>documenting LPC's approval of</u> the <u>design of the</u> residential/commercial development on the East Site on July 7, 2009, and no further LPC approvals will be required for <u>buildings on the East Site</u>. In addition, any changes to the Materials Handling Facility and the design of the public open space on the Triangle Site will be subject to LPC review and approval. These LPC approvals are not subject to CEQR. For work on the Triangle Site, it is expected that an application will be filed with LPC in August of 2011.

MTA-New York City Transit. It is proposed that the bus stop currently located at the corner of Seventh Avenue and West 12th Street be relocated one block south on the Triangle Site. This would require approval by MTA-New York City Transit and that the agency coordinates with New York City Department of Transportation (NYCDOT).

NYCDOT. It is possible that RSV, LLC will seek an assignment of an existing revocable consent from NYCDOT, to allow for the use of an existing tunnel under Seventh Avenue connecting the East Site and Triangle Site and potential reuse of an existing utility connection running under West 12th Street between the medical gas storage area and the former O'Toole Building. The tunnel under Seventh Avenue may be used for storage and mechanical equipment in support of the <u>proposed</u> East Site <u>project</u>, while the connection running below West 12th Street would continue to be used for medical gas.

APPROVALS FOR THE CENTER FOR COMPREHENSIVE CARE

The proposed Center for Comprehensive Care is consistent with current zoning and will not require approvals from the CPC or City Council. A Certificate of Need (CON) approval is required from NYSDOH for the Center for Comprehensive Care. A CON application has been filed by NSLIJ. There will be review of the Center for Comprehensive Care by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP). Review and approval by LPC is required for alterations to the O'Toole Building. LPC held a hearing on the Center for Comprehensive Care on July 26, 2011 and voted to approve the proposed alterations on August 2, 2011.

C. PURPOSE AND NEED FOR EAST SITE PROJECT

EAST SITE RESIDENTIAL DEVELOPMENT

The transfer of the East Site to a private developer for residential development would allow the site to be used for residential, community facility and retail uses along Seventh Avenue consistent with the surrounding context. The redevelopment of the East Site with residential and other uses is intended to allow for the productive reuse of what is otherwise an obsolete group of four historically contributing buildings within the Greenwich Village Historic District and allow for the replacement of other buildings on the East Site with new structures in keeping with the form and context established by the surrounding neighborhood.

TRIANGLE SITE

The proposed <u>East Site</u> project is intended to revitalize and reactivate the Triangle Site by introducing a new passive open space amenity that would replace an elevated, fenced-off landscaped area and the Materials Handling facility. The new open space would be an at-grade plaza with planting, seating, and lighting, with the goal of providing an attractive and secure area for the surrounding community. <u>The</u> development <u>on</u> the Triangle Site would be reduced to <u>the medical gas storage area and adjacent driveway (which would be used by NSLIJ for the Center <u>for Comprehensive Care</u>). <u>This</u> is intended to keep the site as an open, low-scale parcel that would maximize light and air. The open space on the site would be part of the proposed LSGD and would contribute to the open space requirements for the primarily residential development proposed for the East Site.</u>

D. <u>PURPOSE AND NEED FOR THE</u> CENTER FOR COMPREHENSIVE CARE

The Center for Comprehensive Care is intended to provide essential community healthcare services for the local geographic area that had been served by Saint Vincent's Hospital Manhattan. NSLIJ's goal is to create a patient-centered environment dedicated to efficient care, optimized staff performance, and enhanced patient experience. The Center will provide the following services:

- Emergency Services;
- Diagnostic and Treatment Services, including imaging, ambulatory procedures, and laboratory services; and
- Other medical or health-related services appropriate to be located at the Center based upon future community health needs.

In developing the program for the O'Toole Building, NSLIJ undertook a market analysis of the service area based on the demographics, historical community utilization of inpatient discharges and emergency visits provided by the Statewide Planning and Research Cooperative System (SPARCS), cost reports submitted to NYSDOH by SVCMC and area hospitals, Thomson Reuters population estimates and market studies of community services for various physician specialties.

A community-driven, community healthcare assessment is <u>also</u> being undertaken with the support of NSLIJ and Hunter College. The information collected so far from the community healthcare assessment and discussions from the community meetings has been taken into account by NSLIJ in determining the proposed program. According to the applicant, the results of these discussions and analyses indicate the need for the development of a model that combines access to emergency care with the specialized diagnostic and treatment services of an ambulatory center. NSLIJ believes the services provided in this facility will meet a significant portion of the needs of the community which has used <u>Saint</u> Vincent's Hospital Manhattan for many essential healthcare services.

E. ANALYSIS FRAMEWORK

EXISTING CONDITIONS

For each technical area to be assessed in the EIS, the existing conditions <u>in</u> the project <u>area</u> and in the relevant study <u>area</u> will be described. The analysis framework begins with an assessment of existing conditions because these can be most directly measured and observed. The assessment of existing conditions does not represent the condition against which the proposed <u>projects are</u> measured, but serves as a starting point for the projection of future conditions with and without the proposed <u>projects</u> and the analysis of project impacts.

THE FUTURE WITHOUT THE PROPOSED PROJECTS (NO BUILD CONDITION)

Under the terms of the contract approved by the Bankruptcy Court and executed by RSV, LLC and SVCMC it is expected that the O'Toole Building will be conveyed to NSLIJ, and the East Campus Site and the Triangle Site will be conveyed to RSV, LLC, an entity controlled by Rudin Management. The conveyance of the O'Toole Building Site will be for the purpose of allowing for the reuse of the O'Toole Building by NSLIJ for the Center for Comprehensive Care. The conveyance of the Saint Vincent's Hospital Manhattan campus will take place independent of the proposed projects and accordingly the site will no longer be owned by SVCMC in the future, either with or without the projects. In the future without the proposed projects, it is expected that the existing LSCFD would remain in place.

In the event that approvals for the Center for Comprehensive Care are not obtained by NSLIJ, the contract requires NSLIJ to reconvey the O'Toole Building Site to RSV, LLC or to another health care provider at the direction of RSV, LLC. In the event of reconveyance to RSV, LLC, Rudin Management advises that the O'Toole Building will be leased by it for health-related functions not requiring a NYSDOH Certificate of Need, such as <u>doctors'</u> offices and clinic space similar to the uses in the building prior to the closure of Saint Vincent's Hospital Manhattan. Such <u>doctors'</u> offices and clinics, whether conducted pursuant to conveyance to a health care provider other than NSLIJ as directed by RSV, LLC, or under leasehold arrangements between RSV, LLC and health care entities, would be consistent with the <u>LSCFD</u> designation; they would also be consistent with the underlying zoning that allows 6.5 FAR for community facility use. While the underlying zoning allows for commercial use of the building to 2 FAR, the

overall form of the building and the limited number of windows in the O'Toole Building make its use for commercial offices unattractive. In the future without the proposed <u>projects</u>, it is assumed that the below-grade parking garage will remain open and in use and that any loading activities would continue to take place at the curbside.

With respect to the East Site, Rudin Management advises that absent the proposed <u>East Site</u> project it will seek to maximize the value of the East Site by looking for one or more institutional users for the property, and would seek to convert the smaller floor plate buildings on the site to dormitory space for the educational institutions in the area, and the larger floor plate buildings for classroom or conference center space associated with a non-profit institution. While some reuse of portions of the East Site is likely in the future without the proposed <u>projects</u>, the amount and make-up of such use is speculative. Accordingly, as a conservative measure, the EIS will assume no active use of the East Site in the future without the proposed <u>projects</u>. However, the reuse of the East Site buildings for community facility uses, consistent with the LSCFD, will be qualitatively considered as an alternative.

The EIS will also assume that there are no active uses on the Triangle Site in the future without the proposed <u>projects</u>. The loading bays and other above- and below-grade spaces of the Materials Handling Facility will be vacant and unused, as will the area devoted to medical gases. As in the existing condition, the open space on the Triangle Site will be fenced and not accessible to the public. For each technical analysis in the EIS, the No Build condition will also incorporate approved or designated development projects within the appropriate study area that are likely to be completed by the respective analysis years.

THE FUTURE WITH THE PROPOSED PROJECTS (BUILD CONDITION)

The two main components of the <u>East Site</u> project—the residential development on the East Site <u>and the</u> open space on the Triangle Site. **Table 2** presents a comparison of existing conditions and conditions anticipated in the future both with and without the proposed <u>projects</u>.

<u>Table 2</u> Comparison of Existing, No Build and Build Conditions

	Comparison of Existing, No Bund and Bund Conditions						
	<u>Existing</u>	<u>No Build</u>	<u>Build</u>				
East Site							
			676,786 GSF				
Residential	=	=	<u>450 units*</u>				
Community Facility							
(Medical Office)	<u>=</u>		<u>25,094 GSF</u>				
<u>Retail</u>	<u>=</u>		<u>11,200 GSF</u>				
Accessory Parking	=		152 spaces (accessory)				
Vacant (former hospital							
<u>buildings)</u>	<u>878,372</u>	<u>878,372</u>					
Total East Site GSF	<u>878,372</u>	<u>878,372</u>	<u>724,880</u>				
Triangle Site	Materials Handling Facility and	Materials Handling Facility and	1,100 GSF Medical Gas				
	Medical Gas Storage (Vacant)	Medical Gas Storage (Vacant)	<u>Storage</u>				
	<u>+/- 7,390 sf</u>	<u>+/- 7,390 sf</u>	<u>15,102 sf</u>				
	Open Space	Open Space	Open Space				
	(not publicly accessible)	(not publicly accessible)	(publicly accessible)				
Total Triangle Site GSF	<u>26,320</u>	<u>26,320</u>	<u>26,320</u>				
O'Toole	Ambulatory care clinics	Ambulatory care clinics	NSLIJ Center for				
Building Site	and doctors' offices	and doctors' offices	Comprehensive Care				
	48 space parking garage	48 space parking garage	No parking garage				
Total O'Toole Building							
Site GSF	<u>162,020</u>	<u>162,020</u>	<u>152,556</u>				
Notes: * The number of dwelling units would be limited to 450 under the LSGD special permit							

The Center for Comprehensive Care is conservatively analyzed along with the proposed East Site project because it is occurring on a part of the former Saint Vincent's Hospital Manhattan campus and being developed contemporaneously with the proposed East Site project. It is also described below.

RESIDENTIAL DEVELOPMENT

The vacant former hospital and support buildings on the East Site would be developed for residential use with retail and medical office uses on the lower floors of the buildings along Seventh Avenue (see **Figures 5 to 9**, which show the site plan and ground floor plan for the East Site, as well as elevations of the building design reviewed and approved by LPC). The Raskob and Smith Buildings, Spellman Pavilion, and Nurses' Residence would be adapted for residential use. Existing extensions in the rear yards of the Nurses' Residence and Spellman Pavilion would be removed and an extension to the rear yard setback line would be added to the Spellman Pavilion. A 60-foot wide courtyard would be created between these buildings.

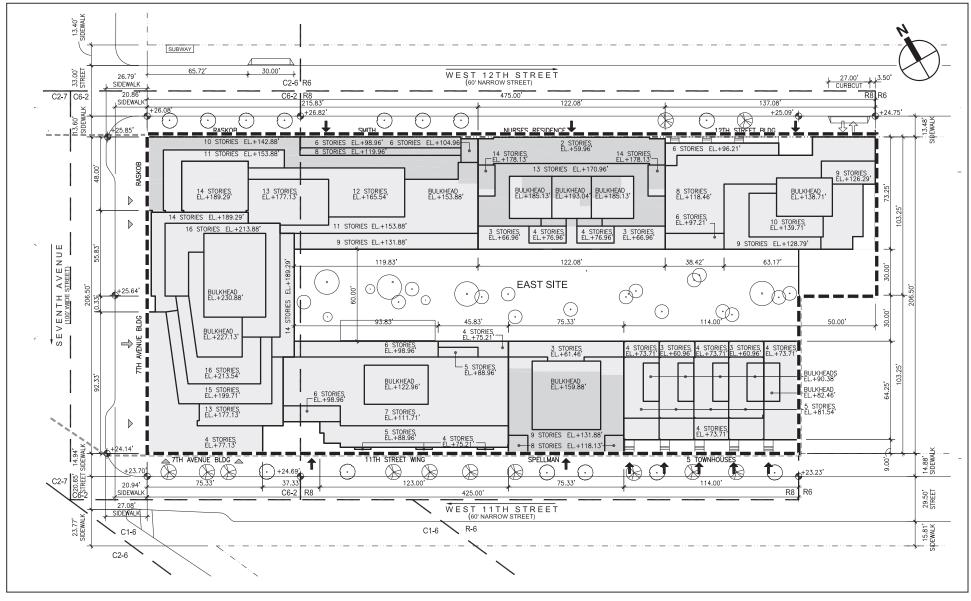
The Coleman, Link, and Reiss Pavilions and Cronin Building would be demolished and new buildings would be constructed at these locations. A new 16-story residential building would be constructed on the site of the Link and Coleman Pavilions, and a new 8- to 10-story apartment building would replace the Reiss Pavilion. A row of five <u>4- and</u> 5-story townhouses would be constructed on the site of the Cronin Building. Along Seventh Avenue, the buildings would include ground floor retail space as well as medical offices on the second and third floors and at the cellar level. An accessory parking garage with 152 spaces would be constructed below grade with access and egress on West 12th Street.

This arrangement of the East Site buildings would follow the development pattern of the area with taller buildings on the avenue stepping down to rowhouses or mid-rise buildings along the side streets. Further, each structure (other than the townhouses) would rise with setbacks again recalling the architectural forms of the neighborhood. There would be an individual pedestrian entry to each of the residential buildings.

The LSGD special permits will limit the amount of commercial and community facility zoning floor area to a maximum aggregate of 31,251, limited to the first three floors of the Seventh Avenue buildings on the East Site. Of this amount, up to 20,390 square feet may be allocated to commercial uses: this would allow for the majority of the ground floor to be used for local retail uses and would allow for the third floor to be used for physician offices or other diagnostic and ambulatory care facilities. At least 10,861 square feet will be used for community facility purposes, and up to the entirety of the space may be used for community facility purposes provided that there is a corresponding reduction in the amount of commercial floor area in the East Site project.

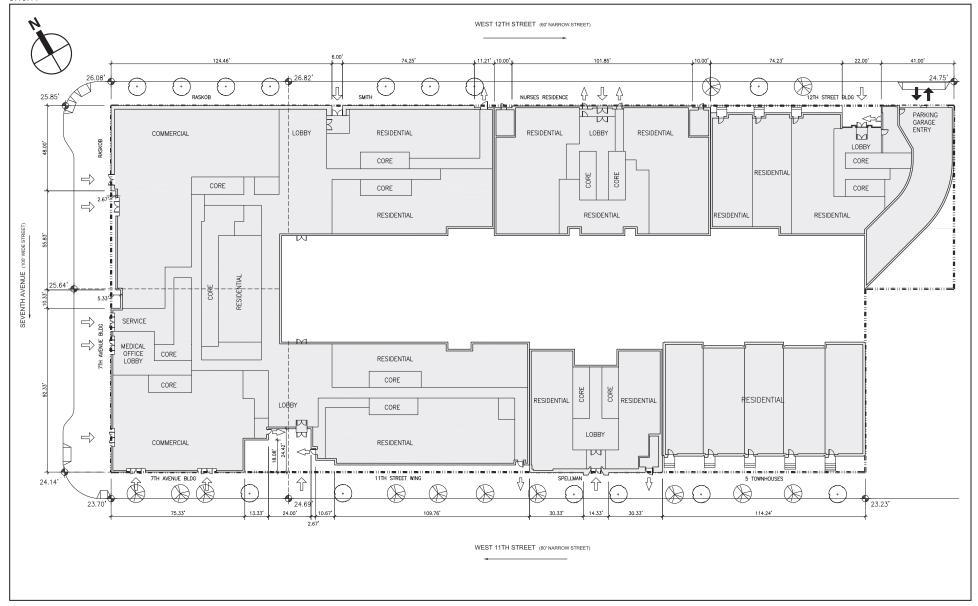
Overall, the East Site would contain a total of 724,880 gsf. There would be 624,280 gsf above grade, including 591,986 gsf of residential space, 11,200 gsf of retail space, and 21,094 gsf of medical office space. Below grade there would be 4,000 gsf of medical office space, as well as 96,600 gsf of accessory parking, mechanical, and residential amenity space. The residential space would amount to 559,409 zoning square feet (zsf) of floor area. The special permit would limit the number of dwelling units allowed on the East Site to no more than 450.

Based on the Census average household size of 1.<u>55</u> for the area, there would be approximately <u>698</u> new residents on the East Site. Based on typical employment rates, the East Site is expected



— — — = East Site Boundary





to generate 34 retail employees, 88 medical office employees, and 17 residential building employees.

TRIANGLE SITE

On the Triangle Site, <u>most of</u> the former Materials Handling Facility would be <u>demolished</u>. Only the area for medical gas storage and the adjacent driveway (totaling <u>approximately 1,500</u> sf) would <u>remain</u>, to be reused by NSLIJ. With the elimination of the loading docks, the curb cut on the south side of West 12th Street between Greenwich and Seventh Avenues—where there is now a long, single curb cut providing access to both the loading docks of the Materials Handling Facility and the gas storage area—would be significantly reduced. The open space on the eastern portion of the Triangle Site would be <u>expanded</u>, redesigned, and opened to the public. The open space is expected to be approximately <u>15,102</u> square feet and would include planted areas, paved walkways, benches, and tables and chairs. The design of the proposed open space would be approved by the CPC as part of the LSGD special permits. The design of the open space, along with <u>demolition of the majority of</u> the Materials Handling Facility, would also be subject to LPC review and approval.

Most of the Triangle Site—excluding the medical gas storage area and driveway that would be used by NSLIJ—would become part of the proposed LSGD. The open space on the Triangle Site would contribute to the amount of open space required under the LSGD, but would also provide access to the general public, which is not required for open space under the Zoning Resolution.

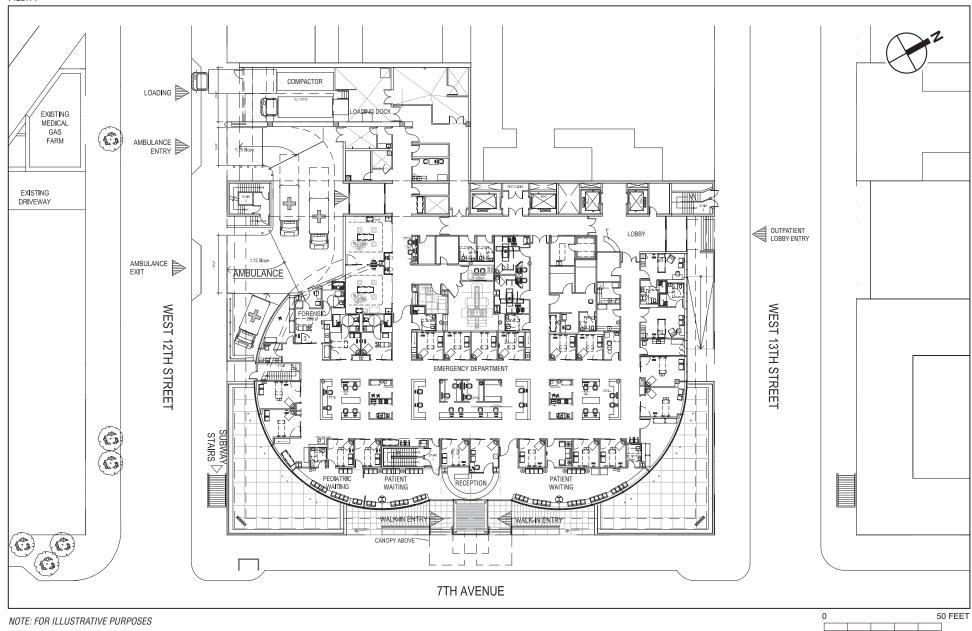
CENTER FOR COMPREHENSIVE CARE

<u>Contemporaneously with the proposed East Site project, NSLIJ</u> would <u>completely renovate</u> the O'Toole <u>Building</u> to create the new state-of-the-art Center for Comprehensive Care. This <u>facility</u> would contain a new free-standing emergency department, ambulatory surgery unit and a new imaging center, along with laboratory services.

Located on the ground floor for immediate access, the emergency department is based on providing the same diagnostic capabilities and staffing as hospital emergency departments (see **Figure 10**). It would be open 24 hours per day, 7 days per week (24/7)—treating conditions from minor abrasions to acute abdominal pain, chest pain, and upper respiratory distress—including advanced life support technology, and it would accept ambulance traffic. Examination and treatment bays would be equipped to evaluate, diagnose, and treat the patient. A small number of beds would be available for patient observation leading up to patient release to the community or transfer to an inpatient hospital.

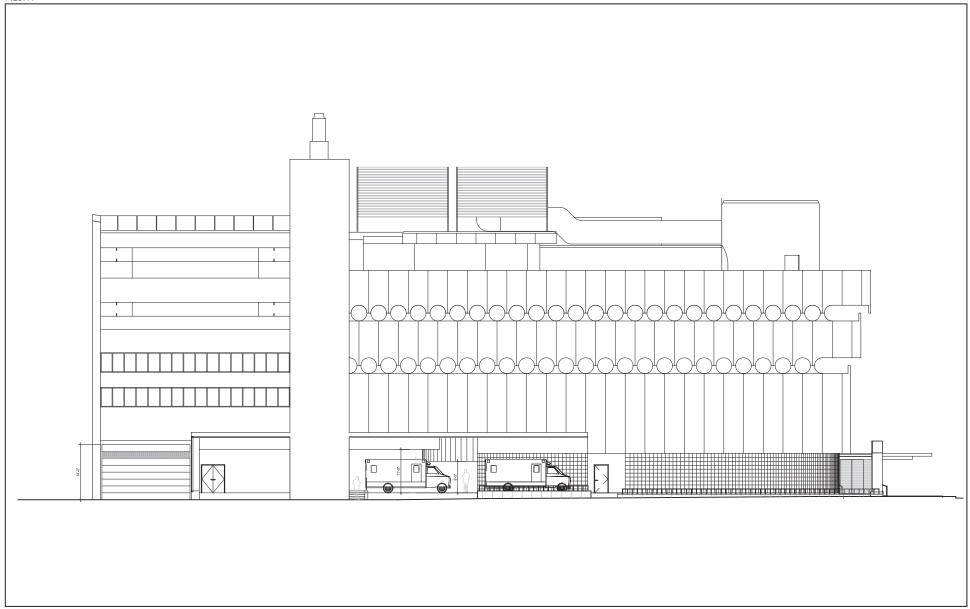
The ground floor would be reconfigured to accommodate the new uses. A new ambulance entry would be located off West 12th Street, while the existing Seventh Avenue entrance would serve for pedestrian access to the emergency department (see **Figures 11 and 12**). Patients coming to the imaging center or coming for ambulatory surgery would use a new entrance on West 13th Street. A single loading dock would be located at the west end of the West 12th Street frontage. Portions of the non-original second floor would be removed to provide for the ambulance access and to permit heating, ventilation and air conditioning (HVAC) distribution to the emergency department.

The emergency department would incorporate diagnostic and treatment services of a hospital emergency department including X-ray, CT, laboratory, and minor procedures. The upper floors would include ambulatory surgery and a state-of-the-art diagnostic/imaging center. This center



SCALE

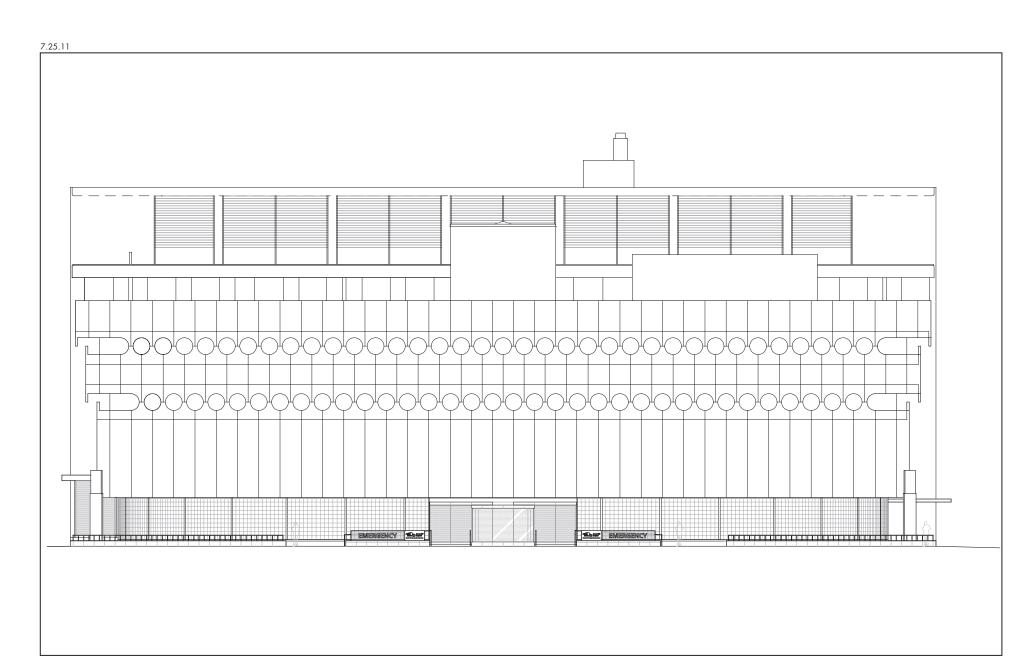
Figure 10
Proposed Center for Comprehensive Care
Ground Floor Plan



NOTE: FOR ILLUSTRATIVE PURPOSES

Figure 11

Proposed Center for Comprehensive Care
South Elevation



NOTE: FOR ILLUSTRATIVE PURPOSES

Proposed Center for Comprehensive Care
Seventh Avenue Elevation

would be equipped with the newest imaging technologies available, and services offered would include digital X-ray, CT, MRI, Ultrasound, and Angiography. Additional space would be allocated to physicians' practices.

In order to support the health care services, new rooftop mechanical equipment will be placed at the seventh floor (roof), in the area currently occupied by the cooling tower (see **Figure 13**). In addition, the façade of the building would be restored and changes would be made to accommodate the new emergency department and its ambulance entrance, as well as the building's pedestrian entrances.

In total, the model for a Center for Comprehensive Care developed by NSLIJ for the O'Toole Building is expected to have more than 144,000 patient visits per year. It is estimated that 391 employees (268 at peak shift), 453 patients and 358 visitors would come to the Center on a daily basis.

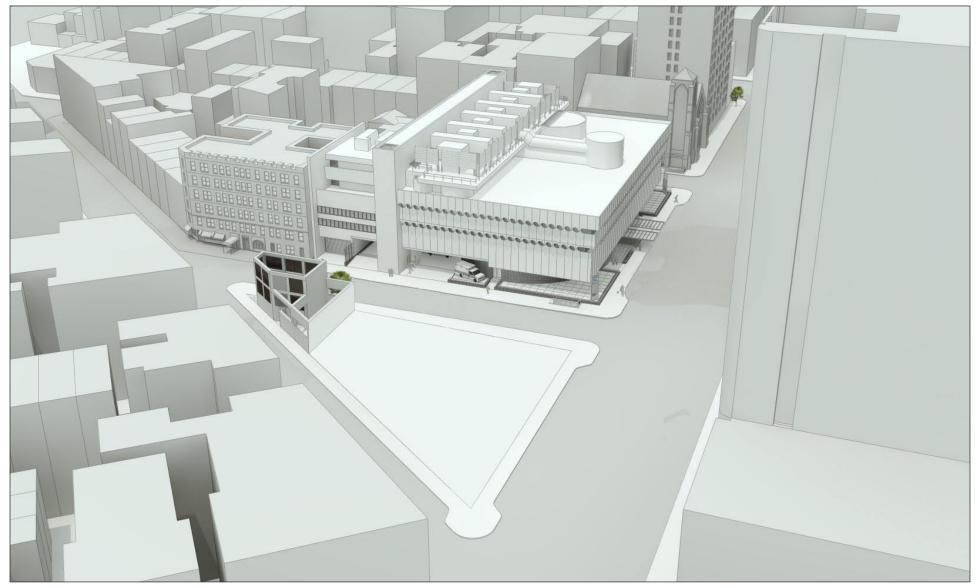
ENVIRONMENTAL REVIEW PROCESS

CPC as lead agency in the environmental review determined that the proposed actions and projects have the potential to result in significant environmental impacts and, therefore, pursuant to CEQR procedures, issued a positive declaration requiring that an EIS be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA), the City's Executive Order No. 91, and CEQR regulations (August 24, 1977), as well as the relevant guidelines of the CEQR Technical Manual. A Draft Scope of Work was prepared in accordance with those laws and regulations and the City's CEQR Technical Manual.

In accordance with SEQRA and CEQR, this Draft Scope of Work was distributed for public review. A public meeting was held on Tuesday, June 28, 2011 at Spector Hall, DCP, 22 Reade Street, New York, NY, 10007. The period for submitting written comments remained open until Monday, July 11, 2011. This Final Scope of Work was prepared, taking into consideration comments received during the public comment period, to direct the content and preparation of a DEIS. As the next step in the process, once the lead agency has determined that the DEIS is complete, it will be subject to additional public review, in accordance with the CEQR and ULURP processes with a public hearing and a period for public comment. A Final EIS (FEIS) will then be prepared to respond to those comments. The lead agency will make CEQR findings based on the FEIS, before making a decision on project approval.

As described in greater detail below, the EIS will contain:

- A description of the proposed actions and <u>projects</u> and <u>their</u> environmental setting;
- An analysis of the potential for adverse environmental impacts to result from the projects;
- A description of mitigation measures proposed to eliminate or minimize any adverse environmental impacts disclosed in the EIS;
- An identification of any adverse environmental effects that cannot be avoided if the proposed projects are implemented;
- A discussion of alternatives to the proposed actions and projects; and
- A discussion of any irreversible and irretrievable commitments of resources to develop the <u>projects</u>.



NOTE: FOR ILLUSTRATIVE PURPOSES

F. ENVIRONMENTAL IMPACT STATEMENT (EIS) SCOPE OF WORK

TASK 1: PROJECT DESCRIPTION

The first chapter of the EIS <u>will introduce</u> the reader to the <u>proposed East Site</u> project and <u>Center for Comprehensive Care and set</u> the context in which to assess impacts. The chapter will contain a project identification; the background and/or history of the hospital's development <u>in</u> the project <u>area</u>; a statement of purpose and need for the proposed <u>projects</u>; a detailed description of the proposed actions necessary to achieve the <u>projects</u>; a description of the development program and project siting and design <u>of both projects</u>; and a discussion of approvals required, procedures to be followed, and the role of the EIS in the process. The chapter is the key to understanding the proposed <u>projects</u> and <u>their</u> impacts, and gives the public and decision-makers a base from which to evaluate the <u>projects</u> against both the future with the proposed <u>projects</u> and the future without the proposed <u>projects</u> options.

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

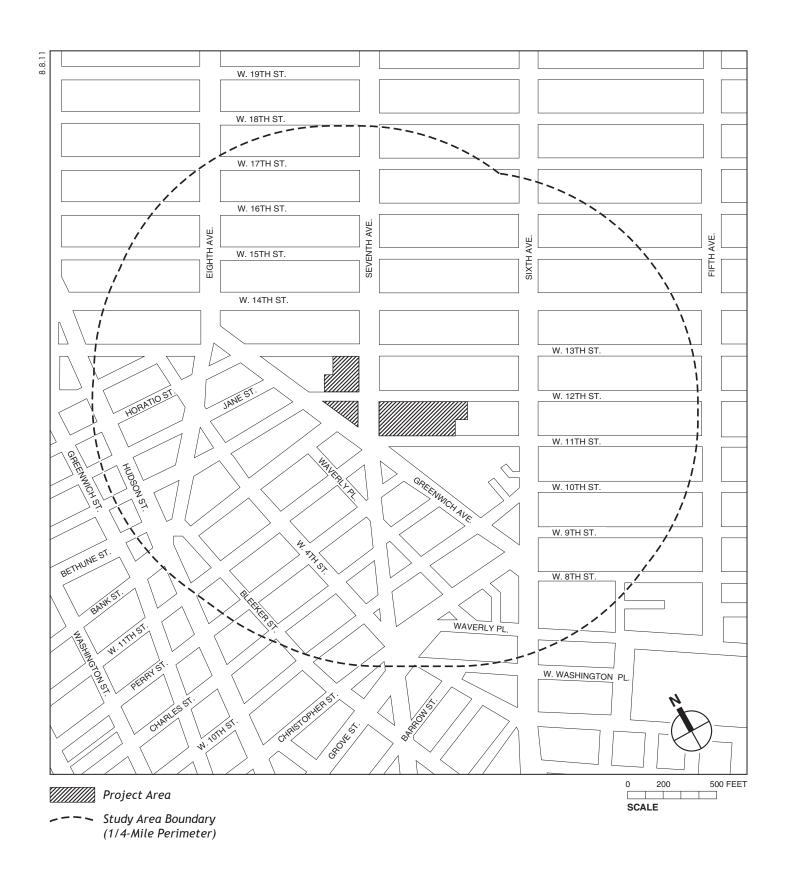
The proposed <u>projects</u> would be in keeping with existing community facility and residential uses in the area. However, <u>as described above</u>, a number of discretionary actions <u>are proposed that</u> would result in changes to land use <u>in</u> the project <u>area</u>. This chapter will:

- A. Provide a brief development history of the project <u>area</u> and surrounding area (see **Figure 14**). Describe conditions <u>in</u> the project <u>area</u>, including existing conditions and the underlying zoning. This description will <u>discuss</u> the 2010 closure of Saint Vincent's Hospital Manhattan and describe the current use of the buildings.
- B. Describe predominant land use patterns, including a description of recent development trends.
- C. Describe the existing zoning and any recent zoning actions in the study area.
- D. Describe other public policies that apply to the project <u>area</u> and the study area, including specific development projects and plans for public improvements.
- E. Prepare a list of future projects in the study area and describe how these projects might affect land use patterns and development trends in the study area in the future without the proposed <u>projects</u>. Also, identify any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area as they relate to the proposed <u>projects</u>.
- F. Assess impacts of the proposed <u>projects</u> on land use and land use trends, zoning, and public policy. Discuss potential changes associated with the addition of the proposed <u>projects</u>.

The project <u>area</u> is not located within or in close proximity of the boundaries of the City's Coastal Zone. Therefore, the Waterfront Revitalization Program and Coastal Zone assessment are not required.

TASK 3: SOCIOECONOMIC CONDITIONS

According to guidelines of the *CEQR Technical Manual*, since the proposed <u>East Site</u> project will include more than 200 residential units, a preliminary socioeconomic assessment is appropriate (the proposed study area is shown in **Figure 15**). The purpose of the assessment is to



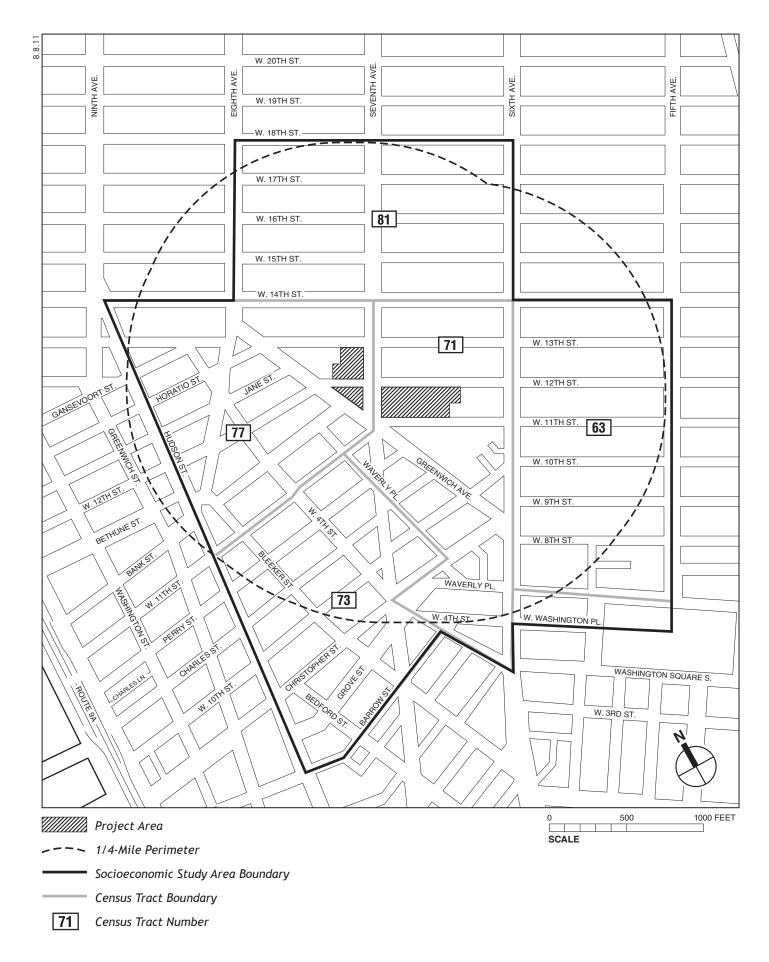


Figure 15 **Socioeconomic Study Area**

disclose changes resulting from the proposed <u>projects</u> and determine if these changes are significant. Socioeconomic impacts can occur when a proposed project directly or indirectly changes economic activities in an area.

In general the five principal issues of concern are (1) direct residential displacement, (2) direct business and institutional displacement, (3) indirect residential displacement, (4) indirect business and institutional displacement, and (5) adverse effects on specific industries.

The CEQR Technical Manual suggests that the analysis for each area of concern begin with a preliminary assessment. Analysis of direct residential and direct business and institutional displacement are not required because the proposed projects would not result in any direct displacement. With respect to indirect effects and potential adverse effects on specific industries, the EIS will include a preliminary assessment. For those areas in which the preliminary assessment cannot definitively rule out the potential for significant adverse impacts, a detailed analysis will be conducted. If significant adverse impacts are identified, mitigation measures will be explored.

TASK 4: COMMUNITY FACILITIES AND SERVICES

The demand for community facilities and services is directly related to the type and size of the new population generated by the proposed <u>projects</u>. New residential developments have the potential to affect facilities, such as public schools, libraries, and hospitals. According to the *CEQR Technical Manual*, a detailed community facilities analysis is conducted when a project would have a direct or indirect effect on a community facility.

DIRECT EFFECTS

A direct effect would occur if a project would physically alter a community facility, whether by displacement of the facility or other physical change. The proposed <u>projects</u> would not displace or alter an existing community facility (due to the fact that the existing buildings are either vacant or the existing community facility users are expected to vacate the project <u>area</u> independent of the proposed <u>projects</u>), but would provide a new comprehensive health care center with an emergency department, a full complement of imaging capabilities, and doctors' offices.

According to the *CEQR Technical Manual*, analyses of police and fire facilities and publicly funded health care facilities are conducted only when a direct impact is expected or where a project would introduce a sizable new neighborhood. The proposed <u>projects</u> would not directly affect any <u>existing</u> police or fire facilities or publicly <u>funded</u> health care facilities, and it would not introduce a sizable new neighborhood. Therefore, no assessment of these facilities is necessary. <u>However</u>, the <u>EIS</u> will include a qualitative assessment of the proposed projects' potential for direct effects on the health care uses in the O'Toole Building.

INDIRECT EFFECTS

Regarding indirect effects on community facilities, the EIS will analyze the proposed <u>projects'</u> potential for significant adverse impacts on public schools. An analysis of public schools is required if <u>a</u> project would introduce more than 50 elementary/middle school or 150 high school students. Based on the student generation ratios provided in the *CEQR Technical Manual*, with up to 450 residential units, the proposed <u>East Site</u> project could introduce approximately 54 elementary, 18 middle, and 27 high school students to public schools in Community School

District (CSD) 2. Because this exceeds the threshold of 50 elementary/middle school students, an analysis of potential impacts on elementary and middle schools will be conducted. Because the proposed <u>East Site</u> project would not exceed the threshold of 150 high school students, no assessment of potential impacts on public high schools is necessary. The assessment of potential impacts on public elementary and middle schools will be conducted as follows:

- G. Identify and locate public schools serving the project <u>area</u> (residential redevelopment area). The primary study area for the analysis of elementary and middle schools will be Sub-district 2 of CSD 2, because this is the sub-district in which the proposed <u>projects are</u> located. In addition to the primary study area, an assessment of elementary and middle schools will be conducted for a local study area, defined as a ½-mile area for elementary schools and a 1-mile area for middle schools (see **Figure 16**). In each study area, the assessment will describe conditions in terms of enrollment, capacity, and utilization <u>at study area schools</u>, noting any specific shortages of school capacity. This analysis will use <u>the most recent available</u> data from the Department of Education (DOE).
- H. Identify conditions that will exist in the future without the proposed <u>projects</u>, taking into account any projected changes in future enrollment and plans to alter school capacity through either the construction of new school space or through administrative actions on the part of DOE.
- I. Analyze future conditions with the proposed <u>projects</u>, adding students likely to be generated by the proposed <u>projects</u> to the projections for the future without the proposed <u>projects</u>. The assessment of impacts will be based on the change in the school utilization rate from the future without the proposed <u>projects</u> to the future with the proposed <u>projects</u>. In accordance with the *CEQR Technical Manual*, the determination of impacts will be based on the primary study area; the analyses of the local study areas will be presented for informational purposes only.

An analysis of libraries is undertaken if the project would result in more than a 5 percent increase in the ratio of residential units to libraries in the borough. In Manhattan, the CEQR threshold for this increase is 901 residential units. As the proposed <u>projects</u> would include no more than 450 residential units, no assessment of potential impacts on public libraries is warranted.

An analysis of publicly funded day care centers is necessary when a project would introduce more than 20 eligible children (170 residential units for low- and moderate-income families, as identified in Table 6-1 of the *CEQR Technical Manual*). As the proposed <u>projects include</u> only market-rate units, no analysis of day care facilities is warranted.

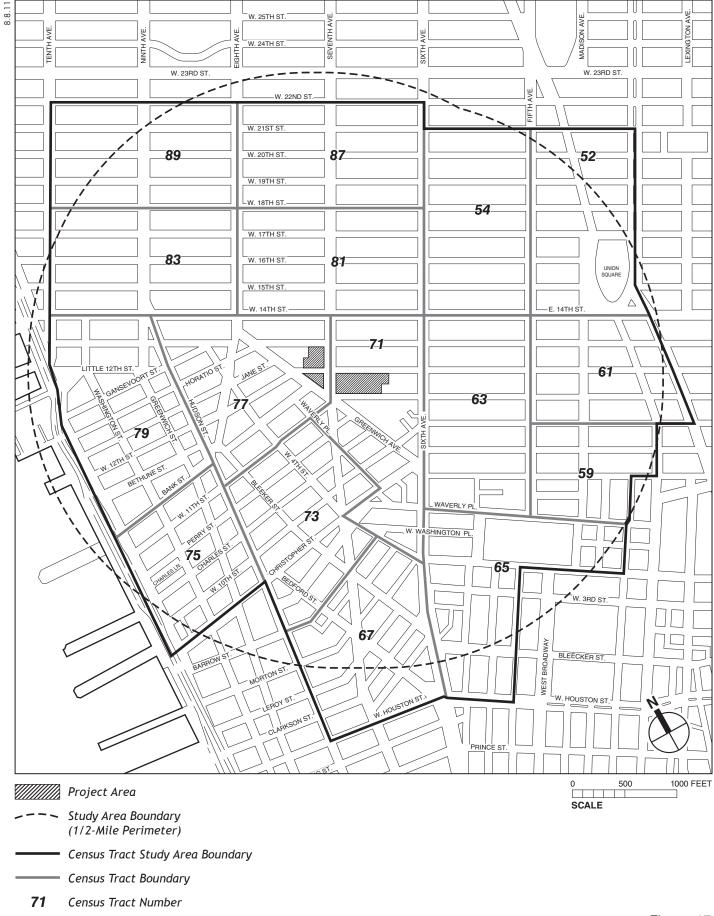
TASK 5: OPEN SPACE

The proposed <u>projects are</u> located in an area that is neither under-served nor well-served in terms of open space according to the *CEQR Technical Manual*. The number of residents introduced to the area by the proposed <u>projects</u> would exceed the CEQR threshold (200 residents) requiring an analysis to assess potential impacts on the residential open space user population in a ½-mile study area (see **Figure 17**). The proposed <u>projects</u> would not result in an increase of over 500 employees <u>in</u> the project <u>area</u>. Therefore, an assessment of potential impacts on the non-residential (worker) population is not required.

The open space analysis will:



Figure 16



- A. Compile an inventory of all passive and active open spaces, both publicly and privately owned, for the study area. This will be accomplished using information from the New York City Department of Parks and Recreation (DPR) and data on privately owned publicly accessible open spaces, and verified through field visits. The inventory will include an evaluation of the condition and use of existing open spaces, as well as acreage. Qualitative discussions of any major public open spaces just outside the study area will be included, if appropriate.
- B. In conformance with *CEQR Technical Manual* methodologies, assess the adequacy of existing publicly accessible open space facilities.
- C. Assess expected changes in future levels of open space supply and demand by the <u>projects'</u> analysis year, based on other planned development projects within the study areas and any public open space expected to be developed. Develop open space ratios for future conditions and compare them with existing ratios to determine changes in future levels of adequacy.
- D. Based on the residential and worker populations to be added by the proposed <u>projects</u>, as well as any public open space to be provided, assess the <u>projects'</u> effects on open space supply and demand. The assessment of project impacts will be based on a comparison of open space ratios with the <u>projects</u> and open space ratios in the future without the proposed <u>projects</u>.

TASK 6: SHADOWS

The CEQR Technical Manual requires a shadow analysis for proposed projects that have the potential to cast new shadows on a publicly accessible open space or historic resource with sunsensitive features. Alterations to the former O'Toole Building to create the proposed Center for Comprehensive Care are not expected to exceed 50 feet and are not expected to cast new shadows on nearby open spaces. However, new shadows are expected to reach the windows of the church north of the O'Toole Building, which is a sunlight-dependent feature of a historic district building. The <u>proposed East Site project</u> would introduce new elements greater than 50 feet in height. Accordingly, a screening analysis will be performed to determine when new shadows from the increased height of the O'Toole Building or new residential buildings would reach any open spaces or sun-sensitive features of historic resources. This chapter of the EIS will:

- A. Identify sun-sensitive landscapes and historic resources within the path of shadows that would be cast by the proposed <u>projects'</u> maximum building envelopes.
- B. In coordination with the analyses for open space and historic resources, map and describe any sun-sensitive areas.
- C. If shadows fall on open spaces, map active and passive recreation areas and features of the open spaces such as benches or play equipment.

If shadows would reach any such resources, a detailed shadow analysis will be performed.

TASK 7: HISTORIC AND CULTURAL RESOURCES

The CEQR Technical Manual identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated NYCLs and Historic Districts; properties calendared for consideration as

NYCLs by LPC or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the NY State Board for listing on the S/NR; National Historic Landmarks (NHLs); and potential historic resources (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements).

Due to the <u>project area's</u> location in the New York City Greenwich Village Historic District, the proposed <u>projects are</u> subject to review and approval by LPC. The <u>designs</u> of the <u>proposed East Site project and the proposed Center for Comprehensive Care have been <u>reviewed and approved by LPC.</u> Any <u>demolition of</u> the Materials Handling Facility and the design of the <u>expanded</u> open space on the Triangle Site will also require LPC review and approval. OPRHP will be consulted with respect to the potential for impacts on historic resources associated with the alteration of the O'Toole Building.</u>

ARCHAEOLOGICAL RESOURCES

In a letter dated August 25, 2008, LPC determined that the project <u>area</u> is not sensitive for potential archaeological resources. <u>OPRHP concurred</u> with LPC's determination <u>that</u> the O'Toole Building <u>Site is not sensitive for archaeological resources</u>. <u>Therefore, there is no potential for significant adverse impacts to archaeological resources and no further analysis is required</u>. This will be stated in the EIS.

ARCHITECTURAL RESOURCES

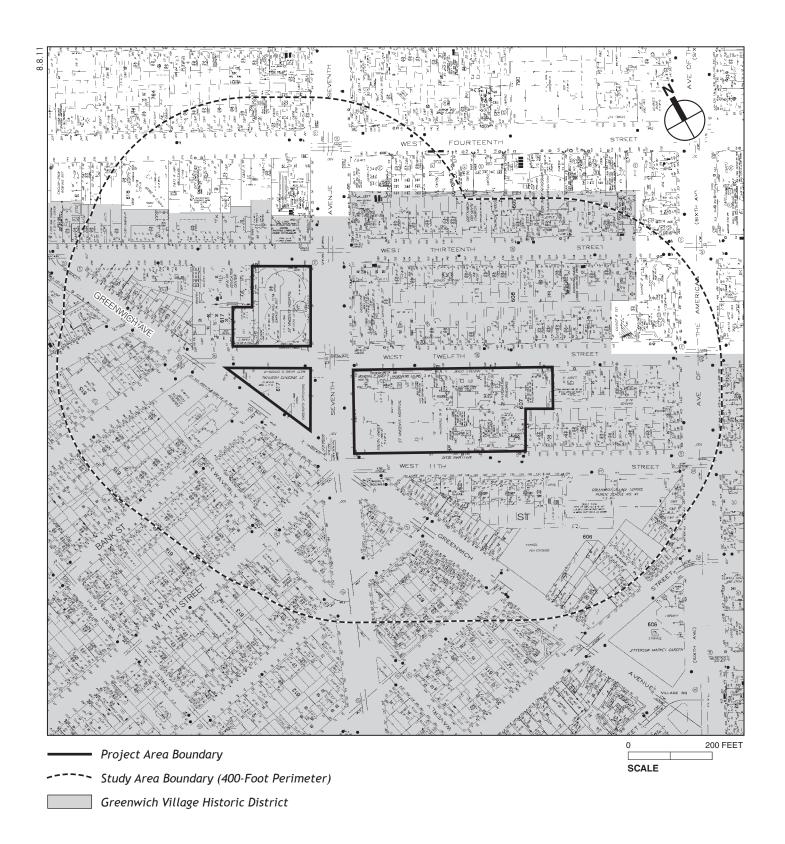
The following tasks will be undertaken as part of the historic resources analysis:

- Describe architectural resources in the project area.
- Within a 400-foot study area, map and briefly describe known architectural resources, which in this area is primarily the Greenwich Village Historic District. The study area for architectural resources is shown in **Figure 18**.
- Conduct a field survey of the small portions of the study area outside the Greenwich Village Historic District to identify any potential architectural resources that could be affected by the proposed <u>projects</u>. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYLC designation and/or S/NR listing. Map and briefly describe any potential architectural resources.
- Qualitatively discuss any impacts on architectural resources that are expected in the future without the proposed <u>projects</u> as a result of other expected development projects.
- Describe the proposed <u>projects</u> and the impact <u>they</u> would have on the buildings <u>in</u> the project <u>area</u>. Assess the <u>projects'</u> potential for indirect impacts on any known or potential architectural resources, including visual and contextual impacts.

If applicable, develop mitigation measures to avoid any adverse impacts on architectural resources in consultation with LPC and OPRHP.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

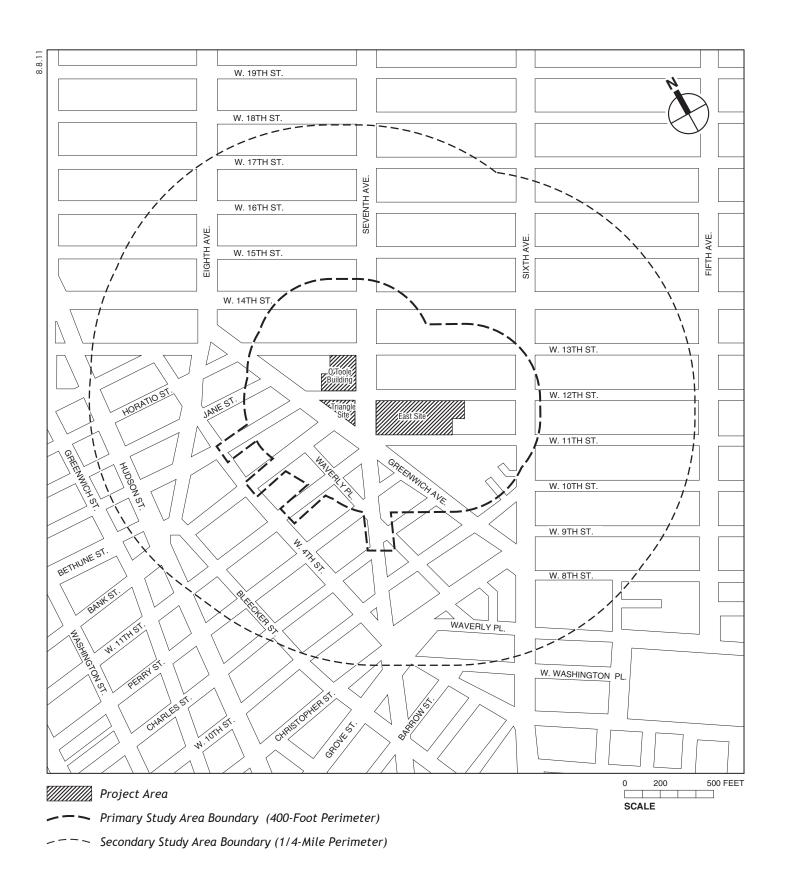
While the proposed alterations to the O'Toole Building would be limited, the proposed development on the East Site would replace some existing buildings with new buildings of a different bulk, height, and form from what is permitted as-of-right. These changes would affect a



pedestrian's experience of public space, requiring a preliminary urban design analysis. The preliminary analysis will determine whether the proposed <u>projects</u> would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study.

The preliminary urban design and visual resources analysis will be undertaken as follows:

- A. Prepare a concise narrative of the project <u>area</u> and the surrounding study area for the existing conditions, the No Build condition, and the Build condition. <u>In accordance with the 2010 CEQR Technical Manual</u>, the urban design and visual resources analysis considers both a ¼-mile study area that is coterminous with that of the land use, zoning, and public policy study area and a smaller 400-foot study area with approximately 200-foot-long extensions to the south on Seventh Avenue and southwest on West 11th, Bank, and West 12th Streets to account for view corridors on these streets. The primary study area is the smaller study area which is roughly bounded by the intersection of West 13th Street and Greenwich Avenue on the west, the north side of West 14th Street on the north, the east side of Sixth Avenue on the east, the west side of West 10th Street on the south, and the midblocks of Perry, West 11th, Bank, West 12th, and Jane Streets also on the south. The larger, secondary study area is roughly bounded by the west side of Hudson Street on the west, the south side of West 18th Street on the north, the west side of Fifth Avenue on the east, and the north side of Washington Place on the south. Both study areas are illustrated on **Figure 19**.
- B. The urban design and visual resources analysis will address the components of urban design as defined in the *CEQR Technical Manual*: streets, buildings, visual resources, open space, natural resources, wind, and sunlight.
- C. The narrative will be supported with items from the preliminary analysis checklist in Section 320 of Chapter 10 in the *CEQR Technical Manual*, and will include photographs of the project <u>area</u> and surrounding area, an aerial photograph of the project <u>area</u> and surrounding area, zoning calculations of the existing and Build conditions, floor area calculations, lot and tower coverage, building heights, a three-dimensional representation of the existing conditions, No Build condition, and Build condition streetscape, project drawings, and site plans. A view corridor assessment will also be prepared describing the proposed <u>projects</u> as it relates to visual resources, including as appropriate, proximity, orientation, height, bulk, etc.
- D. Based on planned and proposed development projects in the surrounding study area and using the information gathered above for existing conditions, assess whether and how urban design and visual resources conditions are expected to change in the future without the proposed <u>projects</u>.
- E. Assess how the proposed <u>projects</u> would affect urban design characteristics and visual resources relative to the future no-actions condition, describing the <u>projects</u> in terms of how <u>they</u> would affect the areas' defining elements of urban design, and determine the significance of those changes.
- F. If the preliminary analysis indicates that a detailed assessment is warranted, such analysis will be included in the EIS following the guidelines of the CEQR Technical Manual.



TASK 9: NATURAL RESOURCES

A natural resources assessment is conducted when a natural resource is present on or near the project <u>area</u> and when an action involves the disturbance of that resource. The *CEQR Technical Manual* defines natural resources as water resources, including surface water bodies and groundwater; wetland resources, including freshwater and tidal wetlands; upland resources, including beaches, dunes, and bluffs, thickets, grasslands, meadows and old fields, woodlands and forests, and gardens and other ornamental landscaping; and built resources, including piers and other waterfront structures. The project <u>area</u> is located in a fully developed area in Manhattan and has limited potential to provide unique habitat for noteworthy wildlife. A screening analysis will be presented in the EIS to determine whether an adverse impact on a natural resource might occur, and therefore, whether an assessment may be appropriate. If the screening analysis identifies a need for an assessment, such an assessment will be conducted to identify whether the proposed <u>projects</u> would result in significant impacts on natural resources.

TASK 10: HAZARDOUS MATERIALS

This task will examine the potential for the presence of hazardous materials <u>in</u> the project <u>area</u>. It will include <u>summaries</u> of <u>the</u> Phase I Environmental Site Assessment (ESA) prepared for the project <u>area</u> and the Phase II Subsurface Investigation. A Phase I ESA includes:

- Determination of the land use history of the project <u>area</u> and the surrounding area by review of historical maps, atlases, and other records.
- Review of databases maintained by the United States Environmental Protection Agency (<u>EPA</u>) and the New York State Department of Environmental Conservation (NYSDEC) to assess the potential for contamination due to the presence of identified problem sites and activities on or adjacent to the project <u>area</u>, including registered petroleum storage tanks, hazardous waste disposal sites, hazardous waste generators or treatment facilities, and hazardous substance releases. The database search areas will be at least as extensive as those cited in ASTM Standard E1527-05.
- Review of prior reports including any available information on subsurface conditions (geology and hydrogeology).
- An inspection of the project <u>area</u> for any evidence of contamination, including the presence
 of drums or tanks, stained soils, stressed vegetation, and illegally dumped or stored material.
 Current or recent occupants of the property will be interviewed to obtain pertinent
 information.
- <u>Discussion of the potential for hazardous materials inside project structures, e.g., asbestos-containing materials and lead-based paint.</u>

A Phase II Subsurface Investigation includes collection and laboratory analysis of soil and groundwater samples.

In addition to summarizing the <u>results of the</u> Phase I ESA <u>and the Phase II subsurface investigation</u>, the need for <u>any special measures prior to, during or following construction of the proposed projects (including potential use of hazardous materials in new medical facilities) will be discussed.</u>

TASK 11: WATER AND SEWER INFRASTRUCTURE

Based on the guidance of the *CEQR Technical Manual*, the proposed <u>projects</u> would not place significant demands on the water and sewer infrastructure systems serving the area.

A preliminary infrastructure analysis for water supply is warranted if a project:

- Would result in an exceptionally large demand for water (e.g., those that are projected to use more than one million gallons per day such as power plants, very large cooling systems, or large developments); or
- Is located in an area that experiences low water pressure (e.g., areas at the end of the water supply distribution system such as the Rockaway Peninsula and Coney Island).

Since the proposed <u>projects do</u> not meet any of these thresholds, no analysis of water supply is needed.

For wastewater and stormwater conveyance and treatment, a preliminary analysis is warranted if a project:

- Is located in a combined sewer area and would have an incremental increase above the No Action condition of 1,000 residential units or 250,000 sf of commercial space in Manhattan;
- Is located in a separately sewered area and would exceed certain incremental development thresholds:
- Is located in an area that is partially sewered or currently unsewered;
- Involves development on a site five acres or larger where the amount of impervious surface would increase (e.g., tow-pounds, parking lots, and warehouse buildings).
- Would involve development on a site one acre or larger where the amount of impervious surface would increase and one of the following would apply:
 - Located within the Jamaica Bay watershed; or
 - Located in certain specific drainage areas including: Bronx River, Coney Island Creek, Flushing Bay and Creek, Gowanus Canal, Hutchinson River, Newtown Creek, and Westchester Creek.
- Would involve construction of a new stormwater outfall that requires federal and/or state permits

The proposed project <u>area</u> is located in a combined sewer area in Manhattan and would not have an incremental increase of 1,000 residential units or 250,000 sq. ft. of commercial space. The project <u>area</u> is not in a separately sewered, partially sewered, or unsewered area, would not involve development on a site five acres or larger, would not increase impervious area within the watersheds specified for sites larger than one acre, and would not involve construction of a new stormwater outfall. Since the proposed <u>projects do</u> not meet any of these thresholds, no analysis of wastewater and stormwater conveyance and treatment is needed.

To the degree that the proposed <u>projects</u> would be subject to the City's Industrial Pretreatment Program, the EIS will disclose participation in the program.

TASK 12: SOLID WASTE AND SANITATION SERVICES

This chapter of the EIS will assess the additional demands the proposed <u>projects</u> would place on solid waste disposal services.

- A. Existing and future New York City solid waste disposal practices will be described, including the collection system and status of landfilling, recycling, and other disposal methods.
- B. The incremental impacts of the development's solid waste generation on the City's collection needs and disposal capacity will be assessed.

TASK 13: ENERGY

This chapter of the EIS will assess the additional demands the proposed <u>projects</u> would place on energy supply. Energy usage for the proposed <u>projects</u> will be estimated and the proposed <u>projects</u>' "green measures" to reduce energy consumption will be described. <u>Following the guidance of the CEQR Technical Manual</u>, this analysis will use estimates of project-specific energy <u>demand by energy source that will be developed by the mechanical engineers for the proposed projects.</u> The effect of the <u>projects</u>' new demand on the energy supply systems will be assessed.

TASK 14: TRANSPORTATION

The effects of the proposed <u>projects</u> will be considered for a 2015 analysis year, by which time both the residential development on the East Site and the new Center for Comprehensive Care would be completed and occupied.

The need for quantified traffic and parking analyses is dependent on the peak hour trips generated by the proposed <u>projects</u> in accordance with the 50 peak hour vehicle trip threshold specified in the *CEQR Technical Manual*. For quantified transit and pedestrian analyses the CEQR threshold is 200 peak hour trips. The projection of trips expected to be generated by the proposed <u>projects</u> will be based on the information provided by NSLIJ and a review of previous SVCMC operations and the travel demand surveys which have been conducted at both the East Site and the O'Toole Building. The data obtained from the travel demand surveys will be used to develop future trip-making characteristics for the <u>users of the Center for Comprehensive Care.</u> In addition, standard references, census data, and rates developed for similar uses from previous studies will be used to develop the trip generation estimates for the new residential development. The trip generation analysis will also include the number of deliveries that are anticipated to service the new facilities.

An initial preliminary analysis was conducted by the applicant and submitted to the lead agency. Based on the comparison of existing, No Build, and Build population and uses for the <u>project area</u> the preliminary analysis found that incremental trips associated with the proposed <u>projects</u> will be below the CEQR thresholds <u>except for two sidewalk and one corner reservoir locations adjacent to the East Site. Detailed quantified traffic <u>and</u> transit analyses <u>would</u> not be required. The EIS will contain a <u>detailed</u> analysis <u>of the above pedestrian locations</u>, <u>which</u> will be reviewed in coordination with NYCDOT. For parking, the proposed <u>projects'</u> parking demand will be estimated and compared to the available parking supply on-site and at nearby facilities to determine if there is a potential for a parking shortfall.</u>

TASK 15: AIR QUALITY

As described above under "Transportation," it is not anticipated that the proposed <u>projects</u> would generate a substantial amount of new vehicle traffic. Thus it is not anticipated that project-generated traffic would result in significant air quality impacts. However, in the event that the number of project-generated trips exceeds the *CEQR Technical Manual* screening thresholds for

carbon monoxide (CO) or particulate matter, air quality impacts from mobile source emissions will be evaluated using computer dispersion modeling.

An air quality analysis of potential impacts from the parking garage will be conducted since emissions from vehicles using the parking facilities could potentially affect ambient levels of CO at nearby sensitive receptors in the project area. An analysis of the emissions from the parking facilities and the dispersion of CO emissions in the environment will be performed using the methodology set forth in the *CEQR Technical Manual*. The CO concentrations will be determined for the time periods when overall garage usage would be the greatest, considering the hours when the greatest number of vehicles would exit the facility. Background and on-street CO concentrations will also be added to the modeling results to obtain the total ambient levels for comparison to ambient air quality standards.

Stationary source emissions will be evaluated using screening analyses to determine the potential for significant pollutant concentrations from the proposed projects' fossil-fueled HVAC systems. The HVAC screening procedure outlined in Section 322.1 of Chapter 17 of the CEOR Technical Manual will be used to evaluate potential impacts of annual NO₂ and SO₂ from proposed project boilers. An analysis using the EPA-approved AERMOD model will also be performed to evaluate potential impacts of PM_{2.5} and one-hour average NO₂. The analyses involve determining the distance (from the exhaust point) within which potential significant impacts may occur, on elevated receptors (such as open windows, air intake vents, etc.) that are of a similar or greater height when compared to the height of the proposed projects' HVAC exhaust(s). The distance within which a significant impact may occur is dependent on a number of factors, including the height of the discharge, type(s) of fuel burned and development size. Project-onexisting and project-on-project impacts will be determined, where applicable. In addition, a screening level analysis will be conducted to determine the potential for significant adverse impacts from commercial, institution or large residential developments on the proposed projects within a distance of 400 feet, and from large emission sources within a distance of 1,000 feet. Based upon this information a determination will be made of whether further detailed analysis is necessary.

TASK 16: GREENHOUSE GAS EMISSIONS

According to the *CEQR Technical Manual*, an assessment of greenhouse gas (GHG) emissions may be appropriate for projects including those that are the subject of an EIS and would result in development of 350,000 square feet or more. While the proposed <u>projects</u> would result in a reduction in the overall amount of development <u>in</u> the project <u>area</u>, it would result in the active use of more than 350,000 square feet of development. Therefore, the EIS will include an assessment of the proposed <u>projects</u>' consistency with the City's GHG reduction goals.

This section of the EIS will disclose the estimated amount of GHG emissions expected to result from the proposed <u>projects</u>, discuss potential measures being considered (such as energy efficient design) that would reduce such emissions, and assess if the <u>projects are</u> consistent with the City's goal of reducing GHG emissions. To the extent practicable, the potential for those measures to reduce GHG emissions from the proposed <u>projects</u> will be quantified. Since the <u>projects</u> will be reusing existing structures and placing residential use and retail in a transit-oriented and mixed-use area zoned for residential use, these energy benefits inherent in the project design and location will be discussed as well.

The EIS will include a brief overview of sources of GHG emissions and their contribution to global climate change will be provided. The pollutants for analysis will be discussed, as well as

the various City, State, and federal goals, policy, regulations, standards, and benchmarks for GHG emissions. In addition, the EIS will include the following:

EMISSIONS

Total project generated emissions will be reported for the build year in carbon dioxide equivalent (CO₂e) metric tons per year. The analysis will be based on the procedures and data in the *CEQR Technical Manual*. GHG emissions other than carbon dioxide (CO₂) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential (GWP). Upstream and downstream emissions will be included in cases where substantial upstream or downstream emissions would be expected.

On-Site Emissions from HVAC Systems

The <u>projects</u> would include health care, residential, and retail uses. Fuel consumption would be estimated for the build year, considering the use type, gross floor area, any available specific design information for the <u>projects</u>, and supplemental data from the *CEQR Technical Manual* and/or other energy use data sources as necessary. If the type of fuel that would be used for heat and hot water systems is unknown, the worst-case assumptions used in the operational air quality analyses would be applied.

Off-Site Emissions from Electricity Use

The <u>projects</u> would result in off-site GHG emissions associated with its electricity use. The demand for electricity will be estimated using project specific information if available, or the electricity demand intensity obtained from *CEQR Technical Manual* or other sources if necessary. GHG emissions for the <u>projects' Build</u> year will be quantified using the approach outlined in the *CEQR Technical Manual*.

Emissions from Project-Generated Vehicle Use

The EIS will describe the fact that the project <u>area</u> is well served by public transportation and will evaluate its consistency with the goals of transit-oriented development.

Trip distances will be quantified using trip distance data provided in the *CEQR Technical Manual*, and the <u>projects'</u> annual trip generation (based on the trip generation described under "Transportation," above) will be multiplied by these distances to produce the overall vehicle-miles traveled (VMT). The GHG emissions will be based on the spreadsheet data provided in the *CEQR Technical Manual*, which applies emission factors from the <u>EPA</u> MOVES emission model and City-specific assumptions to estimate total vehicle emissions.

Construction

Greenhouse gas emissions that would result from the construction of the <u>projects</u> will be discussed qualitatively. However, construction will be included among other components addressed when discussing measures to reduce GHG emissions (see below).

ASSESSMENT OF CONSISTENCY WITH THE PLANYC GHG REDUCTION GOAL

In order to assess consistency with the PlaNYC GHG reduction goal, design components under consideration for the <u>projects</u> that could reduce GHG emissions will be discussed.

TASK 17: NOISE

According to CEQR Technical Manual guidelines, a detailed noise analysis is recommended if a proposed action would (among other things) cause a stationary source to be operating within 1,500 feet of a receptor—such as a park—with a direct line of sight to that receptor, or would generate vehicular traffic above a certain level. The proposed <u>projects</u> would create a new stationary source (i.e., HVAC system for the new comprehensive health care center) within 1,500 feet of noise-sensitive uses including residences.

As described above under "Transportation," based on preliminary trip generation estimates it is not anticipated that the proposed <u>projects</u> would generate a substantial amount of new vehicle traffic. Thus it is not anticipated that project-generated traffic would be likely to result in significant noise impacts. Consequently, the noise analysis will examine the level of attenuation needed in the proposed buildings to satisfy CEQR requirements for interior noise levels. The EIS building attenuation noise study will be an assessment of noise levels in the surrounding area associated primarily with traffic and nearby uses and their potential effect on the proposed <u>projects</u>. The study will include the following tasks:

- A. Select appropriate noise descriptors. Appropriate noise descriptors that characterize the noise environment and the impact of the proposed <u>projects</u> will be selected based on current CEQR criteria. Consequently, the 1-hour equivalent $(L_{eq(1)})$ and the L_{10} noise levels will be examined, where appropriate.
- B. Based on the traffic studies, perform a screening analysis to determine whether there are any locations where there is the potential for the proposed <u>projects</u> to result in significant noise impacts (i.e., doubling of traffic volume) due to project-generated traffic.
- C. Select receptor locations for building attenuation analysis purposes. The six receptor sites for analysis are shown in **Figure 20**.
- D. Determine existing noise levels. At each of the receptor sites, existing noise levels will be measured during <u>five</u> time periods—weekday AM, <u>pre-midday, midday, pre-PM</u>, and PM peak periods. Measurements will be made using a Type 1 Sound Level Meter, and L_{eq}, L₁, L₁₀, L₅₀, and L₉₀ values will be recorded. At each site, 20-minute spot measurements will be made.
- E. Determine the level of attenuation necessary to satisfy CEQR criteria. As necessary, recommendations regarding general noise attenuation measures needed for the proposed <u>projects</u> to achieve compliance with standards and guideline levels will be made. Due to the relatively high ambient noise levels adjacent to the project <u>area</u>, any development in the area would be expected to require double-glazed windows together with provision of some kind of alternate ventilation (i.e., air conditioning) to achieve acceptable interior noise levels.
- F. Disclose the noise levels anticipated in the proposed open space on the Triangle Site.

If the results of the traffic study indicate that a doubling of traffic would occur, a mobile source noise analysis would be performed. <u>Potential noise from ambulances will be discussed qualitatively.</u>

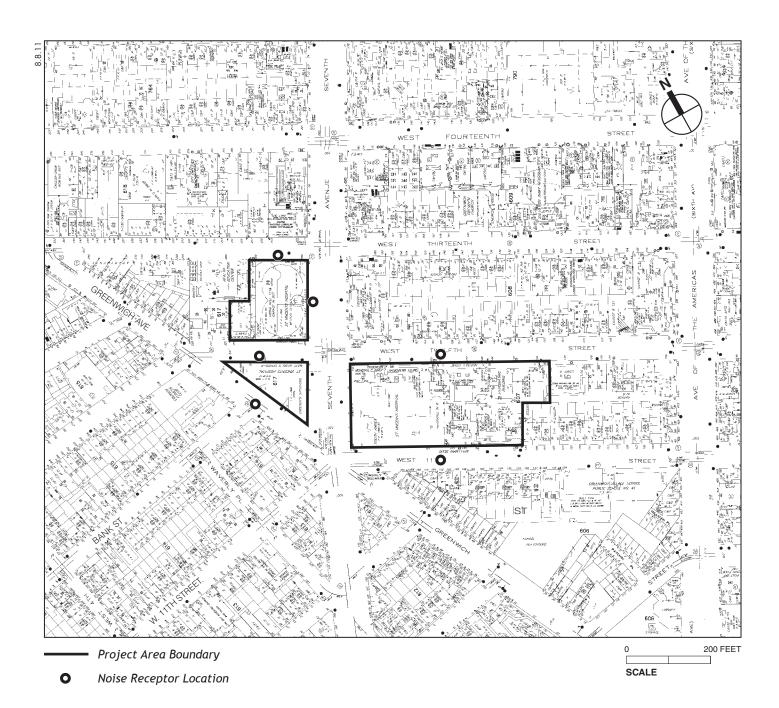


Figure 20 **Noise Receptor Locations**

TASK 18: CONSTRUCTION

The EIS will assess the potential for impacts during the construction period. For the purposes of analyzing the reasonable worst-case development scenario for construction, construction impacts will be evaluated for the periods when maximum potential impacts are expected during construction activity and will assume that construction activity will occur simultaneously on the East Site, the Triangle Site, and at the O'Toole Building Site. The nearby MTA-NYCT vent shaft project will be considered as a background project in the EIS. Measures that will be implemented as part of the proposed projects to avoid or minimize impacts will be disclosed and will be incorporated into the analysis. This chapter will focus on the proposed projects' potential for construction-period impacts in the following areas:

- A. Traffic. Construction-period traffic impacts will be assessed by considering any losses in lanes, walkways, and other above and below grade transportation services, and increases in vehicles from construction workers to identify potential temporary impacts on the transportation system. The analysis will include calculating trips generated by both construction employees as well as trucks associated with project construction, and a quantified traffic assessment of critical intersections.
- B. Parking. This assessment will consider the loss of both on- and off-street parking due to construction activity and the effects of construction worker vehicles on the area's parking resources.
- C. Transit and Pedestrians. Based on the construction worker estimates, effects on the area's transit system and pedestrian facilities will be addressed.
- D. Air Quality. <u>Air</u> emissions from construction <u>activities</u>, including <u>mobile sources</u>, onsite diesel-<u>powered</u> equipment, <u>and fugitive dust will be analyzed</u>. An emission profile for the complete construction period will be developed, and the time of highest emissions <u>will modeled</u>. Although the construction air emissions peaks from the three <u>sites may occur</u> at <u>different times</u>, the <u>modeling will assume that the peaks are concurrent</u>. The peak concentrations of emission will be compared to Ambient Air <u>Quality Standards to determine impacts</u>. The EIS will <u>present</u> measures and emission reduction strategies to avoid or minimize impacts, if any.
- E. Noise and Vibration. The noise from mobile sources, such as construction trucks, and on-site equipment, such as cranes and hoists, will be modeled using the CADNA A model. Using information from the construction managers, the number, type and location of all large pieces of construction equipment will be distributed across the construction sites over the full duration of construction. The peak periods of noise will be compared with the CEQR thresholds to determine impacts. The EIS will present measures and noise reduction strategies to avoid or minimize impacts, if any.
- F. Hazardous Materials. In coordination with the hazardous materials task described above, summarize actions to be taken during construction to limit exposure of construction workers, residents, and the environment to potential contaminants.
- G. Socioeconomic Conditions. This assessment will consider whether construction conditions would affect access to existing businesses, the potential consequences concerning their continued viability, and the potential effects of their loss, if any, on the character of the area.

- H. Historic Resources. In coordination with the work performed for historic resources above, identify the potential for construction-period impacts, and summarize actions to be taken during project construction to protect adjacent historic resources from potential construction impacts.
- I. Land Use and Neighborhood Character. This assessment will consider potential impacts during the construction period to the land use and the character of the surrounding neighborhood.
- J. Other Technical Areas. As appropriate, discuss the other areas of environmental assessment for potential construction-related impacts.
- K. Rodent Control. Discuss the proposed <u>projects'</u> provisions for rodent control during construction activities.
- L. <u>Communication with the Community. The EIS will describe plans for public notification</u> and public outreach during construction.

TASK 19: PUBLIC HEALTH

Following the guidelines presented in the *CEQR Technical Manual*, this task will examine the <u>projects'</u> potential to significantly affect public health concerns related to air quality, noise, hazardous materials, and construction. Drawing on other EIS sections, this task will assess and summarize the potential for significant adverse impacts on public health from project activities.

TASK 20: NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the characteristics of its population and economic activities, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other features that include noise levels, traffic, pedestrian patterns, shadows, and open space. The proposed <u>projects represent</u> a change that could affect the character of the surrounding area. Therefore, based on the guidelines of the *CEQR Technical Manual*, the EIS analysis will consist of the following.

- A. Based on the other EIS analyses, determine if the proposed <u>projects</u> would result in significant adverse impacts in any of the following technical areas: land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; transportation; or noise.
- B. Whether or not the proposed <u>projects</u> would result in significant adverse impacts in the individual technical areas identified above, the EIS will consider if a combination of moderate effects may cumulatively affect neighborhood character.
- C. If it is determined that the proposed <u>projects</u> would result in significant adverse impacts in the individual technical areas or cumulatively due to a combination of moderate effects, then a preliminary analysis of neighborhood character will be undertaken.
- D. If warranted, the preliminary analysis will summarize the predominant factors that contribute to defining the character of the neighborhood and assess the <u>projects'</u> potential to adversely affect those features. If the proposed <u>projects</u> would affect those features, a detailed analysis will be prepared that will include data collection, a description of existing character, a description of changes that can be expected in the

character of the neighborhood in the future without the <u>projects</u>, and an assessment of the proposed <u>projects</u>' effects on key elements of neighborhood character.

TASK 21: MITIGATION

If significant project impacts are identified in the analyses discussed above, measures will be identified and assessed to mitigate those impacts. This <u>chapter will summarize those</u> findings. The formulation and assessment of any recommended mitigation measures would be conducted in close coordination with other city agencies as necessary. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

TASK 22: ALTERNATIVES

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed projects. Based on comments on the Draft Scope of Work, the EIS will consider a No Action Alternative with East Site Reuse and a Community Facility Alternative in addition to the No Action Alternative.

The <u>analyses</u> will be primarily qualitative, except where specific project impacts have been identified. However, the qualitative analysis will be of sufficient detail to allow comparisons of associated environmental impacts and attainment of project goals and objectives.

TASK 23: SUMMARY CHAPTERS

The executive summary will summarize relevant material from the body of the EIS to describe the proposed <u>projects</u>, the necessary approvals, study areas, environmental impacts predicted to occur, measures to mitigate those impacts, unmitigated and unavoidable impacts (if any), and alternatives to the proposed <u>projects</u>. Other summary chapters in the EIS may include the following (as appropriate):

- Irreversible and irretrievable commitment of resources;
- Relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity; and
- Unavoidable significant adverse impacts that cannot be mitigated.

These analyses draw from the work done in the technical areas, as relevant. They are intended to inform the decision maker of the environmental "costs" and benefits of the proposed <u>projects</u>. *